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Pillar III Disclosure Report 2025

MuniFin

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Part 1:
Governance and risk methodologies

1. Introduction and basis for preparation

1.1 Introduction

Municipality Finance Plc (MuniFin) is a Finnish credit institution supervised by the European Central Bank (ECB) and the Finnish Financial Supervisory Authority. As a credit institution, MuniFin has to comply with EU capital requirements for credit institutions consisting of the Capital Requirements Regulation (CRR) (575/2013), as amended by the CRR II (2019/876) and the CRR III (2024/1623), and the Capital Requirements Directive (CRD) (2013/36/EU), as amended by the CRD V (2019/878) and the CRD VI (2024/1619). The CRR II and the CRD V are based on the revised capital adequacy framework of the Basel Committee on Banking Supervision, known as Basel III, whereas the CRR III and CRD VI are based on Basel IV.

The capital requirements for banks consist of three pillars:

- Pillar 1: The minimum capital requirements for each category of risk: credit and counterparty risk, market risk, credit valuation adjustment risk and operational risk.
- Pillar 2: Internal assessment of overall risks and capital adequacy based on those risks: the Internal Capital Adequacy Assessment Process (ICAAP) and the Supervisory Review and Evaluation Process (SREP).
- Pillar 3: Disclosure requirements concerning capital adequacy and risks.

This document fulfils MuniFin's Pillar III disclosure requirements of the current regulation and provides a comprehensive overview of the risk profile of MuniFin. In the case that required information has been reported in another document published by MuniFin, the information has been incorporated into this document as a reference.

1.2 Description of Municipality Finance Group

Municipality Finance Group (MuniFin Group or the Group) consists of Municipality Finance Plc (MuniFin, the Parent Company or the Company) and Kuntarahoituksen digitaaliset palvelut Oy (previously known as Financial Advisory Services Inspira Plc). The change of name of the subsidiary company Financial Advisory Services Inspira Plc to Kuntarahoituksen digitaaliset palvelut Oy was registered in early 2025. Kuntarahoituksen digitaaliset palvelut Oy is fully owned by MuniFin. No changes to the Group or ownership structure took place in the reporting period.

Measured by the balance sheet, MuniFin is Finland's third largest credit institution; the balance sheet totals EUR 55.6 billion. The owners of MuniFin include Finnish municipalities, the public sector pension fund Keva and the State of Finland. MuniFin is an integral part of the Finnish public sector economy.

MuniFin's customers include municipalities, joint municipal authorities, wellbeing services counties, corporate entities under their control, and non-profit organisations nominated by the Centre for State-Subsidised Housing Construction (Varke). Lending is used for environmentally and socially responsible investment targets such as public transportation, sustainable buildings, hospitals and healthcare centres, schools and day care centres, and homes for people with special needs.

MuniFin's customers are domestic, but the Group operates in a completely global business environment. MuniFin is one of the most active Finnish bond issuers in international capital markets and the first Finnish green and social bond issuer. The funding is guaranteed by the Municipal Guarantee Board (MGB). The MGB is established by a special law and all Finnish mainland municipalities (local governments) are permanent members of the MGB.

1.3 Disclosure principles

This Pillar III Year-End Disclosure Report 2025 discloses information on the risk management practices and regulatory capital ratios of MuniFin Group, as specified in Part 8 of the EU Capital Requirements Regulation (575/2013) (CRR) as amended by CRR II (2019/876) and CRR III (2024/1623). In addition to the disclosure requirements in CRR, MuniFin Group applies the European Commission Implementing Regulation (EU) 2024/3172 laying down implementing technical standards to public disclosures by institutions of the information referred to in Titles II and III of Part Eight of CRR, EBA Guidelines on disclosure requirements under Part 8 of Regulation (EU) No 575/2013 (EBA/GL/2016/11), EBA Implementing Technical Standards on institutions' public disclosures of the information referred to in Titles II and III of Part Eight of Regulation (EU) No 575/2013 (including tables and templates) and EBA Implementing Technical Standards on prudential disclosures on ESG risks in accordance with Article 449a CRR (including tables and templates).

Majority of information required to be published by MuniFin Group based on the Pillar III requirements will be disclosed in this Pillar III Report, which is separate from the annually published Report of the Board of Directors and the Financial Statements. In addition, there are documents (e.g. Corporate Governance Statement) available on MuniFin's website supplementing the information disclosed in this Pillar III Report. In the case required information has been published as part of some other document published by MuniFin Group, this information has been incorporated into this document with a reference.

The Pillar III Disclosure Report of MuniFin Group is published semiannually. The annual disclosures are published in conjunction with the date of publication of MuniFin Group's Annual Report (including the Report of the Board of Directors and the Financial Statements). Half Year Pillar III disclosures are published in conjunction with or following the date of publication of MuniFin Group's Half Year Report (interim report).

Following EBA guidelines on disclosure requirements on the frequency of the disclosures, MuniFin Group has assessed the need to publish Pillar III disclosures more frequently than annually. MuniFin Group has considered the matter thoroughly and decided to publish Pillar III disclosures semiannually in accordance with the frequency of the Financial Statements and the Half Year Report. The semiannual publication of the comprehensive Pillar III disclosures is deemed to be sufficient despite MuniFin being one of the three largest institutions in its home Member State and being identified by competent authorities as an Other Systemically Important Institution (O-SII). MuniFin Group's business model is stable with a limited range of activities and exposures. MuniFin Group applies very conservative principles to its risk management and the resulting risk profile of MuniFin Group is not prone to any sudden changes. There have been no material changes in MuniFin Group's risk appetite. On the basis of these considerations, MuniFin Group has deemed it sufficient to publish its Pillar III disclosures semiannually.

The Pillar III Disclosure Report aims to describe all the main activities and all significant risks of MuniFin Group with underlying information and data. If there are any significant changes between reporting periods, these changes in risk exposures are explained. Such events could be arising from MuniFin Group's specific, regulatory or market developments. The level of disclosure is proportionate to the Group's business model complexity.

All figures in this Pillar III Disclosure Report are consolidated figures of the MuniFin Group unless otherwise stated. The figures in this Report are presented in euros (EUR), which is the Group's functional currency, rounded to the nearest thousands of euros (except for the ESG related figures, where the figures are rounded to the nearest million). Due to the rounding, certain figures in the Report may not tally exactly.

MuniFin's Finance division is responsible for the process of publishing financial information including Pillar III disclosures. The Risk Management and Compliance division and the Legal and Communications division take also part in the disclosure process. The Executive Management Team (EMT) examines the Risk Declaration prior to delivering the information for the Risk Committee's review. Following the Risk Committee's review the Risk Declaration is delivered to the Board of Directors for approval. Finally, the Pillar III Disclosure Report in its entirety is sent to the EMT for approval.

This Report is divided into sections mainly based on the breakdown described in the EBA guidelines on disclosure requirements under Part Eight of Regulation (EU) No 575/2013. A CRR reference table including the location where the information can be found, is at the end of this Report.

Following EBA guidelines (EBA/GL/2016/11) MuniFin Group has not disclosed empty tables that are not considered to be relevant for MuniFin Group's activities. The last Section of this Report includes information on the tables that are considered as not applicable for MuniFin Group.

Information in this Pillar III Report has not been audited. However, the Consolidated Financial Statements are annually audited by the External Auditor and the Half Year Report is subject to review by the External Auditor. The appropriateness of the Pillar III disclosed information is approved by MuniFin's EMT. If there is information considered to be proprietary or confidential the information is not published but disclosed in more general manner.

2. Risk management objectives and policies

2.1 Risk management principles

MuniFin Group has a Risk and Governance Framework in place. The Framework aims to ensure that business and risk strategy, risk appetite, risk governance, risk culture, people and processes are aligned and effectively supporting risk management goals. The following principles are followed across the Group:

- The Risk and Governance Framework is supported by comprehensive set of risk policies and underlying guidelines and instructions.
- MuniFin Group has a clearly defined Risk Appetite Framework (RAF), which sets out the level of risk the Group is willing and able to assume in the pursuit of its strategic objectives.
- Limits and targets are in place and embedded throughout MuniFin Group to ensure that the Group remains at any given time within the risk appetite. These ensure that management recognizes its strategic objectives whilst operating within these limits.
- Outcomes of the ongoing ICAAP and ILAAP processes support strategic decision-making, capital planning, liquidity planning, and setting risk appetite and related risk limits.
- The three lines of defence governance model is in place, which ensures that an independent review and challenge of all operations is provided by the Risk Management and Compliance division led by the CRO.
- Material risk types are actively managed in line with MuniFin Group's approach of identifying, measuring, managing, monitoring and reporting risks. Identification of risks is forward looking to allow management to take a proactive approach to risk management.
- The Group is managed in such a way that it is confident of weathering extreme but plausible stress scenarios. Stress testing is used to demonstrate that MuniFin Group is able to withstand these shocks.
- An effective risk culture is in place to ensure that the limits are adhered to. Risk culture is embedded throughout the Group and communicated through the implementation of the RAF.

The components of MuniFin Group's Risk and Governance Framework are presented in the figure below:

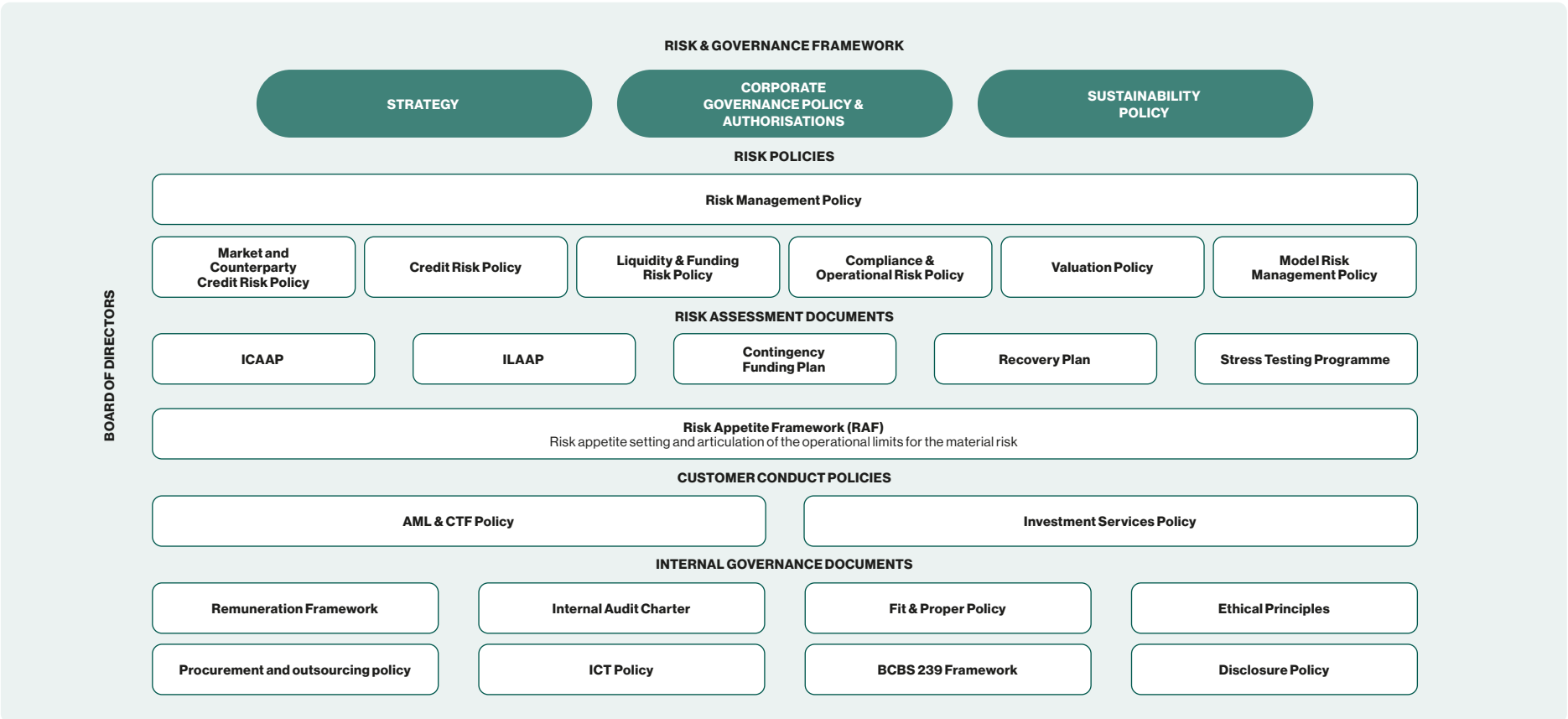

Figure 1. Risk and Governance Framework of MuniFin Group

Municipality Finance Plc • Pillar III Disclosure Report 2025

2.2 Governance of risk management

MuniFin Group has an extensive risk management organisation, which covers all operations including the tasks and responsibilities of different divisions, units and decision-making bodies. The internal control framework is supported by controls of different processes. Internal control is performed at all levels of the organisation and the nature and scope of operations are taken into account when defining the operating methods used in internal control. Internal control is primarily carried out in line operations, where internal control is continuous and part of day-to-day operations.

For the implementation of internal control framework, the Group applies the three lines of defence model, with an adequate segregation of duties and clear roles and responsibilities between different parties. The three lines of defence model has been adopted to ensure that responsibilities are appropriately allocated to all the relevant parties, risks are reported, and breaches escalated.

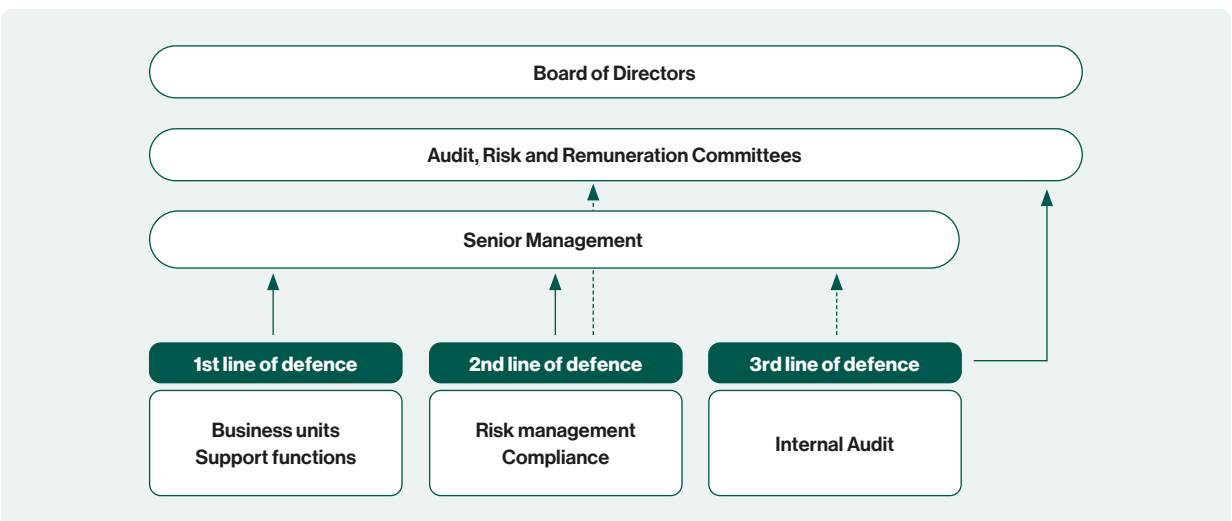

Figure 2. Three lines of defence risk governance model

1st LoD - business units and support functions

The first line of defence is represented by the business units and support functions. They are the risk owners and responsible and accountable for the ongoing identification, measurement, management, monitoring and reporting of risks, taking into account the Group's risk appetite, policies, procedures, controls and limits. The first line of defence operates business activities within the set limits and in accordance with the internal control framework.

The first line of defence has the following main risk management responsibilities:

- Measuring risk exposures and ensuring that they are managed in line with the risk appetite.
- Putting in place processes to ensure that the business is operating within risk appetite and policy objectives through implementing guidelines and instructions.
- Having processes in place for monitoring risk exposure against limits and targets, and for the timely escalation processes in case of any breaches of limits and targets.

2nd LoD - Risk Management and Compliance

The Risk Management and Compliance division, headed by the CRO, serves as an independent risk management function and has the ownership of the second line of defence. The division is responsible for the ongoing identification, measurement, management, monitoring and reporting of risks independently from the business lines. This includes that the division controls and ensures that risks remain within permissible limits and that the Group's risk management framework is in line with the risk strategy and risk appetite and provides recommendations for revisions where necessary. In other words, the second line defence also assists and monitors the implementation of the risk management practices by the first line of defence.

3rd LoD - Internal Audit

The third line of defence, the Internal Audit function, is responsible for conducting risk-based and general audits independently from the first and second line of defences. Internal Audit provides the Board of Directors and executive management assurance on the effectiveness of risk management, control and governance processes.

2.3 Board of Directors and Committees

The Board of Directors (the Board) is the highest decision-making body, both in strategic and risk-related matters. Regarding risk management, the Board establishes and oversees the implementation of the principles with respect to the risk strategy, risk appetite and risk management. The Board determines the Group's willingness to take risks (Risk Appetite Framework). Furthermore, the Board monitors the Group's overall risk appetite and strategy, taking into account all types of risks as described in respective policies to ensure that they are in line with the business strategy, objectives, corporate and risk culture and values of the Group. In addition, the Board establishes an adequate and effective internal control framework, that includes well-functioning and independent risk control, compliance and internal audit functions.

In order to organise its work as efficiently as possible and as required by the Act on Credit Institutions, the Board has established an Audit Committee, a Risk Committee, and a Remuneration Committee for assistance and for the preparation of matters. These committees are not decision-making bodies, but they assist the Board in matters related to risk strategy and risk taking and monitors the compliance of the business operations in relation to the risk strategy set by the Board.

The Risk Committee advises and supports the Board regarding the monitoring of the Group's overall risk strategy and risk appetite, taking into account all types of risks as described in respective risk policies to ensure that they are in line with the business strategy, objectives, corporate and risk culture and values of the Group. In order to fulfil its purpose, the Risk Committee regularly assesses the Group's risk profile, risk definitions, risk-taking capabilities including the RAF, and key limits set by the Board and the risk management framework, taking into account the development of the operating environment and the Group's outlook for the future.

The purpose of the Audit Committee, as a preparatory body, is to assist the Board in monitoring the effectiveness of the Group's internal quality control and risk management systems, including monitoring the financial reporting process. The Audit Committee assesses the auditing plan prepared by internal auditor and ensures that it covers all the essential areas of risk and that cooperation with external auditor is appropriately taken into account.

The Remuneration Committee is responsible for including the risk appetite as a key component in the performance objectives, remuneration and incentive structures of the staff. The Remuneration Committee – together with the Risk and Audit Committees – ensures that the remuneration systems do not lead to undesired operating processes or uncontrolled risk-taking. In addition, the remuneration framework shall be such that a significant breach of the set risk appetite limits may have consequences for the involved individuals' appraisal and remuneration.

2.4 CEO and Executive Management Team (EMT)

The CEO shall see to the executive management of the Company in accordance with the instructions and orders given by the Board (general competence). The CEO shall see to it that the accounts of the Company are in compliance with the law and that its financial affairs have been arranged in a reliable manner.

The CEO is assisted by the EMT. The EMT is chaired by the CEO and is membered by the heads of MuniFin's divisions. Decisions of the EMT are effectively decisions of the CEO. The purpose of the EMT is to deal with matters essential in terms of its operation and act as an intermediary of information between various units. Thus, the EMT is responsible for the appropriate arrangement of the administration and operation, and for assisting the CEO with the implementation of the Group's strategy and other tasks that are the responsibility of the CEO. When discharging its duties and responsibilities the EMT aims at ensuring a sustainable business model that takes into account all risks, including environmental, social and governance risks.

Concerning risk management, the EMT is also responsible for ensuring that the limits set by the Board and other principles related to risk management are taken into account in MuniFin Group's operations by arranging the necessary control points and regular reporting.

The CRO represents the second line of defence and is responsible for the overall coordination of risk management including monitoring risk limits and reporting different types of risks. In addition to the direct reporting line to the CEO, the CRO reports directly to the Board's Risk Committee on MuniFin Group's overall risk position at each meeting.

In addition to the EMT, the CEO may delegate part of its duties to the heads of divisions, heads of units and other operative bodies when deemed necessary for sake of efficiency or necessary for managing and monitoring risks. The CEO, EMT and heads of units form together the Group's senior management.

The EMT is currently supported by six operational bodies: the Risk Management and Compliance Management Team (Risk Management MT), the Capital Markets and Sustainability Management Team (Capital Markets MT), the Credit Group, the Customer Solutions Management Team (Customer Solutions MT), the Finance Management Team (Finance MT) and the Technology Services Management Team (Technology Services MT).

In the composition of these operational groups, the requirement is that the independent risk management shall not participate in business decision-making. However, the view of risk management shall be communicated for the purposes of the decision-making, and the Risk Management MT has an escalation right to the CEO if a business decision is made against its opinion. The CRO is the chair of the Risk Management MT, and one of the main tasks of the Risk Management MT is to ensure that the Group's risks remain within the risk appetite set by the Board.

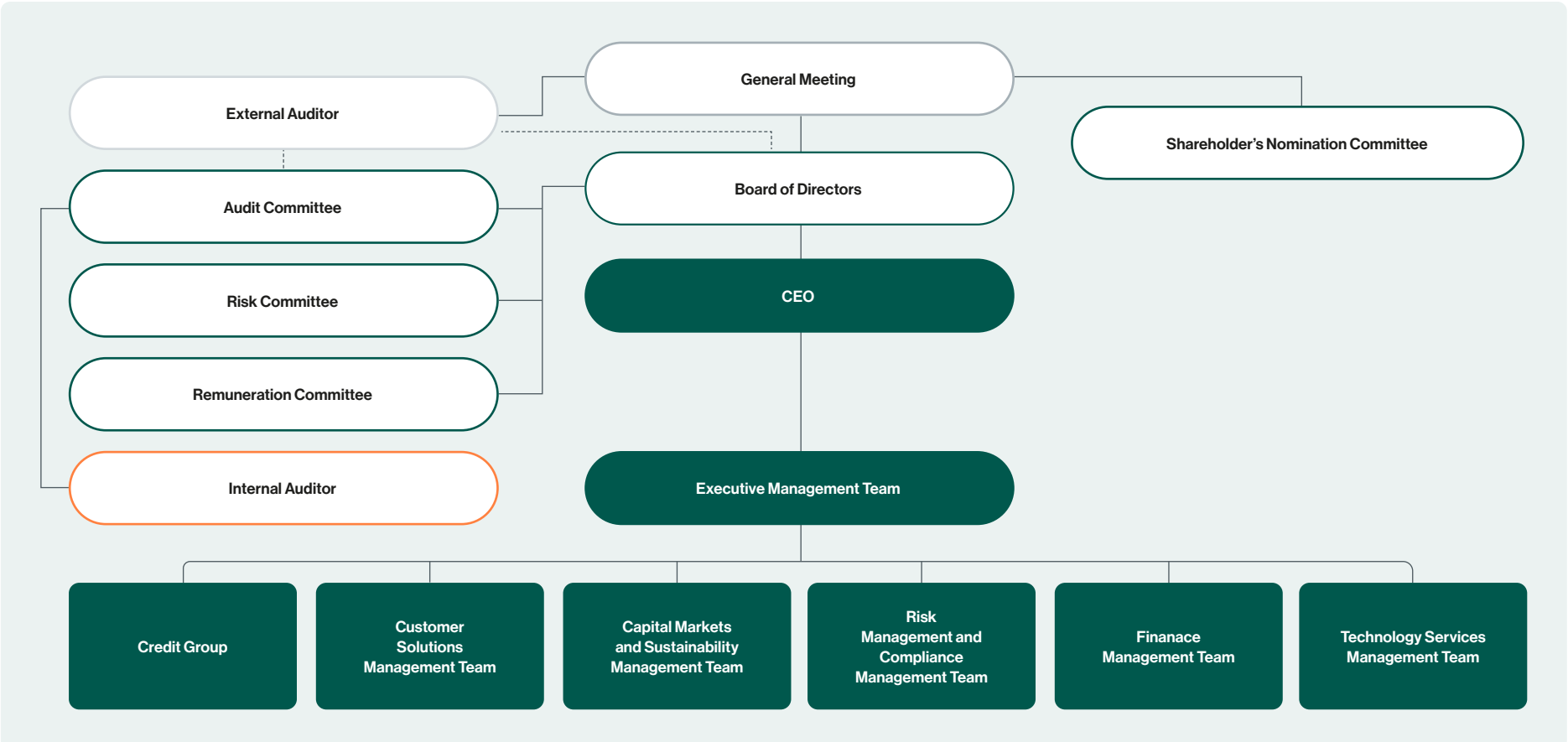

Figure 3. Risk-related governance structure of MuniFin Group

2.5 MuniFin Group's overall risk profile associated with the business strategy and business model and MuniFin Group's Risk Declaration

In the Finnish economy and financial system, MuniFin Group's dedicated role is to ensure the availability of market-based funding to the municipality sector, wellbeing services counties and affordable social housing production. Market based funding is acquired from capital markets at the most competitive rates available to the Group under all market conditions. MuniFin Group operates a low-risk business model with a limited scope of services offered for a restricted customer base. Furthermore, MuniFin Group has conservative risk management policies. The Group's business activity is strictly limited to the financing of Finnish municipalities, joint municipal authorities, wellbeing services counties, joint county authorities, corporate entities under their control and affordable social housing organisations. The services provided by MuniFin Group do not include services typically provided by traditional commercial banks, such as deposit-taking, payments and custody services or asset management-related services. Due to the limited business activities focusing on offering financing services only to public sector entities or entities providing services in public interests, MuniFin Group has no material financial fee income, with net interest income being the only material source of earnings. All MuniFin Group's customer financing is direct local or regional government risk or has a guarantee by a municipality, a wellbeing services county or central government (deficiency guarantee). Hence, all MuniFin Group's exposures to its customers are treated with zero risk-weight in the calculation of capital adequacy as provisioned by the CRR.

MuniFin Group's overall risk profile is described in the Risk Appetite Framework (RAF) approved by the Board and updated at least annually. The RAF is linked to the Group's business model, both short-term and long-term strategic goals, the Capital Plan, the Liquidity and Funding Plan, the Recovery Plan and the Remuneration Policy. It is fully aligned with ICAAP and ILAAP. Business model and strategy are the key drivers that determine MuniFin Group's risk appetite along with the areas of profitability and capital, liquidity and funding risk, credit risk, market risk and operational risks.

In the RAF, MuniFin Group has defined the types and amount of risk that the Group is willing to take and able to accept in pursuing its strategic objectives. The key dimensions of the RAF are:

- The overall risk appetite statement.
- The risk appetite pillars: capital risk, liquidity and funding risk, credit risk, market risks and counterparty credit risks, and operational risk.
- For each pillar its strategic objective or risk appetite statement and material risks.
- The risk indicator(s) for each material risk.
- The risk limits and thresholds for each risk indicator.

MuniFin Group's RAF starts with the overall Risk Appetite Statement, which expresses the level of risk that the Group is willing to accept in order to achieve its strategy. MuniFin Group's overall Risk Appetite Statement is as follows: "Maintain the overall risk profile at such a low level that enables MuniFin to maintain its credit ratings equal to those of the Republic of Finland and ensures that customer financing will be secured in all market conditions".

MuniFin Group's RAF contains core material risks, which are considered the most important to steer the bank and trigger management action. For RAF purposes, these material risks are grouped under five risk pillars. The RAF defines risk indicators for each material risk. Risk limits and threshold values are set for each risk indicator. Altogether, these form the Group's risk profile and define the amount of risk that MuniFin Group is willing to take. At least annually, the risk limits and thresholds are reviewed and recalibrated in order to align the RAF with MuniFin Group's strategy, external and macro-economic developments and ICAAP/ILAAP outcomes.

The Group has established a set of thresholds that are used to monitor and review the amount of risk taken relative to its risk appetite. The available historical data, regulatory requirements and external benchmarks as well as other publicly available information are used to establish, evaluate and calibrate the thresholds.

A "traffic light approach" is used to set the thresholds and to report the risk levels for each of the risk indicators. The target zone (green) is defined as the desired risk appetite level set by the Board. The early warning zone (yellow) refers to a risk level, which exceeds the desired risk appetite and triggers active monitoring and decision-making. The Group may decide to stay temporarily on the yellow zone, but additional risk-taking should be avoided. Furthermore, a plan will be made to steer the risk level back to the green zone. The limit breach zone (red) refers to a risk level which breaches the risk appetite and leads to immediate actions to steer the level of risk back to the desired risk appetite level.

The lowest risk area (blue) represents a level of risk that is below the set risk appetite, i.e. a too conservative level of risk-taking, which may have a negative effect on profitability and might lead to inefficient use of capital. When applicable, a lower threshold level for the risk appetite will be set indicating the point beyond which the risk profile is becoming too risk averse. Finally, the highest risk area (purple) refers to the trigger levels associated with MuniFin Group's Recovery Plan.

The Group's risk position is regularly reported to the Board as a part of regular risk reporting. The risk reporting covers all risk areas, and the utilisation rates of the limits set for different risks. Additionally, the CRO presents a more comprehensive risk report to the Risk Committee on a quarterly basis, detailing MuniFin Group's risk position in relation to different risk areas.

There were no material changes in MuniFin Group's risk appetite in 2025. MuniFin's Board of Directors assures that the risk management arrangements in place are adequate with respect to the Group's risk profile and strategy. Risks remained within the set risk limits during the financial year. There were no limit breaches (red).

According to MuniFin Group's assessment, risk management met the requirements set for it. However, unrealised fair value changes of financial instruments increased the Group's earnings volatility slightly and the Group recognises the importance of limiting fair value volatility where feasible. Unrealised fair value changes were influenced in particular by changes in interest rate expectations and credit risk spreads in the Group's main funding markets. MuniFin Group continuously monitors and analyses the volatility arising from valuations and prepares for any impacts this may have on its profit and capital adequacy.

The Group's risk position remained stable and at a moderate level during year 2025. MuniFin Group's risk management and internal control practices and processes are developed continuously. As part of its yearly actions, the Risk Management and Compliance reviewed the main risk management policies and proposed necessary amendments, Also, MuniFin Group's RAF was updated considering the changes in the operating environment. The Group also implemented monitoring and reporting practices on ICT risk management framework for the implementation of the DORA regulation.

The continued geopolitical tensions and market volatility did not affect the Group's performance during the financial year. Credit risk spreads remained at a high level due to an unusually high degree of market uncertainty in the SSA sector (Sovereigns, Supranationals, Agencies). Despite the market volatility, the Group retained uninterrupted access to capital markets and continued its funding operations in the usual manner during the financial year. Because of the uncertainties in the operating environment, the Group has nevertheless maintained strong liquidity buffers as a precaution. The geopolitical instability mainly affects the Group indirectly through market conditions. Despite the changes in the operating environment, the Group's risk position remained stable and at a moderate level during the financial year.

All financial risk indicators were clearly within the risk tolerance levels set by the Board of Directors at the end of 2025.

Summary of RAF risk pillars and indicators

Risk pillars	Risk indicators
Capital risk	Leverage ratio
	Change in the CET1 ratio
Liquidity and funding risk	Liquidity Coverage Ratio (LCR)
	Net Stable Funding Ratio (NSFR)
	Financing gap
	Survival horizon
Credit risk	Non-performing exposures
	Expected credit losses (ECL)
	ESG score (liquidity portfolio)
	Single-name concentration (customer financing)
	Share of energy score “A” in real-estate collateral
	C&E risk score of consolidated municipality financing
	Share of green finance of all long-term customer financing
Market risk	Stressed CCR derivative loss
	Total EVE risk
	Total NII risk
	NII basis risk
	FX risk
	Credit spread risk
	Fair value VaR
Operational risks	Frequency of material IT disruption (number of incidents per month)
	IT downtime (in hour, per month)
	Number of material system, data incidents or availability of data and systems
	Company ESG risk rating
	Data quality indicators
	Significant operational loss

The ECB Guide on climate-related and environmental risks states that institutions are expected to explicitly include climate-related and environmental risks (C&E risks) in their risk appetite framework. Already during the 2022 RAF update cycle, the Group added new C&E risk indicators to the framework. Furthermore, MuniFin Group included a Risk Appetite Statement (RAS) for C&E risks, which is aligned with the objectives stated in the Group's strategy. MuniFin Group's RAS for C&E risks is as follows: "Identify and manage, in a proportionate way, C&E risks material for MuniFin's business model".

MuniFin Group has not added a specific risk pillar for ESG/C&E risks, but these risks have been included, as applicable, in the existing risk pillars. Considering MuniFin Group's specialised business model, the most obvious new ESG/C&E risk indicators are related to credit risks. Incorporating ESG risks, and C&E risks in particular, into the RAF is an ongoing process that requires further development of risk models and availability of relevant data. As these capabilities increase in the future, more risk indicators can be included in the RAF.

Key figures of capital on the Risk Appetite Dashboard	31 Dec 2025	31 Dec 2024
Change in the CET1 ratio, percentage point	-13.72	4.00
Leverage ratio, %	13.08	12.34

The Board has approved this Risk Declaration and acknowledges that the MuniFin Group's risk management is adequate and well adapted to the Group's business model, risk appetite and capital position.

2.6 Risk management process

In MuniFin Group, risks are identified through continuous monitoring and analyses of the operating environment and, especially, during the annual business planning process, which includes stress testing. In addition to stress testing on the level of single risks, stress testing is also conducted on an entity-wide level and across different risk types. This way the Group aims to ensure that all material risks and their respective risk factors are properly identified. Risks are also identified as part of the annual updates of ICAAP, ILAAP and RAF and through an annual compliance and operational risk and control self-assessment process. The key input for the identification process is quantitative analyses based on historical and forecast data, and expert judgement when risk quantification is not possible.

Climate-related and environmental risks are identified as part of a separate materiality assessment process which is evaluated annually.

Risk measurement quantifies risks and is used to assess and select the appropriate means of managing relevant risks and to enable appropriate resources to be dedicated to the management of that risk. The first line of defence risk owners are responsible for measuring risk exposures and ensuring that risks are managed in line with the Group's risk appetite. In risk measurement, considerations are given to both normal and stressed conditions and processes put in place to ensure that changes in risk trends are identified and factored into the risk measurement. This includes the identification of appropriate stress testing methodologies to test MuniFin Group's resilience under a range of stress scenarios. Measurement is also considering the potential impact of risk management activities that are not operating as planned.

Risk management identifies the appropriate strategy to address material risks. The second line of defence is responsible for developing the risk policies for each risk type as well as the overall RAF, within which the Group manages its risk exposures. The first line risk owners are responsible for putting in place processes with controls to ensure that the business is operating within risk appetite and policy objectives through implementing operational level guidelines and instructions. Stress testing is also used as a risk management tool to assess the Group's potential risk exposures under stress and to put in place processes and procedures to limit risk exposures.

Risk monitoring is used to track identified risks and identify new or emerging risks. It allows MuniFin Group to put in place risk management processes and evaluate their effectiveness. The first line risk owners have processes in place for monitoring risk exposures against limits and targets and second line of defence is responsible for monitoring exposures of material risk types against the RAF and other risk limits.

Escalation processes are in place within the first and the second line of defence to escalate any breaches of limits and targets in a timely manner. In the case of a breach being identified within the first line of defence, the breach is reported to the Risk Management and then escalated according to relevant governance processes, e.g. a breach of risk appetite limits must follow RAF escalation processes. Conversely, in the case of a breach being identified by the second line of defence, the case is first discussed with the first line of defence, before being escalated through relevant governance process.

Risk reporting provides the Board and its Risk Committee, the EMT and senior management with an accurate, timely and clear oversight of the current risk exposures and highlights any risks that may hinder the achievement of business objectives. Reporting tools and methodologies are in place to ensure timely and accurate risk reporting. The first line of defence reporting is mainly conducted through regular reporting to the Capital Markets MT and Customer Solutions MT. The key second line of defence reporting include a monthly Risk Appetite Dashboard, which is based on RAF, and quarterly Risk Report. In addition to these, the Board approves the ICAAP and the ILAAP annually, and the Recovery Plan every second year. Internal Audit prepares to the Audit Committee regularly internal audit reports and MuniFin Group's external auditor PwC prepares interim audit reviews.

Frequency of risk reporting varies according to the materiality of risk types, e.g. liquidity portfolio and CSA collateral positions are reported on a daily basis, while other risks may be reported less frequently.

2.7 Stress testing

Stress testing forms an integral part of MuniFin Group's overall Risk and Governance Framework as stress testing is used to support the limit and threshold calibration of the Group's RAF. The main purpose of the regular calibration is to ensure the alignment of the risk appetite, limits with MuniFin Group's strategy and also external and macro-economic developments.

MuniFin Group pursues stress testing activities in a manner that is suitable for its operations, business model and risk profile. The Group's Stress testing program focuses on principles of governance, stress testing scope and coverage, scenario development, stress testing programme model, methodologies and the application of stress testing programs. The Group's Stress testing program is a pivotal part of risk management. Stress test outputs are used to assess the viability of MuniFin Group's Capital Plan as well as the Liquidity and Funding Plan in adverse circumstances in the context of the capital, liquidity and recovery planning.

The Risk Management and Compliance division, independent of the Group's business activities, is responsible for designing stress scenarios in cooperation with business units. Separate scenarios are created for capital and liquidity stress tests.

The primary objective of the stress testing conducted in 2025 was to analyse the development of MuniFin Group's capital adequacy and profitability over the period 2025–2028. The tests covered business, market, credit and operational risks, as well as the estimated financial impacts of these risks under different conditions. In addition, the adequacy of liquidity was assessed using several stress scenarios.

As expected, the results of the stress tests showed that the Group's capital adequacy remains well above minimum regulatory capital requirements throughout the forecast period even under severe stress. Furthermore, the level of own funds also met the minimum leverage ratio requirement of 3%. With respect to liquidity, under adverse scenarios, stress tests demonstrated that the level of liquidity is adequate.

In 2025, the Group also participated in the ECB's SSM Stress Test assessing the financial resilience of supervised institutions, covering the years 2025–2027. The results of the stress test were published at the beginning of August. MuniFin Group's capital position remained strong even in the adverse economic scenario, and its capital clearly exceeded the capital requirement stipulated by the stress test.

2.8 Capital adequacy management principles

MuniFin Group's capital management is an on-going process of determining and maintaining the appropriate quantity and quality of capital to support its operations. Capital is managed to maintain financial strength, absorb losses to withstand adverse economic conditions, allow for growth opportunities and meet other risk management, regulatory and business objectives.

MuniFin Group's objectives regarding capital in relation to risk taking and the operating environment are defined as part of the annual planning. The planning horizon extends to at least the following three years, in order to be able to predict the business performance trend and the sufficiency of own funds with respect to the increasing capital requirements arising from changing regulations and to be able to react to potential needs for additional capitalisation in sufficient time. The Board approves the Capital Plan and monitors it. The Group updates its Capital Plan at least annually and follows implementation of the plan semiannually.

The aim for capital adequacy management is to monitor the capital adequacy and to confirm that MuniFin Group's capital adequacy fulfills its targets and requirements set by financial authorities to ensure continuity of the operations. Controlling capital adequacy is a continuous and an essential part of MuniFin Group's strategic planning process, which covers setting strategic goals, specifying development projects and making financial forecasts for the following years. This is done in cooperation with the management and the Board. The Board of MuniFin approves the Company's strategy. The management ensures that the operational measures of the Group correspond with the principles determined in the strategy approved by the Board. As part of the annual planning, the management prepares a business plan for the coming year and business forecasts for the years that follow. The Group's risk position and its effect on the MuniFin's financial status are also evaluated. Regular risk analyses as well as various stress test scenarios are used for evaluating and measuring risks. Based on these, the capital adequacy plan is updated annually and potential actions needed to strengthen own funds are determined. The adequacy of own funds is also monitored as part of monthly business analyses.

2.9 ICAAP information

The purpose of the ICAAP is to ensure that MuniFin Group has a sufficient amount of capital at all times to cover the risks associated with its activities. Through ICAAP, the Group assesses and quantifies all risks that may have a material impact on its capital position or profitability and concludes whether it has sufficient capital to support its operations on an ongoing basis.

The objective of the ICAAP is to ensure that MuniFin Group has a coherent approach, processes and methods for capital planning and capital adequacy assessment, and that it is capable to reliably allocate capital using a risk-based approach. The ICAAP covers all material risks that MuniFin Group is, or may be, exposed to through its business activities. The ICAAP reflects MuniFin Group's specialised business model and the overall conservative risk profile set by the Board.

The ICAAP helps to ensure that management practices with regards to capital management comply with the risk strategy defined by the Board and reflected in the RAF, sound corporate governance and capital management principles, as well as external regulations. The ICAAP, including its internal risk assessment and stress testing, feeds into all business decision-making as well as into the update and recalibration process of the risk appetite.

3. Credit and counterparty credit risk

Credit risk refers to the possibility that MuniFin Group's counterparty fails to meet its obligations in accordance with the agreed terms and conditions.

Customer financing is one source of credit risk, but credit risk can also arise from other types of receivables, such as bonds, short-term debt instruments and derivative contracts. Concentration, country and settlement risks are also considered as credit risks.

Counterparty credit risk is the risk that MuniFin Group's counterparty in derivative contracts or repo agreements is not able to meet its obligations. For Pillar III disclosure purposes, counterparty credit risk is presented together with credit risk, although it is classified as part of market risk in MuniFin Group's internal risk framework.

3.1 Credit risk appetite

MuniFin Group's objective for credit risk is to maintain a sound credit-risk profile, keeping inherent financial risks to capital within the boundaries of risk appetite. MuniFin Group's most material credit risks arise from its liquidity portfolio and derivative counterparties.

The credit risk arising from customer financing is low due to the Group's specialised business model and restricted customer base. The material credit risk management principle is that all customer financing and the derivatives offered to customers have to obtain a zero-risk weight in MuniFin Group's capital adequacy calculation. As a business model, this zero-risk requirement for all customer financing is different from other credit institutions and the credit risk principles inherent and required in their credit risk policies. MuniFin Group's Credit risk policy and credit risk management practices rely significantly on this principle.

3.2 Governance of credit risk

For the implementation of the internal control framework for credit risk, MuniFin Group applies the three lines of defense governance model, with adequate segregation of duties and clear roles and responsibilities between different parties.

1st LoD - the Customer Solutions division and the Capital Markets and Sustainability division

The Customer Solutions division offers to MuniFin Group's limited customer base loans, short-term lending, financial lease assets and derivatives for hedging purposes. The main areas of responsibility for the Customer Solutions division in terms of credit risk are:

- Processing financing applications and making credit decisions in accordance with the current credit policy and guidelines.
- Identifying, assessing and managing the risks associated with financing and collateral in the 1st LoD.
- Ensuring an effective flow of information between units on MuniFin Group's credit risk position and on material events and future projects related to individual customers that may have an impact on the creditworthiness of the customer.
- Participation in the activities of the Credit Group.

The Capital Markets and Sustainability division includes MuniFin's Treasury operations, Funding operations and ALM operations. The main areas of responsibility for the Capital Markets and Sustainability division in terms of credit risk are:

- Identifying, assessing, and managing credit and counterparty risks within the division's area of responsibility.
- Ensuring an effective flow of information between units and lines of defences on MuniFin Group's credit risk position and on material events related to individual counterparties that may affect the counterparty's creditworthiness.

2nd LoD - the Risk Management and Compliance division

The second line of defence, the Risk Management and Compliance division, headed by the CRO, is independent of the Group's business operations. Risk Management has the responsibility for developing and maintaining the Group's credit risk management framework and credit risk policies in accordance with the relevant regulations. Risk Management monitors and analyses the Group's credit risks and assures that the credit granting process including credit approval is conducted in accordance with MuniFin Group's credit risk policies. Risk Management also reports the Group's overall credit risk position on a regular basis to the Risk Management MT, the EMT and to the Board. The second line of defence also includes the Compliance function, which monitors that the Group is compliant with applicable credit risk regulation.

3rd LoD - Internal Audit

The third line of defence, internal audit, regularly performs risk-based audits in accordance with the annual plan approved by the Board and its Audit Committee.

Board of Directors and Risk Committee

The Board has overall responsibility for the Group's risk management and decides on the key principles of credit risk management. The Board approves the Credit Risk Policy and the credit risk appetite of MuniFin Group. The Board determines the risk appetite by approving the indicators and limits related to credit risks in the RAF.

The Board steers credit risk management through the credit risk appetite and other relevant policies, collateral management and credit-granting principles that aim to ensure that the level of credit risk remains at a moderate level and at the same time, the solvency and profitability targets are taken into consideration.

The Board generally does not decide on individual credit risk-related matters (e.g., lending to customers or investment decisions for the liquidity portfolio). However, the executive management can escalate a matter to the Board for decision if, for example, the scope of the matter or differing opinions between risk management and business operations require it.

The Risk Committee supports the Board in tasks related to credit risk management, i.e. evaluates proposals for updating the RAF and the Credit Risk Policy before the Board approval and monitors regularly credit risk analyses and reporting through the risk indicators in the RAF, as well as various counterparty-specific and portfolio-level risk analyses.

Executive Management Team (EMT) and division-level management teams

The EMT is responsible for the practical implementation of the Credit Risk Policy approved by the Board and for developing the procedures necessary for identifying, measuring, managing, monitoring and reporting credit risks in MuniFin Group.

The EMT has established three decision-making bodies that have been given tasks in terms of credit risk management. The decision-making bodies are the Risk Management MT, the Credit Group and the Capital Markets MT. The Risk Management MT is responsible for developing MuniFin Group's credit risk management principles and policies. It monitors credit risk limits and indicators defined in the RAF and analyses the status of credit risk, credit counterparty risk and concentration risk.

The Credit Group decides on credit granting to customers with a certain risk level. The Credit Group also follows the development of credit risk positions and customers' payment behaviour and decides on potential actions related to them. In addition, the Credit Group decides on forbearance measures.

The Capital Markets MT is responsible for the management of credit risks related to capital market transactions. The Capital Markets MT decides also on new counterparties and issuers in regards to investment and derivatives operations and their limits in accordance with the Credit Risk Policy and relevant guidelines.

3.3 Management of credit and counterparty credit risk

The management of credit risk in MuniFin Group is based on the RAF approved by the Board and it aligns with the Group's strategy and business model.

To manage its credit risks, MuniFin Group uses among others the following methods approved by the Board to assess the creditworthiness of its customers and counterparties:

- Careful selection of contractual counterparties
- Counterparty-specific credit rating and volume limits
- Guarantees and collateral
- Written credit agreements and contractual terms
- Written operating instructions
- Insurance for personal and property damage
- Segregations of duties to avoid hazardous job combinations
- Decision-making authorities
- Ongoing internal monitoring and reporting
- Reliable and professional staff
- Approval process for new products and services.

The following paragraphs describe the credit risks identified in MuniFin Group's operations and the key principles of credit and counterparty risk management.

3.3.1 Credit risk management in customer financing

MuniFin Group's customers consist of municipalities, joint municipal authorities, well-being services counties, joint county authorities and entities controlled by them and affordable social housing organisations. Municipal customers are divided into three sectors: municipalities, joint municipal authorities and municipality-controlled entities.

MuniFin Group may only grant loans and lease financing without a separate security directly to a municipality, joint municipal authority, wellbeing services county or joint county authority. By law, a Finnish municipality cannot default (Finnish Bankruptcy Act 120/2004). The municipalities have an unlimited right to increase local income tax rates and due to this, together with other elements of autonomy, the Finnish municipal sector has, similar to the sovereign, a zero-credit risk weighting in capital adequacy calculation of credit institutions. Finnish municipalities can also establish joint municipal authorities to provide services that they are legally required to provide for their citizens or undertake regional development activities. Municipalities are jointly members of these joint municipal authorities and are commonly responsible for their funding and other liabilities. All loans to municipal companies are guaranteed by municipalities (or joint municipal authorities). Thus, there is always a municipality, that cannot default by law, to carry the risk of default.

Wellbeing services counties and joint county authorities have also a zero-credit risk weighting in the capital adequacy calculation of credit institutions. This approach is based on the fact that the central government has ultimate responsibility for financing these entities. As municipalities, by law, a wellbeing services county or a joint county authority cannot default (Finnish Bankruptcy Act 120/2004).

For other customers, loans must be secured with an absolute guarantee issued by a municipality or joint municipal authority, or real estate collateral and state deficiency guarantee. When a loan has a 100% absolute guarantee from a municipality, joint municipal authority, wellbeing services county or a joint county authority MuniFin Group can apply for payment directly from the guarantor in accordance with the terms of the loan. The guarantor is obligated based on the guarantee commitment to pay the interest and other ancillary costs in

addition to the principal. When a loan has a state deficiency guarantee, primary pledge of real estate collateral is required, or – at the requirement of Centre for state-subsidised Housing Construction (Varke) – an absolute guarantee by a municipal, joint municipal authority, wellbeing services county or wellbeing services joint authority. Regarding the deficiency guarantee, the central government is responsible for the primary debt in respect of the part that is not recovered from liquidation of the real estate collateral. The guarantee or guarantee together with real estate collateral must fully cover the loan provided. Because such a guarantee is required to reduce the credit risk, all loans granted are classified as zero-risk when calculating capital adequacy. The Group does not bear the residual value risk related to its leasing services.

The housing customer group consists of two types of housing institutions: institutions owned or controlled by municipalities (or joint municipal authorities) and affordable social housing organisations. Housing entities can also be controlled by wellbeing services counties or joint county authorities. Loans for housing companies owned by municipalities or joint municipal authorities are guaranteed by municipalities, or these loans can also at the same time be categorised as affordable social housing loans. In the latter cases there is real estate collateral and a deficiency guarantee from the central government. Affordable social housing organisations are defined as corporations designated by state authority and engaged in the renting or production and maintenance of housing, or corporations controlled by them. The housing companies are nominated by Varke, a governmental agency operating under the supervision of the Ministry of the Environment. Loans for housing companies have a deficiency guarantee from the State of Finland that covers the residual risk over the collateral value of the respective property. When a loan has a deficiency guarantee by the central government, primary pledge of real estate collateral is mainly required unless the loan is a central government subsidised housing loan granted for a municipality or a joint municipal authority in which case there is no collateral required by law. The amount of the primary pledge must be at least 1.3 times the amount of the loan.

The Act on the Municipal Guarantee Board (MGB Act) defines for which MuniFin's funding guaranteed by the Municipal Guarantee Board (MGB) can be used for and can also be considered as a credit risk management tool. MGB is a public institution that can grant guarantees to the funding of credit institutions controlled or owned directly or indirectly by municipalities if the funding is used for financing of municipalities, joint municipal authorities, wellbeing services counties or joint wellbeing services counties authorities as well as entities wholly owned by the aforementioned entities or controlled by them, in addition to communities designated by state authorities to engage in the renting, production and maintenance of housing on social grounds, or entities under their control. All funding issued by MuniFin has a MGB guarantee. In addition, MuniFin has guarantees granted by MGB to mitigate the counterparty credit risk of some derivative counterparties.

Despite MuniFin Group's business model, which is based on the zero risk-weighted customers, the Group has an internal risk-rating system for all customers, which assigns a risk score to the customer as part of the credit granting process. In addition, the independent Credit and ESG Risks unit compiles an annual analysis of all customers, which determines the respective risk rating of the customer. The risk rating of the customer affects the need for further analysis of the customer in the process of granting financing, the financing decision-making, decision-making power inside the Group, possibly the pricing and the monitoring of the customer. The Group has customer specific credit limits.

In addition, the Group assesses the customer's exposure to environmental, social and governance risks (ESG risks), with particular attention to the impacts of climate and environmental risks. The Group assesses ESG risks related to its lending activities based on available data, which can be either actual, forecasted, or representative estimates. The ESG risks are considered in the annual analysis and affect the internal risk rating of the customer, probability of default (PD), or loss given default (LGD), as well as pricing.

3.3.2 Credit risk management in liquidity portfolio

MuniFin Group is also exposed to credit risk from its liquidity portfolio investments. MuniFin Group invests pre-funding and cash collateral received from derivative counterparties in deposits and other liquid instruments, mainly in the international capital and money markets. This creates credit risk for the Group.

The credit risk related to the liquidity portfolio is managed in accordance with the following principles:

- The Group's liquidity is invested in safe and profitable investments.
- Sufficient liquidity of the investments is ensured in all market conditions.
- Investments are diversified in terms of issuer, maturity and country risks.
- Investments and the related credit risks are monitored both on the issuer and on the aggregate level.

When planning the portfolio allocation and maturity of liquidity investments, the risk appetite of the Group regarding credit risk is considered. The annual investment plan is prepared as part of the annual planning process and is part of the Liquidity and Funding Plan.

At the operational level, credit risk in liquidity investments is managed through counterparty-specific credit rating, amount, and concentration limits. Additionally, the selection of approved investment instruments is strictly limited, as described below.

Each investment in the liquidity portfolio must have a credit rating from at least one approved credit rating agency: Standard & Poor's, Moody's or Fitch. MuniFin Group follows a principle that the credit rating in the liquidity portfolio must always be at least A-. Additionally, the issuer must have an internal risk rating determined by Risk Management, which must always be at least 3. If the credit rating of the investment target is downgraded below the external or internal risk rating, MuniFin Group's Risk Management MT decides on necessary measures. The Group may invest in domestic financial counterparties or domestic public sector entities, which are not rated. Investments in these counterparties are restricted by separate limits.

MuniFin Group's liquidity portfolio is divided into a short-term and a long-term portfolio. The Group's short-term liquidity portfolio consists of cash and short-term money market assets. It also contains cash collateral received from derivative counterparties. The long-term liquidity portfolio consists of fixed income assets that have a maturity over one year.

MuniFin Group's investment policy approves only fixed income investments that are principally issued by financial institutions, sovereigns and sovereign agencies from OECD countries. This, in the Group's opinion, reduces major sustainability risks in the portfolio, as the OECD supports the United Nations in ensuring the success of the 2030 Agenda for Sustainable Development. Sustainability is an important part of the Group's liquidity investments, and the liquidity portfolio is regularly reviewed and graded with an ESG score. Investments and issuers are carefully chosen leading to exclusion of issuers and investments that violate the Group's ethical standards or operate in a controversial field of business. Liquidity portfolio ESG score is implemented as a material risk measure in the RAF.

3.3.3 Counterparty credit risk management

Counterparty credit risk refers to the risk that MuniFin Group's counterparty in derivative contracts or repo agreements is not able to meet its obligations. The Group uses derivatives for hedging purposes in its operations, for example hedging all non-euro funding and investment transactions to euros and fixed and long-term interest rate transactions to short-term interest rate. The Group also uses derivatives for hedging balance sheet fixing risk. Furthermore, the Group offers its customers derivatives for their hedging purposes and hedges itself in the markets against the market risk arising from the transactions.

In principle, all hedging instruments are over-the-counter (OTC), and not exchange-traded, which enables the Group to efficiently customise its hedges with the underlying

exposure. Under the requirements set by the European Markets Infrastructure Regulation (EMIR), standard plain-vanilla OTC interest rate swaps are cleared using Central Counterparties (CCPs). The purpose of CCP clearing is to reduce counterparty risk. The Group has two global banks providing clearing broker services. The variation margin of the derivatives with the CCPs is based on the daily margining of the cash collateral (Collateralised-to-Market, CTM). MuniFin Group also uses cash and securities collateral in the central counterparty clearing (CCPs) also for the securities collaterals when exchanging the initial margin.

Since 2022, MuniFin Group has had the capability to exchange initial margin for bilateral derivative agreements with securities collateral. However, for now the initial margin has not been exchanged with the securities, as the threshold limits defined in the regulation have not been exceeded.

During early 2025, the Group prepared for the new EMIR 3.0 (European Market Infrastructure Regulation). The regulatory package introduced new requirements for participants operating in the derivatives markets. EMIR 3.0 requires market participants to have an "active account" with a central counterparty located in the EU, and to clear a portion of their euro denominated interest rate swaps through an EU based central counterparty. MuniFin has established the capability to clear euro denominated interest rate swaps at the euro area central counterparty EUREX Clearing AG, and the first clearings were successfully executed in June.

MuniFin Group's exposure to counterparty credit risk is subject to strict limits. When approving a financial counterparty for derivatives, the counterparty must have at least one credit rating from either Standard & Poor's, Moody's or Fitch and, it must be at least A-. Additionally, the issuer must have an internal risk rating determined by Risk Management, which must always be at least 3.

All contracts are valued daily using market information and advanced valuation models and reconciled with counterparty valuations. Derivatives with financial counterparties are executed only under ISDA Master Agreements. The Group limits credit risk arising from its derivative counterparties with ISDA Credit Support Annex (CSA). MuniFin Group has 34 derivative counterparties with which it has active derivative contracts. The Group has the above-mentioned collateral agreement with all these counterparties. MuniFin Group only enters into a trade with counterparties which have a variation margin CSA with daily margining. Additionally, the Municipal Guarantee Board's guarantees are used for reducing the derivative counterparty risk of certain financial counterparties.

The Credit Valuation Adjustment (CVA) that measures counterparty credit risk and MuniFin Group's own Debt Valuation Adjustment (DVA) are both taken into account when calculating credit risk exposures arising from derivative counterparties. The CVA is estimated for each derivative counterparty by calculating the Group's expected positive exposure throughout the maturity of the derivative portfolio, taking into account the probability of default and the estimated amount of loss in the possible event of default. Input data for the calculation is based on the terms of CSA agreements, generally accepted assumptions in the markets on the loss given default and expected probabilities of default as well as on Credit Default Swaps (CDS). Similarly, the DVA is determined on the basis of MuniFin Group's expected negative exposures, taking into account the probability of the Group's own default and the loss given default. In addition, the Group calculates Funding Valuation Adjustment (FVA) for those derivative contracts that do not hold cash collateral arrangements (derivatives made with MuniFin Group's customers).

MuniFin Group assesses the general wrong way risk (GWWR) related to derivative risks as part of its internal risk assessment and stress testing. Based on its analysis, MuniFin Group has identified exposures that include general wrong-way risk. However, the Group has determined that it does not have any exposures involving specific wrong-way risk. The general wrong-way risk is the risk that the credit quality of the counterparty might positively correlate with macro-economic factors, which also effects the value of derivatives transactions. Specific wrong-way risk is the risk when future exposure to a specific counterparty is positively correlated with the counterparty's PD due to the nature of the transactions with the counterparty.

3.3.4 Settlement risk management

MuniFin Group may also be exposed to settlement risk in the course of its operations in respect to issued bonds, customer financing, liquidity portfolio investments or derivative transactions. The Group's customer financing transactions are dependent on the operations of domestic payment banks and similarly the capital market transactions are dependent on the operations of the Group's international payment banks and clearing parties. In order to minimise the credit risk associated with clearing and settlement, transactions are in principle carried out through delivery against payment.

3.3.5 Concentration risk management

Concentration risk may arise within or across different risk categories where an accumulated exposure towards any single customer, counterparty or group occurs.

Due to MuniFin Group's business model, there is a higher concentration risk related to credit risks on the customer side compared to other lenders. MuniFin Group was specifically established to finance the municipal sector and affordable social housing production, and its operations are limited by the Act on Municipality Guarantee Board. Therefore, the concentration risk cannot be significantly modified. Given the nature of MuniFin Group's operations, the Group has recognised and accepted concentration risk in its customer financing, i.e. geographically (regional operations), by industry (e.g., municipality owned entities and affordable social housing production) and by collateral type (real estate collateral). The state deficiency guarantee reduces significantly the concentration risk from collateral, but at the same time increases the concentration risk towards the State of Finland.

On the other hand, all receivables from the Group's customers have 0% risk weight in capital adequacy calculations, and therefore, the concentration risk is acceptable considering the Group's business model and in line with the Group's strategy. In addition, in the calculation of large exposures, all receivables from customers are zero after mitigation techniques. After the use of guarantees and collateral, MuniFin Group has not incurred any credit losses from its customer financing during its entire operating history. Based on these factors, MuniFin Group accepts the resulting concentration risk as inherent to its business model. However, in the ICAAP, the Group has reserved some internal capital to cover this risk.

The Group may as well be exposed to concentration risk in its liquidity portfolio if diversification is not sufficiently considered in investment targets. However, limits related to investments in liquidity portfolio guide to diversify investments e.g. by geographical areas. The Board annually approves the Liquidity and Funding Plan, in which the investment goals are aligned with principles and limits set in risk policies. In addition to this, the EMT ensures with set guidelines that concentration risk is manageable and within the set limits.

3.4 Non-performing exposures and expected credit losses (ECLs)

The Group defines the non-performing exposures (NPE) as receivables that fulfil at least one of the criteria below.

- Material exposures which are more than 90 days past-due.
- According to the assessment of MuniFin Group's Credit Group (customer financing) or Capital Markets MT (liquidity portfolio) it is probable that the debtor is not likely to pay its credit obligations in full without realisation of the collateral, regardless of whether there have been any delays in payments or how many days the payments have been past due.

Non-performing exposures are treated as Stage 3 receivables in the calculation of expected credit losses.

Forborne receivables include receivables that have been renegotiated due to the customer's financial difficulties. Details about the principles applied to forborne and modified receivables are in the Consolidated Financial Statements 2025 in Note 22 available on MuniFin website.

IFRS 9 requirements for impairment are based on a three-stage approach to measuring expected credit losses (ECL). Financial assets measured at amortised cost or fair value through other comprehensive income are in scope for recognising impairment under the IFRS 9 standard. In addition, financial lease receivables and off-balance sheet binding loan commitments are in scope for recognising impairment due to their credit risk. Impairment of financial assets is calculated based on credit losses expected to arise over a 12-month period, unless there has been a significant increase in credit risk since origination, in which case, the allowance is calculated based on the ECL over the life of the asset. Both lifetime and 12-month ECL are calculated on an individual basis. The definition of default used in ECL is in line with MuniFin Group's capital adequacy calculations and risk management as well as with that required by international regulators. When estimating the ECL, MuniFin Group considers different scenarios. Each scenario is associated with different PD, EAD and LGD. When relevant, the assessment of multiple scenarios also incorporates how defaulted loans are expected to be recovered. The maximum period for which the credit losses are determined is the contractual life of a financial instrument unless the Group has the legal right to call it earlier.

In the measurement of ECL, past events and forward-looking information is used. Utilising forward-looking information in the expected credit loss model requires judgement. In addition to the aforementioned factors, also meaningful macroeconomic variables are included in the model. Their forecasts are included in the macroeconomic scenarios.

The amount of the Group's ECL in relation to the Group's statement of financial position is very low, 0.007% (0.005%). ECL in relation to the total assets and commitments included in the calculations are 0.007% (0.005%). The amount of ECL is materially influenced by the Group's conservative risk management principles, in particular the guarantees and collaterals received by the Group, as well as the customer base and the high credit ratings of counterparties.

3.5 Measurement and reporting of credit risk and counterparty credit risk

MuniFin Group's objective for credit risks is to maintain a sound credit-risk profile appropriate for the Group's business model. MuniFin Group's most material credit risks arise from its liquidity portfolio and derivatives counterparties. This exposure is managed through strict credit rating requirements and daily CSA collateral management. The credit risk arising from customer financing is low due to MuniFin Group's specialised business model and restricted customer base.

Under the RAF, MuniFin Group monitors credit risk using different credit risk indicators. Maintaining high credit-quality customer financing (lending and leasing), liquidity and derivatives portfolios is a key aspect of MuniFin Group's business model. For this, the Group monitors non-performing exposures and ECL on a regular basis. The ECL risk indicator is fully aligned with MuniFin Group's IFRS 9 ECL calculations. For the customer finance portfolio, MuniFin Group monitors the single-name concentration risk indicator, which measures the share of a single-name customer group exposure to total amount of customer financing exposure. For the monitoring of climate and environmental risks (C&E risks) the energy

efficiency of real estate collaterals for loans, climate-related and environmental risk score of consolidated municipality financing and the share of green finance of all long-term customer financing is monitored regularly.

MuniFin Group is also exposed to credit risk from its liquidity portfolio. In selecting counterparties, the Group evaluates credit risk with principles and limits approved by the Board, based on external credit ratings and internal credit risk analysis. In the RAF, the Group monitors all investments through a quarterly calculated ESG score. The ESG score risk indicator of the liquidity portfolio is based on a set of standards that socially conscious investors use to screen investments. The guiding principle for the calibration of the ESG score risk indicator is that the average ESG score of the portfolio should be at minimum at the same level as the benchmark score. The average score of the liquidity portfolio is communicated to external stakeholders. The ESG score for each issuer and the Sustainability benchmark is produced by an external ESG service provider.

MuniFin Group's credit risks are reported to the Board, the Risk Committee, the EMT and to the Risk Management MT. The Risk Management and Compliance division is responsible for producing regular risk reporting on the Group's risk positions including indicators set in the RAF.

The Risk Management function monitors the counterparty credit ratings on a daily basis and reports immediately to the EMT of any significant changes.

3.6 Capital requirements for credit risk and counterparty credit risk

MuniFin Group calculates capital requirements for credit risk using the standardised approach. For counterparty credit risk, the Group is applying the SA-CCR method.

4. Market risk

Market risk refers to the risk of losses resulting from an unfavourable change in market prices or market price volatility. Within MuniFin Group, these risks are generated through banking book activities and arise from a number of sources or sub-risk types. The Group has identified under the RAF the following sources of material market risk:

Interest rate risk (Interest Rate Risk in the Banking Book, IRRBB)	Interest rate risk refers to a change in the value of financial instruments, both from the economic value and earnings perspectives, due to changes in interest rates.
Foreign exchange risk (FX risk)	FX risk (or currency risk) is the risk of potential loss from fluctuating foreign exchange rates.
Credit spread risk (CSRBB)	Credit spread risk (spread risk) refers to the risk of loss due to a negative change in the market value of the liquidity portfolio.
Fair value volatility	Fair value volatility refers to the price change due to adverse market movements. MuniFin Group is exposed to fair value volatility through the valuation of financial instruments.
Valuation risk	Valuation risk arises from valuation uncertainties of fair valued financial instruments. Through fair valuations, MuniFin Group is exposed to valuation risk.

ESG risks have been considered in connection to the identified material market risks, not as a separate market risk. From a market risk perspective, MuniFin Group could be exposed to ESG risks from bond holdings, counterparty credit risk or other similar exposures. ESG risks may have a negative effect on the market price of assets held in the Group's liquidity portfolio. Investor demand may shift away from assets associated with higher ESG risks resulting in both decline in market price and lower the liquidity of these assets. Market risks can also arise from funding if there are, for example, significant changes in market conditions. ESG factors can for example impact exchange rates and investor sentiment.

4.1 Market risk appetite

MuniFin Group's objective concerning market risks is to maintain a sound risk profile, keeping inherent financial risks to capital within the boundaries of risk appetite. The Group fully hedges itself from all direct market risks with the exception of a moderate level of interest rate risk in euros and FX-risk related to the collateral management of central counterparty clearing of derivatives. The level of market risk from these two sources are kept at a low level, which is consistent with the conservative market-risk appetite. The Group is also exposed to market risk through fair valuation of assets.

Under the RAF, MuniFin Group has further set risk indicators defining the tolerance for each material market risk. At least on an annual basis, the risk limits and thresholds are reviewed and recalibrated in order to align the RAF with the Group's strategy and external and macro-economic developments.

Due to MuniFin Group's specialised business model, the Group does not have risk appetite for equity, equity index, commodity, or any other similar market risk type. Therefore, there are no risk limits for these market risks. However, MuniFin Group is exposed to these types of market risks through its funding operations. These risks are always back-to-back hedged using derivatives.

4.2 Governance of market risk

Market risk management operates under the three lines of defence framework as described in Governance of risk management in Chapter 2. Market risk management utilises the existing governance structure and processes involving all organisational levels of the MuniFin Group.

1st LoD - Treasury and ALM unit, Funding and Sustainability unit and Capital Market Services unit

MuniFin Group's Capital Markets and Sustainability division that covers the Treasury and Asset and Liability Management unit (Treasury and ALM), Funding and Sustainability and Capital Market Services units is the main responsible for managing market risk. The primary first line risk owner is Treasury and ALM that is responsible for managing the day-to-day market risk positions of MuniFin Group. The Treasury and ALM unit is also responsible for funds transfer pricing, liquidity projections and supporting balance sheet planning and analysis as well as modelling and analysis related to strategic IRRBB management. In addition, the Funding and Sustainability unit, as another first line risk owner, is responsible for executing funding transactions so that both suitability and hedging possibilities of new funding is always assessed according to the set principles before entering into a transaction.

2nd LoD - Risk Management and Compliance division

The second line tasks are conducted by the Risk Management and Compliance division. The Risk Management function identifies, measures, manages, monitors and reports risks independently from the business functions. The Risk Management function also assists and monitors the implementation of risk management practices by the first line of defence. Furthermore, the function ensures that risks remain within the set limits and that MuniFin Group's RAF is in line with the risk strategy and appetite, and provides recommendations for updates and revisions where necessary. The Risk Management function is responsible for the day-to-day risk management and oversight of market risks at MuniFin Group. The independent Compliance function's task is to ensure that MuniFin Group complies with internal and external regulations related to market risk.

3rd LoD - Internal Audit

The third line of defence, the Internal Audit function, conducts risk-based and general audits, independently reviews and provides objective assurance to the Board on the quality and effectiveness of the internal control systems.

Board of Directors and the Risk Committee

The Board reviews and approves, at least on an annual basis, the Market and Counterparty Credit Risk Policy as well as the risk appetite set in the RAF, including the market risk related risk appetite, risk indicators, limits and thresholds. The Board is responsible for the following duties regarding market risk management:

- Setting the scope and general requirements for risk measurement and assessment.
- Defining the principles for organising market risk management and related quality assurance.
- Confirming the risk limits and risk appetite based on MuniFin Group's strategy and business plan.

The main Board's Committee responsible for market risk management is the Risk Committee. The Risk Committee reviews and challenges the updates proposed to the Market and Counterparty Credit Risk Policy. In addition, the Committee is responsible for reviewing market risk related reporting, e.g. RAF indicators.

Executive Management Team (EMT) and division-level management teams

The Board has delegated the following duties regarding market risk management to the EMT:

- Ensuring that all material market risk related processes for various divisions and units are clearly defined and documented in the Group's internal operational guidelines.
- Ensuring that the processes contained within the Group's process documents are up to date and contain the duties and responsibilities for each of the Group's divisions, units or responsible persons.
- Developing and organising the operational work in order to enable efficient market risk identification, measuring, managing, monitoring and reporting.
- Ensuring that the operational environment is continuously monitored and potential effects on market risks are considered.

The EMT has established two executive level decision-making bodies, management teams, to handle market risk management-related matters. Market risk-related management teams (MTs) are the Capital Markets MT and the Risk Management MT. The Capital Markets MT's key duties include management of market risk position of the balance sheet, setting sub-limits for market risks within the risk appetite approved by the Board, steering the IRRBB strategy and deciding on possible strategic mismatch position, monitoring the balance sheet profitability as well as monitoring key RAF indicators and the financial markets. The Risk Management MT's task is to ensure that the Group's risks remain within risk appetite and at a level sufficient to maintain the Group's business continuity, strong credit rating and compliance with relevant regulatory requirements.

4.3 Management of market risk

4.3.1 General principles

The purpose of market risk management is to ensure that the market risk arising from the Group's banking book corresponds to the accepted risk profile as defined in the RAF. The aim is to maintain the overall risk profile at such a level that enables MuniFin Group to maintain its credit ratings equal to those of the Republic of Finland and ensures that customer financing will be secured in all market conditions.

4.3.2 IRRBB

MuniFin Group's strategy for interest rate risk in the banking book (IRRBB) is to ensure sustainable profitability regardless of the level of interest rates. Net Interest Income (NII) is MuniFin Group's main income. The focus is to stabilise earnings by minimising Earnings at risk (mainly NII risk) measure. Economic value of equity (EVE) of interest rate sensitivity is a secondary measure but also kept within risk appetite.

MuniFin Group manages the interest rate risk arising from its business operations by means of using derivative contracts. Interest rate risk arises mainly from minor repricing mismatches between euro floating rate assets and liabilities. Interest rate risk arises from the operations in funding, customer financing and liquidity portfolio investment activities. MuniFin Group does not have a trading book.

The main principle for managing the Group's interest rate risk hedging is to utilise interest rate swaps to hedge fixed-rate exposures back-to-back to floating-rate. The back-to-back interest rate swaps (IRS) replicate all the details of underlying liability, asset or portfolio of assets to offset the risk of the underlying transaction.

As a norm, interest rate hedges are executed on all fixed-rate assets and liabilities with maturities longer than one year. All shorter maturities and floating-rate items are subject to tenor basis risk and fixing risk (seasonal mismatch) management on a balance sheet level and hedged as balance sheet overlay hedges.

The Capital Markets MT decides on a strategic mismatch position, i.e. leave fixed-rate exposures unhedged in order to steer the Group's NII towards the objective of earnings stabilisation. The strategic mismatch position is created using assets only and includes both fixed and revisable rate loans as well as fixed-rate bond investments in the liquidity portfolio. Derivatives are not used in the creation of the strategic mismatch.

Fair value hedge accounting is applied to certain financial assets and liabilities denominated in euros, where the plain-vanilla interest rate of the hedged item has been swapped to a floating rate using derivatives. In addition, fair value hedge accounting is applied to foreign currency denominated financial liabilities with fixed interest rates, which have been hedged by exchanging the principal into euros and the interest rate into a floating rate. The hedging relationships within hedge accounting are documented and they comply with the Group's risk management objectives and strategy. MuniFin Group does not apply cash flow hedge accounting.

For financial assets, the Group applies fair value hedge accounting in accordance with IAS 39 portfolio hedge accounting to lending at fixed rates and long-term reference rates. For the aforementioned financial assets, the hedged risk is interest rate risk. In addition, fair value hedge accounting according to IFRS 9 is applied to fixed rate funding and zero-coupon funding denominated in euros and in foreign currencies and structured lending transactions that pass the SPPI test and that have been hedged 1:1 with an interest rate swap.

The Capital Markets MT is responsible for monitoring MuniFin Group's interest rate risk and for the principles of IRRBB risk management. Treasury supports the Capital Markets MT in relation to IRRBB risk management activities and is responsible for managing interest rate risk at an operational level in accordance with the risk appetite and the decisions made by the Capital Markets MT. Risk Management regularly monitors and reports on IRRBB, both at an aggregate level and sub-portfolio levels.

4.3.2.1 Interest rate shock and stress scenarios

MuniFin Group performs IRRBB calculations based on a number of different interest rate shock scenarios. The calculations are both from an economic value and earnings risk perspective. For earnings risk, MuniFin Group have two separate calculations, one focusing on NII risk and one that also considers the effects on profit and loss or directly in equity.

MuniFin Group has implemented both internally developed scenarios and the Supervisory outlier test scenarios provided in the EBA Final report on Draft Regulatory Technical Standards (EBA/RTS/2022/10). The scenarios cover both parallel shift and non-parallel shifts in the interest-rate curve.

MuniFin Group does not take deposits, and does not model the behavior of non-maturity deposits.

Earnings at Risk and NII risk

Earnings at Risk and NII risk is measured through a financial forecast model for the Group's projected financial income. The impact is mainly assessed in proportion to MuniFin Group's NII, but the Group also calculates separately Earnings risk which combines Fair Value and NII risk. The models include the entire balance sheet of MuniFin Group and takes into account any optionality in the balance sheet.

NII risk is calculated on a daily basis where Earnings at Risk is measured monthly. Both measures calculate the risk for the following 12-month period.

NII measurement compares the projected financial income of the base scenario of the forecast model to a set of selected eight interest rate scenarios. The most negative scenario is used as a measure for NII risk.

Scenarios used are:

1. Parallel shock up (+50 bp)
2. Parallel shock up (+200 bp)
3. Parallel shock down (-50 bp)
4. Parallel shock down (-200 bp)
5. Steepener shock (short rates down and long rates up)
6. Flattener shock (short rates up and long rates down)
7. Short rates shock up
8. Short rates shock down
9. Supervisory Outlier Test (SOT) parallel shock up (+200 bp)
10. Supervisory Outlier Test (SOT) parallel shock down (-200 bp)

NII risk (EUR 1,000)	Impact on NII	In relation to own funds
31 Dec 2025 (short rate shock up)	-38,470	2.3%
31 Dec 2024 (short rate shock up)	-44,430	2.7%

Earnings at risk measurement comprises the projected financial income of the base scenario of the forecast model to a set of selected four interest rate scenarios. The most negative scenario is used as a measure for Earnings risk.

Scenarios used are:

1. Parallel shock up (+50 bp)
2. Parallel shock up (+200 bp)
3. Parallel shock down (-50 bp)
4. Parallel shock down (-200 bp)

Earnings at Risk (EUR 1,000)	Impact	In relation to NII
31 Dec 2025 (parallel shock up +200bp)	-20,070	1.2%
31 Dec 2024 (parallel shock up +200bp)	-23,170	1.4%

Risk Management performs monthly backtesting of the financial forecast model.

Interest rate sensitivity

Interest rate sensitivity or Economic Value of Equity (EVE) measures how much the present value of assets and liabilities will fluctuate due to changes in the interest rate environment. The impact is assessed in proportion to MuniFin Group's own funds. The Group applies eight interest rate scenarios to measure interest rate sensitivity of the balance sheet.

MuniFin currently applies following standard interest rate scenarios:

1. Parallel shock up (+50 bp)
2. Parallel shock up (+200 bp)
3. Parallel shock down (-50 bp)
4. Parallel shock down (-200 bp)
5. Steepener shock (short rates down and long rates up)
6. Flattener shock (short rates up and long rates down)
7. Short rates shock up
8. Short rates shock down

Economic Value of Equity (EUR 1,000)	Impact	In relation to own funds
31 Dec 2025 (parallel shock up (+200 bp)	-133,600	7.8%
31 Dec 2024 (parallel shock up (+200 bp)	-120,170	7.3%

Basis risk

Basis risk refers to the impact of relative changes in interest rates on interest rates for financial instruments that have similar tenors but are priced using different interest rate indices. Unfavourable changes in basis swap spreads may have a negative effect on MuniFin Group's NII. Maintaining a stable earnings profile, even under stressed interest rate conditions, is an important part of ensuring that MuniFin Group is able to operate according to its business model.

For MuniFin Group, basis risk refers to the single-currency basis risk arising from assets and liabilities, which are linked to different EUR reference indices. The basis risk indicator is defined as a negative effect of an unfavourable change in basis swap spreads on NII and calculated as a proportion of own funds. When measuring basis risk, the Group applies two different scenarios:

1. Narrowing basis swap spreads scenario (€STR vs. 3-month Euribor and 3-month vs. 6-month Euribor)
2. Widening basis swap spreads scenario (€STR vs. 3-month Euribor and 3-month vs. 6-month Euribor)

Basis risk is managed continuously by the Treasury unit. Furthermore, the Risk Management and Compliance function is responsible for reporting and monitoring basis risk.

Basis risk (EUR 1,000)	Impact	In relation to NII
31 Dec 2025	-6,330	0.4%
31 Dec 2024	-9,140	0.6%

4.3.3 FX risk

MuniFin Group does not assume any material foreign currency risks from its regular business activities. All MuniFin Group's customer financing is denominated in euros. The Group hedges against exchange rate risks by using derivative contracts to translate all foreign currency denominated funding and liquidity investments into euros at the time of underlying transaction. The functionality of the cross-currency derivatives markets is always assessed before entering into new funding or investment transactions in order to ensure that currency hedges can be put in place and replaced with another counterparty, if deemed necessary. Furthermore, all foreign currency denominated funding transactions with call options are fully hedged, i.e. the hedge mirrors all the features of the issued bond.

Despite this, MuniFin Group is not able to completely hedge out all FX risk, due to the need to conduct daily collateral management in foreign currency when non-euro interest rate derivatives are cleared with Central Counterparties.

MuniFin will avoid cross-currency basis risk on its foreign currency denominated funding and liquidity investments by executing hedges to the maturity date of underlying hedged item. Thus, future changes in the cross-currency bases will not affect MuniFin Group's cash-flow-based risk profile.

The currency position is calculated as the euro-denominated difference between assets and liabilities in various currencies.

Currency position (EUR 1,000)	Position
31 Dec 2025	12,038
31 Dec 2024	10,409

4.3.4 Credit spread risk

Credit spread risk (CSRBB) refers to the risk premium component of a traded instrument, indicating the additional return demanded by investors for an instrument with a specific credit rating instead of investing in the risk-free yield. MuniFin Group has analysed the entire balance sheet and based on the Group's definition of CSRBB concluded that only the liquidity buffer, funding and derivatives are sensitive to credit spread risk. As CVA already covers derivatives and funding is covered by business risk, CSRBB is only calculated for the liquidity portfolio.

For MuniFin Group, CSRBB refers to the risk of loss due to a negative change in the market value or in the earnings of the liquidity portfolio. Credit spread risk is defined as a probability of change in the market value of an instrument, if the market requires return changes. The change may be caused by a change in the instrument's level of risk or a change in the risk sensitivity of the market.

MuniFin performs credit spread market value calculation (CSRBB model) using a Monte Carlo simulation model based on a multivariate distribution. The methodology models credit spread risk on an instrument level, but CSRBB model's results can be aggregated and monitored on a sub-portfolio, rating, duration class, sector, country, region, issuer or even group level. In addition to the credit spread market value calculation, the Group also performs CSRBB earnings calculations.

The liquidity portfolio credit spread risk is managed in Treasury within the portfolio management framework. In active management the primary focus is on market value risk, as earnings risk in the liquidity portfolio are expected to be offset by the funding portfolio.

CSRBB, which affects the market value of liquidity investments, is managed on an aggregate level by controlling the average maturity and composition of the liquidity portfolio. Targets for average maturity and portfolio composition are decided for each year as part of Liquidity and Funding Plan, in association with business planning. Furthermore, Treasury manages spread risk on transaction level by choosing low-risk issuers into the portfolio.

According to MuniFin Group's liquidity policy, all liquidity investments are classified/limited according to their liquidity, credit rating and geographic concentration. Risk Management performs three types of spread risk calculations NII, CR01 and CSRBB VaR. CR01 and NII is analysed in absolute terms where the VaR result is then divided by total bond euro amounts used in the simulation to get the VaR ratio, which describes the relative risk of the liquidity portfolio. Back-testing of the CSRBB model is done and compared from the actual euro changes of the fair values including asset swap protection effect. This will provide a proxy for the credit spread risk in euros, which is then compared to the VaR results with tighter confidence levels and a shorter prediction time horizon, which will match the backtesting period.

Spread risk (EUR 1,000)	Impact	In relation to own funds
31 Dec 2025	-58,500	3.4%
31 Dec 2024	-38,600	2.3%

4.3.5 Fair Value Volatility

MuniFin Group has identified fair value volatility as a material risk for its operations. The Group is exposed to fair value volatility through the valuation of financial instruments. The volatility related to these unrealised changes in IFRS valuations may have a significant negative effect on the Group's profitability and own funds.

For MuniFin Group, the market risk volatility associated with fair valued instruments arises from tenor basis spreads, cross-currency basis spreads and credit spreads.

In accordance with the market practice and IFRS 13 standard, the Group discounts the financial assets and liabilities measured at fair value and the hedged items with the swap curve and the hedging derivatives with the OIS curve, which causes a significant part of the Group's valuation volatility. The Group continuously monitors and analyses the volatility arising from valuations and prepares for its potential profitability and solvency impacts.

Fair value volatility is regularly monitored and reported to capture any changes in the positions or sensitivities to market movements. MuniFin Group has set up daily controls to validate the IFRS valuations and monitor PnL, cost-of-hedging and own credit risk volatility. The Risk Management MT is in

charge of analysing Group's fair values, whereas the Finance Management Team, steered by the CFO, monitors the fair values and is responsible for the final decision of fair values for financial reporting. Fair value risk is regularly also reported to the EMT, Risk Committee and to the Board.

4.3.6 Valuation Risk

Through fair valuations, the Group is exposed to valuation risk. Valuation risk arises from valuation uncertainties of fair valued financial instruments. Prudent valuation refers to additional valuation adjustments (AVAs) that reflect valuation uncertainties of fair valued financial instruments. Fair value is considered "prudent" following the adjustments reflecting all relevant AVAs. The Group applies the Core approach for prudent valuation.

The Group has implemented an efficient control and performance monitoring framework with regards to its valuation models, which aims to ensure the accuracy and appropriateness of model output. The model performance monitoring consists of four main controls:

1. Counterparty valuation control (CVC)
2. Fair value explanation
3. Independent price verification (IPV)
4. Independent model validation.

CVC is performed as part of the daily collateral valuation control by Risk Management, who shall assess any deviations in valuation model output compared to MuniFin Group's own earlier valuations and to counterparty valuations. The results of the assessment are reported monthly to the CFO and quarterly to the Finance MT.

Fair value explanation process consists of daily analysis and explanation of the changes in fair values by Risk Management and a monthly fair value explanation report to the CFO and quarterly to the Finance MT.

The IPV is performed at least monthly as part of MuniFin Group's IPV process by a third-party service provider. The results of the control activities are reported monthly to the CFO and quarterly to the Finance MT. Based on the results, the Finance MT may require making fair value adjustments. At the end of December 2025, there are no fair value adjustments based on the IPV results.

The independent model validation is performed yearly for a subset of MuniFin Group's valuation models by a third-party service provider. The results of the model validation are reported to Risk Management MT and the Finance MT.

4.4 Capital requirements for market risk

MuniFin Group calculates capital requirements for the overall net FX position. The Group hedges against exchange rate risks by using derivative contracts to translate all foreign currency denominated funding and liquidity investments into euros. However, a small temporary exchange rate risk may arise due to collateral management in the clearing of derivatives by CCPs. This exchange risk is actively monitored and managed.

At the end of December 2025 and 2024, the FX position was less than 2% of own funds. There was no capital requirement for market risk since the FX net position did not exceed 2% of the total own funds based on CRR (575/2013), Article 351.

In the evaluation of the credit risk exposure, MuniFin Group uses accounting credit valuation adjustment (accounting CVA) and regulatory CVA (CVA VaR). MuniFin Group calculates CVA VaR in accordance with the standardised approach and it is an estimate of potential unexpected losses.

4.5 Stress testing

MuniFin Group's stress-testing framework documented in the Stress Testing Programme has been developed to be in line with the EBA Guidelines on institutions' stress testing, taking into consideration the principle of proportionality in both the quantitative and the qualitative aspects of stress testing within MuniFin Group.

Group's stress testing performed for market risks covers IRRBB related stress test for earnings and economic value following EBA/RTS/2022/10 and RAF calibration related to IRRBB, FX risk, credit spread risk and fair valuation risk. Market risk is also part of the comprehensive annual ICAAP stress testing exercises and the ECB SSM stress tests.

Stress testing enables MuniFin Group to gain a more in-depth understanding of its individual risk profile (e.g. related to interest rate risk) and thus enhance its risk management activities. Stress testing allows the Group to gain insights into how key measures predicted as part of the planning process could change under different stress situations.

Market risk stress testing is carried out regularly and results are reported to the Risk Management MT, Risk Committee and to the Board.

4.6 Market risk reporting

The market risk related RAF indicators and limits form an important part of the regular market risk monitoring process of MuniFin Group. Performance against the limits and thresholds are monitored on a regular basis and reported to the EMT, Risk Management MT, Capital Markets MT monthly and to the Risk Committee at each meeting and ultimately to each meeting of the Board.

Treasury continuously monitors and manages the balance-sheet interest rate risk. In addition, both Treasury and Risk Management function monitor daily the balance-sheet interest rate sensitivity and other market risk indicators through Risk Management Dashboard application, including both EVE and NII risk.

Both the Board and the EMT receive a monthly RAD report, showing the performance of the key risk indicators against the relevant threshold values, and a quarterly Risk Report providing a more comprehensive analysis on all risk types.

5. Liquidity risk

Liquidity and funding risk is the risk that MuniFin Group is unable to meet its financial obligations as they become due, resulting in an inability to support normal business activities, or a failure to meet regulatory liquidity requirements or rating agency expectations. The Group is exposed to liquidity risk in its customer financing, funding, liquidity portfolio investments and other operations.

MuniFin Group strives to ensure liquidity adequacy under all market conditions, by maintaining a sufficient number of liquidity sources (e.g. short-term and long-term funding). The objective of MuniFin Group's liquidity and funding risk management is to maintain an adequate liquidity buffer and a sustainable funding position and profile, even in stress periods.

MuniFin Group has identified sub-sets of material liquidity and funding risks in the RAF. When identifying liquidity and funding risks, the Group considers the connection between liquidity and funding risk and other risks, such as interest rate risk and credit risk, operational and reputational risk as these risks may have an effect on MuniFin Group's liquidity position.

The table below introduces the material risks and risk indicators set in the RAF for liquidity and funding risk.

Material risks	Risk appetite indicators
Liquidity risk (short term)	Liquidity Coverage Ratio (LCR)
Stable funding risk (longer term)	Net Stable Funding Ratio (NSFR)
Refinancing risk	Financing gap
Risk of insufficient market access	Survival Horizon

5.1 Governance of liquidity risk

1st LoD - Treasury and ALM unit, Funding and Sustainability unit and Capital Market Services unit

In the first line of defence, MuniFin Group's Capital Markets and Sustainability division that covers Funding and Sustainability, Treasury & ALM unit, as well as Capital Market Services is responsible for managing liquidity and funding risk within limits set by the Board. The annual Liquidity and Funding Plan is prepared in cooperation with all units in the Capital Markets and Sustainability division.

Treasury & ALM manages MuniFin's daily liquidity and funding based on the annual Liquidity & Funding plan. The plan is developed in cooperation with other Capital Markets and Sustainability units. In addition, Treasury & ALM drafts and presents operational liquidity plans for Capital Markets MT to meet short-term funding needs and to maintain desired risk appetite for liquidity and funding risks. The unit handles funds transfer pricing, liquidity projections, and conducts ALM planning and analysis.

The Funding and Sustainability unit is in charge of drafting and implementing the long-term funding (over 12 months) plan. It is also responsible for all long-term funding operations of MuniFin Group.

2nd LoD - the Risk Management and Compliance division

The Risk Management and Compliance division, as an independent control function in the second line of defence, is responsible for the risk management policies and framework. The Risk Management function identifies, measures, manages, monitors and reports liquidity risk independently from the business units. It ensures that risks remain within the set limits and that the Risk Management Framework is in line with MuniFin Group's risk strategy and appetite and provides recommendations for updates and revisions where necessary.

Risk Management function is responsible for the day-to-day risk management and oversight of liquidity and funding risk in MuniFin Group. It is also responsible for validation of the FTP (Fund-Transfer-Pricing) methodologies and calculations implemented by the first line of defence. The Risk Management and Compliance division includes also MuniFin Group's compliance function which is responsible for monitoring the Group's compliance with external and internal regulation.

3rd LoD - Internal Audit

The third line of defence, the Internal Audit function, conducts risk-based and general audits, independently reviews and provides objective assurance to the Board on the quality and effectiveness of the internal control system.

Board of Directors and the Risk Committee

The Board is responsible for setting the scope and general requirements for liquidity risk measurement and assessment and for defining the principles for organising liquidity and funding risk management and related quality assurance. Furthermore, the Board confirms the risk limits and risk appetite based on the Group's strategy and business plan and approves the Liquidity and Funding Plan for maintaining liquidity adequacy proportionate to the risk appetite. In addition, the Board approves new debt programs and sets the total amount of debt programs. The Risk Committee assists the Board in the matter of liquidity and funding risks.

Executive Management Team (EMT) and division-level management teams

The EMT's responsibility is to ensure that all material liquidity and funding risk related processes of the various divisions and units are clearly defined and documented in the Group's internal operational guidelines. Furthermore, the EMT ensures that the processes contained within the Group's process documents are up to date and contain the duties and responsibilities for each of MuniFin Group's divisions, units or responsible people. The EMT is also responsible for developing and organising the operational work in order to enable an efficient liquidity and funding risk identification, measurement, management, monitoring and reporting. The EMT makes decisions on updating the debt programmes, provided that the size of the debt program is not increased nor material changes are made to the content of the debt program. In the case of material changes, the decision is made by the Board.

The EMT has delegated part of its duties to two executive decision-making bodies: the Risk Management MT and the Capital Markets MT. The Capital Markets MT is responsible for the first line liquidity and funding risk management related to monitoring and decisions of quality and quantity of liquidity and funding. It also reviews quarterly the Liquidity and Funding Plan and makes decisions on the short-term liquidity plan taking into account the RAF indicators. The Risk Management MT ensures from the second line perspective that risks of MuniFin Group remain within the risk appetite and at a level sufficient to maintain the Group's business continuity, strong credit rating and compliance with relevant regulatory requirements. It monitors the usage and breaches of liquidity and funding risk limits and reports of any material deviations from the risk management policies and guidelines.

5.2 Management of liquidity risk

MuniFin Group's liquidity risk management is based on the Liquidity and Funding Risk Policy. The purpose of the Liquidity and Funding Risk Policy is to set high-level principles by which the liquidity and funding risk is to be identified, measured, managed, monitored and reported within MuniFin Group.

MuniFin Group conducts systematic liquidity and funding planning. The Liquidity and Funding Plan is prepared annually, in connection with the business planning process, and the development of the Liquidity and Funding Plan is reviewed quarterly. The Liquidity and Funding Plan and the quarterly review of the plan include regular back testing. The Liquidity and Funding Plan is an integral part of the Group's ILAAP and it includes forecasting and planning of funding and liquidity position. The Liquidity and Funding Plan is aligned with the ICAAP baseline scenario during the annual business planning process. The plan aims at keeping the level of the Group's liquidity and funding within its risk appetite defined by the Board. It also takes into account economic perspective to ensure a sufficient long-term profitability for the Group. In addition, the plan is complemented by a rolling short-term 3-month operational plan for liquidity management.

The Group has set risk indicators defining the tolerance for liquidity and funding risk in its RAF. At least on a yearly basis, the risk indicators, limits and threshold values are reviewed and calibrated in order to align the RAF with the Group's strategy and external and macro-economic developments. MuniFin Group has set targets and early-warning threshold levels which, when breached, will trigger corrective actions in order to ensure that the Group remains within its risk appetite.

MuniFin Group has implemented a comprehensive Fund Transfer Pricing (FTP) framework based on the matched-maturity, marginal cost principle. The purpose of the FTP framework is to ensure that all users and providers of liquidity are fully aware of the related costs and benefits, to support timely and accurate pricing decisions when transacting new business, and to quantify and ensure awareness of the contribution to profitability arising from the maturity mismatch of assets and liabilities and from interest rate risk. Furthermore, the FTP framework allows business units to be appropriately and correctly incentivised with regards to liquidity and interest rate risk. The FTP framework supports the overall risk management of MuniFin Group in relation to liquidity and interest rate risk and supports sustainable profitability.

MuniFin Group's liquidity risk posture is conservative. The Group strives to ensure liquidity adequacy under all market conditions by maintaining sufficient number of liquidity sources. The primary sources of liquidity are short-term and long-term funding, liquidity buffer (including cash) and repo markets. The secondary sources of liquidity are Central Bank operations and liquidity facility.

MuniFin Group follows the principle of prefunding and acquires its funding in the form of short and long-term funding. For this purpose, the required minimum amount for the liquidity buffer is determined through scenario analyses to meet internal and regulatory liquidity requirements. In the case that the Group needed to acquire additional liquidity, it would first assess the availability of funding from the capital markets in the form of short-term or long-term funding. If this is not available, the Group could utilise its liquidity buffer as a source of liquidity by selling assets or using them as collateral in the repo markets. MuniFin Group has existing agreements in place with counterparties to enter into bilateral repurchase agreements (repo agreements). These repo arrangements could be used to cover funding redemptions in short-term and to cover any unexpected changes in the liquidity position.

The overall liquidity portfolio mainly consists of prefunding that is raised from the markets, but not yet utilised for customer financing. In case of a sudden outflow of funds, the Group holds a liquidity portfolio at such a level that its Liquidity Coverage Ratio (LCR) and Survival Horizon have a sufficient buffer to continue normal operations even under such conditions. Net Stable Funding Ratio (NSFR) is used to measure stable funding risk.

MuniFin Group also maintains a sufficient liquidity portfolio of unencumbered, highly liquid assets to be able to meet its financial obligations even under severe market distress for at least a period of time defined by the Board without any new funding.

The secondary source of liquidity is central bank liquidity facility in the form of the existing central bank open market operations and standing credit facilities. These are considered as an alternative, if primary sources were either not sufficient, available in a timely manner or the cost of using primary sources of liquidity were considered too high in comparison. MuniFin Group may participate in Eurosystem's open market operations and use standing facilities. The minimum reserve requirement applies to MuniFin Group, and thus is required to deposit a certain amount of funds with the Bank of Finland (31 Dec 2025 EUR 38 million). MuniFin Group has pledged part of its lending portfolio to the Bank of Finland in order to ensure access to this secondary source of liquidity (31 Dec 2025 EUR 4,705 million).

MuniFin Group's funding is acquired mainly from international capital markets. The Group's funding strategy is to diversify its funding sources, which aims to ensure the availability of funding under all market conditions. MuniFin Group actively diversifies its funding across different currencies, markets, maturities, geographical areas and investor types. Active long-term cooperation with investors has increased name recognition of MuniFin Group in different markets. The Group has a number of debt programmes that enables to have access to funding at all time at competitive price. MuniFin Group has following programmes available for long-term funding:

- Medium Term Note (MTN) programme of EUR 50 billion. Green bonds and Social bonds are issued under this programme.
- AUD debt programme of AUD 2 billion (Kangaroo – Kauri programme), specifically for the Australian and New Zealand market.

For short-term funding, MuniFin Group has following programmes and arrangements available:

- Euro Commercial Paper (ECP) programme of EUR 10 billion.
- Repo transactions with selected interbank counterparties under the Global Master Repurchase Agreement (GMRA), where Group's debt securities in the liquidity portfolio may use as collateral.

MuniFin Group's funding is guaranteed by the Municipal Guarantee Board (MGB), which has the same credit ratings from Moody's and Standard & Poor's as MuniFin and the State of Finland. The MGB is a public-law institution whose members are all Finnish mainland municipalities. The MGB granted guarantees for the debt programmes, as well as for funding arrangements outside the programmes. Based on this, debt instruments issued by MuniFin are classified as zero-risk when calculating the capital adequacy of credit institutions and solvency of insurance companies, and as Level 1 liquid assets in liquidity calculation in the EU. As defined in the Act on the Municipal Guarantee Board (487/1996) MuniFin has pledged a sufficient amount of loans for the MGB's guarantee.

5.3 Contingency Funding Plan

The MuniFin Group maintains a Contingency Funding Plan (CFP), which will be activated in the event of a liquidity crisis. The CFP provides a framework for recognizing, managing and responding to possible future liquidity and funding stress events. The objectives of the CFP are to:

- Ensure that the Group can meet its commitments as and when they fall due.
- Identify specific triggers that prompt liquidity management activity.
- Provide an escalation methodology.
- Provide a range of management actions available in the event of a liquidity crisis.
- Provide a clear mechanism for communication and coordination under a liquidity stress with specified roles and responsibilities.
- Clearly defining and documenting the circumstances when the plan should be involved.

Furthermore, the CFP addresses the risks identified in MuniFin Group's ILAAP and presents possible management actions that could be implemented in such liquidity stress periods.

The risk indicators, limits and thresholds used for the CFP purposes are leveraged from MuniFin Group's RAF. It should be noted that a breach of any of the thresholds for liquidity and funding risk indicators in itself does not indicate that MuniFin Group should automatically implement CFP operational actions, rather it should be used as an indicator that the Group may be experiencing a level of liquidity stress, which may need prompt actions.

The governance processes to manage the Group's liquidity and funding risk profile under a liquidity crisis situation is aligned with the existing governance structures and processes.

5.4 Measurement and reporting of liquidity risk

MuniFin Group's risk indicators for liquidity and funding risk are set to measure the sustainability of its funding position and the adequacy of its liquidity buffer, in both normal and stress periods.

For measuring short-term liquidity risk, MuniFin Group uses Liquidity Coverage Ratio (LCR) as a risk indicator. LCR measures the adequacy of the Group's high-quality liquid assets (HQLA) to cover total net cash outflows over a 30-day period under regulatory defined stress assumptions. The regulatory minimum requirement for the LCR is 100%. The ratio measures MuniFin Group's ability to operate even under negative market conditions. Due to the amount of callable funding, the Group's net outflow fluctuations cause volatility to the ratio. Thus, large enough liquidity buffers are maintained to keep the LCR at an acceptable level.

Stable funding risk (long term) is the risk that MuniFin Group does not have sufficient stable funding available to cover its funding needs in the long term. To mitigate this, the Group ensures that it has sufficient long-term funding (> 1 year) to cover the funding needs of its assets (e.g. loans and liquidity portfolio). This is measured by the Net Stable Funding Ratio (NSFR), which measures the amount of long-term stable funding relative to funded assets and off-balance sheet liquidity exposures. MuniFin Group complies with the NSFR minimum requirement of 100%.

Refinancing risk occurs when MuniFin Group is holding assets with a longer-term maturity than that of its liabilities. The risk is that liabilities will need to be refinanced at an unacceptably high cost or, in extreme cases, cannot be refinanced at all. Refinancing risk is measured using the financing gap risk indicator. The financing gap risk indicator measures the difference between the average maturity of assets, i.e. customer financing and liquidity portfolio, and the average maturity of liabilities, i.e. the funding portfolio.

One goal of MuniFin Group's risk appetite is to ensure that it has sufficient liquidity under both normal and stressed market conditions. The Group aims to have a sufficient liquidity buffer to be able to continue normal operations under extraordinary circumstances in which its access to the funding markets has temporarily ceased. Liquidity buffers are of the utmost importance in times of stress, when MuniFin Group has an urgent need to raise liquidity within a short timeframe, and normal funding sources are no longer available or do not provide enough liquidity. These buffers, composed of cash and other highly liquid unencumbered assets, should be sufficient to enable the Group to "survive" during its defined survival horizon without requiring adjustments to its business operations. This risk is included in the RAF and measured by the Survival Horizon risk indicator.

Liquidity and funding risk indicators are reported to the Board and the EMT regularly. Both bodies are informed of any material changes in MuniFin Group's liquidity risk profile or position and of any necessary actions which should be taken in order for the Group to remain within the set risk appetite. In addition to this, ad-hoc reporting is prepared in the event that any liquidity and funding risk appetite thresholds are breached. These breaches are reported immediately to the CRO, who in turn escalates the issue according to the escalation processes set out in the RAF.

For operational purposes, MuniFin Group has daily liquidity risk dashboards for liquidity management and planning purposes. Daily liquidity projections are produced and they are taking into account forecasted new business and the latest call forecast. The Risk Management monitors, on a daily basis, the development of the RAF liquidity risk indicators.

5.5 Internal Liquidity Adequacy Assessment Process (ILAAP)

In the ILAAP performed annually, MuniFin Group assesses the adequacy of its liquidity resources to cover the forecasted liquidity needs under the business-as-usual and stress scenarios. The ILAAP is an integral part of MuniFin Group's risk management framework that includes other strategic processes such as RAF, ICAAP, Recovery Plan and remuneration framework.

Stress tests are required to assess the Group's liquidity adequacy in a comprehensive, integrated and forward-looking manner. The ILAAP consists of a baseline scenario and adverse scenarios and is fully aligned with the ICAAP baseline scenario; the only exception being the assumed restricted access to funding markets. All liquidity risk indicators from the RAF and other liquidity indicators used by MuniFin Group are included in the ILAAP.

5.6 Liquidity stress testing

Liquidity stress testing is a key tool used by MuniFin Group to assess liquidity adequacy and these stress tests are mainly performed regularly. The main objective is to determine whether the Group has sufficient liquidity to continue its normal business operations under both business-as-usual or baseline scenario and stress scenarios. Stress-testing scenarios are also used to calibrate the RAF threshold values for liquidity and funding indicators. In addition, the Group applies liquidity and funding risk related stress testing in order to define a downward scenario for the Liquidity and Funding Plan.

The scenarios used in the stress test have been designed with due consideration of the scope and specificities of the Group's operations. The scenarios are reviewed regularly and updated whenever market conditions change.

5.7 Liquidity risk statement

The EMT of MuniFin Group acknowledges that the liquidity risk position of MuniFin Group is strong and that the key ratios for liquidity has remained within the set risk appetite during year 2025. The EMT also assures that the liquidity risk management systems put in place are adequate with regard to the Group's profile and strategy.

Key liquidity ratios as of 31 December 2025:

LCR	225%
NSFR	121%
Survival Horizon	12 months

6. Operational risk

Operational risk means the risk of loss resulting from inadequate or failed internal processes, people and systems or from external events including legal, conduct and compliance risks. Strategic risks are excluded from operational risks.

MuniFin Group has a low-risk appetite for operational risks. However, operational risks are closely related to all business operations, and they cannot be totally eliminated. Therefore, MuniFin Group aims to minimise operational risks related to its business and operations by carefully identifying and analysing the impact and probability of these risks. The objective of MuniFin Group's operational risk management is to maintain an effective operational control and compliance to support functional and responsible operations.

6.1 Governance of operational risk

In accordance with the Risk Management Policy, the management of operational risks is organized into three lines of defence. MuniFin Group's divisions and units are accountable for the operational risks related to their areas of responsibility. They are also responsible for managing operational risks within the limits set by the RAF.

MuniFin Group's independent Risk Management and Compliance division is responsible for developing and maintaining the framework for managing operational risk and for supporting and controlling the first line of defence in their implementation of the operational risk framework. The Compliance and Operational Risks function maintains adequate operational risk policies and procedures. In addition, the function monitors and reports the adequacy and effectiveness of the operational risk framework on a regular basis to the Board.

The same function is responsible for developing and maintaining the framework for managing compliance risk. It also supports the first line of defence in the implementation of the compliance risk framework.

The Compliance and Operational Risks function reports to the Risk Management MT and to the CRO on a regular basis on all operational risk incidents and controls needed. The Risk Management MT decides if any further actions are needed. It also reviews and approves the findings of the annual operational risk self-assessment process. Given the scale of the matter, the issue may be referred by the Risk Management MT to the EMT or, where appropriate, to the Board. In addition, to ensure the independence of the Compliance function, the Head of Compliance may report directly to the Board's Audit Committee and to the CEO.

Internal Audit performs regularly risk-based audits in the operational risk area in accordance with the annual plan approved by the Board.

The Board approves the principles of operational risk management. The Risk Committee of the Board assists the Board on matters concerning the Group's risk strategy and risk appetite level, for example, by evaluating changes in the operational risk management policy. The Risk Committee supports the Board in the supervision that the Group adheres to the risk strategy approved by the Board.

6.2 Management and measurement of operational risk

Operational risks are recognised as part of the Group's daily operations and processes. This has been supplemented by an annual operational risk assessment, which is carried out by units through a self-assessment led by the Compliance and Operational Risks function. The assessment of risks is conducted by assigning the probability of the occurrence and the impact on the materialisation of the event. In addition, mitigation actions are recognised and agreed.

Each division's and unit's responsibilities include continuous management of operational risks. In addition, the Group's Risk Management and Compliance division supports other divisions and units and have the responsibility at the Group level for coordinating the management of operational risks.

MuniFin Group uses various methods for managing operational risks. The Group has internal policies approved by the Board and supplementing internal guidelines approved by the management in order to guide operations. Operational risks are also covered by the RAF approved by the Board. Internal instructions and processes are updated on a regular basis, and compliance with them is supervised. The tasks related to business activities, risk control, back-office functions and financial accounting are separated. The Group has adequate backup systems to ensure the continuity of key functions. The expertise of the personnel is maintained and developed through regular development discussions and training plans.

The Group has a contingency plan for situations in which business operations are interrupted. The plan is designed to ensure that the Group is able to continue functioning and to limit its losses in different disruptive scenarios. The business continuity and crisis management also include a disaster recovery plan for technical infrastructure and IT systems. MuniFin Group's business continuity is the responsibility of the EMT. The annual operational risk survey and the operational risk-event reporting process support the Group's continuity planning. In addition, the Group has insurance policies related to its operations and the level of the insurance coverage is assessed on a regular basis.

MuniFin Group's Compliance function continuously monitors the development in legislation and regulations issued by authorities relevant to the Group's operations and ensures that any regulatory changes are appropriately responded to. The legislation and regulation concerning the operations of credit institutions have faced significant changes during the past few years and will continue to change in the future, which creates challenges for the Group's Compliance unit. The Group mitigates this risk by maintaining active contacts with the authorities and interest groups as well as through the organisation of the Group's internal Compliance function (incl. system support, reporting and evaluation of effects).

MuniFin Group has a whistleblowing process in place for reporting potential internal or external misconduct, breaches of ethical standards and internal or external rules. The whistleblowing channel for employees and other stakeholders is a safe way to report any misconduct. Concerns can be raised anonymously and confidentially through MuniFin's website.

MuniFin Group has significant information system and business process related projects aimed at improving the quality, efficiency and regulatory compliance of current operations. The extent of these projects creates operational risks that the Group strives to minimise by developing and implementing models related to project management and monitoring (incl. regular reporting) and ensuring sufficient resources. The risks related to development projects are surveyed and monitored regularly. In addition, project audits are in scope of the internal audit when included in the annual audit plan.

The Group has an approval process for new products and services. The process aims to ensure that all material risks and operational requirements are taken into account when developing new products and services. The process applies also to material adjustments of the existing products and services.

The realisation of operational risks is monitored with systematic operational risk event reporting, which is used to change operating principles or implement other measures to reduce operational risks where necessary. Operational risk events are reported to the EMT and the Board. No material losses from operational risks have been realised during 2025.

6.3 Minimum own funds requirement for operational risk

MuniFin Group calculates the minimum own funds requirement for operational risk in accordance with Articles 311a–315 of CRR. MuniFin Group has utilised the so-called Prudential Boundary Approach (PBA) for the financial component in the calculation of operational risk, based on the European Banking Authority's no-action letter (dated 12 Aug 2024) related to the postponement of the implementation of the Fundamental Review of the Trading Book (FRTB) regulation.

The postponement of the FRTB regulation's implementation has created a situation where derivative contracts that hedge market risks in banking operations would be classified in the trading book without their impact being netted with the hedged item in the calculation of operational risk requirement. According to MuniFin Group's assessment, the Group does not have trading activities, so it has decided to utilise the PBA method in the capital adequacy calculation for 2025. The Group believes that after the removal of the temporal differences related to the regulation, the approach can be applied in 2027, and applying the approach already in 2025 provides an accurate picture of MuniFin Group's capital adequacy. The impact of the PBA method is estimated to be approximately 21 percentage points. Without the PBA method, the Group's CET1 capital ratio was almost five times the required minimum capital, taking capital buffers into account.

7. Information on governance arrangements

Information on governance arrangements is described in a separate document, Corporate Governance Statement 2025, which is available on MuniFin's website.

8. Remuneration policy

8.1 Remuneration of the Board of Directors

In accordance with MuniFin's articles of association, the fees paid to the members of the Board of Directors are decided by the Annual General Meeting (AGM). The remuneration of a Board member consists of a fixed annual fee and meeting fees. The remuneration of each Board member is paid for a term starting from the end of an AGM and ending at the end of the next AGM. In 2025, the Board members were paid in accordance with the resolution of the AGM 2024 until the AGM held on 25 March 2025 and thereafter in accordance with the resolution of the AGM 2025.

The AGM 2024 confirmed the following fees for the Board members:

- Annual fee for the Chair of the Board EUR 45,000.
- Annual fee for the Vice-Chair of the Board EUR 29,000.
- Annual fee for the Chair of the Audit Committee and the Chair of the Risk Committee EUR 31,000.
- Annual fee for a member of the Board EUR 25,000.
- To the members, a fee of EUR 600 per a Board and a committee meeting attended; and to the chairs, EUR 950 per meeting attended. Such fees are also paid per each meeting required by authorities.

The AGM 2025 resolved that the annual fee of the Chair of the Board is increased by EUR 6,000, the annual fee of the Vice-Chair is increased by EUR 4,000 and the Chairs of the Audit Committee and the Risk Committee is increased by EUR 5,000 and annual fee of a member of the Board is increased by EUR 3,000. The AGM confirmed the following fees:

- Annual fee for the Chair of the Board EUR 51,000.
- Annual fee for the Vice-Chair of the Board EUR 33,000.
- Annual fee for the Chair of the Audit Committee and the Chair of the Risk Committee EUR 36,000.
- Annual fee for a member of the Board EUR 28,000.
- To the members, a fee of EUR 600 per a Board and a committee meeting attended; and to the chairs, EUR 950 per meeting attended. Such fees are also paid per each meeting required by authorities.

Travel expenses and per diem allowances are paid in accordance with the Company's travel policy.

Remuneration paid to the members of the Board (EUR 1,000)	2025	2024
Kari Laukkanen, Chair	74	65
Maaria Kettunen, Vice Chair	48	43
Liisa Harjula, member from the AGM held on 25 March 2025	31	-
Markku Koponen, member until the AGM held on 25 March 2025	11	47
Juho Malmberg, member from the AGM held on 25 March 2025	31	-
Tuomo Mäkinen	37	38
Henrik Rainio, member from the AGM held on 25 March 2025	32	-
Minna Smedsten, member until the AGM held on 17 May 2024	-	14
Denis Strandell, member until the AGM held on 25 March 2025	9	37
Elina Stråhlman	47	23
Leena Vainiomäki	53	49
Arto Vuojolainen	39	38
Total	**411**	**354**

More quantitative information on the remuneration is presented in other parts of this Report. For the sake of clarity, the Board of Directors is the management body in its supervisory function of MuniFin and any reference to the remuneration of such a body means the remuneration of the Board of Directors. The members of the Board are not employed (i.e. are all non-executive members) by the Company and are not covered by the Company's Remuneration Policy.

At the end of 2025, the members of the Board were Kari Laukkanen (Chair of the Board), Maaria Kettunen, Liisa Harjula, Juho Malmberg, Tuomo Mäkinen, Henrik Rainio, Elina Stråhlman, Leena Vainiomäki and Arto Vuojolainen. In 2025, the Board convened 12 times. The Board of Directors has established an Audit Committee, a Risk Committee and a Remuneration Committee and their roles in relation to remuneration are explained under the section 8.2.1 Remuneration Governance. During 2025, the Audit Committee convened eight times, the Risk Committee eight times and the Remuneration Committee four times. Furthermore, MuniFin has a Shareholders' Nomination Committee established by the AGM and its members are not paid any remuneration.

8.2 Remuneration of the Executive Management and the Employees

8.2.1 Remuneration Governance

Role of the Board of Directors and the Remuneration Committee

MuniFin has a Remuneration Policy approved by the Board of Directors, which applies both to the executive management and to all employees. One remuneration framework applies to the executive management and the entire staff, unless otherwise decided due to the nature of employment (e.g. temporary employments). Internal Audit is not included in the remuneration framework.

The Board of Directors decides all principles related to variable remuneration including the Remuneration Policy and changes thereto, setting of the Company level targets, assessment of the achievement of Company-level targets and subsequent performance pay, variable remuneration paid to the CEO and persons reporting to the CEO and any changes to their fixed remuneration. The Board also follows the total remuneration of the entire personnel with the assistance of the Remuneration Committee. In addition, the Board assesses the Remuneration Policy annually and determines the payment of deferred remuneration in accordance with the regulations. The Board is entitled to decide on any changes or termination of the remuneration framework at any time.

The Board of Directors decides the remuneration paid to the CEO and their deputy, and the terms of their employment. Furthermore, the Board of Directors confirms the remuneration paid to the employees who report directly to the CEO (fixed remuneration of the Head of Internal Audit is decided by the Audit Committee) based on a proposal made by the CEO. The key employee responsible for internal control (Executive Vice President, Risk Management and Compliance) is part of the Executive Management Team (EMT) and the remuneration of EMT members is conditional to Board approval. The Board also monitors the remuneration of the material risk takers (including the remuneration of the internal control functions such as compliance). The head and personnel of Internal Audit, which is part of the Company's third line of defence, are not subject to variable remuneration.

The purpose of the Remuneration Committee is to prepare all remuneration related Board-level matters for the Board discussion and decision-making, and to advice the Board. The main duties of the committee include but are not limited to:

- Overseeing the remuneration process with the assistance of the HR and internal control functions.
- Preparing the Board decisions on remuneration.
- Preparing setting and assessment of the achievement of company level targets.
- Preparing and monitoring of the remuneration of the CEO, the Deputy to the CEO, and the members of the EMT (also independent control functions) and the employees who report directly to the CEO, as well as of other identified employees.

At the end of 2025, the members of the Remuneration Committee were Kari Laukkanen (Chair), Maaria Kettunen, Tuomo Mäkinen and Leena Vainiomäki.

Other stakeholders

The Risk Committee monitors the setting of targets and variable remuneration to ensure compliance with the Company's risk appetite. The CRO and the Head of Compliance and Operational Risk Unit also provide the Board of Directors and its Committees with statements on whether the targets and remuneration are consistent with the Company's risk appetite and regulations.

The Audit Committee's role is to assist the Board in duties related to internal controls, financial reporting and internal and external auditing.

The internal audit provides the Remuneration Committee and the Board of Directors with an annual statement on whether or not the Remuneration Policy has been complied with when deciding on variable remuneration. In addition, the internal audit regularly assesses the Remuneration Policy and the related documentation and the processes to the extent required by the legislation.

8.2.2 Structure of the Remuneration System

Fixed remuneration, benefits and pensions

Remuneration paid to the executive management and to the employees comprises of fixed remuneration (salary in money and benefits in kind) and variable remuneration. A car benefit may be part of an individual's fixed total salary in defined positions. MuniFin does not offer any unusual benefits in kind. A fixed total salary forms the major portion of the total annual remuneration paid to the executive management and to other employees.

The pensionable age and pensions of the executive management and the employees are determined in accordance with the Employees' Pensions Act. Some members of the EMT (starting in the position before 2018) have a contribution-based group pension insurance taken out by the company. Pension can be paid from the insurance to members who have turned 63. In 2025, the CEO and the members of the EMT entitled to this pension on 1 Jan 2025 were paid a total of EUR 62,112.26 in pension insurance (EUR 62,112.26). The contribution-based pension benefit is part of fixed remuneration and not dependent on performance.

If the Company dismisses the CEO, the period of notice is six months. The CEO's benefits in kind (car, meal and telephone benefit) are cancelled at the end of the period of notice. Should the Company give notice to the CEO for reasons beyond him or her, the Company shall pay the CEO's salary for the period of notice and a severance pay corresponding to the CEO's total salary of six months.

In accordance with MuniFin's strategy approved by the Board of Directors, MuniFin follows the development of salaries and remuneration in the finance sector and the operating environment. An evaluation has been carried out for each position to establish sufficient comparability with market data. The help of KornFerry Oy has been used for market comparisons that have been based on evaluation of each position and related classification of positions. The Company has also obtained benchmark data of the remuneration of the management roles by participating in the remuneration study of PricewaterhouseCoopers Oy. The purpose of using external support is to ensure that the remuneration framework is consistent with the market practice.

Variable remuneration

MuniFin's business model and strategy are the key drivers of its financial success. Variable remuneration is always based on performance supporting MuniFin's business model, strategy and annual planning. The purpose of the variable remuneration is to promote achievement of challenging targets, to ensure availability and retention of skilled employees and to ensure and promote sound and effective management of remuneration process and practices considering MuniFin's business model, risk profile (including all risk types), corporate values, and the size of the organisation.

Within the remuneration framework, all targets have a maximum level, a target level and a minimum level and the remuneration amount is paid based on achieving those levels. Even if the maximum level of a target is exceeded, the variable remuneration cannot exceed the maximum amount of remuneration and correspondingly, if the minimum level is not reached, no remuneration will be paid. The target and maximum remuneration levels vary by the remuneration category. In accordance with the Remuneration Policy, a maximum of the variable pay cannot exceed 100% of the fixed pay. The General Meeting can decide to increase the ratio to 200%, but such a decision requires a majority of the shareholders' votes in accordance with the national laws. No proposal to increase the ratio has been made to the General Meeting.

The targets and the weights of the targets related to the variable remuneration framework are set for each calendar year (earnings year). Across all pay grades, the variable remuneration is based on both company level and individual performance targets. The targets are set to support the company's strategy, operational targets and efficient risk management. The targets may not encourage employees to take risks that exceed the confirmed risk appetite. The weight of company and individual level targets varies between the remuneration categories. The CEO and the members of the EMT have company level targets, in addition to which they have their individual performance targets, relating to each member's respective area of responsibility, set by the Board. The targets for the other staff are also set on the company level, in addition to which individual targets are set. Excellent individual performance in individual targets may be rewarded with special remuneration and poor individual performance may decrease the outcome of the company level performance targets.

A company level performance appraisal is approved by the Board of Directors, and personal performance appraisals are approved by the supervisors. Remuneration of the people working in the key control functions is not linked to the business operations they are controlling, but only to the performance of the entire company, their own unit and the person in question. Their company level target is the Company's operating profit, company's sustainability target and company's development targets. The Board of Directors approves the remuneration of the CEO and the employees reporting directly to the CEO. The CEO approves the remuneration paid to the other employees. In accordance with the Remuneration Policy, the set performance targets may be adjusted (by the same body having approved the original target) in case of substantial extraordinary events during the performance year. This kind of event may be e.g., extraordinary changes in the business or market environment, an acquisition or a divestment, a considerable investment, an incidental capital gain or loss, an outside and unforeseen circumstance that has an impact upon fulfilment of the targets or any other circumstance that could not be considered upon election of performance criteria but has a material impact on the achievement of the targets. Furthermore, the CEO or the Board has the right to decide on the non-payment or reduction of variable remuneration at any time, as described in more detail in the section 8.2.3 Risk Adjustments, subsection Ex Post Risk Adjustments.

Variable remuneration based on company level targets is paid annually, after the Board of Directors has approved the Financial Statements for the earnings year. The recipients of remuneration may not use financial instruments to protect themselves against personal risk related to variable remuneration. All variable remuneration is paid in cash. Therefore, due to the Finnish labour law, MuniFin does not have a clawback right on any paid remuneration. However, this would be possible through a court claim if there was evidence that a person has gained variable remuneration unlawfully. Special remuneration based on excellent performance in individual targets may be paid during the year at the end of each assessment period.

MuniFin does not give guaranteed variable remuneration in any form.

Due to restrictions on the ownership of the Company in accordance with MuniFin's Articles of Association there are no shareholding requirements of any kind that may be imposed on the identified employees or any other employee or management.

Deferral of variable remuneration and application of other regulatory requirements

According to Article 450(1)(k) of the Capital Requirements Regulation (CRR), MuniFin applies the exemption provided for in the Capital Requirements Directive (and Chapter 8, Section 1 of the Act on Credit Institutions enacted on the basis thereof), according to which the deferral of variable remuneration and the use of other instruments in the payment of variable remuneration do not apply to persons whose variable annual remuneration does not exceed EUR 50,000 and does not exceed one third of the person's fixed annual salary. Pursuant to the Article 94(3) point (b), MuniFin derogates from the points (l) and (m) of Article 94(1). In 2025, 184 (185) persons benefitted from the derogation and their total fixed remuneration was EUR 16,155,970.08 (EUR 14,647,823.98) and variable remuneration EUR 1,447,462.42 (EUR 1,862,745.33).

If an individual's variable remuneration for the earnings year is EUR 50,000 or more, 60% of the remuneration shall be paid over the following year, and 40% shall be deferred and paid in instalments of equal amounts over the four years following the payment year. However, the deferral period for the CEO and other members of the EMT is five years. The limit of EUR 50,000 applies to all individuals, regardless of their position in the company. In addition, if the variable remuneration exceeds EUR 135,000, 40% of the remuneration shall be paid over the following year and 60% of the remuneration shall be deferred.

Furthermore, if the variable remuneration of an employee exceeds one-third (1/3) of the total remuneration, including the fixed salary and variable remuneration of an employee, the payment of the variable remuneration shall be deferred. The minimum time for deferral is four years.

Variable remuneration is invariably paid in money. The Company does not have any share- or option-based remuneration due to the specific business model and the ownership restrictions laid down in MuniFin's Articles of Association, which prevent all employees and management from holding or acquiring the shares of the Company.

For those who the deferral rules apply to, half of the variable remuneration is tied to the development of Municipal Finance's Common Equity Tier 1, CET1 (a class of instrument used in remuneration in compliance with the regulations). According to the terms and conditions, the value of variable remuneration can be temporarily reduced if the Company's CET1 capital falls below 14,9%. Finally, for those who the deferral rules apply to, variable remuneration is subject to a 12-month waiting period, referring to the time between the remuneration decision and the payment of remuneration.

Severance Payments

The CEO, the members of the EMT and certain key function holders are entitled to severance pay as determined in their director contracts, if the Company terminates the contract for reasons beyond their control. The Board approves the terms of director contracts. A fixed salary payment during the notice period is not considered to be a severance payment.

8.2.3 Risk Adjustments

Key Risks

The key risks of MuniFin are described in other parts of this Report.

Ex Ante Risk Adjustments

MuniFin has a very simple business model having only one business line, financing its customers. Nevertheless, success in business requires other functions such as funding and liquidity portfolio management. MuniFin's aim is to keep the overall risk profile at such a low level that MuniFin's credit rating remains equal to that of the Republic of Finland and to secure customer financing even under negative market conditions. This results in a very conservative risk profile and compared to other credit institutions in general, limiting widely an individual employees' powers for risk taking is limited.

As described above, MuniFin's business model, alone, protects MuniFin from excessive risk taking. It is in practice, impossible, to exceed the approved risk appetite without breaching internal guidelines. MuniFin does not have trading activities or commission-based remuneration scheme. The maximum amount of variable remuneration per employee is moderate and consistent with MuniFin's low risk profile. The amounts of remuneration are well known in advance, and they cannot unexpectedly exceed the predetermined maximum amount.

The CRO reviews the performance target setting process and confirms that it does not pose a threat to MuniFin's capital or liquidity. The Compliance function reviews the target setting process to confirm the compliance with regulation.

Ex Post Risk Adjustments

Variable remuneration is based on an actual performance, and the Company does not commit to paying variable remuneration in advance. The Board of Directors is always entitled to make the final decision on changing or terminating the remuneration framework or not paying variable remuneration.

After the calculation of variable remuneration, the CEO or the Board determines if the variable remuneration can be confirmed to be earned by an employee and paid. Depending on the employee's position, the CEO or the Board has the right to decide on the non-payment or reduction (malus) of variable remuneration at any time. The decision on non-payment can be made on the company or an individual level, depending on the reasoning. A risk-based approach may lead to the non-payment decision if the payment would endanger company's capital adequacy, liquidity or otherwise would be against sound business practices. The risk determination has a specific focus on the RAF indicators and breaching the indicators may lead to the non-payment. The actions of individual persons are also considered in the risk-based approach. With any deferred payments, the risk determination will be done again when the deferred amounts are due.

Material Risk Takers

The Company conducts annually a self-assessment to identify all employees whose professional activities have or may have a material impact on the institution's risk profile. The self-assessment is conducted based on criteria laid down in applicable legislation.

The Company maintains a list of the persons considered as the material risk takers. The positions at the Company meeting the criteria are identified in the Remuneration Policy and are as follows:

- The CEO and all other members of the EMT.
- The heads of the following units: Customer Relations, Customer Finance Services, Funding and Sustainability, Treasury and Asset and Liability management, Capital Markets Services, Risk Management and Analytics, Compliance and Operational Risks, Credit and ESG risks, Legal, Financial Control and Regulatory Reporting, Business Planning and Data Management, Business System Development, ICT Services and Production.
- Members of the Risk management and Compliance Management Team.
- Members of the Capital Markets and Sustainability Management Team.
- Members of the Credit Group.
- The following staff members of Treasury and Asset and Liability Management: Senior Managers, Managers and Senior Analysts.

8.2.4 Variable Remuneration in 2025

In 2025, the variable remuneration was paid based on the Board approved remuneration framework and the 2024 performance targets set therein. The company level targets of 2024, affecting the variable remuneration of all employees, focused on the Company's operating profit, and customer satisfaction as well as sustainability. The economic targets were in line with the Company's risk appetite and were based on the economic forecasts for the company, taking into account the limits and the limitations of activities. In addition, in 2025 MuniFin paid remuneration that had been awarded from previous years and deferred for 2025.

In 2025, the target variable remuneration of the CEO and the members of the EMT corresponded to 2.5 months' fixed salary, with a maximum remuneration amount corresponding to 5 months' salary. For the remaining remuneration categories, the target remuneration levels varied between amounts corresponding to 1 months' and 2 months' salary, with the maximum remuneration levels of 2 to 4 months' salary. Ratio of a maximum remuneration to a fixed annual salary is 39.7%, taking into account holiday compensation, for the CEO and the other members of the EMT and between 15.7% and 31.7% for the other remuneration categories. A maximum remuneration amount can only be considered in cases of exceptional performance. In 2025, the maximum remuneration was not paid to any individuals out of all individuals covered by the Remuneration Policy. In 2025 the Company did not employ any individuals whose remuneration exceeded a million euros during the financial year. In 2025, the amount of paid variable remuneration to CEO corresponded 2.7 months' salary (3.2), for deputy to the CEO the amount of paid variable remuneration corresponded 3.7 months' salary (2.4) and for other members of the EMT the amount corresponded 3.0 months' salary (3.4). The variable remuneration paid for CEO was 21.4% (25.0%) of fixed remuneration in 2025, for the deputy of CEO 28.7% (18.9%) and for other members of the EMT 22.8% (26.9%) of fixed remuneration.

More detailed quantitative information on the remuneration paid in 2025 is disclosed in the other parts of this report.

8.2.5 Changes to the Remuneration Policy

No material changes were made to the remuneration policy in 2025.

9. Environmental, Social and Governance risks (ESG risks)

9.1 Qualitative information on ESG risks

9.1.1 Business strategy and processes

For MuniFin Group, sustainable business operations – economically, socially and environmentally – are at the core of its strategy. The main risk mitigation approach for risks, including ESG risks, is embedded in MuniFin Group's specific business model. As defined by the Act on Municipal Guarantee Board, the MGB guaranteed funding is intended exclusively for a limited customer base consisting of local and regional government entities and affordable social housing organisations, which are considered low-risk entities. Due to this regulation, the Group's strategy cannot be broadened to any higher-risk customers. MuniFin Group's customers are public sector and affordable social housing organisations, whose operations are aimed at maintaining and improving the Finnish welfare state. MuniFin Group finances both socially responsible and environmentally sustainable projects, such as schools, day-care centres, public transportation, hospitals and affordable social housing. MuniFin Group supports its customers in making sustainable choices and encourages sustainable investments through information sharing, competitive pricing, impact assessment and visibility.

The Group emphasises the importance of ESG risk management and the increasing ESG requirements for its customers. It is crucial for MuniFin Group that its customers are well-informed about ESG risks, as this awareness is essential for the Group to effectively manage its own ESG risks. MuniFin Group views customer engagement as an essential part of its sustainability commitments and risk management strategy. The Group engages in discussions on sustainability topics with its customers, hosts sustainability-related webinars, and provides an ESG tool for its municipal customers to assess their own ESG risks.

Despite MuniFin Group's low-risk business model, it systematically identifies environmental, social, and governance factors through their transmission channels. Using a materiality assessment, the Group evaluates both positive and negative impacts on the planet and society, as well as financial impacts and considers factors on short, medium and long-term. In addition, the Risk Management function conducts a more detailed materiality analysis of risks, incorporating scenario analysis to enhance the assessment. These assessments guide MuniFin Group's sustainability efforts and ESG risk management.

MuniFin Group's strategy highlights sustainability, which is at the heart of the Group's operations. MuniFin Group's sustainability agenda focuses especially on the Group's business operations and the impact achieved through them. The agenda considers the most material themes of the materiality assessment and was designed with input from MuniFin Group's stakeholders. It crystallises MuniFin Group's role and long-term sustainability goals. The agenda is built around social and environmental themes: the foundation of the Finnish welfare society and the driver of the green transition. MuniFin Group's goal is to support the development of a sustainable welfare society and promote investments that are friendly to the climate and environment.

The Group's first long-term sustainability goals outlined in the Sustainability Agenda, approved by the Board of Directors in 2023, set the desired direction, with chosen indicators to track progress. The amount of sustainable finance, including both green and social finance, and financed emissions, have been selected as key indicators. The amount of sustainable finance provides a clear and measurable gauge of MuniFin Group's impact, as all projects must meet pre-determined criteria within respected frameworks that assess their promotion of sustainability. The share of sustainable finance also offers an overview of the Group's business operations' sustainability, which is crucial for risk management. Promoting greener investments is essential for managing both the Group's and its customers' climate-related and environmental (*C&E*) risks. MuniFin Group sees that impacting through its customers is the most effective way and hence the targets focus on MuniFin Group's customer portfolio.

Environmental factors in business strategy and processes

MuniFin Group's target for 2030 is that 25% of its long-term customer financing is green finance. The target level was set by analysing the Group's balance sheet, current green finance share, and its future development. The ratio of green finance to the long-term customer financing was 23.7% (19.0%) at the end of December 2025. MuniFin Group offers green finance to selected projects that promote the transition to low-carbon and climate-resilient growth. These projects contribute to both climate change mitigation and adaptation. This reduces exposure to transition risks such as regulatory, market or technology risks. Projects can also include adaptation measures. The strategic target to increase the amount of green finance enables the Group to increase the share of climate-resilient projects in its loan portfolio.

MuniFin Group's Green Bond Framework (2025) determines what kind of projects can be financed by green finance. The eligibility criteria of the Green Bond Framework consider the publication date EU Taxonomy Regulation and the EU Taxonomy Climate Delegated Act with the intention to apply them on a best effort basis, where there are feasible practical applications and support by local regulation. The approach includes for example local market analysis based on the availability of needed documentation and national wide EU Taxonomy alignment interpretations made in the project category sector. The result is that in addition to mandatory requirements, the project category specific criteria may include non-compulsory criteria to be considered and promoted to make environmentally friendly investments more attractive to MuniFin Group's customers and facilitate the implementation of the EU Taxonomy.

In addition to the green finance target, the Group has set its first financed emissions reduction target for financed projects in the building sector. The goal is to have an emission intensity of 8 $kgCO_2e/m2$ for the real estate portfolio by 2035. In 2024 the emission intensity was 14.2 $kgCO_2e/m2$ and MuniFin Group is on track to achieve the target. The increase in reported emission intensity from 2023 to 2024 results from a change in used calculation methodology. The calculations for 2025 will be finalised during 2026. The goal is based on the International Energy Agency's (IEA) Beyond 2°C Scenario (*B2DS*) decarbonisation pathway. Buildings have been chosen as the first target as the financial sector already has an established methodology for this. Moreover, the portfolio accounts for over 50% of the long-term customer financing.

In the beginning of 2025, MuniFin introduced a new sustainability-linked loan. It is a loan offered exclusively to municipalities. With this loan product, MuniFin supports the goals of the Paris Climate Agreement and promotes climate action aimed at mitigating and adapting to climate change. The loan is designed to recognise and encourage municipal climate efforts by offering more affordable financing to municipalities that achieve their emission reduction targets. To qualify for the loan, a municipality must have an approved climate plan. A margin discount is granted if the municipality achieves the set emission reduction target.

Social factors in business strategy and processes

MuniFin Group launched its specific social finance product in 2020, which is used for investments that produce widespread social benefits. Social finance can be granted to projects within the housing for special groups and assisted living, healthcare, wellbeing and culture and education categories. The financed projects must have a positive impact on individuals and communities by promoting equality, communality, safety, welfare or regional vitality. Project selection is based on the Group's Social Bond Framework. In its 2023 published Sustainability Agenda, the Group has set a target for eligible social finance to reach 8% of long-term customer financing by 2030. The target level was set by analysing the Group's balance sheet, current social finance share, and future development. The ratio of social finance to the long-term customer financing was 7.2% (7.1%) at the end of December 2025. The Group has not set any additional short-term or medium-term targets for its social finance product but monitors the progress of the long-term target yearly as part of the strategy. MuniFin Group sees that targeted finance to promote socially responsible projects limits social risks its customers and consequently the Group is exposed to.

MuniFin Group's risk approach as determined by the strategy is very conservative and therefore in relation to other counterparties (e.g., liquidity portfolio counterparties, funding dealers, derivative counterparties, suppliers etc.) there is a requirement to operate only with responsible counterparties that can be considered to meet the principles defined in MuniFin Group's Sustainability Policy.

The Group considers local and regional government exposures to be at low risk with no evidence of major social risk-related challenges, unless otherwise proven in individual cases. Furthermore, affordable social housing organisations are non-profit entities whose operations are monitored by the Centre for State-Subsidised Housing Construction (Varke) and manages tasks previously handled by the Housing Finance and Development Centre of Finland (Ara), which was dissolved in February 2025. Therefore, similar general approach in relation to those is justified.

Finally, the Group's own actions as a responsible counterparty, employer and contributor to society are defined in the Board approved strategy and reflected in the Sustainability Policy and Code of Conduct.

9.1.2 Governance on ESG risks

The governance for ESG risks is arranged as part of the sustainability governance model with the focus on climate-related and environmental risks, as depicted in the figure below.

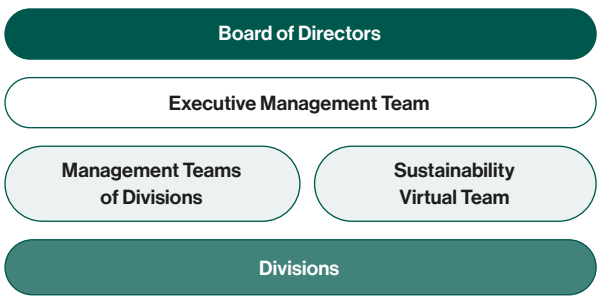

Figure 4. MuniFin Group's sustainability governance model

Board of Directors

MuniFin Board's task is to approve the Group's strategy, which includes key strategic choices, priorities and goals related to sustainability. The Board monitors the development of the Group's operating environment and observes the sustainability-related development needs, such as regulatory changes and the expectations of its customers and key stakeholders. The Board also approves MuniFin Group's Sustainability Agenda, which summarises the key themes and goals of the Group's sustainability work.

The Board ensures that the Group's key business risks, including ESG risks, are identified, and monitors the development of the Group's ESG risks ensuring that its risk profile corresponds to the Board's risk appetite and aligns with the Group's strategy, goals, corporate culture and values. If necessary, the Board decides on essential strategic changes and other measures related to business operations or risk management based on sustainability developments in the operating environment and risks.

The Risk Committee of the Board assists the Board in matters related to the Group's risk strategy and risk taking. The Risk Committee supports the Board in its duties concerning profitability and capital risks, liquidity and funding risks, credit risks, market risks, operational risks and ESG risks, which can occur in the form of any of these risks. Additionally, the Risk Committee has regular thematic meetings focused on ESG risks.

The Executive Management Team (EMT)

The Group's EMT is tasked with the implementation of the strategy set by the Board, within the risk appetite approved by the Board. This responsibility also includes acting in accordance with the sustainability approach approved by the Board as part of the Group's strategy. It also involves adjusting operations to the risk limits and goals set for ESG risks.

The EMT is tasked with monitoring and guiding the development of the Group's sustainability-related measures at the Group level and ensuring that sustainability is considered in accordance with the strategy in all areas of operations in a way that is appropriate for each case considering the materiality principle.

The EMT includes an Executive Vice President of Capital Markets and Sustainability. This individual is responsible for sustainability and the development of MuniFin Group's sustainability initiatives at the Group level.

Sustainability Virtual Team

The Group's sustainability work is coordinated by the Sustainability Virtual Team, which consists of sustainability experts and other relevant people from different divisions and functions.

The Sustainability Virtual Team is tasked with ensuring that sustainability is considered across the Group and that sustainability-related projects are progressing in accordance with the Sustainability Agenda and the Group's strategy. The Sustainability Virtual Team oversees the annual planning and high-level monitoring of MuniFin Group's sustainability work and coordinates its development. The team tracks projects that are currently underway at MuniFin Group and follows current market developments and expectations. The team convenes regularly and invites people outside the core group to take part as necessary, for example when project-specific matters call for it. The team follows the development of the key sustainability indicators of the Group on a quarterly basis. The team is chaired by the Executive Vice President of the Capital Markets and Sustainability. The team can make decisions on sustainability matters specifically assigned for it in the Group's governance model.

Roles and responsibilities in divisions and functions

MuniFin Group has assessed that its existing organisation structure is serving well the identified environmental risks and therefore the Group has not reorganised its business lines and internal control functions due to these risks. However, the Group has established new roles over the past years to incorporate these risks into its operations. As explained in the Risk Management section, most of MuniFin Group's identified environmental risks pertain to long-term effects.

MuniFin Group has an independent Risk Management function including a Credit and ESG risks unit that continuously monitors both identified and potential ESG risks. The Risk Management function reports risk exposures regularly to the Board's Risk Committee and may escalate identified challenges of its counterparties to the Risk Committee and, if necessary, to the Board. The Group's annual customer risk analysis, which may also highlight ESG risk-related challenges of a customer, is prepared by the Risk Management function, and reviewed by the Board's Risk Committee. MuniFin Group's business and support functions in the first line of defence have specific staff dedicated to ensuring that sustainability aspects are integrated into daily business operations and that external reporting, including disclosure requirements, is properly managed. The Capital Markets and Sustainability division includes two dedicated Sustainability Managers. In addition, dedicated people within the Customer Solutions divisions are responsible for the Group's sustainable financing products, including green and social financing and sustainability-linked loans. The Finance division includes Regulation Manager and ESG Controller who take care of ESG disclosure requirements and published reporting.

Given the Group's low exposure to social risks, no dedicated internal resources are currently allocated for their assessment. However, the assessment of social risks is increasingly integrated into the existing risk assessment processes within MuniFin Group. Consequently, this integration extends to the tasks and responsibilities of individuals managing climate-related and environmental risks.

9.1.3 ESG risks in remuneration policy

The Group has a Remuneration Policy for its executive management and employees, the terms and implementation of which are decided by the Board. MuniFin Group's variable remuneration framework includes a sustainability factor and thus indirectly considers the environmental and social risk aspect.

9.1.4 Materiality Assessment

MuniFin Group has established double materiality assessment process. This process is designed to evaluate both the positive and negative impacts on the planet and society, as well as financial impacts of ESG risks and opportunities. The process includes a thorough qualitative analysis of various ESG factors to identify material risks. This includes assessing the severity and likelihood of potential risks, as well as their actual and potential impacts. The assessment covers a wide range of ESG topics relevant to MuniFin Group and its stakeholders. MuniFin Group has engaged both its internal and external stakeholders to ensure their perspectives are considered in the process.

The double materiality assessment is updated on a regular basis to ensure evolving risks and changes in the operational environment are considered. MuniFin Group's double materiality assessment is approved by the Board. Despite the relatively stable nature of its business environment, MuniFin Group recognises the uncertain nature and emerging risks of climate change, social and governance landscapes, and considers evolving risks in its assessment over the short, medium, and long-term.

In addition to the double materiality assessment, Risk Management updates its own materiality assessment annually, while remaining aligned with the double materiality approach. As part of this assessment, Risk Management has evaluated a range of relevant environmental risk factors in relation to credit risk, liquidity risk, funding risk, market risk, and operational risks. The quantitative assessment identified material climate-related risks, including transition and physical risks. However, the financial impact of these climate risks on MuniFin Group's financial position has been assessed as low. Social and governance risk factors were also identified as material based on both qualitative and quantitative assessments, but their impact on MuniFin Group's financial stability is considered almost negligible according to the quantification. Potential social and governance risks are managed within the framework of operational and compliance risk management practices.

9.2 Qualitative information on environmental risks

9.2.1 Risk management on environmental risks

Identification, measurement and management of environmental risks

MuniFin Group's risk management approach includes a careful assessment of climate-related and environmental risks. MuniFin Group has integrated the short-, medium- and long-term impacts of C&E risk factors into its comprehensive risk management framework. The risk management framework of C&E risks follows the ECB Guide on climate-related and environmental risks. Additionally, MuniFin Group's overall Risk and Governance Framework contains risk management policies and principles for all identified risk areas, including C&E risks.

MuniFin Group evaluates C&E risks across all traditional risk categories using multiple methods. To identify relevant C&E risks and assess MuniFin Group's exposure, the Risk Management function conducts an annual C&E risks materiality assessment. The materiality assessment covers the lending portfolio, investment portfolio, critical and high inherent outsourcing arrangements and MuniFin Group's own operations. It includes a qualitative analysis to identify relevant C&E risk drivers and a quantitative analysis to measure these risks. The materiality is evaluated in the short-, medium- and long-term, utilising different forward-looking climate scenarios when applicable. The short-, medium- and long-term effects of environmental factors and risks are applied especially when assessing MuniFin Group's economic vulnerability across different scenarios and time horizons.

Risk	Transmission channel	Potential climate risk events
Credit Risk	Lower real estate value	Increased energy consumption and renovation requirements to improve energy efficiency can increase the costs for property owners, which can negatively impact the financial stability of the owner and eventually the value of the property. Additionally, extreme weather events such as floods can cause damage to properties, leading to a decrease in real-estate value.
	Lower profitability	Increase in carbon price can lead to higher operational costs for energy or raw materials. Also, implementation of energy efficiency requirements increases costs. Changes in consumer preferences may decrease the revenue. Additionally, repairment and renovation costs for extreme weather events may increase the operational costs. The increase in costs and decrease in revenue can decrease profitability and impact the credit risk.
	Increased cost of compliance	Additional expenses to monitor and meet new regulatory requirements, e.g. energy efficiency may affect the operational costs and credit risk of customers or counterparties.
Market Risk	Lower asset value	C&E risks can negatively affect the market price of assets in MuniFin Group's liquidity portfolio. For example, companies with higher C&E risks may experience a decline in market price due to shifts in investor preferences or regulatory requirements.
	Increased volatility	Climate change can create uncertainty in the markets, for example due to changes in carbon pricing, new regulation and shift in investor sentiment, leading to increased market volatility. Also, C&E events can disrupt global supply chains, affecting the availability and costs of materials and services. Disruptions can cause uncertainty and volatility in the market.
Liquidity and funding risk	Lower asset value and liquidity	Investor demand may shift away from assets associated with higher C&E risks, which can negatively affect the market price of assets in MuniFin Group's liquidity portfolio and decrease the liquidity of the assets.
	Increased legal cost and cost of compliance	Additional expenses due to climate-related legal and regulatory compliance costs can increase MuniFin Group's operational costs and lead to decreased liquidity.
	Limited access to funding	Investors are increasingly considering ESG factors when making investment decisions. MuniFin Group's insufficient response to the investor demand may lead to reduced investor interest and demand for its sustainable products. This can limit MuniFin Group's access to funding.
Operational risk	Increased legal cost and cost of compliance	C&E risk events in MuniFin Group's own actions or in MuniFin Group's customers, counterparties or suppliers may lead to increased operational costs through legal costs or sanctions.
	Reputational risk	C&E risk events in MuniFin Group's own actions or in MuniFin Group's customers, counterparties or suppliers may lead to reputational damage.

Table 1. Risk categories, their transmission channels and examples of potential climate risk events

MuniFin Group continuously monitors its exposures on C&E risks in its risk reporting and RAF using several risk reports that track C&E risk factors among its customers and liquidity portfolio. MuniFin Group follows various ESG-related metrics of customers and liquidity portfolio on its ESG dashboard. Additionally, RAF reflects MuniFin Group's conservative approach to all material risks and sets limits for C&E risk indicators including green finance, collateral's energy efficiency, liquidity portfolio's ESG rating, municipalities' E score and MuniFin Group's ESG risk rating. While these metrics primarily reflect the present situation, they also serve as indicators of potential future risk exposure and management capabilities. If these metrics begin to trend in an unfavourable direction, it signals an increase in ESG risk levels. Especially transition risks arise for entities that are unprepared for the transition towards climate change mitigation and therefore, it is crucial to track metrics that reflect their current ESG performance and capability to address future challenges. The risk limits and thresholds, which define the amount of risk MuniFin Group is able and willing to take, are reviewed annually. MuniFin Group also regularly assesses the necessity of current and additional new RAF indicators. The risk assessment and management practices are integrated across the Group's risk categories, depending on the materiality of the anticipated risk effects.

The EMT is accountable for MuniFin Group's RAF. The EMT manages RAF and the associated limit structures and ensures that all the associated targets and limits are cascaded throughout the Group. The Risk Management MT is responsible for monitoring all the RAF risk indicators and for making decisions on needed actions and/or escalation. If necessary, the matters related to RAF are escalated to the Board. The CRO in co-operation with the Risk Management MT is responsible for the design, update and calibration of RAF. The CRO also heads the Risk Management and Compliance division equipped with RAF-specific tasks, such as monitoring risk limits and thresholds.

MuniFin Group has a climate stress testing framework to assess its economic vulnerability to climate-related and environmental shocks. This framework considers various transmission channels and climate scenarios, covering both physical and transition risks. The methodology aligns with the best practices of the ECB and incorporates microeconomic transmission channels, including customers' operational costs and debt, and macroeconomic transmission channels, including GDP, interest rates and foreign exchange rates. MuniFin Group utilises scenario analysis to identify material C&E risks, and to conduct climate stress testing.

The outcomes of the scenario analysis have been integrated into the Group's internal capital and liquidity adequacy processes. Based on the results, the Group's capital position is considered sufficient to meet regulatory requirements and to remain resilient under adverse environmental risk scenarios. In addition, the Group's liquidity buffer is assessed to be adequate to cover potential risks arising from C&E risk events.

Stress testing elements	MuniFin Group's stress testing	Additional information
Scenarios	NGFS scenarios, including combined impacts of physical and transition risks. RCP scenarios for flood projections in Finland.	Main scenarios include Net Zero 2050, Delayed transition, Fragmented world, Nationally Determined Contributions (NDCs).
Time horizons	Short-, medium-, long-term	Short <5 years, Medium: 5-10 years, Long: over 10 years (until 2050).
Risk drivers	Physical and transition risks	For customers: Physical risks: floods. Transition risks: carbon price, electricity price, regulatory energy efficiency requirements. For other counterparties: Physical and transition risks combined (NGFS).
Transmission channels	Macroeconomic and microeconomic	Macroeconomic: GDP, interest rate, foreign exchange rate. Microeconomic: operational costs, debt/liabilities
Region	EU, Finland, and other countries relevant to MuniFin Group's liquidity portfolio	
Risk categories	Credit risk, liquidity risk, funding risk, market risk	

Table 2. Overview of MuniFin Group's climate stress testing framework

Exposures and mitigation actions of environmental risks

MuniFin Group's exposure to C&E risks is considered low aligning with the findings of the materiality analysis. Also, the results from the one-off Fit-for-55 climate risk scenario analysis in 2023 revealed that MuniFin Group's transition risk profile is relatively low in comparison to other participating banks. This is primarily due to MuniFin Group's business model, which limits exposure to Finnish local and central government risk. The identified material climate-related risks are expected to have a potential impact in the medium to long-term. The most notable environmental risk is associated with real-estate collaterals from affordable social housing organisations.

The primary risk mitigation approach for all risks, including ESG risks, is embedded in MuniFin Group's business model. According to the Act on the Municipal Guarantee Board, MuniFin Group can use MGB-guaranteed funding only for a limited customer base consisting of local and regional government entities and affordable social housing organisations, which are considered low-risk entities. Accordingly, MuniFin Group's strategy cannot be extended to include higher-risk customers. Additionally, the central government provides a deficiency guarantee in respect of loans granted to affordable social housing organisations. Such guarantees significantly mitigate the risks associated with real-estate collaterals: the deficiency guarantees cover the amount that cannot be covered by liquidating the respective real estate collateral. Therefore, financial risks in an environmental risk event, like flooding, are limited.

Other mitigation measures for C&E risks have been identified by leveraging industry best practices to mitigate the entity's exposure to transition and physical risks. MuniFin Group's approach to identifying appropriate mitigation methods is based on a thorough assessment of its C&E risk exposures and the financial vulnerabilities associated with these risks. Furthermore, many of these risks are mitigated through monitoring ESG and C&E metrics. By ensuring that these metrics remain within target levels, MuniFin Group can proactively manage potential risks and maintain alignment with its sustainability goals.

MuniFin Group's customers are exposed to both physical and transition risks, primarily floods and costs related to the transition, such as an increase in carbon price. Finnish legislation ensures that municipalities cannot be declared bankrupt and have independent and unlimited right to levy taxes. This means that municipalities have a reliable source of revenue, and they are always able to meet their financial obligations even the increased expenses due to climate-related and environmental risks. This significantly reduces the credit risk for MuniFin Group.

To measure the C&E risks of municipalities, MuniFin Group uses an external service provider to produce ESG score for each municipality. The score includes several ESG metrics that account for both climate-related and environmental physical and transition risks that municipalities are exposed to. MuniFin Group is developing an internally calculated ESG score for municipalities, which will be implemented during 2026. Part of the customers' annual risk assessment, MuniFin Group has created an annual ESG survey for each customer group to evaluate their actions and commitments to mitigate and manage C&E risks. Physical risk exposures are evaluated separately for the housing companies and their properties. The ESG scores are integrated into customers' internal risk scores. ESG factors have also been integrated into the customer lending process, as required by the Group's Sustainability Policy and EBA Guidelines on loan origination and monitoring (EBA/GL/2020/06). This approach ensures that MuniFin Group can address and manage the potential ESG risks associated with its customers.

Additionally, MuniFin Group actively supports its customers in tackling significant sustainability challenges by promoting sustainable choices and investments. This is achieved through information sharing, providing competitive pricing and conducting an impact assessment. MuniFin Group is committed to offering relevant information to its customers by hosting webinars and providing an ESG tool to help municipalities evaluate their performance against United Nations Sustainable Development Goals. MuniFin Group also offers green finance for projects that meet the criteria outlined in MuniFin Group's Green Bond Framework. By promoting greener investments, the Group also manages its own exposure to C&E risks through its customers. For example, energy-efficient construction makes real estate less prone to transition risks. Therefore, MuniFin Group's strategic target to increase the proportion of green finance mitigates the transition risks from its customer portfolio.

Furthermore, MuniFin Group engages with its suppliers to ensure ESG risks are effectively monitored and mitigated. As part of the process, the Group collects responses through a supplier questionnaire. Initially, ESG risks, with a focus on C&E risks, are assessed for critical and high inherent suppliers. The questionnaire covers various aspects, including the supplier's environmental policies and commitments to sustainable practices. MuniFin Group maintains an active dialogue with its service providers and investigates any risk events that could potentially harm MuniFin Group's reputation or the service provided.

MuniFin Group's liquidity portfolio counterparties include central banks, sovereigns, agencies and credit institutions, all of which are considered low risk in terms of C&E risks. This is due to MuniFin Group's investment criteria to invest only in low-risk issuers from both credit risk and ESG risk perspectives. Investments are made in accordance with MuniFin Group's Sustainable Investment Framework, which incorporates ESG factors and defines sustainability criteria for both new and existing investments. The framework includes exclusion criteria for controversial sectors and allows investments only to OECD countries. The exclusion criteria are monitored at the time of the investment and bi-annually for the whole portfolio. The same requirements apply to the derivative counterparties, which are regularly analysed and assigned internal credit ratings, including ESG risk scores.

The liquidity portfolio receives an externally provided ESG score quarterly. This score is measured on a scale of 0–10. MuniFin Group closely monitors the ESG score and compares the performance of its liquidity portfolio against a benchmark portfolio. The benchmark portfolio is composed of relevant market indices that replicate the actual portfolio weights in each asset class. With the MuniFin Group's objective that the liquidity portfolio outperforms the benchmark in terms of ESG score, MuniFin Group can mitigate the ESG risks associated with its liquidity portfolio. Based on history, the liquidity portfolio's ESG score has consistently been higher than the benchmark portfolio's ESG score. Additionally, the liquidity portfolio's physical and transition risks are assessed using an external country-specific environmental risk score. This score evaluates both the risk exposure of current and projected natural hazards as well as climate change-related transition risks, and risk management capabilities of the country where the issuer is located. The risk scores are evaluated regularly, and specific thresholds are set to trigger follow-up actions when necessary.

Data availability and quality

MuniFin Group acknowledges the data limitations associated with C&E risk management, as many of its customers are not subject to ESG disclosure regulations and disclose information only voluntarily. To address this challenge, MuniFin Group utilises open data sources of information to enrich its analysis of customers. This approach helps to supplement the data collected directly from customers.

MuniFin Group's customers are continuously improving their capabilities related to sustainability and ESG topics. As a result, MuniFin Group can collect more detailed and comprehensive ESG data directly from its customers. This ongoing improvement ensures that the data collected is increasingly accurate and relevant for effective risk management and sustainability efforts. Additionally, MuniFin Group engages with its customers in several ways to enhance their preparedness and awareness of C&E risks. MuniFin Group believes that ongoing dialogue with customers and increased awareness will reduce associated risks and improve the quality and availability of data, as customers increasingly consider ESG risks in their operations.

Over the past years, MuniFin Group has made significant efforts to improve the availability, quality and accuracy of its ESG and climate-related data. MuniFin Group has begun collecting ESG data from all its customers and critical suppliers. The goal is to reduce the usage of estimated data by increasing the amount of actual data. Therefore, the proportion of estimated data in MuniFin Group's key risk indicators is monitored. Additionally, external data sources are reviewed to ensure the data used aligns with market best practices and serves its intended purpose. Recognising the importance of ESG data in risk management and sustainability work, MuniFin Group has conducted an assessment to identify the areas and methods for improving ESG data quality and management. MuniFin Group is continuously developing its capabilities to measure, analyse and enhance the quality of ESG data.

9.3 Qualitative information on social risks

9.3.1 Governance on social risks

MuniFin Group communicates its expectations, requirements and own commitment regarding the activities towards the community and society, employee relationships and labour standards, customer protection and product responsibility, and human rights through the Sustainability Policy and Supplier Code of Conduct. The counterparties' commitment to these standards ensures alignment with the Group's values and ethical principles. MuniFin Group's independent Risk Management function reports regularly to the Board's Risk Committee and may escalate the identified challenges of its counterparties to the Risk Committee and, if necessary, to the Board. The Group's annual customer risk analysis, which is also highlighting social risk related challenges of a customer, is prepared by the Risk Management function and reviewed by the Board's Risk Committee.

The Group's current monitoring and reporting processes related to social risk are based on internal actions supported by different types of information tools for information gathering, together with active dialogue with customers and other counterparties.

9.3.2 Risk management on social risks

Identification and management of social risks

MuniFin Group evaluates its exposure to social risks as part of its broader ESG risk management framework, employing methodologies that integrate social risks within overall ESG assessment. MuniFin Group is dedicated to aligning with the internationally recognised standards, including the UN Global Compact and the Commitment 2050 initiative of the Finnish Prime Minister's Office. Additionally, MuniFin Group is committed to observing the conventions set by the International Labour Organization (ILO). However, MuniFin Group has not yet established specific methods, definitions, and standards for the management of social factors.

MuniFin Group has established comprehensive policies and processes for approving new customers and other counterparties. These policies ensure that ESG aspects are continuously monitored and managed through its customer and liquidity portfolios. The proactive approach helps MuniFin Group to maintain high standards of social responsibility and effectively manage any potential social risk events. MuniFin Group also emphasises active engagement with its counterparties. MuniFin Group takes an active role in ensuring that all counterparties meet compliance standards, and in case counterparties fail to meet these, MuniFin Group is prepared to terminate the relationship.

Monitoring social risks of its stakeholders

MuniFin Group's customer finance and approach to social and administrative risks is governed by the law on public procurement, which applies to most MuniFin Group's customers. Public contracts, including supply, service, or public work contracts, must comply with national procurement legislation and the European Union's procurement directives. The objective is to optimise the use of public funds, promote high-quality, innovative and sustainable procurement practices, and ensure equal opportunities for companies and entities to participate in public procurement tenders. Significant part of MuniFin Group's customers must comply with these laws and thus mitigate the indirect social risks associated with MuniFin Group's credit granting processes.

MuniFin Group follows the external ESG score for municipalities that includes several metrics related to poverty, unemployment, education and health. Furthermore, MuniFin Group's customer ESG questionnaire includes questions related to ethical principles and human rights, employee satisfaction and diversity. Based on this data, MuniFin Group can identify, measure and monitor its customers' social risk factors.

MuniFin Group has internal and external assessment processes to identify and mitigate social risks in its liquidity portfolio. First, MuniFin Group makes a thorough assessment to accept new counterparties. This includes evaluating the social responsibility practices of counterparties. MuniFin Group's investment criteria are defined in the Sustainable Investment Framework, which incorporates ESG factors and defines sustainability criteria for both new and existing investments. The Framework reflects MuniFin Group's low risk appetite and conservative liquidity management strategy, which limits exposures to very low-risk entities that are generally considered to have minimal social risk challenges. The Framework includes exclusion criteria for controversial sectors and allows investments only in OECD countries. The social factors are included in the criteria and those are screened regularly. The strict criteria limit the exposures to counterparties with minimal social risk challenges, such as central banks, sovereigns and credit institutions. MuniFin Group also utilises external ESG ratings and benchmarks to gain insights into the social risk profiles of its investments compared to other benchmark portfolios. Even though the social risks are considered low, MuniFin Group actively monitors its liquidity portfolio exposures and is prepared to react to individual social risk challenges if they arise.

For its suppliers, MuniFin Group has a Supplier Code of Conduct that sets minimum standards for its suppliers. This Supplier Code requires suppliers to comply with laws and regulations, report any conduct concerns or violations, and commit to develop their responsibility practices in suppliers' own operations and supply chain.

Impact on risk categories

MuniFin Group assesses social risks in the short-, medium- and long-term through its materiality assessment process using both qualitative and quantitative methods and also applies scenario analysis. MuniFin recognises that social risks can influence various risk categories, including credit, liquidity, funding, market, operational and reputational risks. Municipal Finance has identified an internally driven social risk, which manifests through operational risk channels. The risk is considered well managed.

Risk	Transmission channel	Potential social risk events
Credit Risk	**Lower profitability**	Social risk events, such as human rights violations or labour rights abuses, may cause sanctions or reputational damage to MuniFin Group's customer or counterparty, decreasing its profitability or even leading to default. In addition, broader social uncertainty, such as rising unemployment, may weaken customer profitability.
Market Risk	**Lower asset value**	Social risk events, such as corruption or unethical practices of a bond issuer, could decrease the value of bonds or derivatives.
Liquidity risk	**Decreased liquidity of assets**	Social risk events, such as corruption or unethical practices, may affect MuniFin Group's liquidity portfolio and derivative counterparties, potentially decreasing the liquidity of assets.
Funding risk	**Limited access to funding**	Social risk events, such as allegations of corruption or other unethical business practices can lead to loss of confidence among investors and funding sources. For example, if an investor or funding dealer is implicated in a scandal, they may face boycotts from socially responsible investors resulting MuniFin Group to lose access to these funding sources.
Operational and reputational risk	**Increased operational costs**	Social risk events, including internal social challenges within MuniFin Group or issues involving any of its suppliers, such as labour right violations, could cause challenges to the service provided to MuniFin Group, increasing operational risks. A social risk event involving MuniFin Group's customer, counterparty or supplier can cause also reputational damage and lead to sanctions or increased operational costs or decreased funding access.

Table 3. Risk categories, their transmission channels and examples of potential social risk events

Financial risk categories, potential social risk events and their transmission channels for MuniFin Group

MuniFin Group has not identified any projects or counterparties in the past that would be socially harmful or would significantly harm the social objectives of its business strategy. Minimising social risks is integrated into MuniFin Group's business model and it does not extend to higher-risk customers. With respect to other counterparties, MuniFin Group requires engagement only with responsible counterparties that commit to principles outlined in MuniFin Group's Sustainability Policy. MuniFin Group has not set any specific limits for projects or counterparties that could significantly harm the social objectives.

9.4 Qualitative information on governance risks

9.4.1 Governance

MuniFin Group deems its governance risk very low. Due to the nature of the Group's business model and therefore the customers (municipal sector, wellbeing services counties and affordable social housing organisations) it finances, MuniFin Group has no integration to the governance arrangements of its customers. Compositions of municipalities' highest decision-making body, the municipal council, is based on democracy, and thus public elections organised every fourth year.

MuniFin Group's liquidity portfolio counterparties are central banks, sovereigns, agencies and credit institutions, and thus MuniFin Group as a bondholder has no integration to their governance arrangements. This applies also to derivative counterparties. Therefore, it should be noted that the main risk mitigation approach for governance risk is already taken in the form of MuniFin Group's specific business model, which allows (as defined by the Act on Municipal Guarantee Board) to use the MGB guaranteed funding only for limited clientele consisting of local and regional government entities and affordable social housing organisations and thus considered low risk entities in respect of governance risk. MuniFin Group's strategy cannot be broadened to include any higher-risk entities. However, MuniFin Group monitors also governance performance of its customers and liquidity portfolio counterparties through a scoring model that includes governance factors among other credit and ESG factors. This governance factor of ESG scoring also takes into account, if available, counterparties' non-financial reporting on their governance arrangements. Availability of such information is still quite limited in relation to small municipalities, wellbeing services counties and affordable social housing sector entities where non-financial information reporting is not compulsory.

9.4.2 Risk management on governance risks

MuniFin Group has integrated its risk management framework to evaluate also the governance performance of its customers and counterparties. However, the lack of availability of non-financial information related to small municipalities, wellbeing services counties and affordable social housing organisations poses challenge for MuniFin Group in analysing their non-financial performance. Despite this, MuniFin Group considers the governance risks associated with its customers to be low due to the nature of its customers and business model. MuniFin Group's service model and products do not closely integrate the Group with its customers, meaning that risk events in these areas are not considered materially harmful to MuniFin Group.

Nevertheless, MuniFin Group's risk monitoring process, which covers its customer and liquidity portfolio counterparties, considers ESG factors. This process can identify and raise material issues also in governance if public information on challenges is available.

Part 2:
Pillar III tables

1. Key metrics and overview of risk-weighted exposure amounts

EU KM1
Key metrics template

MuniFin Group's total capital ratio was 93.99% at the end of December 2025 decreasing from the year-end 2024 (107.71%).

Furthermore to the regulatory minimum capital requirements, as part of the annual Supervisory Review and Evaluation Process (SREP), the European Central Bank (ECB) has imposed a bank-specific Pillar II Requirement (P2R) of 2.00% on MuniFin Group to cover additional risks not covered in Pillar I. The minimum level of total capital ratio is 15.11% (15.04%) including P2R and other additional capital buffers. The total SREP capital requirement (TSCR) is 10.00% (10.00%).

1. Key metrics and overview of risk-weighted exposure amounts

(EUR 1,000)		a 31 Dec 2025	b 30 Sep 2025	c 30 Jun 2025	d 31 Mar 2025	e 31 Dec 2024
	Available own funds (amounts)					
1	Common Equity Tier 1 (CET1) capital	1,705,929	1,612,775	1,653,973	1,616,877	1,646,129
2	Tier 1 capital	1,705,929	1,612,775	1,653,973	1,616,877	1,646,129
3	Total capital	1,705,929	1,612,775	1,653,973	1,616,877	1,646,129
	Risk-weighted exposure amounts					
4	Total risk exposure amount	1,815,051	1,788,924	1,850,630	1,688,901	1,528,307
4a	Total risk exposure pre-floor	1,815,051	1,788,924	1,850,630	1,688,901	
	Capital ratios (as a percentage of risk-weighted exposure amount)					
5	Common Equity Tier 1 ratio (%)	93.9879%	90.1534%	89.3735%	95.7354%	107.7093%
5a	Not applicable					
5b	Common Equity Tier 1 ratio considering unfloored TREA (%)	0.0000%	0.0000%	0.0000%	0.0000%	
6	Tier 1 ratio (%)	93.9879%	90.1534%	89.3735%	95.7354%	107.7093%
6a	Not applicable					
6b	Tier 1 ratio considering unfloored TREA (%)	0.0000%	0.0000%	0.0000%	0.0000%	
7	Total capital ratio (%)	93.9879%	90.1534%	89.3735%	95.7354%	107.7093%
7a	Not applicable					
7b	Total capital ratio considering unfloored TREA (%)	0.0000%	0.0000%	0.0000%	0.0000%	
	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 (%)	2.0000%	2.0000%	2.0000%	2.0000%	2.0000%
EU 7e	of which: to be made up of CET1 capital (percentage points)	1.1250%	1.1250%	1.1250%	1.1250%	1.1250%
EU 7f	of which: to be made up of Tier 1 capital (percentage points)	1.5000%	1.5000%	1.5000%	1.5000%	1.5000%
EU 7g	Total SREP own funds requirements (%)	10.0000%	10.0000%	10.0000%	10.0000%	10.0000%

1. Key metrics and overview of risk-weighted exposure amounts

(EUR 1,000)		a 31 Dec 2025	b 30 Sep 2025	c 30 Jun 2025	d 31 Mar 2025	e 31 Dec 2024
	Combined buffer and overall capital requirement (as a percentage of risk-weighted exposure amount)					
8	Capital conservation buffer (%)	2.5000%	2.5000%	2.5000%	2.5000%	2.5000%
EU 8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
9	Institution specific countercyclical capital buffer (%)	1.1118%	1.1652%	1.1494%	1.1078%	1.0363%
EU 9a	Systemic risk buffer (%)	1.0000%	1.0000%	1.0000%	1.0000%	1.0000%
10	Global Systemically Important Institution buffer (%)	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
EU 10a	Other Systemically Important Institution buffer (%)	0.5000%	0.5000%	0.5000%	0.5000%	0.5000%
11	Combined buffer requirement (%)	5.1118%	5.1652%	5.1494%	5.1078%	5.0363%
EU 11a	Overall capital requirements (%)	15.1118%	15.1652%	15.1494%	15.1078%	15.0363%
12	CET1 available after meeting the total SREP own funds requirements (%)	83.9879%	80.1534%	79.3735%	85.7354%	97.7093%
	Leverage ratio					
13	Total exposure measure	13,042,867	15,220,512	14,474,635	15,792,485	13,340,479
14	Leverage ratio (%)	13.0794%	10.5960%	11.4267%	10.2383%	12.3394%
	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 (%)	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
EU 14b	of which: to be made up of CET1 capital (percentage points)	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
EU 14c	Total SREP leverage ratio requirements (%)	3.0000%	3.0000%	3.0000%	3.0000%	3.0000%

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1. Key metrics and overview of risk-weighted exposure amounts

		a	b	c	d	e
(EUR 1,000)		31 Dec 2025	30 Sep 2025	30 Jun 2025	31 Mar 2025	31 Dec 2024
	Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)					
EU 14d	Leverage ratio buffer requirement (%)	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
EU 14e	Overall leverage ratio requirement (%)	3.0000%	3.0000%	3.0000%	3.0000%	3.0000%
	Liquidity Coverage Ratio					
15	Total high-quality liquid assets (HQLA) (Weighted value -average)	12,039,215	11,978,012	12,178,301	12,109,289	11,716,025
EU 16a	Cash outflows - Total weighted value	5,249,339	4,783,984	4,552,704	4,364,961	4,160,643
EU 16b	Cash inflows - Total weighted value	1,315,184	1,230,933	1,250,583	1,107,081	1,128,447
16	Total net cash outflows (adjusted value)	3,934,197	3,553,093	3,302,162	3,257,880	3,032,196
17	Liquidity coverage ratio (%)	315.5626%	358.3955%	403.7949%	405.3028%	411.6291%
	Net Stable Funding Ratio					
18	Total available stable funding	41,449,861	41,892,241	42,485,879	41,817,936	39,297,987
19	Total required stable funding	34,154,344	33,090,154	33,273,298	32,092,999	31,757,350
20	NSFR ratio (%)	121.3604%	126.6003%	127.6876%	130.3024%	123.7445%

EU OV1
Overview of total risk exposure amounts

The total risk exposure amount increased from the year-end 2024 EUR 1,528 million to EUR 1,815 million at the end of the year 2025. The capital requirement for credit risk is calculated using the standardised approach and the total risk exposure amount for credit risk excluding CCR increased by EUR 166 million from the year-end 2024. The total risk exposure amount for counterparty credit risk decreased to EUR 43 million (EUR 46 million). Total CVA VaR increased to EUR 573 million (EUR 453 million).

In calculating the regulatory capital requirements for market risk, only foreign exchange risk is taken into account as the Group does not have a trading book nor share or commodity positions. As foreign exchange risk is hedged by swapping all currency denominated funding and investments into euros, the Group's foreign exchange position is small and consists of FX trades made for daily collateral management purposes in USD. On 31 December 2025, the FX net position was EUR 12.0 million (EUR 10.4 million), which is less than 2% of total own funds. There was no capital requirement for market risk since the FX net position did not exceed 2% of the total own funds (CRR 575/2013, Art. 351) at the end of 2025 or 2024.

The risk exposure amount of operational risk was EUR 454 million (EUR 450 million).

1. Key metrics and overview of risk-weighted exposure amounts

		Total risk exposure amounts (TREA)		Total own funds requirements
		a	b	c
(EUR 1,000)		31 Dec 2025	30 Sep 2025	31 Dec 2025
1	Credit risk (excluding CCR)	744,763	695,332	59,581
2	Of which the standardised approach	744,763	695,332	59,581
3	Of which the Foundation IRB (F-IRB) approach	-	-	-
4	Of which slotting approach	-	-	-
EU 4a	Of which equities under the simple riskweighted approach	-	-	-
5	Of which the Advanced IRB (A-IRB) approach	-	-	-
6	Counterparty credit risk - CCR	43,169	43,206	3,453
7	Of which the standardised approach	40,959	40,702	3,277
8	Of which internal model method (IMM)	-	-	-
EU 8a	Of which exposures to a CCP	2,210	2,505	177
9	Of which other CCR	-	-	-
10	Credit valuation adjustments risk - CVA risk	572,696	598,739	45,816
EU 10a	Of which the standardised approach (SA)	-	-	-
EU 10b	Of which the basic approach (F-BA and R-BA)	572,696	598,739	45,816
EU 10c	Of which the simplified approach	-	-	-
11	Not applicable			
12	Not applicable			
13	Not applicable			
14	Not applicable			

1. Key metrics and overview of risk-weighted exposure amounts

		Total risk exposure amounts (TREA)		Total own funds requirements
		a	b	c
(EUR 1,000)		31 Dec 2025	30 Sep 2025	31 Dec 2025
15	Settlement risk	-	-	-
16	Securitisation exposures in the non-trading book (after the cap)	-	-	-
17	Of which SEC-IRBA approach	-	-	-
18	Of which SEC-ERBA (including IAA)	-	-	-
19	Of which SEC-SA approach	-	-	-
EU 19a	Of which 1250% / deduction	-	-	-
20	Position, foreign exchange and commodities risks (Market risk)	-	-	-
21	Of which the Alternative standardised approach (A-SA)	-	-	-
EU 21a	Of which the Simplified standardised approach (S-SA)	-	-	-
22	Of which A-IMA	-	-	-
EU 22a	Large exposures	-	-	-
23	Reclassifications between trading and non-trading books	-	-	-
24	Operational risk	454,423	451,647	36,354
EU 24a	Exposures to crypto-assets	-	-	-
25	Amounts below the thresholds for deduction (subject to 250% risk weight)	-	-	-
26	Output floor applied (%)	-	-	
27	Floor adjustment (before application of transitional cap)	-	-	
28	Floor adjustment (after application of transitional cap)	-	-	
29	**Total**	**1,815,051**	**1,788,924**	**145,204**

1. Key metrics and overview of risk-weighted exposure amounts

		Total risk exposure amounts (TREA)		Total own funds requirements
		a	b	c
(EUR 1,000)		31 Dec 2024	30 Sep 2024	31 Dec 2024
1	Credit risk (excluding CCR)	578,784	558,863	46,713
2	Of which the standardised approach	578,784	558,863	46,713
3	Of which the Foundation IRB (F-IRB) approach	-	-	-
4	Of which slotting approach	-	-	-
EU 4a	Of which equities under the simple riskweighted approach	-	-	-
5	Of which the Advanced IRB (A-IRB) approach	-	-	-
6	Counterparty credit risk - CCR	499,547	470,776	39,964
7	Of which the standardised approach	44,324	45,059	3,546
8	Of which internal model method (IMM)	-	-	-
EU 8a	Of which exposures to a CCP	2,157	1,506	173
EU 8b	Of which credit valuation adjustment - CVA	453,066	424,210	36,245
9	Of which other CCR	-	-	-
10	Not applicable			
11	Not applicable			
12	Not applicable			
13	Not applicable			
14	Not applicable			

1. Key metrics and overview of risk-weighted exposure amounts

		Total risk exposure amounts (TREA)		Total own funds requirements
		a	b	c
(EUR 1,000)		31 Dec 2024	30 Sep 2024	31 Dec 2024
15	Settlement risk	-	-	-
16	Securitisation exposures in the non-trading book (after the cap)	-	-	-
17	Of which SEC-IRBA approach	-	-	-
18	Of which SEC-ERBA (including IAA)	-	-	-
19	Of which SEC-SA approach	-	-	-
EU 19a	Of which 1250% / deduction	-	-	-
20	Position, foreign exchange and commodities risks (Market risk)	-	-	-
21	Of which the standardised approach	-	-	-
22	Of which IMA	-	-	-
EU 22a	Large exposures	-	-	-
23	Operational risk	449,976	499,797	35,998
EU 23a	Of which basic indicator approach	449,976	499,797	35,998
EU 23b	Of which standardised approach	-	-	-
EU 23c	Of which advanced measurement approach	-	-	-
24	Amounts below the thresholds for deduction (subject to 250% risk weight)	-	-	-
25	Not applicable			
26	Not applicable			
27	Not applicable			
28	Not applicable			
29	**Total**	**1,528,307**	**1,529,436**	**122,675**

2. Scope of application

EU LI1
Differences between the accounting scope and the scope of prudential consolidation and mapping of financial statement categories with regulatory risk categories

The following table provides a breakdown of the published Financial Statements into the various risk frameworks. Certain items such as foreign currency assets and liabilities are subject to both the credit risk framework and the market risk framework. Cross currency derivatives hedging these foreign currency assets and liabilities are taken into account in the market risk and counterparty credit risk frameworks.

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31 Dec 2025 (EUR 1,000)		a & b	c	d	e	f	g
		Carrying values as reported in published financial statements & Carrying values under scope of regulatory 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
	Breakdown by asset classes according to the balance sheet in the published financial statements						
	Assets						
1	Cash and balances with central banks	5,169,257	5,169,257	-	-	-	-
2	Loans and advances to credit institutions	1,989,943	412,885	1,577,058	-	42,950	-
3	Loans and advances to the public and public sector entities	38,082,843	38,082,843	-	-	-	-
4	Debt securities	8,061,264	8,061,264	-	-	-	-
5	Derivative contracts	1,486,616	-	1,486,616	-	371,352	-
6	Intangible assets	836	-	-	-	-	836
7	Tangible assets	8,941	8,941	-	-	-	-
8	Other assets	831,484	29,881	803,833	-	0	-
9	Accrued income and prepayments	3,114	3,114	-	-	-	0
10	Deferred tax assets	29	-	-		-	29
11	**Total assets**	**55,634,327**	**51,768,185**	**3,867,506**	**-**	**414,302**	**866**

31 Dec 2025 (EUR 1,000)		a & b	c	d	e	f	g
		Carrying values as reported in published financial statements & Carrying values under scope of regulatory 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
	Breakdown by liability classes according to the balance sheet in the published financial statements						
	Liabilities						
1	Liabilities to credit institutions	196,077	-	30,939	-	-	165,138
2	Liabilities to the public and public sector entities	2,314,539	-	-	-	19,763	2,294,776
3	Debt securities issued	47,127,029	-	-	-	24,588,097	22,538,932
4	Derivative contracts	3,368,357	-	3,368,357	-	1,151,265	-
5	Other liabilities	275,161	-	225,418	-	-	49,743
6	Accrued expenses and deferred income	47,312	-	-	-	-	47,312
7	Deferred tax liabilities	369,693	-	-	-	-	369,693
8	**Total liabilities**	**53,698,168**	**-**	**3,624,714**	**-**	**25,759,125**	**25,465,594**

31 Dec 2024 (EUR 1,000)		a & b	c	d	e	f	g
		Carrying values as reported in published financial statements & Carrying values under scope of regulatory 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
	Breakdown by asset classes according to the balance sheet in the published financial statements						
	Assets						
1	Cash and balances with central banks	7,776,888	7,776,888	-	-	-	-
2	Loans and advances to credit institutions	789,725	181,317	608,408	-	60,249	-
3	Loans and advances to the public and public sector entities	35,376,909	35,376,909	-	-	-	-
4	Debt securities	5,878,912	5,878,912	-	-	-	-
5	Derivative contracts	2,323,708	-	2,323,708	-	1,111,180	-
6	Intangible assets	2,720	-	-	-	-	2,720
7	Tangible assets	8,236	8,236	-	-	-	-
8	Other assets	915,913	26,231	889,682	-	101,281	-
9	Accrued income and prepayments	18,797	18,797	-	-	-	0
10	Deferred tax assets	10	-	-	-	-	10
11	**Total assets**	**53,091,818**	**49,267,289**	**3,821,798**	**-**	**1,272,709**	**2,730**

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31 Dec 2024 (EUR 1,000)		a & b	c	d	e	f	g
		Carrying values as reported in published financial statements & Carrying values under scope of regulatory 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
	Breakdown by liability classes according to the balance sheet in the published financial statements						
	Liabilities						
1	Liabilities to credit institutions	883,694	-	716,137	-	-	167,558
2	Liabilities to the public and public sector entities	2,463,874	-	-	-	21,465	2,442,409
3	Debt securities issued	44,534,306	-	-	-	23,325,901	21,208,405
4	Derivative contracts	2,561,718	-	2,561,718	-	498,099	2,747
5	Other liabilities	285,181	-	259,850	-	-	25,331
6	Accrued expenses and deferred income	45,485	-	-	-	-	45,485
7	Deferred tax liabilities	372,126	-	-	-	-	372,126
8	**Total liabilities**	**51,146,383**	**-**	**3,537,705**	**-**	**23,845,465**	**24,264,060**

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EU LI2
Main sources of differences between regulatory exposure amount and carrying values in financial statements

31 Dec 2025 (EUR 1,000)		a	b	c	d	e
			Items subject to			
		Total	Credit risk framework	Securitisation framework	CCR framework	Market risk framework
1	**Assets carrying value amount under the scope of prudential consolidation (as per template LI1)**	**55,633,462**	**51,768,185**	**-**	**3,867,506**	**414,302**
2	**Liabilities carrying value amount under the scope of prudential consolidation (as per template LI1)**	**-28,232,574**	**-**	**-**	**-3,624,714**	**-25,759,125**
3	**Total net amount under the scope of prudential consolidation**	**27,400,888**	**51,768,185**	**-**	**242,793**	**-25,344,823**
4	**Off-balance-sheet amounts**	**8,694,457**	**8,694,457**	**-**	**-**	
5	*Differences in valuations*	-48,085	-48,085	-	-	
6	*Differences due to different netting rules, other than those already included in row 2*	-	-	-	-	
7	*Differences due to consideration of provisions*	-	-	-	-	
8	*Differences due to the use of credit risk mitigation techniques (CRMs)*	-	-	-	-	
9	*Differences due to credit conversion factors*	-7,711,745	-7,711,745	-	-	
10	*Differences due to Securitisation with risk transfer*	-	-	-	-	
11	*Other differences*	636,082	48,085	-	587,996	
12	**Exposure amounts considered for regulatory purposes**	**53,593,725**	**52,750,898**	**-**	**830,789**	**12,038**

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31 Dec 2024 (EUR 1,000)		a	b	c	d	e
			Items subject to			
		Total	Credit risk framework	Securitisation framework	CCR framework	Market risk framework
1	**Assets carrying value amount under the scope of prudential consolidation (as per template LI1)**	**53,089,087**	**49,267,289**	**-**	**3,821,798**	**1,272,709**
2	**Liabilities carrying value amount under the scope of prudential consolidation (as per template LI1)**	**-26,882,324**	**-**	**-**	**-3,537,705**	**-23,845,465**
3	**Total net amount under the scope of prudential consolidation**	**26,206,764**	**49,267,289**	**-**	**284,094**	**-22,572,756**
4	**Off-balance-sheet amounts**	**2,943,513**	**2,943,513**	**-**	**-**	
5	*Differences in valuations*	-51,719	-51,719	-	-	
6	*Differences due to different netting rules, other than those already included in row 2*	-	-	-	-	
7	*Differences due to consideration of provisions*	-	-	-	-	
8	*Differences due to the use of credit risk mitigation techniques (CRMs)*	-	-	-	-	
9	*Differences due to credit conversion factors*	-1,541,392	-1,541,392	-	-	
10	*Differences due to Securitisation with risk transfer*	-	-	-	-	
11	*Other differences*	649,609	51,719	-	597,889	
12	**Exposure amounts considered for regulatory purposes**	**51,561,802**	**50,669,410**	**-**	**881,983**	**10,409**

EU LI3
Outline of the differences in the scopes of consolidation (entity by entity)

There has been no changes in the scope of the consolidation compared to year-end 2024.

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	
Municipality Finance Plc	*Full consolidation*	*X*					*Credit institution*
Kuntarahoituksen digitaaliset palvelut Oy	*Full consolidation*	*X*					*Digital services to MuniFin Group's customers*

EU LIA
Explanation of differences between accounting and regulatory exposure amounts

a) Differences between columns (a) and (b) in template EU LI1

No differences reported between columns (a) and (b) in template EU LI1.

b) Qualitative information on the main sources of differences between the accounting and regulatory scope of consolidation shown in template EU LI2

The differences between the carrying values used in the Financial Statements and regulatory exposure amounts arise mainly from off-balance sheet items, the difference in the treatment of derivatives between the IFRS framework and regulatory framework and the treatment of market risk. Off-balance sheet items include credit commitments, which are included in the regulatory exposure on row 4, but not included in the balance sheet carrying amounts in the Financial Statements. The difference in the treatment of derivatives between the IFRS and regulatory frameworks is shown on row 11 and arises from the counterparty credit risk framework and applying CRR SA-CCR method to derivatives. The derivative assets and liabilities in the Financial Statements are fair valued on instrument level, with no netting applied on counterparty level and without considering the impact of any collateral. A difference also arises from the market risk framework in comparison to the accounting framework.

In calculating the capital requirements for market risk, only foreign exchange risk is taken into account as the Group does not have a trading book nor share or commodity positions. With regard to foreign exchange risk, the accounting carrying amounts of cross currency derivatives do not represent the actual long or short positions in only foreign currency, therefore a difference exists in comparison to the treatment of foreign currency positions in CRR Article 352. As foreign exchange risk is hedged by swapping all currency denominated assets and liabilities into euros, the Group's net foreign exchange position is small. In practice, small temporary exchange rate risk may arise due to collateral management in USD in the clearing of derivatives by central counterparties. This FX risk is actively monitored and hedged. There is no capital requirement for foreign exchange risk, as the Group's net position does not exceed 2% of own funds at the end of 2025 or 2024 (CRR Article 351).

The basis of consolidation does not differ between the Consolidated Financial Statements and regulatory consolidation.

Fair value is the price that would be received to sell the asset or paid to transfer the liability in an orderly transaction between market participants at the measurement date. The fair values of financial instruments are determined on the basis of either price quotations obtained from functioning markets or, if such markets do not exist, by applying valuation methods. A market is deemed to be functioning if price quotations are readily and consistently available, and they reflect real market transactions executed in a consistent manner between independent parties. If a quoted price in an active market is not available for a financial instrument, MuniFin Group uses valuation techniques standard across the industry and for which sufficient information is available to determine the fair value. The chosen valuation technique should include all factors that market participants would consider in pricing the financial instrument. The valuation technique uses as much observable inputs as possible and as little unobservable inputs as possible.

Financial instruments are valued in accordance with MuniFin Group's Valuation Policy. MuniFin Group assigns fair value to its financial instruments based on quotes and market data input from Bloomberg, Refinitiv and other external sources. Instruments are valued by using the quotes either directly or indirectly, i.e. using them as inputs of the valuation techniques used to assign fair value. MuniFin Group applies both market approach and income approach to its valuation of financial instruments.

MuniFin Group applies a market-based approach when the instrument has a functioning market and public price quotations are available. The market approach is used mainly for the valuation of investment bonds. All instruments for which quoted market prices are available, the Group uses quoted unadjusted market price for identical instruments in active markets that the Group can access at the measurement date. The market is considered to be active if trading is frequent and price data is regularly available. The mid-price quotes are considered to represent the price for an orderly transaction between parties in the market on the valuation date.

Income approach is applied when valuation is based, for example, on determining the present value of future cash flows (discounting). The Group uses the income approach for many of its financial instruments, for example derivatives, lending and funding. If the market has a well-established valuation approach for a financial instrument that is not quoted, the fair value is based on an established, appropriate underlying method provided that sufficient information is available to determine fair value for that purpose. If a valuation practice is not established on the market, the valuation model for the product concerned is based on commonly used calculation methods covering all the elements that would be taken into account by market participants when setting the price. In addition, the selected method is required to be consistent with the accepted financial methods used in pricing financial instruments.

All valuation models, both complex and simple models, use market prices and other inputs. These market prices and inputs comprise interest rates, FX rates, volatilities, correlations etc. MuniFin Group applies different types of valuation inputs depending on the type and complexity of the instruments and the related risk factors and payoff structures. Valuation methods consider an assessment of the credit risk, discount rates used, the possibility of early repayment and other factors that influence the fair value of a financial instrument reliably. Stochastic models are used to generate a distribution of future rates, FX, equity or inflation values. These values are used in the payoff of each instrument to generate a distribution of possible instrument values in the future. The future values are then discounted to produce valuations for the instruments.

MuniFin Group uses widely recognised valuation models to determine the fair value of common and simple financial instruments, such as interest rate and currency swaps, that use only observable market data and require little judgement and estimation. Observable prices or model inputs are usually available in the market for listed debt and equity securities and simple OTC derivatives such as interest rate swaps. The availability of observable market prices and model inputs reduces the need for management judgement and estimation and reduces the uncertainty associated with determining fair values. The availability of observable market prices and inputs varies depending on the products and markets and is prone to changes based on specific events and general conditions in the financial markets.

MuniFin Group applies different models to derive the fair value of a certain type of instruments. The choice of base models and its calibration depends on the complexity of the financial instrument and the observability of the relevant inputs. In line with market practice, the primary choice of base model is contingent on the underlying instrument classes. Additionally, instruments are broken down into different categories granular enough to capture the most important risk drivers and different kinds of calibration techniques. The specific combination of base models and the different assumptions and calibrations techniques are documented. The Group's fair value instruments that are subject to mark-to-model valuation techniques consists out of four asset classes:

- Interest rate instruments
- FX instruments
- Equity-linked instruments
- Hybrid instruments.

MuniFin Group has implemented a framework for the arrangements, activities and procedures with regard to the Group's model risk management. The purpose of the model risk management framework is to ensure the effective management of model risk and mitigation of fair value uncertainty, as well as to ensure compliance with external and internal requirements. The Group ensures that all aspects of the lifecycle of valuation models (i.e. approval, design and development, testing and maintenance, monitoring and execution) are subject to effective governance, clear roles and responsibilities and effective internal control.

The Group manages and maintains a model inventory which provides a holistic view of all valuation models, their business purpose and characteristics as well as their applications and conditions for use. All approved valuation models within the model inventory are subject to annual review and re-approval by the Risk Management and Compliance Management Team.

The Finance Management Team acts as a Valuation Control Group for MuniFin Group's fair values and is responsible for the final approval of the Group's fair values for financial reporting. The Finance Management Team monitors and controls MuniFin Group's valuation process and the performance of valuation models, decides on the necessary measures and reports to the EMT. The Finance Management Team assesses whether the valuation models and valuation process provide sufficiently accurate information to be used in financial reporting and, based on the information received, decides on possible adjustments to the values generated by the valuation process.

The Group has implemented an efficient control and performance monitoring framework with regards to its valuation models, which aims to ensure the accuracy and appropriateness of model output. The model performance monitoring consists of four main controls:

- Counterparty valuation control (*CVC*)
- Fair value explanation
- Independent price verification (*IPV*)
- Independent model validation.

CVC is performed daily by Risk Management, who assesses any deviations in valuation model output compared to MuniFin Group's own earlier valuations and to counterparty valuations. The results of the assessment are reported monthly to the CFO and quarterly to the Finance Management Team. Fair value explanation process consists of a daily analysis and explanation of the changes in fair values by Risk Management and a monthly fair value explain report to the CFO and quarterly to the Finance Management Team. The IPV is performed monthly as part of MuniFin Group's IPV process by a third-party service provider. The results of the control activities are reported monthly to the CFO and quarterly to the Finance Management Team. The independent model validation is performed annually for a subset of MuniFin Group's valuation models by a third-party service provider. The results of the model validation are reported to the Finance Management Team.

MuniFin Group does not have a trading book.

At year-end 2025, MuniFin Group deducted a prudent valuation adjustment totalling EUR 48.1 million (EUR 51.7 million) from Common Equity Tier 1, as shown on row 5 of the EU LI2. MuniFin Group's fair valued assets and liabilities exceed the threshold of EUR 15 billion set for applying the simplified approach and when calculating prudent valuation adjustment MuniFin Group applies core approach. In addition to the prudent valuation adjustment, MuniFin Group has calculated Credit Valuation and Debt Valuation Adjustments in accordance with IFRS 13 to account for the non-performance risk in the fair values of its derivatives. In addition, the Group calculates Funding Valuation Adjustment for those derivative contracts that do not hold cash collateral arrangements (derivatives made with MuniFin Group's customers).

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

MuniFin Group does not have any current or expected material practical or legal impediment to the prompt transfer of own funds or to the repayment of liabilities between the parent undertaking (MuniFin) and its subsidiaries (Kuntarahoituksen digitaaliset palvelut Oy).

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

All subsidiaries are included in the consolidation with own funds.

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

MuniFin Group does not use the derogation referred to in Article 7 CRR or individual consolidation method laid down in Article 9 CRR. MuniFin's subsidiary, Kuntarahoituksen digitaaliset palvelut Oy, is not individually subject to supervision by the FIN-FSA.

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

Reference to question (b), MuniFin is including all subsidiaries in the consolidation with own funds.

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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				
Category level AVA		Equity	Interest Rates	Foreign exchange	Credit	Commodities	Unearned credit spreads AVA	Investment and funding costs AVA	Total category level post-diversification	Of which: Total core approach in the trading book	Of which: Total core approach in the banking book
1	Market price uncertainty	-	5,533	4,004	-	-	2	345	4,942	-	4,942
2	Not applicable										
3	Close-out cost	-	28,684	20,757	-	-	459	173	25,036	-	25,036
4	Concentrated positions	-	-	-	-	-	-	-	-	-	-
5	Early termination	-	-	-	-	-	-	-	-	-	-
6	Model risk	-	4,007	2,899	-	-	77	-	3,491	-	3,491
7	Operational risk	-	1,739	1,259	-	-	-	-	2,998	-	2,998
8	Not applicable										
9	Not applicable										
10	Future administrative costs	-	6,740	4,878	-	-	-	-	11,618	-	11,618
11	Not applicable										
12	**Total Additional Valuation Adjustments (AVAs)**								**48,085**	**-**	**48,085**

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31 Dec 2024 (EUR 1,000)		a	b	c	d	e	EU e1	EU e2	f	g	h
		Risk category					Category level AVA - Valuation uncertainty				
Category level AVA		Equity	Interest Rates	Foreign exchange	Credit	Commodities	Unearned credit spreads AVA	Investment and funding costs AVA	Total category level post-diversification	Of which: Total core approach in the trading book	Of which: Total core approach in the banking book
1	Market price uncertainty	3	4,579	3,326	-	-	35	34	3,989	-	3,989
2	Not applicable										
3	Close-out cost	21	33,888	24,614	-	-	1,275	107	29,953	-	29,953
4	Concentrated positions	-	-	-	-	-	-	-	-	-	-
5	Early termination	-	-	-	-	-	-	-	-	-	-
6	Model risk	1	1,623	1,179	-	-	143	-	1,473	-	1,473
7	Operational risk	1	1,965	1,428	-	-	-	-	3,394	-	3,394
8	Not applicable										
9	Not applicable										
10	Future administrative costs	5	7,476	5,430	-	-	-	-	12,911	-	12,911
11	Not applicable										
12	**Total Additional Valuation Adjustments (AVAs)**								**51,719**	**-**	**51,719**

3. Own funds

EU CC1
Composition of regulatory own funds

At the end of the year, the Group's CET1 capital totalled EUR 1,706 million (EUR 1,646 million). The Group had no Additional Tier 1 instruments or Tier 2 capital at the end of the financial year, so its CET1 capital was therefore equal to Tier 1 capital and total own funds, EUR 1,706 million (EUR 1,646 million).

CET1 capital includes profit for the period of 1 January–31 December 2025, as the profit has been subject to a review by the auditors, and therefore can be included in CET1 capital on the basis of permission granted by the ECB in accordance with the CRR. Deductions due to prudential filters on CET1 capital are made up of MuniFin Group's Debt Valuation Adjustment (DVA), Prudent Valuation Adjustment (PVA) and changes in fair value due to own credit risk standing. In addition, the amount of foreseeable dividend of EUR 71 million for the financial year 2025 has been deducted from CET1 capital.

31 Dec 2025 (EUR 1,000)		(a) Amounts	(b) Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
Common Equity Tier 1 (CET1) capital: instruments and reserves			
1	Capital instruments and the related share premium accounts	82,949	(c)
	of which: Share capital	42,583	(c)
	of which: Reserve for invested non-restricted equity	40,366	(c)
2	Retained earnings	1,570,497	(f)
3	Accumulated other comprehensive income (and other reserves)	128,656	(d)+(e)
EU-3a	Funds for general banking risk	-	
4	Amount of qualifying items referred to in Article 484 (3) CRR and the related share premium accounts subject to phase out from CET1	-	
5	Minority interests (amount allowed in consolidated CET1)	-	
EU-5a	Independently reviewed interim profits net of any foreseeable charge or dividend	82,571	(g)
6	**Common Equity Tier 1 (CET1) capital before regulatory adjustments**	**1,864,673**	
Common Equity Tier 1 (CET1) capital: regulatory adjustments			
7	Additional value adjustments (negative amount)	-48,085	
8	Intangible assets (net of related tax liability) (negative amount)	-836	(a)
9	Not applicable		
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)	-	
11	Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value	-	
12	Negative amounts resulting from the calculation of expected loss amounts	-	
13	Any increase in equity that results from securitised assets (negative amount)	-	
14	Gains or losses on liabilities valued at fair value resulting from changes in own credit standing	-107,864	(e)
15	Defined-benefit pension fund assets (negative amount)	-	
16	Direct, indirect and synthetic holdings by an institution of own CET1 instruments (negative amount)	-	

31 Dec 2025 (EUR 1,000)		(a) Amounts	(b) Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
17	Direct, indirect and synthetic holdings of the CET 1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-	
18	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	
19	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	
20	Not applicable		
EU-20a	Exposure amount of the following items which qualify for a RW of 1250%, where the institution opts for the deduction alternative	-	
EU-20b	of which: qualifying holdings outside the financial sector (negative amount)	-	
EU-20c	of which: securitisation positions (negative amount)	-	
EU-20d	of which: free deliveries (negative amount)	-	
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)	-	
22	Amount exceeding the 17.65% threshold (negative amount)	-	
23	of which: direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities	-	
24	Not applicable		
25	of which: deferred tax assets arising from temporary differences	-	
EU-25a	Losses for the current financial year (negative amount)	-	
EU-25b	Foreseeable tax charges relating to CET1 items except where the institution suitably adjusts the amount of CET1 items insofar as such tax charges reduce the amount up to which those items may be used to cover risks or losses (negative amount)	-	
26	Not applicable		
27	Qualifying AT1 deductions that exceed the AT1 items of the institution (negative amount)	-	
27a	Other regulatory adjustments	-1,958	(b)
28	**Total regulatory adjustments to Common Equity Tier 1 (CET1)**	**-158,744**	
29	**Common Equity Tier 1 (CET1) capital**	**1,705,929**	

31 Dec 2025 (EUR 1,000)		(a) Amounts	(b) Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
Additional Tier 1 (AT1) capital: instruments			
30	Capital instruments and the related share premium accounts	-	
31	of which: classified as equity under applicable accounting standards	-	
32	of which: classified as liabilities under applicable accounting standards	-	
33	Amount of qualifying items referred to in Article 484 (4) CRR and the related share premium accounts subject to phase out from AT1	-	
EU-33a	Amount of qualifying items referred to in Article 494a(1) CRR subject to phase out from AT1	-	
EU-33b	Amount of qualifying items referred to in Article 494b(1) CRR subject to phase out from AT1	-	
34	Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties	-	
35	of which: instruments issued by subsidiaries subject to phase out	-	
36	**Additional Tier 1 (AT1) capital before regulatory adjustments**	**-**	
Additional Tier 1 (AT1) capital: regulatory adjustments			
37	Direct, indirect and synthetic holdings by an institution of own AT1 instruments (negative amount)	-	
38	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-	
39	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	
40	Direct, indirect and synthetic holdings by the institution of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	-	
41	Not applicable		
42	Qualifying T2 deductions that exceed the T2 items of the institution (negative amount)	-	
42a	Other regulatory adjustments to AT1 capital	-	
43	**Total regulatory adjustments to Additional Tier 1 (AT1) capital**	**-**	
44	**Additional Tier 1 (AT1) capital**	**-**	
45	**Tier 1 capital (T1 = CET1 + AT1)**	**1,705,929**	

31 Dec 2025 (EUR 1,000)		(a) Amounts	(b) Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
Tier 2 (T2) capital: instruments			
46	Capital instruments and the related share premium accounts	-	
47	Amount of qualifying items referred to in Article 484(5) CRR and the related share premium accounts subject to phase out from T2 as described in Article 486(4) CRR	-	
EU-47a	Amount of qualifying items referred to in Article 494a(2) CRR subject to phase out from T2	-	
EU-47b	Amount of qualifying items referred to in Article 494b(2) CRR subject to phase out from T2	-	
48	Qualifying own funds instruments included in consolidated T2 capital (including minority interests and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties	-	
49	of which: instruments issued by subsidiaries subject to phase out	-	
50	Credit risk adjustments	-	
51	**Tier 2 (T2) capital before regulatory adjustments**	**-**	
Tier 2 (T2) capital: regulatory adjustments			
52	Direct, indirect and synthetic holdings by an institution of own T2 instruments and subordinated loans (negative amount)	-	
53	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-	
54	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	
54a	Not applicable		
55	Direct, indirect and synthetic holdings by the institution of the T2 instruments and subordinated loans of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	-	
56	Not applicable		
EU-56a	Qualifying eligible liabilities deductions that exceed the eligible liabilities items of the institution (negative amount)	-	
EU-56b	Other regulatory adjustments to T2 capital	-	
57	**Total regulatory adjustments to Tier 2 (T2) capital**	**-**	

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31 Dec 2025 (EUR 1,000)		(a) Amounts	(b) Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
58	**Tier 2 (T2) capital**	**-**	
59	**Total capital (TC = T1 + T2)**	**1,705,929**	
60	**Total risk exposure amount**	**1,815,051**	
Capital ratios and requirements including buffers			
61	Common Equity Tier 1 capital	93.9879%	
62	Tier 1 capital	93.9879%	
63	Total capital	93.9879%	
64	Institution CET1 overall capital requirements	10.7368%	
65	of which: capital conservation buffer requirement	2.5000%	
66	of which: countercyclical capital buffer requirement	1.1118%	
67	of which: systemic risk buffer requirement	1.0000%	
EU-67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer requirement	0.5000%	
EU-67b	of which: additional own funds requirements to address the risks other than the risk of excessive leverage	1.1250%	
68	**Common Equity Tier 1 capital (as a percentage of risk exposure amount) available after meeting the minimum capital requirements**	**83.9879%**	
National minima (if different from Basel III)			
69	Not applicable		
70	Not applicable		
71	Not applicable		

31 Dec 2025 (EUR 1,000)		(a) Amounts	(b) Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
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)	-	
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)	-	
74	Not applicable		
75	Deferred tax assets arising from temporary differences (amount below 17.65% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met)	-	
Applicable caps on the inclusion of provisions in Tier 2			
76	Credit risk adjustments included in T2 in respect of exposures subject to standardised approach (prior to the application of the cap)	-	
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach	-	
78	Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)	-	
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach	-	

31 Dec 2024 (EUR 1,000)		(a) Amounts	(b) Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
Common Equity Tier 1 (CET1) capital: instruments and reserves			
1	Capital instruments and the related share premium accounts	82,949	(c)
	of which: Share capital	42,583	(c)
	of which: Reserve for invested non-restricted equity	40,366	(c)
2	Retained earnings	1,510,462	(f)
3	Accumulated other comprehensive income (and other reserves)	219,330	(d)+(e)
EU-3a	Funds for general banking risk	-	
4	Amount of qualifying items referred to in Article 484 (3) CRR and the related share premium accounts subject to phase out from CET1	-	
5	Minority interests (amount allowed in consolidated CET1)	-	
EU-5a	Independently reviewed interim profits net of any foreseeable charge or dividend	60,034	(g)
6	**Common Equity Tier 1 (CET1) capital before regulatory adjustments**	**1,872,776**	
Common Equity Tier 1 (CET1) capital: regulatory adjustments			
7	Additional value adjustments (negative amount)	-51,719	
8	Intangible assets (net of related tax liability) (negative amount)	-2,720	(a)
9	Not applicable	-	
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)	-	
11	Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value	-	
12	Negative amounts resulting from the calculation of expected loss amounts	-	
13	Any increase in equity that results from securitised assets (negative amount)	-	
14	Gains or losses on liabilities valued at fair value resulting from changes in own credit standing	-169,999	(e)
15	Defined-benefit pension fund assets (negative amount)	-	
16	Direct, indirect and synthetic holdings by an institution of own CET1 instruments (negative amount)	-	

31 Dec 2024 (EUR 1,000)		(a) Amounts	(b) Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
17	Direct, indirect and synthetic holdings of the CET 1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-	
18	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	
19	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	
20	Not applicable	-	
EU-20a	Exposure amount of the following items which qualify for a RW of 1250%, where the institution opts for the deduction alternative	-	
EU-20b	of which: qualifying holdings outside the financial sector (negative amount)	-	
EU-20c	of which: securitisation positions (negative amount)	-	
EU-20d	of which: free deliveries (negative amount)	-	
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)	-10	(h)
22	Amount exceeding the 17.65% threshold (negative amount)	-	
23	of which: direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities	-	
24	Not applicable	-	
25	of which: deferred tax assets arising from temporary differences	-	
EU-25a	Losses for the current financial year (negative amount)	-	
EU-25b	Foreseeable tax charges relating to CET1 items except where the institution suitably adjusts the amount of CET1 items insofar as such tax charges reduce the amount up to which those items may be used to cover risks or losses (negative amount)	-	
26	Not applicable	-	
27	Qualifying AT1 deductions that exceed the AT1 items of the institution (negative amount)	-	
27a	Other regulatory adjustments	-2,197	(b)
28	**Total regulatory adjustments to Common Equity Tier 1 (CET1)**	**-226,647**	
29	**Common Equity Tier 1 (CET1) capital**	**1,646,129**	

31 Dec 2024 (EUR 1,000)		(a) Amounts	(b) Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
Additional Tier 1 (AT1) capital: instruments			
30	Capital instruments and the related share premium accounts	-	
31	of which: classified as equity under applicable accounting standards	-	
32	of which: classified as liabilities under applicable accounting standards	-	
33	Amount of qualifying items referred to in Article 484 (4) CRR and the related share premium accounts subject to phase out from AT1	-	
EU-33a	Amount of qualifying items referred to in Article 494a(1) CRR subject to phase out from AT1	-	
EU-33b	Amount of qualifying items referred to in Article 494b(1) CRR subject to phase out from AT1	-	
34	Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties	-	
35	of which: instruments issued by subsidiaries subject to phase out	-	
36	**Additional Tier 1 (AT1) capital before regulatory adjustments**	**-**	
Additional Tier 1 (AT1) capital: regulatory adjustments			
37	Direct, indirect and synthetic holdings by an institution of own AT1 instruments (negative amount)	-	
38	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-	
39	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	
40	Direct, indirect and synthetic holdings by the institution of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	-	
41	Not applicable	-	
42	Qualifying T2 deductions that exceed the T2 items of the institution (negative amount)	-	
42a	Other regulatory adjustments to AT1 capital	-	
43	**Total regulatory adjustments to Additional Tier 1 (AT1) capital**	**-**	

31 Dec 2024 (EUR 1,000)		(a) Amounts	(b) Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
44	**Additional Tier 1 (AT1) capital**	**-**	
45	**Tier 1 capital (T1 = CET1 + AT1)**	**1,646,129**	
Tier 2 (T2) capital: instruments			
46	Capital instruments and the related share premium accounts	-	
47	Amount of qualifying items referred to in Article 484(5) CRR and the related share premium accounts subject to phase out from T2 as described in Article 486(4) CRR	-	
EU-47a	Amount of qualifying items referred to in Article 494a(2) CRR subject to phase out from T2	-	
EU-47b	Amount of qualifying items referred to in Article 494b(2) CRR subject to phase out from T2	-	
48	Qualifying own funds instruments included in consolidated T2 capital (including minority interests and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties	-	
49	of which: instruments issued by subsidiaries subject to phase out	-	
50	Credit risk adjustments	-	
51	**Tier 2 (T2) capital before regulatory adjustments**	**-**	
Tier 2 (T2) capital: regulatory adjustments			
52	Direct, indirect and synthetic holdings by an institution of own T2 instruments and subordinated loans (negative amount)	-	
53	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-	
54	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	
54a	Not applicable	-	
55	Direct, indirect and synthetic holdings by the institution of the T2 instruments and subordinated loans of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	-	
56	Not applicable	-	
EU-56a	Qualifying eligible liabilities deductions that exceed the eligible liabilities items of the institution (negative amount)	-	
EU-56b	Other regulatory adjustments to T2 capital	-	

31 Dec 2024 (EUR 1,000)		(a) Amounts	(b) Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
57	**Total regulatory adjustments to Tier 2 (T2) capital**	**-**	
58	**Tier 2 (T2) capital**	**-**	
59	**Total capital (TC = T1 + T2)**	**1,646,129**	
60	**Total risk exposure amount**	**1,528,307**	
Capital ratios and requirements including buffers			
61	Common Equity Tier 1 capital	107.7093%	
62	Tier 1 capital	107.7093%	
63	Total capital	107.7093%	
64	Institution CET1 overall capital requirements	10.6613%	
65	of which: capital conservation buffer requirement	2.5000%	
66	of which: countercyclical capital buffer requirement	1.0363%	
67	of which: systemic risk buffer requirement	1.0000%	
EU-67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer requirement	0.5000%	
EU-67b	of which: additional own funds requirements to address the risks other than the risk of excessive leverage	1.1250%	
68	**Common Equity Tier 1 capital (as a percentage of risk exposure amount) available after meeting the minimum capital requirements**	**97.7093%**	
National minima (if different from Basel III)			
69	Not applicable		
70	Not applicable		
71	Not applicable		

31 Dec 2024 (EUR 1,000)		(a) Amounts	(b) Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
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)	-	
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)	-	
74	Not applicable		
75	Deferred tax assets arising from temporary differences (amount below 17.65% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met)	-	
Applicable caps on the inclusion of provisions in Tier 2			
76	Credit risk adjustments included in T2 in respect of exposures subject to standardised approach (prior to the application of the cap)	-	
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach	-	
78	Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)	-	
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach	-	

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

31 Dec 2025 (EUR 1,000)		a	b	c
		Balance sheet as in published financial statements	Under regulatory scope of consolidation	Reference
		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 balances with central banks	5,169,257	5,169,257	
2	Loans and advances to credit institutions	1,989,943	1,989,943	
3	Loans and advances to the public and public sector entities	38,082,843	38,082,843	
4	Debt securities	8,061,264	8,061,264	
5	Derivative contracts	1,486,616	1,486,616	
6	Intangible assets	836	836	(a)
7	Tangible assets	8,941	8,941	
8	Other assets	831,484	831,484	
9	Accrued income and prepayments	3,077	3,077	
10	Current tax assets	29	29	
11	Deferred tax assets	37	37	
12	**Total assets**	**55,634,327**	**55,634,327**	
	Liabilities - Breakdown by liability classes according to the balance sheet in the published financial statements			
1	Liabilities to credit institutions	196,077	196,077	
2	Liabilities to the public and public sector entities	2,314,539	2,314,539	
3	Debt securities issued	47,127,029	47,127,029	
4	Derivative contracts	3,368,357	3,368,357	
4a	Of which: Debit Valuation Adjustment*	-1,958	-1,958	(b)
5	Other liabilities	275,161	275,161	
6	Accrued expenses and deferred income	47,312	47,312	
7	Deferred tax liabilities	369,693	369,693	
8	**Total liabilities**	**53,698,168**	**53,698,168**	

31 Dec 2025 (EUR 1,000)		a	b	c
		Balance sheet as in published financial statements	Under regulatory scope of consolidation	Reference
		As at period end	As at period end	
	Shareholders' Equity			
1	Share capital	42,583	42,583	(c)
2	Reserve fund	277	277	(d)
3	Fair value reserve of investments	1,837	1,837	(d)
4	Own credit revaluation reserve	107,864	107,864	(e)
5	Cost-of-Hedging reserve	18,679	18,679	(d)
6	Reserve for invested non-restricted equity	40,366	40,366	(c)
7	Retained earnings	1,724,554	1,724,554	
7a	Of which: Retained earnings from previous years	1,570,497	1,570,497	(f)
7b	Of which: Independently reviewed interim profits	154,058	82,571	(g)
8	Total equity attributable to parent company equity holders	1,936,160	1,936,160	
9	**Total shareholders' equity**	**1,936,160**	**1,936,160**	
10	**Total liabilities and shareholder's equity**	**55,634,327**	**55,634,327**	

MuniFin Group's scope of accounting consolidation and the scope of prudential consolidation do not differ.
* DVA includes tax impact reducement of 20%.

31 Dec 2024 (EUR 1,000)		a	b	c
		Balance sheet as in published financial statements	Under regulatory scope of consolidation	Reference
		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 balances with central banks	7,776,888	7,776,888	
2	Loans and advances to credit institutions	789,725	789,725	
3	Loans and advances to the public and public sector entities	35,376,909	35,376,909	
4	Debt securities	5,878,912	5,878,912	
5	Derivative contracts	2,323,708	2,323,708	
6	Intangible assets	2,720	2,720	(a)
7	Tangible assets	8,236	8,236	
8	Other assets	915,913	915,913	
9	Accrued income and prepayments	18,797	18,797	
10	Deferred tax assets	10	10	(h)
11	**Total assets**	**53,091,818**	**53,091,818**	
	Liabilities - Breakdown by liability classes according to the balance sheet in the published financial statements			
1	Liabilities to credit institutions	883,694	883,694	
2	Liabilities to the public and public sector entities	2,463,874	2,463,874	
3	Debt securities issued	44,534,306	44,534,306	
4	Derivative contracts	2,561,718	2,561,718	
4a	Of which: Debit Valuation Adjustment	-2,197	-2,197	(b)
5	Other liabilities	285,181	285,181	
6	Accrued expenses and deferred income	45,485	45,485	
7	Deferred tax liabilities	372,126	372,126	
8	**Total liabilities**	**51,146,383**	**51,146,383**	

31 Dec 2024 (EUR 1,000)		a	b	c
		Balance sheet as in published financial statements	Under regulatory scope of consolidation	Reference
		As at period end	As at period end	
	Shareholders' Equity			
1	Share capital	42,583	42,583	(c)
2	Reserve fund	277	277	(d)
3	Fair value reserve of investments	3,340	3,340	(d)
4	Own credit revaluation reserve	169,999	169,999	(e)
5	Cost-of-Hedging reserve	45,714	45,714	(d)
6	Reserve for invested non-restricted equity	40,366	40,366	(c)
7	Retained earnings	1,643,155	1,643,155	
7a	Of which: Retained earnings from previous years	1,510,462	1,510,462	(f)
7b	Of which: Independently reviewed interim profits	132,693	60,034	(g)
8	Total equity attributable to parent company equity holders	1,945,435	1,945,435	
9	**Total shareholders' equity**	**1,945,435**	**1,945,435**	
10	**Total liabilities and shareholder's equity**	**53,091,818**	**53,091,818**	

EU CCA
Main features of regulatory own funds instruments and eligible liabilities instruments

31 Dec 2025		a
		Common Equity Tier 1 capital
		Shares A and B of share capital
1	Issuer	Municipality Finance Plc
2	Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	N/A
2a	Public or private placement	Private
3	Governing law(s) of the instrument	Finnish law
3a	Contractual recognition of write down and conversion powers of resolution authorities	No
	Regulatory treatment	
4	Current treatment taking into account, where applicable, transitional CRR rules	Common Equity Tier 1
5	Post-transitional CRR rules	Common Equity Tier 1
6	Eligible at solo/(sub-)consolidated/ solo&(sub-)consolidated	Solo and (Sub-)Consolidated
7	Instrument type (types to be specified by each jurisdiction)	Share capital as defined in Regulation No (EU) 575/2013 Article 28, Finnish Limited Liability Companies Act
8	Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	EUR 42.583 million
9	Nominal amount of instrument	N/A
EU-9a	Issue price	N/A
EU-9b	Redemption price	Redemption price according to the Articles of Association depending on the redemption situation
10	Accounting classification	Shareholders' equity
11	Original date of issuance	N/A

31 Dec 2025		a Common Equity Tier 1 capital Shares A and B of share capital
12	Perpetual or dated	Perpetual
13	Original maturity date	No maturity
14	Issuer call subject to prior supervisory approval	Yes
15	Optional call date, contingent call dates and redemption amount	N/A
16	Subsequent call dates, if applicable	N/A
	Coupons / dividends	
17	Fixed or floating dividend/coupon	Floating
18	Coupon rate and any related index	N/A
19	Existence of a dividend stopper	No
EU-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Fully discretionary
EU-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Fully discretionary
21	Existence of step up or other incentive to redeem	No
22	Noncumulative or cumulative	Noncumulative
23	Convertible or non-convertible	Non-convertible
24	If convertible, conversion trigger(s)	N/A
25	If convertible, fully or partially	N/A
26	If convertible, conversion rate	N/A
27	If convertible, mandatory or optional conversion	N/A
28	If convertible, specify instrument type convertible into	N/A
29	If convertible, specify issuer of instrument it converts into	N/A

31 Dec 2025		a Common Equity Tier 1 capital Shares A and B of share capital
30	Write-down features	No
31	If write-down, write-down trigger(s)	N/A
32	If write-down, full or partial	N/A
33	If write-down, permanent or temporary	N/A
34	If temporary write-down, description of write-up mechanism	N/A
34a	Type of subordination (only for eligible liabilities)	N/A
EU-34b	Ranking of the instrument in normal insolvency proceedings	N/A
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Additional Tier 1
36	Non-compliant transitioned features	No
37	If yes, specify non-compliant features	N/A
37a	Link to the full term and conditions of the instrument (signposting)	-

(1) 'N/A' if the question is not applicable.

31 Dec 2024		a Common Equity Tier 1 capital Shares A and B of share capital
1	Issuer	Municipality Finance Plc
2	Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	N/A
2a	Public or private placement	Private
3	Governing law(s) of the instrument	Finnish law
3a	Contractual recognition of write down and conversion powers of resolution authorities	No
	Regulatory treatment	
4	Current treatment taking into account, where applicable, transitional CRR rules	Common Equity Tier 1
5	Post-transitional CRR rules	Common Equity Tier 1
6	Eligible at solo/(sub-)consolidated/ solo&(sub-)consolidated	Solo and (Sub-)Consolidated
7	Instrument type (types to be specified by each jurisdiction)	Share capital as defined in Regulation No (EU) 575/2013 Article 28, Finnish Limited Liability Companies Act
8	Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	EUR 42.583 million
9	Nominal amount of instrument	N/A
EU-9a	Issue price	N/A
EU-9b	Redemption price	Redemption price according to the Articles of Association depending on the redemption situation
10	Accounting classification	Shareholders' equity
11	Original date of issuance	N/A
12	Perpetual or dated	Perpetual
13	Original maturity date	No maturity

31 Dec 2024		a Common Equity Tier 1 capital Shares A and B of share capital
14	Issuer call subject to prior supervisory approval	Yes
15	Optional call date, contingent call dates and redemption amount	N/A
16	Subsequent call dates, if applicable	N/A
	Coupons / dividends	
17	Fixed or floating dividend/coupon	Floating
18	Coupon rate and any related index	N/A
19	Existence of a dividend stopper	No
EU-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Fully discretionary
EU-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Fully discretionary
21	Existence of step up or other incentive to redeem	No
22	Noncumulative or cumulative	Noncumulative
23	Convertible or non-convertible	Non-convertible
24	If convertible, conversion trigger(s)	N/A
25	If convertible, fully or partially	N/A
26	If convertible, conversion rate	N/A
27	If convertible, mandatory or optional conversion	N/A
28	If convertible, specify instrument type convertible into	N/A
29	If convertible, specify issuer of instrument it converts into	N/A

31 Dec 2024		a Common Equity Tier 1 capital Shares A and B of share capital
30	Write-down features	No
31	If write-down, write-down trigger(s)	N/A
32	If write-down, full or partial	N/A
33	If write-down, permanent or temporary	N/A
34	If temporary write-down, description of write-up mechanism	N/A
34a	Type of subordination (only for eligible liabilities)	N/A
EU-34b	Ranking of the instrument in normal insolvency proceedings	N/A
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Additional Tier 1
36	Non-compliant transitioned features	No
37	If yes, specify non-compliant features	N/A
37a	Link to the full term and conditions of the instrument (signposting)	-

(1) 'N/A' if the question is not applicable.

4. Capital buffers

Minimum capital requirements and capital buffers

Minimum capital requirements and capital buffers (%) 31 Dec 2025	Capital requirement	Capital conservation buffer [1]	Countercyclical buffer [2]	O-SII [3]	Systemic risk buffer [4]	Total capital buffers	Total
Common Equity Tier 1 capital (CET1)	4.5000%	2.5000%	1.1118%	0.5000%	1.0000%	5.1118%	9.6118%
Tier 1 Capital (T1)	6.0000%	2.5000%	1.1118%	0.5000%	1.0000%	5.1118%	11.1118%
Total own funds	8.0000%	2.5000%	1.1118%	0.5000%	1.0000%	5.1118%	13.1118%

Minimum capital requirements and capital buffers (EUR 1,000) 31 Dec 2025	Capital requirement	Capital conservation buffer [1]	Countercyclical buffer [2]	O-SII [3]	Systemic risk buffer [4]	Total capital buffers	Total
Common Equity Tier 1 capital (CET1)	81,677	45,376	20,180	9,075	18,151	92,782	174,459
Tier 1 Capital (T1)	108,903	45,376	20,180	9,075	18,151	92,782	201,685
Total own funds	145,204	45,376	20,180	9,075	18,151	92,782	237,986

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Minimum capital requirements and capital buffers (%) 31 Dec 2024	Capital requirement	Capital conservation buffer [1]	Countercyclical buffer [2]	O-SII [3]	Systemic risk buffer [4]	Total capital buffers	Total
Common Equity Tier 1 capital (CET1)	4.5000%	2.5000%	1.0363%	0.5000%	1.0000%	5.0363%	9.5363%
Tier 1 Capital (T1)	6.0000%	2.5000%	1.0363%	0.5000%	1.0000%	5.0363%	11.0363%
Total own funds	8.0000%	2.5000%	1.0363%	0.5000%	1.0000%	5.0363%	13.0363%

Minimum capital requirements and capital buffers (EUR 1,000) 31 Dec 2024	Capital requirement	Capital conservation buffer [1]	Countercyclical buffer [2]	O-SII [3]	Systemic risk buffer [4]	Total capital buffers	Total
Common Equity Tier 1 capital (CET1)	68,774	38,208	15,839	7,642	15,283	76,971	145,745
Tier 1 Capital (T1)	91,698	38,208	15,839	7,642	15,283	76,971	168,669
Total own funds	122,265	38,208	15,839	7,642	15,283	76,971	199,235

[1] Act on Credit Institutions (610/2014), Chapter 10, Section 3, and the EU Capital Requirements Regulation (575/2013; CRR) amended by CRR II (2019/876) and CRR III (2024/1623) and Directive (2013/36/EU; CRD IV) amended by CRD V (2019/878) and CRD VI (2024/1619). Valid from 1 January 2015.

[2] Act on Credit Institutions (610/2014) Sect 10:4-6 § and the EU Capital Requirements Regulation (575/2013; CRR) amended by CRR II (2019/876) and CRR III (2024/1623) and Directive (2013/36/EU; CRD IV) amended by CRD V (2019/878) and CRD VI (2024/1619). On 17 Dec 2025 (17 Dec 2024), the Board of Financial Supervisory Authority (FIN-FSA) decided not to set countercyclical capital buffer requirement for credit exposures allocated to Finland. The institution-specific countercyclical capital buffer requirement is determined on the basis of the geographical distribution of the exposures. For MuniFin Group it is 1.11% (1.04%).

[3] Other Systemically Important Institutions additional capital requirements: Act on Credit Institutions (610/2014) Sect 10:8 § and the EU Capital Requirements Regulation (575/2013; CRR) amended by CRR II (2019/876) and CRR III (2024/1623) and Directive (2013/36/EU; CRD IV) amended by CRD V (2019/878) and CRD VI (2024/1619). Additional capital requirement (O-SII) for MuniFin Group is 0.5% (0.5%). The decision of the Board of FIN-FSA on 26 Jun 2025, effective immediately.

[4] Act on Credit Institutions (610/2014) Sect 10:6a § and the EU Capital Requirements Regulation (575/2013; CRR) amended by CRR II (2019/876) and CRR III (2024/1623) and Directive (2013/36/EU; CRD IV) amended by CRD V (2019/878) and CRD VI (2024/1619). The FIN-FSA has imposed a requirement to maintain a systemic risk buffer (SyRB) covered by CET1 capital and amounting to 1.0% on MuniFin. This requirement also applies to other Finnish credit institutions at the same level. In its June 2025 decision, the FIN-FSA decided to keep the SyRB requirement unchanged at 1.0% (effective from 1 July 2026).

ECB has imposed a bank-specific Pillar 2 Requirement (P2R) of 2% on MuniFin Group as part of the annual Supervisory Review and Evaluation Process (SREP). Including this P2R requirement, the total SREP capital requirement ratio (TSCR) was 10% (10%) at the end of December 2025. The minimum level of total capital ratio was 15.11% (15.04%) including P2R and other additional capital buffers.

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EU CCyB1

Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer

Countercyclical capital buffer is calculated only for the relevant credit exposure classes as defined in Article 140(4) of the Capital Requirement Directive. Exposure classes not included in the calculation are exposures to a) central governments or central banks; b) regional governments or local authorities; c) public sector entities; d) multilateral development banks; e) international organisations; f) institutions.

At 31 December 2025, the institution-specific countercyclical buffer rate for MuniFin Group was 1.11% (0.92%).

		a	b	c	d	e	f	g	h	i	j	k	l	m
		General credit exposures		Relevant credit exposures – Market risk				Own fund requirements						
31 Dec 2025 (EUR 1,000)		Exposure value under the standardised approach	Exposure value under the IRB approach	Sum of long and short positions of trading book exposures for SA	Value of trading book exposures for internal models	Securitisation exposures Exposure value for non-trading book	Total exposure value	Relevant credit risk exposures - Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book	Total	Risk-weighted exposure amounts	Own fund requirements weights (%)	Counter-cyclical buffer rate (%)
010	**Breakdown by country:**													
	BE	163,672	-	-	-	-	163,672	1,309	-	-	1,309	16,367	6.0630%	1.0000%
	CA	30,015	-	-	-	-	30,015	480	-	-	480	6,003	2.2237%	0.0000%
	DE	20,295	-	-	-	-	20,295	162	-	-	162	2,029	0.7518%	0.7500%
	DK	94,311	-	-	-	-	94,311	903	-	-	903	11,285	4.1805%	2.5000%
	ES	17,552	-	-	-	-	17,552	140	-	-	140	1,755	0.6502%	0.5000%
	FI	631,822	-	-	-	-	631,822	8,045	-	-	8,045	100,565	37.2529%	0.0000%
	FR	279,736	-	-	-	-	279,736	2,238	-	-	2,238	27,974	10.3624%	1.0000%
	GB	195,794	-	-	-	-	195,794	3,827	-	-	3,827	47,838	17.7207%	2.0000%
	NL	88,046	-	-	-	-	88,046	704	-	-	704	8,805	3.2615%	2.0000%
	NO	344,585	-	-	-	-	344,585	2,757	-	-	2,757	34,458	12.7646%	2.5000%
	SE	128,735	-	-	-	-	128,735	1,030	-	-	1,030	12,873	4.7688%	2.0000%
020	**Total**	**1,994,562**	**-**	**-**	**-**	**-**	**1,994,562**	**21,596**	**-**	**-**	**21,596**	**269,953**	**100.0000%**	

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		a	b	c	d	e	f	g	h	i	j	k	l	m
		General credit exposures		Relevant credit exposures – Market risk				Own fund requirements						
31 Dec 2024 (EUR 1,000)		Exposure value under the standardised approach	Exposure value under the IRB approach	Sum of long and short positions of trading book exposures for SA	Value of trading book exposures for internal models	Securitisation exposures Exposure value for non-trading book	Total exposure value	Relevant credit risk exposures - Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book	Total	Risk-weighted exposure amounts	Own fund requirements weights (%)	Counter-cyclical buffer rate (%)
010	**Breakdown by country:**													
	BE	138,151	-	-	-	-	138,151	1,105	-	-	1,105	13,815	6.3028%	1.0000%
	DE	20,286	-	-	-	-	20,286	162	-	-	162	2,029	0.9255%	0.7500%
	DK	82,197	-	-	-	-	82,197	808	-	-	808	10,097	4.6064%	2.5000%
	FI	591,903	-	-	-	-	591,903	7,256	-	-	7,256	90,702	41.3803%	0.0000%
	FR	309,106	-	-	-	-	309,106	2,473	-	-	2,473	30,911	14.1021%	1.0000%
	GB	95,418	-	-	-	-	95,418	2,178	-	-	2,178	27,229	12.4227%	2.0000%
	NL	64,015	-	-	-	-	64,015	512	-	-	512	6,402	2.9205%	2.0000%
	NO	247,865	-	-	-	-	247,865	1,983	-	-	1,983	24,787	11.3082%	2.5000%
	SE	132,202	-	-	-	-	132,202	1,058	-	-	1,058	13,220	6.0314%	2.0000%
020	**Total**	**1,681,144**	**-**	**-**	**-**	**-**	**1,681,144**	**17,535**	**-**	**-**	**17,535**	**219,191**	**100.0000%**	

EU CCyB2
Amount of institution-specific countercyclical capital buffer

31 Dec 2025
(EUR 1,000)

		a
1	Total risk exposure amount	1,815,051
2	Institution specific countercyclical capital buffer rate	1.1118%
3	Institution specific countercyclical capital buffer requirement	20,180

31 Dec 2024
(EUR 1,000)

		a
1	Total risk exposure amount	1,528,307
2	Institution specific countercyclical capital buffer rate	1.0363%
3	Institution specific countercyclical capital buffer requirement	15,839

5. Leverage ratio

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

31 Dec 2025 (EUR 1,000)		a
		Applicable amount
1	Total assets as per published financial statements	55,634,327
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation	-
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	-549,828
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)	1,629,718
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) 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	-43,671,351
13	**Total exposure measure**	**13,042,867**

31 Dec 2024 (EUR 1,000)		b
		Applicable amount
1	Total assets as per published financial statements	53,091,818
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation	-
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	-1,383,199
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)	1,402,129
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) 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	-39,770,268
13	**Total exposure measure**	**13,340,479**

EU LR2
LRCom: Leverage ratio common disclosure

The Group's leverage ratio was 13,08% (12.34%) at the end of December 2025.

The total balance sheet exposures increased by EUR 2,508 million from previous year. Off-balance sheet exposures, loan commitments to public and public sector entities increased by EUR 204 million during the period. Tier 1 capital increased in the period by EUR 60 million.

MuniFin fulfills the CRR definition of a public development credit institution and may therefore deduct all credit receivables from municipalities, wellbeing services counties and central government in the calculation of its leverage ratio exposure measure. The total amount exempted is EUR 41,610 million (EUR 38,604 million). It consists of loans, short-term lending, leasing and loan commitments to regional governments, wellbeing services counties and non-financial corporations (companies that are fully owned or under control of municipalities or wellbeing services counties) or central government subsidised housing companies.

Rows 28-31a of the table are reported annually.

5. Leverage ratio

(EUR 1,000)		CRR leverage ratio exposures a 31 Dec 2025	CRR leverage ratio exposures b 31 Dec 2024
	On-balance sheet exposures (excluding derivatives and SFTs)		
1	On-balance sheet items (excluding derivatives, SFTs, but including collateral)	54,170,137	50,765,808
2	Gross-up for derivatives collateral provided, where deducted from the balance sheet assets pursuant to the applicable accounting framework	-	-
3	(Deductions of receivables assets for cash variation margin provided in derivatives transactions)	-2,059,485	-1,160,788
4	(Adjustment for securities received under securities financing transactions that are recognised as an asset)	-	-
5	(General credit risk adjustments to on-balance sheet items)	-	-
6	(Asset amounts deducted in determining Tier 1 capital)	-836	-2,730
7	**Total on-balance sheet exposures (excluding derivatives and SFTs)**	**52,109,815**	**49,602,289**
	Derivative exposures		
8	Replacement cost associated with SA-CCR derivatives transactions (ie net of eligible cash variation margin)	59,815	75,760
EU-8a	Derogation for derivatives: replacement costs contribution under the simplified standardised approach	-	-
9	Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions	876,972	864,749
EU-9a	Derogation for derivatives: Potential future exposure contribution under the simplified standardised approach	-	-
EU-9b	Exposure determined under Original Exposure Method	-	-
10	(Exempted CCP leg of client-cleared trade exposures) (SA-CCR)	-	-
EU-10a	(Exempted CCP leg of client-cleared trade exposures) (simplified standardised approach)	-	-
EU-10b	(Exempted CCP leg of client-cleared trade exposures) (Original Exposure Method)	-	-
11	Adjusted effective notional amount of written credit derivatives	-	-
12	(Adjusted effective notional offsets and add-on deductions for written credit derivatives)	-	-
13	**Total derivatives exposures**	**936,788**	**940,510**
	Securities financing transaction (SFT) exposures		
14	Gross SFT assets (with no recognition of netting), after adjustment for sales accounting transactions	-	-
15	(Netted amounts of cash payables and cash receivables of gross SFT assets)	-	-
16	Counterparty credit risk exposure for SFT assets	-	-

5. Leverage ratio

(EUR 1,000)		CRR leverage ratio exposures a 31 Dec 2025	CRR leverage ratio exposures b 31 Dec 2024
EU-16a	Derogation for SFTs: Counterparty credit risk exposure in accordance with Articles 429e(5) and 222 CRR	-	-
17	Agent transaction exposures	-	-
EU-17a	(Exempted CCP leg of client-cleared SFT exposure)	-	-
18	**Total securities financing transaction exposures**	**-**	**-**
	Other off-balance sheet exposures		
19	Off-balance sheet exposures at gross notional amount	8,694,476	2,943,531
20	(Adjustments for conversion to credit equivalent amounts)	-7,087,988	-1,541,402
21	(General provisions deducted in determining Tier 1 capital and specific provisions associated with off-balance sheet exposures)	-	-
22	**Off-balance sheet exposures**	**1,606,488**	**1,402,129**
	Excluded exposures		
EU-22a	(Exposures excluded from the total exposure measure in accordance with point (c) and point (ca) of Article 429a(1) CRR)	-	-
EU-22b	(Exposures exempted in accordance with point (j) of Article 429a(1) CRR (on and off balance sheet))	-	-
EU-22c	(Excluded exposures of public development banks (or units) - Public sector investments)	-	-
EU-22d	(Excluded exposures of public development banks (or units) - Promotional loans)	-41,610,224	-38,604,448
EU-22e	(Excluded passing-through promotional loan exposures by non-public development banks (or units))	-	-
EU-22f	(Excluded guaranteed parts of exposures arising from export credits)	-	-
EU-22g	(Excluded excess collateral deposited at triparty agents)	-	-
EU-22h	(Excluded CSD related services of CSD/institutions in accordance with point (o) of Article 429a(1) CRR)	-	-
EU-22i	(Excluded CSD related services of designated institutions in accordance with point (p) of Article 429a(1) CRR)	-	-
EU-22j	(Reduction of the exposure value of pre-financing or intermediate loans)	-	-
EU-22k	(Excluded exposures to shareholders according to Article 429a (1), point (da) CRR)		
EU-22l	(Exposures deducted in accordance with point (q) of Article 429a(1) CRR)		
EU-22m	(Total exempted exposures)	-41,610,224	-38,604,448

5. Leverage ratio

(EUR 1,000)		CRR leverage ratio exposures a 31 Dec 2025	CRR leverage ratio exposures b 31 Dec 2024
	Capital and total exposure measure		
23	**Tier 1 capital**	**1,705,929**	**1,646,129**
24	**Total exposure measure**	**13,042,867**	**13,340,479**
	Leverage ratio		
25	Leverage ratio (%)	13.0794%	12.3394%
EU-25	Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%)	3.1214%	3.1690%
25a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) (%)	13.0794%	12.3394%
26	Regulatory minimum leverage ratio requirement (%)	3.0000%	3.0000%
EU-26a	Additional own funds requirements to address the risk of excessive leverage (%)	-	-
EU-26b	of which: to be made up of CET1 capital	-	-
27	Leverage ratio buffer requirement (%)	-	-
EU-27a	Overall leverage ratio requirement (%)	3.0000%	3.0000%
	Choice on transitional arrangements and relevant exposures		
EU-27b	Choice on transitional arrangements for the definition of the capital measure	-	-
	Disclosure of mean values		
28	Mean of daily values of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables	-	-
29	Quarter-end value of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables	-	-
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)	13,042,867	13,340,479
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)	13,042,867	13,340,479
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)	13.0794%	12.3394%
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)	13.0794%	12.3394%

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

MuniFin fulfills the CRR definition of a public development credit institution and may therefore deduct all credit receivables from municipalities, wellbeing services counties and central government in the calculation of its leverage ratio exposure measure. The total amount exempted is EUR 41,610 million (EUR 38,604 million) at end of December 2025.

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:**	**12,106,915**
EU-2	Trading book exposures	-
EU-3	Banking book exposures, of which:	12,106,915
EU-4	Covered bonds	1,725,280
EU-5	Exposures treated as sovereigns	7,389,808
EU-6	Exposures to regional governments, MDB, international organisations and PSE, not treated as sovereigns	80,532
EU-7	Institutions	2,365,240
EU-8	Secured by mortgages of immovable properties	-
EU-9	Retail exposures	-
EU-10	Corporates	501,745
EU-11	Exposures in default	-
EU-12	Other exposures (e.g. equity, securitisations, and other non-credit obligation assets)	44,309

31 Dec 2024 (EUR 1,000)		a
		CRR leverage ratio exposures
EU-1	**Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:**	**12,402,700**
EU-2	Trading book exposures	-
EU-3	Banking book exposures, of which:	12,402,700
EU-4	Covered bonds	1,531,432
EU-5	Exposures treated as sovereigns	8,928,720
EU-6	Exposures to regional governments, MDB, international organisations and PSE, not treated as sovereigns	44,702
EU-7	Institutions	1,458,444
EU-8	Secured by mortgages of immovable properties	-
EU-9	Retail exposures	-
EU-10	Corporates	382,377
EU-11	Exposures in default	-
EU-12	Other exposures (e.g. equity, securitisations, and other non-credit obligation assets)	57,024

EU LRA
Disclosure of LR qualitative information

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

The risk of excessive leverage is managed as part of the internal capital management process. Within this process, the target level for leverage ratio is defined. The leverage ratio is part of MuniFin Group's RAF and is regularly monitored in Risk Appetite Dashboard and in internal monthly reporting. Leverage ratio is also one of the Recovery Plan indicators. The principles for managing maturity mismatch and asset encumbrance are defined in the Liquidity and Funding Risk Policy. The maturity mismatch is followed and managed through the financing gap indicator within the RAF. The Group maintains a sufficient liquidity portfolio of unencumbered, highly liquid assets at all times.

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

The consolidated leverage ratio was 13,0794% at the end of 2025 compared to 12.3394% at the end of previous year. The balance sheet exposures increased by EUR 2,508 million during the year. Off-balance sheet exposures, loan commitments to public and public sector entities, increased by EUR 204 million during the year. Tier 1 capital increased in the period by EUR 60 million.

6. Liquidity requirements

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 YYYY)	31 Dec 2025	30 Sep 2025	30 Jun 2025	31 Mar 2025	31 Dec 2025	30 Sep 2025	30 Jun 2025	31 Mar 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)					12,039,215	11,978,012	12,178,301	12,109,289
Cash - outflows									
2	Retail deposits and deposits from small business customers, of which:	-	-	-	-	-	-	-	-
3	Stable deposits	-	-	-	-	-	-	-	-
4	Less stable deposits	-	-	-	-	-	-	-	-
5	Unsecured wholesale funding	3,247,647	2,819,719	2,588,200	2,369,494	3,247,647	2,819,719	2,588,200	2,369,494
6	Operational deposits (all counterparties) and deposits in networks of cooperative banks	-	-	-	-	-	-	-	-
7	Non-operational deposits (all counterparties)	29,623	32,411	30,745	21,731	29,623	32,411	30,745	21,731
8	Unsecured debt	3,218,025	2,787,308	2,557,455	2,347,763	3,218,025	2,787,308	2,557,455	2,347,763
9	Secured wholesale funding					-	-	-	-
10	Additional requirements	3,955,728	4,030,190	4,096,936	4,150,364	1,295,400	1,270,586	1,285,053	1,326,398
11	Outflows related to derivative exposures and other collateral requirements	1,002,056	966,185	975,100	1,015,567	1,000,033	964,185	972,870	1,012,918
12	Outflows related to loss of funding on debt products	-	-	-	-	-	-	-	-
13	Credit and liquidity facilities	2,953,672	3,064,005	3,121,837	3,134,797	295,367	306,400	312,184	313,480
14	Other contractual funding obligations	66,193	59,793	47,254	45,634	55,165	49,164	36,650	29,555

Scope of consolidation: Consolidated (EUR 1,000)		a	b	c	d	e	f	g	h
		Total unweighted value (average)				Total weighted value (average)			
15	Other contingent funding obligations	6,511,265	6,445,149	6,428,007	6,395,147	651,126	644,515	642,801	639,515
16	**Total cash outflows**					**5,249,339**	**4,783,984**	**4,552,704**	**4,364,961**
Cash - inflows									
17	Secured lending (e.g. reverse repos)	-	-	-	-	-	-	-	-
18	Inflows from fully performing exposures	382,150	361,156	338,163	314,227	287,940	268,915	247,710	226,501
19	Other cash inflows	1,027,244	962,018	1,002,873	880,580	1,027,244	962,018	1,002,873	880,580
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**	**1,409,394**	**1,323,174**	**1,341,037**	**1,194,807**	**1,315,184**	**1,230,933**	**1,250,583**	**1,107,081**
EU-20a	**Fully exempt inflows**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
EU-20b	**Inflows subject to 90% cap**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
EU-20c	**Inflows subject to 75% cap**	**1,409,394**	**1,323,174**	**1,341,037**	**1,194,807**	**1,315,184**	**1,230,933**	**1,250,583**	**1,107,081**
Total adjusted value									
EU-21	**Liquidity buffer**					**12,039,215**	**11,978,012**	**12,178,301**	**12,109,289**
22	**Total net cash outflows**					**3,934,197**	**3,553,093**	**3,302,162**	**3,257,880**
23	**Liquidity coverage ratio**					**315.5626%**	**358.3955%**	**403.7949%**	**405.3028%**

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 YYYY)	31 Dec 2024	30 Sep 2024	30 Jun 2024	31 Mar 2024	31 Dec 2024	30 Sep 2024	30 Jun 2024	31 Mar 2024
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)					11,716,025	11,352,061	10,991,317	10,923,090
Cash - outflows									
2	Retail deposits and deposits from small business customers, of which:	-	-	-	-	-	-	-	-
3	Stable deposits	-	-	-	-	-	-	-	-
4	Less stable deposits	-	-	-	-	-	-	-	-
5	Unsecured wholesale funding	2,120,248	1,890,002	2,104,352	2,263,704	2,120,248	1,890,002	2,104,352	2,263,704
6	Operational deposits (all counterparties) and deposits in networks of cooperative banks	-	-	-	-	-	-	-	-
7	Non-operational deposits (all counterparties)	26,695	16,489	17,768	15,969	26,695	16,489	17,768	15,969
8	Unsecured debt	2,093,553	1,873,513	2,086,583	2,247,736	2,093,553	1,873,513	2,086,583	2,247,736
9	Secured wholesale funding					-	-	-	-
10	Additional requirements	4,212,829	4,346,709	4,417,236	4,257,162	1,378,735	1,460,943	1,505,149	1,501,052
11	Outflows related to derivative exposures and other collateral requirements	1,067,337	1,144,449	1,186,100	1,199,487	1,064,186	1,140,717	1,182,036	1,195,284
12	Outflows related to loss of funding on debt products	-	-	-	-	-	-	-	-
13	Credit and liquidity facilities	3,145,491	3,202,260	3,231,136	3,057,676	314,549	320,226	323,114	305,768
14	Other contractual funding obligations	42,790	44,474	46,772	35,744	32,791	34,423	36,631	31,014
15	Other contingent funding obligations	6,288,688	6,178,961	6,014,858	5,852,411	628,869	617,896	601,486	585,241
16	**Total cash outflows**					**4,160,643**	**4,003,264**	**4,247,618**	**4,381,011**

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Scope of consolidation: Consolidated (EUR 1,000)		a	b	c	d	e	f	g	h
		Total unweighted value (average)				Total weighted value (average)			
Cash - inflows									
17	Secured lending (e.g. reverse repos)	-	-	-	-	-	-	-	-
18	Inflows from fully performing exposures	310,054	306,215	294,818	276,681	221,249	218,106	209,009	195,093
19	Other cash inflows	907,198	927,577	951,908	987,995	907,198	927,577	951,908	987,995
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**	**1,217,252**	**1,233,792**	**1,246,726**	**1,264,676**	**1,128,447**	**1,145,682**	**1,160,917**	**1,183,088**
EU-20a	**Fully exempt inflows**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
EU-20b	**Inflows subject to 90% cap**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
EU-20c	**Inflows subject to 75% cap**	**1,217,252**	**1,233,792**	**1,246,726**	**1,264,676**	**1,128,447**	**1,145,682**	**1,160,917**	**1,183,088**
Total adjusted value									
EU-21	**Liquidity buffer**					**11,716,025**	**11,352,061**	**10,991,317**	**10,923,090**
22	**Total net cash outflows**					**3,032,196**	**2,857,582**	**3,086,701**	**3,197,923**
23	**Liquidity coverage ratio**					**411.6291%**	**427.9744%**	**382.1731%**	**369.4444%**

EU LIQ2
Net Stable Funding Ratio

31 Dec 2025 (EUR 1,000)		a	b	c	d	e
		Unweighted value by residual maturity				
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	Weighted value
Available stable funding (ASF) Items						
1	Capital items and instruments	1,864,673	-	-	-	1,864,673
2	*Own funds*	1,864,673	-	-	-	1,864,673
3	*Other capital instruments*		-	-	-	-
4	Retail deposits		-	-	-	-
5	*Stable deposits*		-	-	-	-
6	*Less stable deposits*		-	-	-	-
7	Wholesale funding:		8,679,699	3,440,241	37,495,375	39,215,495
8	*Operational deposits*		-	-	-	-
9	*Other wholesale funding*		8,679,699	3,440,241	37,495,375	39,215,495
10	Interdependent liabilities		-	-	-	-
11	Other liabilities:	131,803	201,677	-	369,693	369,693
12	*NSFR derivative liabilities*	131,803				
13	*All other liabilities and capital instruments not included in the above categories*		201,677	-	369,693	369,693
14	**Total available stable funding (ASF)**					**41,449,861**
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					323,040
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool		-	-	-	-
16	Deposits held at other financial institutions for operational purposes		-	-	-	-

31 Dec 2025 (EUR 1,000)		a	b	c	d	e
		Unweighted value by residual maturity				
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	Weighted value
17	Performing loans and securities:		2,760,532	1,263,031	35,921,330	32,743,067
18	*Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut*		-	-	-	-
19	*Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions*		83,453	0	30,062	38,407
20	*Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:*		755,271	1,157,897	35,716,646	31,542,760
21	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*		594,088	927,248	27,412,799	23,425,637
22	*Performing residential mortgages, of which:*		-	-	-	-
23	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*		-	-	-	
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*		1,921,808	105,134	174,622	1,161,899
25	Interdependent assets		-	-	-	-
26	Other assets:	-	2,842,333	2,347	312,464	965,397
27	*Physical traded commodities*				-	-
28	*Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs*		343,150	-	-	291,677
29	*NSFR derivative assets*		-			-
30	*NSFR derivative liabilities before deduction of variation margin posted*		2,129,152			106,458
31	*All other assets not included in the above categories*		370,032	2,347	312,464	567,262
32	Off-balance sheet items		281,193	41,597	2,134,010	122,840
33	**Total RSF**					**34,154,344**
34	**Net Stable Funding Ratio (%)**					**121.3604%**

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		a	b	c	d	e
		Unweighted value by residual maturity				
30 Sep 2025 (EUR 1,000)		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	Weighted value
Available stable funding (ASF) Items						
1	Capital items and instruments	1,797,726	-	-	-	1,797,726
2	*Own funds*	1,797,726	-	-	-	1,797,726
3	*Other capital instruments*		-	-	-	-
4	Retail deposits		-	-	-	-
5	*Stable deposits*		-	-	-	-
6	*Less stable deposits*		-	-	-	-
7	Wholesale funding:		8,972,961	3,004,311	38,237,107	39,739,263
8	*Operational deposits*		-	-	-	-
9	*Other wholesale funding*		8,972,961	3,004,311	38,237,107	39,739,263
10	Interdependent liabilities		-	-	-	-
11	Other liabilities:	146,944	223,036	-	355,308	355,253
12	*NSFR derivative liabilities*	146,944				
13	*All other liabilities and capital instruments not included in the above categories*		223,036	-	355,308	355,253
14	**Total available stable funding (ASF)**					**41,892,241**
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					303,494
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool		-	-	-	-
16	Deposits held at other financial institutions for operational purposes		-	-	-	-

30 Sep 2025 (EUR 1,000)		a	b	c	d	e
		Unweighted value by residual maturity				
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	Weighted value
17	Performing loans and securities:		2,391,389	1,334,011	34,948,332	31,770,332
18	*Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut*		-	-	-	-
19	*Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions*		78,933	0	30,070	37,963
20	*Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:*		760,623	1,160,788	34,715,399	30,697,406
21	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*		592,656	920,892	26,545,832	22,693,808
22	*Performing residential mortgages, of which:*		-	-	-	-
23	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*		-	-	-	
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*		1,551,834	173,223	202,863	1,034,962
25	Interdependent assets		-	-	-	-
26	Other assets:	-	2,565,481	3,883	386,573	874,691
27	*Physical traded commodities*				-	-
28	*Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs*		305,500	-	-	259,675
29	*NSFR derivative assets*		-			-
30	*NSFR derivative liabilities before deduction of variation margin posted*		2,021,836			101,092
31	*All other assets not included in the above categories*		238,145	3,883	386,573	513,925
32	Off-balance sheet items		399,915	76,190	2,356,623	141,636
33	**Total RSF**					**33,090,154**
34	**Net Stable Funding Ratio (%)**					**126.6003%**

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30 Jun 2025 (EUR 1,000)		a	b	c	d	e
		Unweighted value by residual maturity				
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	Weighted value
Available stable funding (ASF) Items						
1	Capital items and instruments	1,852,767	-	-	-	1,852,767
2	*Own funds*	1,852,767	-	-	-	1,852,767
3	*Other capital instruments*		-	-	-	-
4	Retail deposits		-	-	-	-
5	*Stable deposits*		-	-	-	-
6	*Less stable deposits*		-	-	-	-
7	Wholesale funding:		6,885,320	4,319,362	38,112,621	40,272,302
8	*Operational deposits*		-	-	-	-
9	*Other wholesale funding*		6,885,320	4,319,362	38,112,621	40,272,302
10	Interdependent liabilities		-	-	-	-
11	Other liabilities:	132,388	96,920	-	361,090	360,810
12	*NSFR derivative liabilities*	132,388				
13	*All other liabilities and capital instruments not included in the above categories*		96,920	-	361,090	360,810
14	**Total available stable funding (ASF)**					**42,485,879**
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					296,256
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool		-	-	-	-
16	Deposits held at other financial institutions for operational purposes		-	-	-	-

	30 Jun 2025 (EUR 1,000)	a	b	c	d	e
		Unweighted value by residual maturity				
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	Weighted value
17	Performing loans and securities:		2,404,697	1,470,637	34,753,167	31,672,529
18	*Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut*		-	-	-	-
19	*Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions*		158,128	0	30,065	53,784
20	*Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:*		678,100	1,175,640	34,551,246	30,540,934
21	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*		551,781	931,666	26,291,086	22,496,661
22	*Performing residential mortgages, of which:*		-	-	-	-
23	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*		-	-	-	-
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*		1,568,470	294,997	171,855	1,077,810
25	Interdependent assets		-	-	-	-
26	Other assets:	-	2,630,947	3,258	305,613	865,807
27	*Physical traded commodities*					
28	*Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs*		335,500	-	-	285,175
29	*NSFR derivative assets*		-			-
30	*NSFR derivative liabilities before deduction of variation margin posted*		1,958,589			97,929
31	*All other assets not included in the above categories*		336,857	3,258	305,613	482,703
32	Off-balance sheet items		367,668	95,317	2,459,296	438,706
33	**Total RSF**					**33,273,298**
34	**Net Stable Funding Ratio (%)**					**127.6876%**

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31 Mar 2025 (EUR 1,000)		a	b	c	d	e
		Unweighted value by residual maturity				
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	Weighted value
Available stable funding (ASF) Items						
1	Capital items and instruments	1,829,475	-	-	-	1,829,475
2	*Own funds*	1,829,475	-	-	-	1,829,475
3	*Other capital instruments*		-	-	-	-
4	Retail deposits		-	-	-	-
5	*Stable deposits*		-	-	-	-
6	*Less stable deposits*		-	-	-	-
7	Wholesale funding:		7,014,728	5,912,042	36,666,061	39,622,081
8	*Operational deposits*		-	-	-	-
9	*Other wholesale funding*		7,014,728	5,912,042	36,666,061	39,622,081
10	Interdependent liabilities		-	-	-	-
11	Other liabilities:	126,335	54,766	-	366,550	366,379
12	*NSFR derivative liabilities*	126,335				
13	*All other liabilities and capital instruments not included in the above categories*		54,766	-	366,550	366,379
14	**Total available stable funding (ASF)**					**41,817,936**
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					266,566
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool		-	-	-	-
16	Deposits held at other financial institutions for operational purposes		-	-	-	-

31 Mar 2025 (EUR 1,000)		a	b	c	d	e
		Unweighted value by residual maturity				
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	Weighted value
17	Performing loans and securities:		2,197,324	1,371,602	33,950,517	30,969,007
18	*Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut*		-	-	-	-
19	*Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions*		94,046	-	27,563	36,968
20	*Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:*		694,367	1,135,157	33,750,092	29,962,428
21	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*		512,916	917,477	25,967,913	22,328,126
22	*Performing residential mortgages, of which:*		-	-	-	-
23	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*		-	-	-	
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*		1,408,911	236,446	172,862	969,611
25	Interdependent assets		-	-	-	-
26	Other assets:	-	1,697,913	3,254	270,664	688,129
27	*Physical traded commodities*				-	-
28	*Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs*		355,000	-	-	301,750
29	*NSFR derivative assets*		-			-
30	*NSFR derivative liabilities before deduction of variation margin posted*		1,253,028			62,651
31	*All other assets not included in the above categories*		89,885	3,254	270,664	323,727
32	Off-balance sheet items		696,526	110,189	2,553,971	169,297
33	**Total RSF**					**32,092,999**
34	**Net Stable Funding Ratio (%)**					**130.3024%**

EU LIQB
On qualitative information on LCR, which complements template EU LIQ1

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

The main items which effect the outflows of MuniFin Group's LCR are funding outflows and the impact of an adverse market scenario on derivatives transactions. On the inflow side larger than normal principal payments of loan contracts and non-ISIN short-term papers may have impact on the LCR ratio.

(b) Explanations on the changes in the LCR over time

MuniFin Group has had steady figures in LCR for over a year.

(c) Explanations on the actual concentration of funding sources

MuniFin Group acquires funding from international capital markets, mainly with unsecured public bond issuances. While there is a high concentration on the unsecured wholesale funding, the Group has diversified its funding extensively across markets, currencies, durations and maturities.

(d) High-level description of the composition of the institution`s liquidity buffer.

MuniFin Group holds a diversified liquidity buffer of Level 1 and Level 2A investments. The liquidity buffer is composed of the following Level 1 assets: central bank assets, coins and banknotes, central government assets, regional government / local authority assets, public sector entity assets, multilateral development bank and international organisation assets and extremely high quality covered bonds. The liquidity buffer is composed of the following Level 2 assets: regional government / local authorities or public sector entity assets (Member State, risk-weight 20%), central bank or central / regional government or local authorities or public sector entity assets (Third Country, risk-weight 20%), high quality covered bonds (CQS2) and high quality covered bonds (Third Country, CQS1). MuniFin Group holds a liquidity buffer in EUR.

(e) Derivative exposures and potential collateral calls

MuniFin Group has made CSA agreements including daily margin calls with most of its derivative counterparties. The Group calculates the largest cash collateral movement with the historical look-back approach and considers this as an outflow for the potential collateral calls.

(f) Currency mismatch in the LCR

MuniFin Group monitors and calculates LCR in all significant currencies on a regular basis. The Group hedges against exchange rate risks by using derivative contracts to translate all foreign currency denominated funding into euros. MuniFin Group does not bear any material foreign exchange risk.

(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

Outflows from unsecured wholesale funding with call maturity options are treated in the LCR calculation according to the next possible call date.

7. Credit risk quality

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 default in accordance with Article 178 CRR.

Definition of default: A default shall be considered to have occurred with regard to a particular obligor when either or both of the following have taken place: (i) the institution considers that the obligor is unlikely to pay its credit obligations to the institution, the parent undertaking or any of its subsidiaries in full, without recourse by the institution to actions such as realising security; (ii) the obligor is past due more than 90 days on any material credit obligation to the institution, the parent undertaking or any of its subsidiaries.

Past due: A credit obligation is recognised past due when any amount of principal, interest or fee has not been paid at the date it was due according to the latest (modified) schedule of payments.

The definitions of past due and default for accounting and regulatory purposes are the same.

Impaired: At the end of each reporting period, MuniFin Group assesses whether there is objective evidence that a financial asset is impaired. A financial asset is impaired and impairment losses are incurred if there is objective evidence of impairment as a result of one or more events that occurred after the initial recognition of the asset, and this loss event has an impact on the estimated future cash flows that can be reliably estimated. Objective evidence of impairment of an item or group recognised under financial assets can include information on the following loss events: the issuer or debtor is experiencing significant financial difficulty, or breach of contract terms, such as default or delinquency in interest or principal payments.

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

All past-due exposures (more than 90 days) are impaired. There are no past-due exposures that would not be considered impaired.

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

MuniFin Group is only applying specific credit risk adjustments (SCRA). All SCRA for stage 3 assets under IFRS 9 are considered to be a result of a significant perceived decline in the credit quality of a credit obligation and hence are treated as an indication of unlikeliness to pay. If exposure losses recognised in the profit or loss account or losses are result of current or past events, exposure is treated as credit-impaired under SCRA and it is considered defaulted.

(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 forborne exposure defined in Annex V to Commission Implementing Regulation (EU) 680/2014.

MuniFin Group does not have an 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. The definition of a restructured exposure correspond to the definition of a forborne exposure defined in Annex V to Commission Implementing Regulation (EU) 680/2014.

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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							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		
31 Dec 2025 (EUR 1,000)			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		On performing exposures	On non-performing exposures
005	Cash balances at central banks and other demand deposits	5,250,877	5,250,877	-	-	-	-	0	0	-	-	-	-	-	-	-
010	Loans and advances	40,925,714	38,673,973	2,200,933	454,168	-	451,880	-2,912	-263	-2,649	-655	-	-652	-	22,006,601	453,449
020	Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
030	General governments	17,511,245	17,346,790	144,303	-	-	-	-170	-107	-62	-	-	-	-	1,867,316	-
040	Credit institutions	1,908,417	1,908,417	-	-	-	-	-96	-96	-	-	-	-	-	-	-
050	Other financial corporations	803,838	803,838	-	-	-	-	-5	-5	-	-	-	-	-	-	-
060	Non-financial corporations	20,281,164	18,257,150	1,998,177	452,038	-	449,750	-2,505	-55	-2,450	-653	-	-650	-	19,720,089	451,357
070	Of which SMEs	4,059,502	3,600,706	458,796	297,359	-	297,359	-513	-10	-504	-263	-	-263	-	4,043,663	297,073
080	Households	421,050	357,777	58,453	2,131	-	2,131	-137	-1	-136	-2	-	-2	-	419,195	2,092
090	Debt securities	8,061,266	2,465,533	2,778	-	-	-	-2	-2	0	-	-	-	-	711,687	-
100	Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
110	General governments	3,301,001	1,850,587	1,439	-	-	-	-2	-2	0	-	-	-	-	157,474	-

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		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
31 Dec 2025 (EUR 1,000)			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			
120	Credit institutions	4,394,899	509,714	-	-	-	-	-	-	-	-	-	-	-	463,336	-
130	Other financial corporations	274,190	15,395	-	-	-	-	-	-	-	-	-	-	-	-	-
140	Non-financial corporations	91,176	89,837	1,339	-	-	-	0	0	0	-	-	-	-	90,877	-
150	Off-balance sheet exposures	8,694,476	2,359,606	97,195	-	-	-	19	13	5	-	-	-	-	437,180	-
160	Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
170	General governments	6,923,677	858,025	11,125	-	-	-	5	4	1	-	-	-	-	67,325	-
180	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
190	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
200	Non-financial corporations	1,751,899	1,483,381	86,069	-	-	-	14	9	5	-	-	-	-	353,244	-
210	Households	18,900	18,200	-	-	-	-	0	0	-	-	-	-	-	16,610	-
220	**Total**	**62,932,333**	**48,749,988**	**2,300,905**	**454,168**	**-**	**451,880**	**-2,895**	**-252**	**-2,644**	**-655**	**-**	**-652**	**-**	**23,155,467**	**453,449**

As of the end of December 2025, off-balance-sheet exposures have also included limits for short-term customer financing.

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		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		
31 Dec 2024 (EUR 1,000)			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		On performing exposures	On non-performing exposures
005	Cash balances at central banks and other demand deposits	7,870,360	7,870,360	-	-	-	-	0	0	-	-	-	-	-	-	-
010	Loans and advances	37,271,335	35,121,954	2,093,405	299,539	-	297,585	-2,320	-217	-2,103	-316	-	-313	-	20,143,390	298,886
020	Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
030	General governments	16,849,968	16,678,634	149,365	-	-	-	-126	-102	-24	-	-	-	-	1,855,634	-
040	Credit institutions	696,311	696,311	-	-	-	-	-60	-60	-	-	-	-	-	-	-
050	Other financial corporations	889,688	889,688	-	-	-	-	-5	-5	-	-	-	-	-	-	-
060	Non-financial corporations	18,483,910	16,554,109	1,901,243	297,299	-	295,345	-2,038	-49	-1,990	-312	-	-309	-	17,937,799	296,650
070	Of which SMEs	3,849,313	3,259,459	589,854	229,832	-	229,832	-773	-8	-764	-253	-	-253	-	3,831,712	229,575
080	Households	351,459	303,213	42,797	2,240	-	2,240	-90	-1	-89	-4	-	-4	-	349,957	2,236
090	Debt securities	5,878,913	2,201,906	986	-	-	-	-1	-1	0	-	-	-	-	324,052	-
100	Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
110	General governments	2,630,806	1,764,296	-	-	-	-	-1	-1	0	-	-	-	-	175,853	-

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		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
31 Dec 2024 (EUR 1,000)			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			
120	Credit institutions	2,964,032	351,707	-	-	-	-	-	-	-	-	-	-	-	77,311	-
130	Other financial corporations	212,695	15,508	-	-	-	-	-	-	-	-	-	-	-	-	-
140	Non-financial corporations	71,381	70,394	986	-	-	-	0	0	0	-	-	-	-	70,888	-
150	Off-balance sheet exposures	2,943,531	2,872,312	71,219	-	-	-	18	16	2	-	-	-		765,687	-
160	Central banks	-	-	-	-	-	-	-	-	-	-	-	-		-	-
170	General governments	658,584	658,584	-	-	-	-	4	4	-	-	-	-		-	-
180	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-		-	-
190	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-		-	-
200	Non-financial corporations	2,275,056	2,203,837	71,219	-	-	-	15	13	2	-	-	-		765,301	-
210	Households	9,891	9,891	-	-	-	-	0	0	-	-	-	-		386	-
220	**Total**	**53,964,140**	**48,066,533**	**2,165,610**	**299,539**	**-**	**297,585**	**-2,303**	**-202**	**-2,101**	**-316**	**-**	**-313**	**-**	**21,233,130**	**298,886**

EU CR1-A
Maturity of exposures

Table CR1-A shows breakdown by residual maturity for on- and off balance sheet exposures. As of the end of December 2025, debt securities also include off-balance-sheet items related to limits for short-term customer financing, which totalled EUR 6,238 million at year-end. At the end of December 2025, 62.03% (71.9%) of the exposures were within the "> 5 years" bucket.

31 Dec 2025 (EUR 1,000)		a	b	c	d	e	f
		Net exposure value					
		On demand	≤ 1 year	> 1 year ≤ 5 years	> 5 years	No stated maturity	Total
1	Loans and advances	2,378,662	1,073,459	5,778,794	34,602,182	-	43,833,097
2	Debt securities	-	8,952,996	3,889,315	1,456,629	-	14,298,940
3	**Total**	**2,378,662**	**10,026,455**	**9,668,109**	**36,058,811**	**-**	**58,132,037**

31 Dec 2024 (EUR 1,000)		a	b	c	d	e	f
		Net exposure value					
		On demand	≤ 1 year	> 1 year ≤ 5 years	> 5 years	No stated maturity	Total
1	Loans and advances	1,509,726	890,771	5,583,335	32,527,918	-	40,511,751
2	Debt securities	-	2,518,618	2,540,252	820,042	-	5,878,912
3	**Total**	**1,509,726**	**3,409,389**	**8,123,587**	**33,347,960**	**-**	**46,390,663**

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

31 Dec 2025 (EUR 1,000)		a
		Gross carrying amount
010	**Initial stock of non-performing loans and advances**	**299,539**
020	Inflows to non-performing portfolios	175,239
030	Outflows from non-performing portfolios	-20,610
040	Outflow due to write-offs	-
050	Outflow due to other situations	-20,610
060	**Final stock of non-performing loans and advances**	**454,168**

31 Dec 2024 (EUR 1,000)		a
		Gross carrying amount
010	**Initial stock of non-performing loans and advances**	**151,028**
020	Inflows to non-performing portfolios	158,132
030	Outflows from non-performing portfolios	-9,620
040	Outflow due to write-offs	-
050	Outflow due to other situations	-9,620
060	**Final stock of non-performing loans and advances**	**299,539**

EU CQ1
Credit quality of forborne exposures

Total amount of forborne exposures at the end of December 2025 increased by EUR 90 million compared to the previous year. Performing forborne exposures decreased by EUR 23 million and non-performing forborne exposures grew by EUR 113 million.

		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	
			Non-performing forborne						
31 Dec 2025 (EUR 1,000)		Performing forborne		Of which defaulted	Of which impaired	On performing forborne exposures	On non-performing forborne exposures		Of which collateral and financial guarantees received on non-performing exposures with forbearance measures
005	Cash balances at central banks and other demand deposits	-	-	-	-	-	-	-	-
010	Loans and advances	407,492	250,261	250,261	250,261	-200	-351	657,122	249,909
020	*Central banks*	-	-	-	-	-	-	-	-
030	*General governments*	-	-	-	-	-	-	-	-
040	*Credit institutions*	-	-	-	-	-	-	-	-
050	*Other financial corporations*	-	-	-	-	-	-	-	-
060	*Non-financial corporations*	407,492	249,258	249,258	249,258	-200	-351	656,119	248,906
070	*Households*	-	1,003	1,003	1,003	-	0	1,003	1,003
080	Debt securities	-	-	-	-	-	-	-	-
090	Loan commitments given	-	-	-	-	-	-	-	-
100	**Total**	**407,492**	**250,261**	**250,261**	**250,261**	**-200**	**-351**	**657,122**	**249,909**

		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	
			Non-performing forborne						
31 Dec 2024 (EUR 1,000)		Performing forborne		Of which defaulted	Of which impaired	On performing forborne exposures	On non-performing forborne exposures		Of which collateral and financial guarantees received on non-performing exposures with forbearance measures
005	Cash balances at central banks and other demand deposits	-	-	-	-	-	-	-	-
010	Loans and advances	430,501	137,511	137,511	137,511	-257	-94	567,601	137,391
020	*Central banks*	-	-	-	-	-	-	-	-
030	*General governments*	-	-	-	-	-	-	-	-
040	*Credit institutions*	-	-	-	-	-	-	-	-
050	*Other financial corporations*	-	-	-	-	-	-	-	-
060	*Non-financial corporations*	429,121	136,447	136,447	136,447	-252	-94	565,163	136,327
070	*Households*	1,380	1,064	1,064	1,064	-5	0	2,438	1,064
080	Debt securities	-	-	-	-	-	-	-	-
090	Loan commitments given	-	-	-	-	-	-	-	-
100	**Total**	**430,501**	**137,511**	**137,511**	**137,511**	**-257**	**-94**	**567,601**	**137,391**

EU CQ3
Credit quality of performing and non-performing exposures by past due days

The following table shows the counterparty breakdown for the gross carrying amount of performing and non-performing exposures. As of the end of December 2025, off-balance-sheet exposures have also included limits for short-term customer financing. The gross NPL ratio is 1.10% (0.80%).

		a	b	c	d	e	f	g	h	i	j	k	l
		Gross carrying amount/nominal amount											
		Performing exposures			Non-performing exposures								
31 Dec 2025 (EUR 1,000)			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
005	Cash balances at central banks and other demand deposits	5,250,877	5,250,877	-	-	-	-	-	-	-	-	-	-
010	Loans and advances	40,925,714	40,923,297	2,417	454,168	324,747	-	-	129,421	-	-	-	454,168
020	*Central banks*	-	-	-	-	-	-	-	-	-	-	-	-
030	*General governments*	17,511,245	17,511,245	-	-	-	-	-	-	-	-	-	-
040	*Credit institutions*	1,908,417	1,908,417	-	-	-	-	-	-	-	-	-	-
050	*Other financial corporations*	803,838	803,838	-	-	-	-	-	-	-	-	-	-
060	*Non-financial corporations*	20,281,164	20,278,805	2,359	452,038	322,616	-	-	129,421	-	-	-	452,038
070	*Of which SMEs*	4,059,502	4,059,502	-	297,359	226,142	-	-	71,216	-	-	-	297,359
080	*Households*	421,050	420,992	59	2,131	2,131	-	-	-	-	-	-	2,131
090	Debt securities	8,061,266	8,061,266	-	-	-	-	-	-	-	-	-	-
100	*Central banks*	-	-	-	-	-	-	-	-	-	-	-	-

		a	b	c	d	e	f	g	h	i	j	k	l
		Gross carrying amount/nominal amount											
		Performing exposures			Non-performing exposures								
31 Dec 2025 (EUR 1,000)			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
110	*General governments*	3,301,001	3,301,001	-	-	-	-	-	-	-	-	-	-
120	*Credit institutions*	4,394,899	4,394,899	-	-	-	-	-	-	-	-	-	-
130	*Other financial corporations*	274,190	274,190	-	-	-	-	-	-	-	-	-	-
140	*Non-financial corporations*	91,176	91,176	-	-	-	-	-	-	-	-	-	-
150	Off-balance-sheet exposures	8,694,476			-								-
160	*Central banks*	-			-								-
170	*General governments*	6,923,677			-								-
180	*Credit institutions*	-			-								-
190	*Other financial corporations*	-			-								-
200	*Non-financial corporations*	1,751,899			-								-
210	*Households*	18,900			-								-
220	**Total**	**62,932,333**	**54,235,439**	**2,417**	**454,168**	**324,747**	**-**	**-**	**129,421**	**-**	**-**	**-**	**454,168**

		a	b	c	d	e	f	g	h	i	j	k	l
		Gross carrying amount/nominal amount											
		Performing exposures			Non-performing exposures								
31 Dec 2024 (EUR 1,000)			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
005	Cash balances at central banks and other demand deposits	7,870,360	7,870,360	-	-	-	-	-	-	-	-	-	-
010	Loans and advances	37,271,335	37,268,864	2,471	299,539	211,817	72,973	1,220	13,529	-	-	-	299,539
020	*Central banks*	-	-	-	-	-	-	-	-	-	-	-	-
030	*General governments*	16,849,968	16,849,968	-	-	-	-	-	-	-	-	-	-
040	*Credit institutions*	696,311	696,311	-	-	-	-	-	-	-	-	-	-
050	*Other financial corporations*	889,688	889,688	-	-	-	-	-	-	-	-	-	-
060	*Non-financial corporations*	18,483,910	18,481,439	2,471	297,299	210,534	72,973	263	13,529	-	-	-	297,299
070	*Of which SMEs*	3,849,313	3,849,313	-	229,832	176,779	39,262	263	13,529	-	-	-	229,832
080	*Households*	351,459	351,459	-	2,240	1,283	-	957	-	-	-	-	2,240
090	Debt securities	5,878,913	5,878,913	-	-	-	-	-	-	-	-	-	-
100	*Central banks*	-	-	-	-	-	-	-	-	-	-	-	-
110	*General governments*	2,630,806	2,630,806	-	-	-	-	-	-	-	-	-	-
120	*Credit institutions*	2,964,032	2,964,032	-	-	-	-	-	-	-	-	-	-
130	*Other financial corporations*	212,695	212,695	-	-	-	-	-	-	-	-	-	-
140	*Non-financial corporations*	71,381	71,381	-	-	-	-	-	-	-	-	-	-

31 Dec 2024 (EUR 1,000)		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
150	*Off-balance-sheet exposures*	2,943,531			-								-
160	*Central banks*	-			-								-
170	*General governments*	658,584			-								-
180	*Credit institutions*	-			-								-
190	*Other financial corporations*	-			-								-
200	*Non-financial corporations*	2,275,056			-								-
210	*Households*	9,891			-								-
220	**Total**	**53,964,140**	**51,018,137**	**2,471**	**299,539**	**211,817**	**72,973**	**1,220**	**13,529**	**-**	**-**	**-**	**299,539**

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EU CQ4
Quality of non-performing exposures by geography

The Group's non-domestic original exposures are 13.2% (10.1%) of total exposures on 31 Dec 2025. The five largest countries are reported below. Other countries include exposures in the following countries: AT, AU, BE, DK, ES, IE, JP, KR, LU, LV, NL, NO, NZ and SE. As of the end of December 2025, off-balance-sheet exposures have also included limits for short-term customer financing.

		a	b	c	d	e	f	g
		Gross carrying/nominal amount						
			Of which non-performing					
31 Dec 2025 (EUR 1,000)				Of which defaulted	Of which subject to impairment	Accumulated impairment	Provisions on off-balance-sheet commitments and financial guarantees given	Accumulated negative changes in fair value due to credit risk on non-performing exposures
010	**On-balance-sheet exposures**	**49,441,145**	**454,168**	**454,168**	**43,797,380**	**-3,327**		**-**
020	FI	41,769,854	454,168	454,168	40,802,672	-3,517		-
030	DE	1,370,854	-	-	756,150	-21		-
040	GB	1,098,542	-	-	1,032,666	-10		-
050	FR	976,520	-	-	370,595	-11		-
060	CA	710,637	-	-	208,015	-2		-
070	Other countries	3,514,737	-	-	627,282	234		-
080	**Off-balance-sheet exposures**	**8,694,476**	**-**	**-**			**19**	
090	FI	8,694,476	-	-			19	
150	**Total**	**58,135,621**	**454,168**	**454,168**	**43,797,380**	**-3,327**	**19**	**-**

31 Dec 2024 (EUR 1,000)		a	b	c	d	e	f	g
		Gross carrying/nominal amount						
			Of which non-performing					
				Of which defaulted	Of which subject to impairment	Accumulated impairment	Provisions on off-balance-sheet commitments and financial guarantees given	Accumulated negative changes in fair value due to credit risk on non-performing exposures
010	**On-balance-sheet exposures**	**43,449,788**	**299,539**	**299,539**	**39,717,791**	**-2,637**		**-**
020	FI	38,746,834	299,539	299,539	38,052,064	-2,622		-
030	GB	1,004,008	-	-	977,000	-6		-
040	DE	716,271	-	-	96,192	-2		-
050	FR	506,475	-	-	243,491	-5		-
060	CA	412,984	-	-	175,846	-1		-
070	Other countries	2,063,216	-	-	173,199	-1		-
080	**Off-balance-sheet exposures**	**2,943,531**	**-**	**-**			**18**	
090	FI	2,943,531	-	-			18	
150	**Total**	**46,393,318**	**299,539**	**299,539**	**39,717,791**	**-2,637**	**18**	**-**

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

31 Dec 2025 (EUR 1,000)		a	b	c	d	e	f
		Gross carrying amount					
			Of which non-performing				
				Of which defaulted	Of which loans and advances subject to impairment	Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures
010	Agriculture, forestry and fishing	-	-	-	-	-	-
020	Mining and quarrying	-	-	-	-	-	-
030	Manufacturing	4,494	-	-	4,494	0	-
040	Electricity, gas, steam and air conditioning supply	217,235	-	-	217,235	-2	-
050	Water supply	994,353	-	-	984,616	-8	-
060	Construction	137,887	-	-	137,887	-61	-
070	Wholesale and retail trade	-	-	-	-	-	-
080	Transport and storage	78,070	-	-	78,070	-1	-
090	Accommodation and food service activities	4,243	-	-	4,243	-1	-
100	Information and communication	14,081	-	-	14,081	-23	-
110	Real estate activities	19,084,764	450,541	450,541	19,068,665	-3,058	-
120	Financial and insurance activities	8,862	-	-	8,862	0	-
130	Professional, scientific and technical activities	11,754	-	-	11,754	0	-
140	Administrative and support service activities	20,406	-	-	20,406	-2	-
150	Public administration and defense, compulsory social security	-	-	-	-	-	-
160	Education	-	-	-	-	-	-
170	Human health services and social work activities	107,579	-	-	107,579	-1	-
180	Arts, entertainment and recreation	49,474	1,496	1,496	49,474	-1	-
190	Other services	-	-	-	-	-	-
200	**Total**	**20,733,201**	**452,038**	**452,038**	**20,707,364**	**-3,158**	**-**

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31 Dec 2024 (EUR 1,000)		a	b	c	d	e	f
		Gross carrying amount					
			Of which non-performing				
				Of which defaulted	Of which loans and advances subject to impairment	Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures
010	Agriculture, forestry and fishing	-	-	-	-	-	-
020	Mining and quarrying	-	-	-	-	-	-
030	Manufacturing	5,190	-	-	5,190	-1	-
040	Electricity, gas, steam and air conditioning supply	264,694	-	-	264,694	-4	-
050	Water supply	963,876	-	-	953,635	-9	-
060	Construction	140,085	239	239	140,085	-93	-
070	Wholesale and retail trade	-	-	-	-	-	-
080	Transport and storage	87,466	-	-	87,466	-1	-
090	Accommodation and food service activities	4,288	-	-	4,288	-17	-
100	Information and communication	12,469	-	-	12,469	-31	-
110	Real estate activities	17,099,702	296,119	296,119	17,081,385	-2,191	-
120	Financial and insurance activities	10,051	-	-	10,051	0	-
130	Professional, scientific and technical activities	13,869	-	-	13,869	0	-
140	Administrative and support service activities	23,036	-	-	23,036	-2	-
150	Public administration and defense, compulsory social security	1,625	-	-	1,625	0	-
160	Education	-	-	-	-	-	-
170	Human health services and social work activities	106,347	-	-	106,347	0	-
180	Arts, entertainment and recreation	48,512	941	941	48,512	-1	-
190	Other services	-	-	-	-	-	-
200	**Total**	**18,781,209**	**297,299**	**297,299**	**18,752,651**	**-2,350**	**-**

8. Use of credit risk mitigation techniques

EU CR3
CRM techniques overview:
Disclosure of the use of credit risk mitigation techniques

In the following table, the unsecured loans include loans granted to MuniFin Group's customers, cash held at the central bank and loans and advances to credit institutions other than posted cash collateral as variation margin. Collaterals reported in this table consist exclusively of immovable property. For further credit risk mitigation, all loans secured by immovable property have guarantees from the State of Finland, municipalities or wellbeing services counties.

On 31 December 2025, unsecured debt securities include covered bonds by EUR 1,725 million (EUR 1,531 million) and commercial papers to municipalities and wellbeing services counties by EUR 1,117 million (EUR 982 million).

31 Dec 2025 (EUR 1,000)		Unsecured carrying amount	Secured carrying amount	Of which secured by collateral	Of which secured by financial guarantees	Of which secured by credit derivatives
1	Loans and advances	24,167,142	22,460,050	15,916,456	6,543,594	-
2	Debt securities	7,349,577	711,687	-	711,687	-
3	**Total**	**31,516,719**	**23,171,737**	**15,916,456**	**7,255,281**	**-**
4	Of which non-performing exposures	65	453,449	348,914	104,535	-
EU-5	Of which defaulted	65	453,449			

31 Dec 2024 (EUR 1,000)		Unsecured carrying amount	Secured carrying amount	Of which secured by collateral	Of which secured by financial guarantees	Of which secured by credit derivatives
1	Loans and advances	24,996,322	20,442,276	13,985,353	6,456,923	-
2	Debt securities	5,554,859	324,052	-	324,052	-
3	**Total**	**30,551,182**	**20,766,329**	**13,985,353**	**6,780,976**	**-**
4	Of which non-performing exposures	338	298,886	254,021	44,865	-
EU-5	Of which defaulted	338	298,886			

MuniFin

9. Credit risk standardised approach

EU CRD
Qualitative disclosure requirements related to standardised approach

The capital requirement for credit risk is calculated using the standardised approach. In the standardised approach external credit assessment may be used according to the Capital Requirements Regulation. MuniFin Group uses external credit assessment institutions (ECAI) recognised by EBA to determine the risk-weight for liquidity portfolio issuers and issues. MuniFin Group uses three EBA-recognised ECAI for this purpose: Standard & Poor's, Moody's Investor Services and Fitch Ratings. The mapping of the alphanumeric scale of each ECAI used with the credit quality steps are aligned with the standard association published by the EBA. There were no changes in the ECAI used compared with year-end of 2024.

31 Dec 2025 and 31 Dec 2024 Asset class (debt securities)	External rating equivalent		
	Standard & Poor's	Moody's	Fitch
Exposures to central governments or central banks	x	x	x
Exposures to regional governments or local authorities	x	x	x
Exposures to public sector entities	x	x	x
Exposures to multilateral development banks	x	x	x
Exposures to international organisations	x	x	x
Exposures to institutions	x	x	x
Exposures to corporates	x	x	x
Exposures in the form of covered bonds	x	x	x
Exposures in other items	x	x	x

EU CR4
Standardised approach – Credit risk exposure and CRM effects

This table shows on- and off-balance sheet exposures. Items treated within the scope of counterparty credit risk are excluded.
Total on- and off-balance sheet exposure amount post CCF and CRM was EUR 52,751 million at the end of December 2025 increasing by EUR 2,081 million from the year-end 2024.

Exposure classes		a	b	c	d	e	f
		Exposures before CCF and before CRM		Exposures post CCF and post CRM		RWAs and RWAs density	
31 Dec 2025 (EUR 1,000)		On-balance-sheet exposures	Off-balance-sheet exposures	On-balance-sheet exposures	Off-balance-sheet exposures	RWAs	RWAs density (%)
1	Central governments or central banks	5,717,217	-	23,475,190	798,894	-	0.0000%
2	Non-central government public sector entities	-	-	-	-	-	-
EU 2a	Regional government or local authorities	18,059,188	6,868,623	23,104,821	183,818	5,914	0.0254%
EU 2b	Public sector entities	608,841	-	338,893	-	10,193	3.0076%
3	Multilateral development banks	381,509	-	381,509	-	-	0.0000%
EU 3a	International organisations	340,087	-	340,087	-	-	0.0000%
4	Institutions	2,365,240	-	2,171,852	-	474,154	21.8318%
5	Covered bonds	1,725,280	-	1,725,280	-	174,382	10.1075%
6	Corporates	5,553,204	332,399	187,080	-	38,390	20.5207%
6.1	Of which: Specialised Lending	-	-	-	-	-	-
7	Subordinated debt exposures and equity	-	-	-	-	-	-
EU 7a	Subordinated debt exposures	-	-	-	-	-	-
EU 7b	Equity	-	-	-	-	-	-

Exposure classes		a	b	c	d	e	f
		Exposures before CCF and before CRM		Exposures post CCF and post CRM		RWAs and RWAs density	
31 Dec 2025 (EUR 1,000)		On-balance-sheet exposures	Off-balance-sheet exposures	On-balance-sheet exposures	Off-balance-sheet exposures	RWAs	RWAs density (%)
8	Retail	-	-	-	-	-	-
9	Secured by mortgages on immovable property and ADC exposures	16,522,234	1,493,436	-	-	-	-
9.1	Secured by mortgages on residential immovable property - non IPRE	13,052,457	357,344	-	-	-	-
9.2	Secured by mortgages on residential immovable property - IPRE	2,199,121	2,153	-	-	-	-
9.3	Secured by mortgages on commercial immovable property - non IPRE	-	-	-	-	-	-
9.4	Secured by mortgages on commercial immovable property - IPRE	555	-	-	-	-	-
9.5	Acquisition, Development and Construction (ADC)	1,270,100	1,133,939	-	-	-	-
10	Exposures in default	451,911	-	-	-	-	-
EU 10a	Claims on institutions and corporates with a short-term credit assessment	-	-	-	-	-	-
EU 10b	Collective investment undertakings (CIU)	-	-	-	-	-	-
EU 10c	Other items	43,473	-	43,473	-	41,730	95.9918%
11	Not applicable						
12	**TOTAL**	**51,768,185**	**8,694,457**	**51,768,185**	**982,713**	**744,763**	**1.4118%**

Exposure classes		a	b	c	d	e	f
		Exposures before CCF and before CRM		Exposures post CCF and post CRM		RWAs and RWAs density	
31 Dec 2024 (EUR 1,000)		On-balance-sheet exposures	Off-balance-sheet exposures	On-balance-sheet exposures	Off-balance-sheet exposures	RWAs	RWAs density (%)
1	Central governments or central banks	8,030,004	-	23,421,184	1,167,852	-	0.0000%
2	Regional government or local authorities	17,548,491	642,180	22,219,388	234,269	3,255	0.0145%
3	Public sector entities	320,099	-	298,427	-	5,686	1.9052%
4	Multilateral development banks	150,733	-	150,733	-	-	0.0000%
5	International organisations	162,349	-	162,349	-	-	0.0000%
6	Institutions	1,458,444	-	1,381,134	-	367,182	26.5856%
7	Corporates	6,646,827	2,301,332	48,349	-	10,700	22.1302%
8	Retail	-	-	-	-	-	-
9	Secured by mortgages on immovable property	13,074,089	-	-	-	-	-
10	Exposures in default	290,525	-	-	-	-	-
11	Exposures associated with particularly high risk	-	-	-	-	-	-
12	Covered bonds	1,531,432	-	1,531,432	-	155,020	10.1226%
13	Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-
14	Collective investment undertakings	-	-	-	-	-	-
15	Equity	-	-	-	-	-	-
16	Other items	54,293	-	54,293	-	36,941	68.0394%
17	**TOTAL**	**49,267,289**	**2,943,513**	**49,267,289**	**1,402,121**	**578,784**	**1.1423%**

EU CR5
Standardised approach

Table shows on- and off-balance sheet exposures post conversion factor and post risk mitigation techniques. Items treated within the scope of counterparty credit risk are excluded. To determine the exposure's risk weight, MuniFin Group applies credit ratings by Moody's Investors Service, Fitch Ratings or Standard & Poor's Financial Services.

The largest change took place in the 0% risk weight bucket, which increased by EUR 917 million. 92.0% (94.0%) of the total exposure amount is risk-weighted by 0%.

9. Credit risk standardised approach

31 Dec 2025 (EUR 1,000) Exposure classes		Risk weight								
		0%	2%	4%	10%	20%	30%	35%	40%	45%
1	Central governments or central banks	24,274,084	-	-	-	-	-	-	-	-
2	Non-central government public sector entities	-	-	-	-	-	-	-	-	-
EU 2a	Regional governments or local authorities	23,259,070	-	-	-	29,570	-	-	-	-
EU 2b	Public sector entities	287,930	-	-	-	50,963	-	-	-	-
3	Multilateral development banks	381,509	-	-	-	-	-	-	-	-
EU 3a	International organisations	340,087	-	-	-	-	-	-	-	-
4	Institutions	-	-	-	-	1,774,017	397,835	-	-	-
5	Covered bonds	-	-	-	1,706,738	18,542	-	-	-	-
6	Corporates	-	-	-	-	183,834	-	-	-	-
6.1	Of which: Specialised Lending	-	-	-	-	-	-	-	-	-
7	Subordinated debt exposures and equity	-	-	-	-	-	-	-	-	-
EU 7a	Subordinated debt exposures	-	-	-	-	-	-	-	-	-
EU 7b	Equity	-	-	-	-	-	-	-	-	-
8	Retail exposures	-	-	-	-	-	-	-	-	-
9	Secured by mortgages on immovable property and ADC exposures	-	-	-	-	-	-	-	-	-
9.1	Secured by mortgages on residential immovable property - non IPRE	-	-	-	-	-	-	-	-	-
9.1.1	No loan splitting applied	-	-	-	-	-	-	-	-	-
9.1.2	Loan splitting applied (secured)	-	-	-	-	-	-	-	-	-
9.1.3	Loan splitting applied (unsecured)	-	-	-	-	-	-	-	-	-
9.2	Secured by mortgages on residential immovable property - IPRE	-	-	-	-	-	-	-	-	-
9.3	Secured by mortgages on commercial immovable property - non IPRE	-	-	-	-	-	-	-	-	-
9.3.1	No loan splitting applied	-	-	-	-	-	-	-	-	-
9.3.2	Loan splitting applied (secured)	-	-	-	-	-	-	-	-	-
9.3.3	Loan splitting applied (unsecured)	-	-	-	-	-	-	-	-	-
9.4	Secured by mortgages on commercial immovable property - IPRE	-	-	-	-	-	-	-	-	-
9.5	Acquisition, Development and Construction (ADC)	-	-	-	-	-	-	-	-	-
10	Exposures in default	-	-	-	-	-	-	-	-	-
EU 10a	Claims on institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-
EU 10b	Collective investment undertakings (CIU)	-	-	-	-	-	-	-	-	-
EU 10c	Other items	40	-	-	-	2,129	-	-	-	-
11	Not applicable									
EU 11c	**TOTAL**	**48,542,720**	**-**	**-**	**1,706,738**	**2,059,054**	**397,835**	**-**	**-**	**-**

31 Dec 2025 (EUR 1,000) Exposure classes		Risk weight								
		50%	60%	70%	75%	80%	90%	100%	105%	110%
1	Central governments or central banks	-	-	-	-	-	-	-	-	-
2	Non-central government public sector entities	-	-	-	-	-	-	-	-	-
EU 2a	Regional governments or local authorities	-	-	-	-	-	-	-	-	-
EU 2b	Public sector entities	-	-	-	-	-	-	-	-	-
3	Multilateral development banks	-	-	-	-	-	-	-	-	-
EU 3a	International organisations	-	-	-	-	-	-	-	-	-
4	Institutions	-	-	-	-	-	-	-	-	-
5	Covered bonds	-	-	-	-	-	-	-	-	-
6	Corporates	3,247	-	-	-	-	-	-	-	-
6.1	Of which: Specialised Lending	-	-	-	-	-	-	-	-	-
7	Subordinated debt exposures and equity	-	-	-	-	-	-	-	-	-
EU 7a	Subordinated debt exposures	-	-	-	-	-	-	-	-	-
EU 7b	Equity	-	-	-	-	-	-	-	-	-
8	Retail exposures	-	-	-	-	-	-	-	-	-
9	Secured by mortgages on immovable property and ADC exposures	-	-	-	-	-	-	-	-	-
9.1	Secured by mortgages on residential immovable property - non IPRE	-	-	-	-	-	-	-	-	-
9.1.1	No loan splitting applied	-	-	-	-	-	-	-	-	-
9.1.2	Loan splitting applied (secured)	-	-	-	-	-	-	-	-	-
9.1.3	Loan splitting applied (unsecured)	-	-	-	-	-	-	-	-	-
9.2	Secured by mortgages on residential immovable property - IPRE	-	-	-	-	-	-	-	-	-
9.3	Secured by mortgages on commercial immovable property - non IPRE	-	-	-	-	-	-	-	-	-
9.3.1	No loan splitting applied	-	-	-	-	-	-	-	-	-
9.3.2	Loan splitting applied (secured)	-	-	-	-	-	-	-	-	-
9.3.3	Loan splitting applied (unsecured)	-	-	-	-	-	-	-	-	-
9.4	Secured by mortgages on commercial immovable property - IPRE	-	-	-	-	-	-	-	-	-
9.5	Acquisition, Development and Construction (ADC)	-	-	-	-	-	-	-	-	-
10	Exposures in default	-	-	-	-	-	-	-	-	-
EU 10a	Claims on institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-
EU 10b	Collective investment undertakings (CIU)	-	-	-	-	-	-	-	-	-
EU 10c	Other items	-	-	-	-	-	-	41,305	-	-
11	Not applicable									
EU 11c	**TOTAL**	**3,247**	**-**	**-**	**-**	**-**	**-**	**41,305**	**-**	**-**

31 Dec 2025 (EUR 1,000) Exposure classes		Risk weight							Total	Of which unrated
		130%	150%	250%	370%	400%	1250%	Others		
1	Central governments or central banks	-	-	-	-	-	-	-	24,274,084	-
2	Non-central government public sector entities	-	-	-	-	-	-	-	-	-
EU 2a	Regional governments or local authorities	-	-	-	-	-	-	-	23,288,639	22,761,057
EU 2b	Public sector entities	-	-	-	-	-	-	-	338,893	-
3	Multilateral development banks	-	-	-	-	-	-	-	381,509	-
EU 3a	International organisations	-	-	-	-	-	-	-	340,087	-
4	Institutions	-	-	-	-	-	-	-	2,171,852	30,157
5	Covered bonds	-	-	-	-	-	-	-	1,725,280	-
6	Corporates	-	-	-	-	-	-	-	187,080	-
6.1	Of which: Specialised Lending	-	-	-	-	-	-	-	-	-
7	Subordinated debt exposures and equity	-	-	-	-	-	-	-	-	-
EU 7a	Subordinated debt exposures	-	-	-	-	-	-	-	-	-
EU 7b	Equity	-	-	-	-	-	-	-	-	-
8	Retail exposures	-	-	-	-	-	-	-	-	-
9	Secured by mortgages on immovable property and ADC exposures	-	-	-	-	-	-	-	-	-
9.1	Secured by mortgages on residential immovable property - non IPRE	-	-	-	-	-	-	-	-	-
9.1.1	No loan splitting applied	-	-	-	-	-	-	-	-	-
9.1.2	Loan splitting applied (secured)	-	-	-	-	-	-	-	-	-
9.1.3	Loan splitting applied (unsecured)	-	-	-	-	-	-	-	-	-
9.2	Secured by mortgages on residential immovable property - IPRE	-	-	-	-	-	-	-	-	-
9.3	Secured by mortgages on commercial immovable property - non IPRE	-	-	-	-	-	-	-	-	-
9.3.1	No loan splitting applied	-	-	-	-	-	-	-	-	-
9.3.2	Loan splitting applied (secured)	-	-	-	-	-	-	-	-	-
9.3.3	Loan splitting applied (unsecured)	-	-	-	-	-	-	-	-	-
9.4	Secured by mortgages on commercial immovable property - IPRE	-	-	-	-	-	-	-	-	-
9.5	Acquisition, Development and Construction (ADC)	-	-	-	-	-	-	-	-	-
10	Exposures in default	-	-	-	-	-	-	-	-	-
EU 10a	Claims on institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-
EU 10b	Collective investment undertakings (CIU)	-	-	-	-	-	-	-	-	-
EU 10c	Other items	-	-	-	-	-	-	-	43,473	43,436
11	Not applicable									
EU 11c	**TOTAL**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**52,750,898**	**22,834,649**

31 Dec 2024 (EUR 1,000)		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q
		Risk weight																
Exposure classes		0%	2%	4%	10%	20%	35%	50%	70%	75%	100%	150%	250%	370%	1250%	Others	Total	Of which unrated
1	Central governments or central banks	24,589,036	-	-	-	-	-	-	-	-	-	-	-	-	-	-	24,589,036	-
2	Regional government or local authorities	22,437,382	-	-	-	16,275	-	-	-	-	-	-	-	-	-	-	22,453,656	22,107,125
3	Public sector entities	269,999	-	-	-	28,428	-	-	-	-	-	-	-	-	-	-	298,427	-
4	Multilateral development banks	150,733	-	-	-	-	-	-	-	-	-	-	-	-	-	-	150,733	-
5	International organisations	162,349	-	-	-	-	-	-	-	-	-	-	-	-	-	-	162,349	-
6	Institutions	-	-	-	-	1,077,948	-	303,185	-	-	-	-	-	-	-	-	1,381,134	27,618
7	Corporates	-	-	-	-	44,915	-	3,433	-	-	-	-	-	-	-	-	48,349	-
8	Retail exposures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Exposures secured by mortgages on immovable property	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Exposures in default	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Exposures associated with particularly high risk	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	Covered bonds	-	-	-	1,512,660	18,772	-	-	-	-	-	-	-	-	-	-	1,531,432	-
13	Exposures to institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Units or shares in collective investment undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity exposures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	Other items	16,579	-	-	-	967	-	-	-	-	36,747	-	-	-	-	-	54,293	37,717
17	**TOTAL**	**47,626,078**	**-**	**-**	**1,512,660**	**1,187,305**	**-**	**306,619**	**-**	**-**	**36,747**	**-**	**-**	**-**	**-**	**-**	**50,669,410**	**22,172,460**

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10. Exposures to counterparty credit risk

EU CCR1
Analysis of CCR exposure by approach

MuniFin Group has 34 counterparties with which it has active derivative contracts in the interbank financial markets. The Group limits the credit risk arising from these derivative contracts with ISDA Credit Support Annexes. The Group has the above-mentioned collateral agreement with all of these counterparties. Additionally, the Municipal Guarantee Board's guarantees are used for reducing the derivative counterparty risk of certain counterparties. In addition to the interbank counterparties, MuniFin has derivative contracts with its clients. The counterparty credit risk RWEA has decreased to EUR 41 million (EUR 44 million) when excluding CCP exposures. With CCP exposures the RWEA is EUR 43 million. The change is due to increased exposure at default.

10. Exposures to counterparty credit risk

31 Dec 2025 (EUR 1,000)		a Replacement cost (RC)	b Potential future exposure (PFE)	c EEPE	d Alpha used for computing regulatory exposure value	e Exposure value pre-CRM	f Exposure value post-CRM	g Exposure value	h RWEA
EU-1	EU - Original Exposure Method (for derivatives)	-	-		1.4	-	-	-	-
EU-2	EU - Simplified SA-CCR (for derivatives)	-	-		1.4	-	-	-	-
1	SA-CCR (for derivatives)	42,519	514,010		1.4	1,040,268	722,074	720,287	40,959
2	IMM (for derivatives and SFTs)			-	-	-	-	-	-
2a	Of which securities financing transactions netting sets			-		-	-	-	-
2b	Of which derivatives and long settlement transactions netting sets			-		-	-	-	-
2c	Of which from contractual cross-product netting sets			-		-	-	-	-
3	Financial collateral simple method (for SFTs)					-	-	-	-
4	Financial collateral comprehensive method (for SFTs)					-	-	-	-
5	VaR for SFTs					-	-	-	-
6	**Total**					**1,040,268**	**722,074**	**720,287**	**40,959**

The table above represents counterparty credit risk exposures without exposures to CCP. With CCP exposures included, the exposure value is EUR 831 million and RWEA is EUR 43 million.

10. Exposures to counterparty credit risk

31 Dec 2024 (EUR 1,000)		a Replacement cost (RC)	b Potential future exposure (PFE)	c EEPE	d Alpha used for computing regulatory exposure value	e Exposure value pre-CRM	f Exposure value post-CRM	g Exposure value	h RWEA
EU-1	EU - Original Exposure Method (for derivatives)	-	-		1.4	-	-	-	-
EU-2	EU - Simplified SA-CCR (for derivatives)	-	-		1.4	-	-	-	-
1	SA-CCR (for derivatives)	48,709	518,344		1.4	2,516,607	776,789	774,137	44,324
2	IMM (for derivatives and SFTs)			-	-	-	-	-	-
2a	Of which securities financing transactions netting sets			-		-	-	-	-
2b	Of which derivatives and long settlement transactions netting sets			-		-	-	-	-
2c	Of which from contractual cross-product netting sets			-		-	-	-	-
3	Financial collateral simple method (for SFTs)					-	-	-	-
4	Financial collateral comprehensive method (for SFTs)					-	-	-	-
5	VaR for SFTs					-	-	-	-
6	**Total**					**2,516,607**	**776,789**	**774,137**	**44,324**

The table above represents counterparty credit risk exposures without exposures to CCP. With CCP exposures included, the exposure value is EUR 882 million and RWEA is EUR 46 million.

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

Table shows classification of counterparty credit risk exposure value in exposure classes and risk weights after credit risk mitigation. MuniFin Group applies SA-CCR method in calculating the counterparty credit risk. After credit risk mitigation, 70.5% (74.3%) of the total exposure value is in the 0% risk weight bucket. Credit risk mitigation techniques applied are guarantees granted by the Municipal Guarantee Board and municipalities.

31 Dec 2025 (EUR 1,000)		a	b	c	d	e	f	g	h	i	j	k	l
		Risk weight											
Exposure classes		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	25,578	-	-	-	-	-	-	-	-	-	-	25,578
3	Public sector entities	559,788	-	-	-	-	-	-	-	-	-	-	559,788
4	Multilateral development banks	-	-	-	-	-	-	-	-	-	-	-	-
5	International organisations	-	-	-	-	-	-	-	-	-	-	-	-
6	Institutions	-	110,502	-	-	33,497	-	-	-	-	-	62,696	206,695
7	Corporates	-	-	-	-	13,046	25,683	-	-	-	-	-	38,728
8	Retail	-	-	-	-	-	-	-	-	-	-	-	-
9	Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-
10	Other items	-	-	-	-	-	-	-	-	-	-	-	-
11	**Total exposure value**	**585,366**	**110,502**	**-**	**-**	**46,543**	**25,683**	**-**	**-**	**-**	**-**	**62,696**	**830,789**

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10. Exposures to counterparty credit risk

31 Dec 2024 (EUR 1,000)		a	b	c	d	e	f	g	h	i	j	k	l
		Risk weight											
Exposure classes		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	45,081	-	-	-	-	-	-	-	-	-	-	45,081
3	Public sector entities	610,613	-	-	-	-	-	-	-	-	-	-	610,613
4	Multilateral development banks	-	-	-	-	-	-	-	-	-	-	-	-
5	International organisations	-	-	-	-	-	-	-	-	-	-	-	-
6	Institutions	-	107,846	-	-	26,308	45,066	-	-	-	-	-	179,220
7	Corporates	-	-	-	-	23,349	23,720	-	-	-	-	-	47,069
8	Retail	-	-	-	-	-	-	-	-	-	-	-	-
9	Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-
10	Other items	-	-	-	-	-	-	-	-	-	-	-	-
11	**Total exposure value**	**655,694**	**107,846**	**-**	**-**	**49,657**	**68,786**	**-**	**-**	**-**	**-**	**-**	**881,983**

EU CCR5
Composition of collateral for CCR exposures

The amount of collaterals posted for derivative transactions at the end of December 2025 was EUR 2,526 million (EUR 1,593 million). MuniFin holds a strong credit rating (Aa1/AA+). The impact of a possible credit downgrade lower than four notches of MuniFin would not have any impact on the collateral posted.

31 Dec 2025 (EUR 1,000)		a	b	c	d	e	f	g	h
		Collateral used in derivative transactions				Collateral used in SFTs			
		Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral	
Collateral type		Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated
1	Cash – domestic currency	-	247,694	318,400	2,059,485	-	-	-	-
2	Cash – other currencies	-	30,909	-	-	-	-	-	-
3	Domestic sovereign debt	-	-	-	-	-	-	-	-
4	Other sovereign debt	-	-	125,064	-	-	-	-	-
5	Government agency debt	-	-	22,562	-	-	-	-	-
6	Corporate bonds	-	-	-	-	-	-	-	-
7	Equity securities	-	-	-	-	-	-	-	-
8	Other collateral	-	-	-	-	-	-	-	-
9	**Total**	**-**	**278,603**	**466,026**	**2,059,485**	**-**	**-**	**-**	**-**

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10. Exposures to counterparty credit risk

31 Dec 2024 (EUR 1,000)		a	b	c	d	e	f	g	h
		Collateral used in derivative transactions				Collateral used in SFTs			
		Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral	
Collateral type		Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated
1	Cash – domestic currency	-	974,128	335,000	1,059,532	-	-	-	-
2	Cash – other currencies	-	-	-	101,257	-	-	-	-
3	Domestic sovereign debt	-	-	-	-	-	-	-	-
4	Other sovereign debt	-	-	96,949	-	-	-	-	-
5	Government agency debt	-	-	-	-	-	-	-	-
6	Corporate bonds	-	-	-	-	-	-	-	-
7	Equity securities	-	-	-	-	-	-	-	-
8	Other collateral	-	-	-	-	-	-	-	-
9	**Total**	**-**	**974,128**	**431,949**	**1,160,788**	**-**	**-**	**-**	**-**

EU CCR8
Exposures to CCPs

Exposures for qualified central clearing counterparties increased to EUR 111 million (EUR 108 million). The increase was due to higher amount of exposure at default.

31 Dec 2025 (EUR 1,000)		a	b
		Exposure value	RWEA
1	**Exposures to QCCPs (total)**		**2,210**
2	Exposures for trades at QCCPs (excluding initial margin and default fund contributions); of which	110,502	2,210
3	(i) OTC derivatives	110,502	2,210
4	(ii) Exchange-traded derivatives	-	-
5	(iii) SFTs	-	-
6	(iv) Netting sets where cross-product netting has been approved	-	-
7	Segregated initial margin	466,026	
8	Non-segregated initial margin	-	-
9	Prefunded default fund contributions	-	-
10	Unfunded default fund contributions	-	-
11	**Exposures to non-QCCPs (total)**		**-**
12	Exposures for trades at non-QCCPs (excluding initial margin and default fund contributions); of which	-	-
13	(i) OTC derivatives	-	-
14	(ii) Exchange-traded derivatives	-	-
15	(iii) SFTs	-	-
16	(iv) Netting sets where cross-product netting has been approved	-	-
17	Segregated initial margin	-	
18	Non-segregated initial margin	-	-
19	Prefunded default fund contributions	-	-
20	Unfunded default fund contributions	-	-

31 Dec 2024 (EUR 1,000)		a Exposure value	b RWEA
1	**Exposures to QCCPs (total)**		**2,157**
2	Exposures for trades at QCCPs (excluding initial margin and default fund contributions); of which	107,846	2,157
3	(i) OTC derivatives	107,846	2,157
4	(ii) Exchange-traded derivatives	-	-
5	(iii) SFTs	-	-
6	(iv) Netting sets where cross-product netting has been approved	-	-
7	Segregated initial margin	431,949	
8	Non-segregated initial margin	-	-
9	Prefunded default fund contributions	-	-
10	Unfunded default fund contributions	-	-
11	**Exposures to non-QCCPs (total)**		**-**
12	Exposures for trades at non-QCCPs (excluding initial margin and default fund contributions); of which	-	-
13	(i) OTC derivatives	-	-
14	(ii) Exchange-traded derivatives	-	-
15	(iii) SFTs	-	-
16	(iv) Netting sets where cross-product netting has been approved	-	-
17	Segregated initial margin	-	
18	Non-segregated initial margin	-	-
19	Prefunded default fund contributions	-	-
20	Unfunded default fund contributions	-	-

11. Use of standardised approach and internal model for market risk

EU MR1
Market risk under the standardised approach

MuniFin Group calculates capital requirements for overall net foreign exchange position. The Group hedges against exchange rate risks by using derivative contracts to translate all foreign currency denominated funding and investments into euros. The Group does not bear any material foreign exchange risk.

The FX risk position was EUR 12.0 million at the end of December 2025 (EUR 10.4 million). Since the FX risk position was less than 2% of the own funds, there was no capital requirement for it (CRR 575/2013, Art. 351).

MuniFin Group does not hold trading book exposures.

31 Dec 2025 (EUR 1,000)		a RWEAs
	Outright products	
1	Interest rate risk (general and specific)	-
2	Equity risk (general and specific)	-
3	Foreign exchange risk	12,038
4	Commodity risk	-
	Options	
5	Simplified approach	-
6	Delta-plus approach	-
7	Scenario approach	-
8	Securitisation (specific risk)	-
9	**Total**	**12,038**

31 Dec 2024 (EUR 1,000)		a RWEAs
	Outright products	
1	Interest rate risk (general and specific)	-
2	Equity risk (general and specific)	-
3	Foreign exchange risk	10,409
4	Commodity risk	-
	Options	
5	Simplified approach	-
6	Delta-plus approach	-
7	Scenario approach	-
8	Securitisation (specific risk)	-
9	**Total**	**10,409**

EU CVAA
Qualitative disclosure requirements related to credit valuation adjustment risk

a) A description of the institution's processes to manage credit valuation adjustment risk, including:
- a description of the processes implemented to identify, measure, monitor and control the institution's credit valuation adjustment risks;
- a description of their policies for hedging and mitigating risk and strategies and processes for monitoring the continuing effectiveness of hedges.

MuniFin Group manages the CVA capital charge with comprehensive use of CSAs and CCP clearing.

b) An explanation whether the institution meets all the conditions set out in Article 273a(2);
where those conditions are met,
whether institution has chosen to calculate the own funds requirements for CVA risk using the simplified approach set out in Article 385;
where institutions have 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.

Not relevant for MuniFin.

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EU CVA 1
Credit valuation adjustment risk under the Reduced Basic Approach (R-BA)

	31 Dec 2025 (EUR 1,000)	a	b
		Components of Own Funds Requirements	Own Funds Requirements
1	Aggregation of systematic components of CVA risk	124,105	
2	Aggregation of idiosyncratic components of CVA risk	38,605	
3	**Total**		**45,816**

12. Disclosure of operational risk

EU OR2
Business Indicator, components and subcomponents

		a	b	c	d
BI and its subcomponents		**T**	**T-1**	**T-2**	**Average value**
1	Interest, lease and dividend component (ILDC)				259,850
EU 1	ILDC related to the individual institution/consolidated Group (excluding entities considered by Article 314(3)				259,850
1a	Interest and lease income	1,693,958	2,252,474	2,717,519	2,221,317
1b	Interest and lease expense	1,433,836	1,992,297	2,458,267	1,961,467
1c	Total assets/Asset component	56,185,113	53,651,404	50,594,604	53,477,040
1d	Dividend income/dividend component	-	-	-	-
2	Services component (SC)				18,772
2a	Fee and commission income	1,166	1,465	2,275	1,635
2b	Fee and commission expense	18,175	16,917	15,638	16,910
2c	Other operating income	86	31	139	85
2d	Other operating expense	1,940	2,095	1,552	1,862
3	Financial component (FC)				24,326
3a	Net profit or loss applicable to trading book (TB)	-259,918	-3,163	252,354	3,575
3b	Net profit or loss applicable to banking book (BB)	278,096	-11,920	-292,073	8,632
EU 3c	Approach followed to determine the TB/BB boundary (PBA or accounting approach)				PBA
4	**Business Indicator (BI)**				302,949
5	**Business indicator component (BIC)**				36,354

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Disclosure on the BI:		a
6a	BI gross of excluded divested activities	302,949
6b	Reduction in BI due to excluded divested activities	-
EU 6c	Impact in BI of mergers/acquisitions	-

EU OR3
Operational risk own funds requirements and risk exposure amounts

		a
1	Business Indicator Component (BIC)	36,354
EU1	Alternative Standardised Approach (ASA) Own Funds Requirements (OROF) under Article 314(4)	-
2	Not applicable	
3	Minimum Required Operational Risk Own Funds Requirements (OROF)	36,354
4	Operational Risk Exposure Amounts (REA)	454,423

13. Disclosure of exposures to interest rate risk on positions not held in the trading book

EU IRRBB1
Interest rate risks of non-trading book activities

Current period is as of 31 December 2025. Last period is 31 December 2024. In current period for NII and current and last period for EVE, a 50% weight is used to positive changes when summing up the EVE and NII, inline with the Supervisory outlier test specifications in EBA/RTS/2022/10. Most of all EVE risk comes from EUR.

It should be noted that the figures for the last period for NII were calculated using internal scenarios, whereas the current period figures are aligned with EBA/RTS/2022/10. Consequently, the periods are not entirely comparable.

		a	b	c	d
		Changes of the economic value of equity		Changes of the net interest income	
	Supervisory shock scenarios	Current period	Last period	Current period	Last period
1	Parallel up	-133,600	-120,225	-33,194	-38,243
2	Parallel down	78,332	100,518	15,720	18,200
3	Steepener	20,234	24,274		
4	Flattener	-59,959	-65,243		
5	Short rates up	-99,548	-101,040		
6	Short rates down	52,302	53,377		

14. Remuneration policy

EU REM1
Remuneration awarded for the financial year

31 Dec 2025 (EUR 1,000)			a	b	c	d
			MB Supervisory function	MB Management function	Other senior management	Other identified staff
1	Fixed remuneration	Number of identified staff	11	1	7	18
2		Total fixed remuneration	411	364	1,483	2,417
3		Of which: cash-based	411	364	1,483	2,417
4		(Not applicable in the EU)				
EU-4a		Of which: shares or equivalent ownership interests	-	-	-	-
5		Of which: share-linked instruments or equivalent non-cash instruments	-	-	-	-
EU-5x		Of which: other instruments	-	-	-	-
6		(Not applicable in the EU)				
7		Of which: other forms	-	-	-	-
8		(Not applicable in the EU)				

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31 Dec 2025 (EUR 1,000)			a	b	c	d
			MB Supervisory function	MB Management function	Other senior management	Other identified staff
9	Variable remuneration	Number of identified staff	11	1	8	19
10		Total variable remuneration	-	57	225	282
11		Of which: cash-based	-	29	225	282
12		Of which: deferred	-	11	-	-
EU-13a		Of which: shares or equivalent ownership interests	-	-	-	-
EU-14a		Of which: deferred	-	-	-	-
EU-13b		Of which: share-linked instruments or equivalent non-cash instruments	-	-	-	-
EU-14b		Of which: deferred	-	-	-	-
EU-14x		Of which: other instruments	-	29	-	-
EU-14y		Of which: deferred	-	29	-	-
15		Of which: other forms	-	-	-	-
16		Of which: deferred	-	-	-	-
17	**Total remuneration (2 + 10)**		**411**	**421**	**1,708**	**2,698**

31 Dec 2024 (EUR 1,000)			a MB Supervisory function	b MB Management function	c Other senior management	d Other identified staff
1	Fixed remuneration	Number of identified staff	9	1	7	20
2		Total fixed remuneration	354	364	1,480	2,283
3		Of which: cash-based	354	364	1,480	2,283
4		(Not applicable in the EU)				
EU-4a		Of which: shares or equivalent ownership interests	-	-	-	-
5		Of which: share-linked instruments or equivalent non-cash instruments	-	-	-	-
EU-5x		Of which: other instruments	-	-	-	-
6		(Not applicable in the EU)				
7		Of which: other forms	-	-	-	-
8		(Not applicable in the EU)				
9	Variable remuneration	Number of identified staff	9	1	7	20
10		Total variable remuneration	-	85	333	419
11		Of which: cash-based	-	42	255	419
12		Of which: deferred	-	17	31	-
EU-13a		Of which: shares or equivalent ownership interests	-	-	-	-
EU-14a		Of which: deferred	-	-	-	-
EU-13b		Of which: share-linked instruments or equivalent non-cash instruments	-	-	-	-
EU-14b		Of which: deferred	-	-	-	-
EU-14x		Of which: other instruments	-	42	78	-
EU-14y		Of which: deferred	-	42	78	-
15		Of which: other forms	-	-	-	-
16		Of which: deferred	-	-	-	-
17	**Total remuneration (2 + 10)**		**354**	**466**	**1,813**	**2,702**

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EU REM2
Special payments to staff whose professional activities have a material impact on institutions' risk profile (identified staff)

	31 Dec 2025 (EUR 1,000)	a MB Supervisory function	b MB Management function	c Other senior management	d Other identified staff
	Guaranteed variable remuneration awards				
1	Guaranteed variable remuneration awards - Number of identified staff	0	0	0	0
2	Guaranteed variable remuneration awards - Total amount	-	-	-	-
3	Of which guaranteed variable remuneration awards paid during the financial year, that are not taken into account in the bonus cap	-	-	-	-
	Severance payments awarded in previous periods, that have been paid out during the financial year				
4	Severance payments awarded in previous periods, that have been paid out during the financial year - Number of identified staff	0	0	0	0
5	Severance payments awarded in previous periods, that have been paid out during the financial year - Total amount	-	-	-	-
	Severance payments awarded during the financial year				
6	Severance payments awarded during the financial year - Number of identified staff	0	0	0	0
7	Severance payments awarded during the financial year - Total amount	-	-	-	-
8	Of which paid during the financial year	-	-	-	-
9	Of which deferred	-	-	-	-
10	Of which severance payments paid during the financial year, that are not taken into account in the bonus cap	-	-	-	-
11	Of which highest payment that has been awarded to a single person	-	-	-	-

31 Dec 2024 (EUR 1,000)		a	b	c	d
		MB Supervisory function	MB Management function	Other senior management	Other identified staff
	Guaranteed variable remuneration awards				
1	Guaranteed variable remuneration awards - Number of identified staff	0	0	0	0
2	Guaranteed variable remuneration awards - Total amount	-	-	-	-
3	Of which guaranteed variable remuneration awards paid during the financial year, that are not taken into account in the bonus cap	-	-	-	-
	Severance payments awarded in previous periods, that have been paid out during the financial year				
4	Severance payments awarded in previous periods, that have been paid out during the financial year - Number of identified staff	0	0	0	0
5	Severance payments awarded in previous periods, that have been paid out during the financial year - Total amount	-	-	-	-
	Severance payments awarded during the financial year				
6	Severance payments awarded during the financial year - Number of identified staff	0	0	0	0
7	Severance payments awarded during the financial year - Total amount	-	-	-	-
8	Of which paid during the financial year	-	-	-	-
9	Of which deferred	-	-	-	-
10	Of which severance payments paid during the financial year, that are not taken into account in the bonus cap	-	-	-	-
11	Of which highest payment that has been awarded to a single person	-	-	-	-

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EU REM3
Deferred remuneration

31 Dec 2025 (EUR 1,000)		a	b	c	d	e	f	EU - g	EU - h
Deferred and retained remuneration		Total amount of deferred remuneration awarded for previous performance periods	Of which due to vest in the financial year	Of which vesting in subsequent financial years	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in the financial year	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in future performance years	Total amount of adjustment during the financial year due to ex post implicit adjustments (i.e. changes of value of deferred remuneration due to the changes of prices of instruments)	Total amount of deferred remuneration awarded before the financial year actually paid out in the financial year	Total of amount of deferred remuneration awarded for previous performance period that has vested but is subject to retention periods
1	MB Supervisory function								
2	Cash-based	-	-	-	-	-	-	-	-
3	Shares or equivalent ownership interests	-	-	-	-	-	-	-	-
4	Share-linked instruments or equivalent non-cash instruments	-	-	-	-	-	-	-	-
5	Other instruments	-	-	-	-	-	-	-	-
6	Other forms	-	-	-	-	-	-	-	-
7	MB Management function								
8	Cash-based	48	11	36	-	-	-	18	-
9	Shares or equivalent ownership interests	-	-	-	-	-	-	-	-
10	Share-linked instruments or equivalent non-cash instruments	-	-	-	-	-	-	-	-
11	Other instruments	83	29	54	-	-	-	48	35
12	Other forms	-	-	-	-	-	-	-	-

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31 Dec 2025 (EUR 1,000)		a	b	c	d	e	f	EU - g	EU - h
Deferred and retained remuneration		Total amount of deferred remuneration awarded for previous performance periods	Of which due to vest in the financial year	Of which vesting in subsequent financial years	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in the financial year	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in future performance years	Total amount of adjustment during the financial year due to ex post implicit adjustments (i.e. changes of value of deferred remuneration due to the changes of prices of instruments)	Total amount of deferred remuneration awarded before the financial year actually paid out in the financial year	Total of amount of deferred remuneration awarded for previous performance period that has vested but is subject to retention periods
13	Other senior management								
14	Cash-based	88	0	88	-	-	-	38	-
15	Shares or equivalent ownership interests	-	-	-	-	-	-	-	-
16	Share-linked instruments or equivalent non-cash instruments	-	-	-	-	-	-	-	-
17	Other instruments	126	0	126	-	-	-	79	38
18	Other forms	-	-	-	-	-	-	-	-
19	Other identified staff								
20	Cash-based	-	-	-	-	-	-	-	-
21	Shares or equivalent ownership interests	-	-	-	-	-	-	-	-
22	Share-linked instruments or equivalent non-cash instruments	-	-	-	-	-	-	-	-
23	Other instruments	-	-	-	-	-	-	-	-
24	Other forms	-	-	-	-	-	-	-	-
25	**Total amount**	**345**	**40**	**304**	**-**	**-**	**-**	**183**	**73**

31 Dec 2024 (EUR 1,000)		a	b	c	d	e	f	EU - g	EU - h
Deferred and retained remuneration		Total amount of deferred remuneration awarded for previous performance periods	Of which due to vest in the financial year	Of which vesting in subsequent financial years	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in the financial year	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in future performance years	Total amount of adjustment during the financial year due to ex post implicit adjustments (i.e. changes of value of deferred remuneration due to the changes of prices of instruments)	Total amount of deferred remuneration awarded before the financial year actually paid out in the financial year	Total of amount of deferred remuneration awarded for previous performance period that has vested but is subject to retention periods
1	MB Supervisory function								
2	Cash-based	-	-	-	-	-	-	-	-
3	Shares or equivalent ownership interests	-	-	-	-	-	-	-	-
4	Share-linked instruments or equivalent non-cash instruments	-	-	-	-	-	-	-	-
5	Other instruments	-	-	-	-	-	-	-	-
6	Other forms	-	-	-	-	-	-	-	-
7	MB Management function								
8	Cash-based	54	17	37	-	-	-	17	-
9	Shares or equivalent ownership interests	-	-	-	-	-	-	-	-
10	Share-linked instruments or equivalent non-cash instruments	-	-	-	-	-	-	-	-
11	Other instruments	97	42	55	-	-	-	48	43
12	Other forms	-	-	-	-	-	-	-	-

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31 Dec 2024 (EUR 1,000)		a	b	c	d	e	f	EU - g	EU - h
Deferred and retained remuneration		Total amount of deferred remuneration awarded for previous performance periods	Of which due to vest in the financial year	Of which vesting in subsequent financial years	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in the financial year	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in future performance years	Total amount of adjustment during the financial year due to ex post implicit adjustments (i.e. changes of value of deferred remuneration due to the changes of prices of instruments)	Total amount of deferred remuneration awarded before the financial year actually paid out in the financial year	Total of amount of deferred remuneration awarded for previous performance period that has vested but is subject to retention periods
13	Other senior management								
14	Cash-based	126	31	95	-	-	-	32	-
15	Shares or equivalent ownership interests	-	-	-	-	-	-	-	-
16	Share-linked instruments or equivalent non-cash instruments	-	-	-	-	-	-	-	-
17	Other instruments	205	78	127	-	-	-	125	79
18	Other forms	-	-	-	-	-	-	-	-
19	Other identified staff								
20	Cash-based	-	-	-	-	-	-	-	-
21	Shares or equivalent ownership interests	-	-	-	-	-	-	-	-
22	Share-linked instruments or equivalent non-cash instruments	-	-	-	-	-	-	-	-
23	Other instruments	-	-	-	-	-	-	-	-
24	Other forms	-	-	-	-	-	-	-	-
25	**Total amount**	**482**	**168**	**314**	**-**	**-**	**-**	**223**	**122**

EU REM4
Remuneration of 1 million EUR or more per year

MuniFin Group does not have any high earners as set out in Article 450(i) CRR.

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EU REM5
Information of staff whose professional activities have a material impact on institutions' risk profile (identified staff)

		a	b	c	d	e	f	g	h	i	j
		Management body remuneration			Business areas						
31 Dec 2025 (EUR 1,000)		MB Supervisory function	MB Management function	Total MB	Investment banking	Retail banking	Asset management	Corporate functions	Independent internal control functions	All other	Total
1	Total number of identified staff										35
2	Of which: members of the MB	9	1	10							
3	Of which: other senior management				-	-	-	4	1	2	
4	Of which: other identified staff				-	-	-	5	3	10	
5	Total remuneration of identified staff	411	421	832	-	-	-	1,766	762	1,883	
6	Of which: variable remuneration	-	57	57	-	-	-	235	54	223	
7	Of which: fixed remuneration	411	364	775	-	-	-	1,532	708	1,660	

		a	b	c	d	e	f	g	h	i	j
		Management body remuneration			Business areas						
31 Dec 2024 (EUR 1,000)		MB Supervisory function	MB Management function	Total MB	Investment banking	Retail banking	Asset management	Corporate functions	Independent internal control functions	All other	Total
1	Total number of identified staff										37
2	Of which: members of the MB	9	1	10							
3	Of which: other senior management				-	-	-	4	1	2	
4	Of which: other identified staff				-	-	-	5	4	11	
5	Total remuneration of identified staff	354	448	802	-	-	-	1,873	757	1,884	
6	Of which: variable remuneration	-	85	85	-	-	-	337	101	313	
7	Of which: fixed remuneration	354	364	717	-	-	-	1,537	656	1,570	

15. Encumbered and unencumbered assets

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EU AE1
Encumbered and unencumbered assets

Note: the disclosed values in the template are calculated as rolling quarterly medians of the corresponding reporting values over the previous twelve months by interpolation

		Carrying amount of encumbered assets		Fair value of encumbered assets		Carrying amount of unencumbered assets		Fair value of unencumbered assets	
31 Dec 2025 (EUR 1,000)		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
010	**Assets of the reporting institution**	**21,458,787**	**154,784**			**34,117,352**	**12,386,350**		
030	Equity instruments	-	-	-	-	-	-	-	-
040	Debt securities	154,784	154,784	154,784	154,784	6,389,480	4,407,856	6,389,480	4,407,856
050	of which: covered bonds	-	-	-	-	1,735,161	1,735,161	1,735,161	1,735,161
060	of which: securitisations	-	-	-	-	-	-	-	-
070	of which: issued by general governments	154,784	154,784	154,784	154,784	2,357,502	947,884	2,357,502	947,884
080	of which: issued by financial corporations	-	-	-	-	3,942,319	3,467,858	3,942,319	3,467,858
090	of which: issued by non-financial corporations	-	-	-	-	87,885	-	87,885	-
120	Other assets	21,303,205	-			27,777,714	7,978,494		

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31 Dec 2024 (EUR 1,000)		Carrying amount of encumbered assets		Fair value of encumbered assets		Carrying amount of unencumbered assets		Fair value of unencumbered assets	
			of which notionally eligible EHQLA and HQLA		of which notionally eligible EHQLA and HQLA		of which EHQLA and HQLA		of which EHQLA and HQLA
		010	030	040	050	060	080	090	100
010	**Assets of the reporting institution**	**20,615,645**	**102,523**			**31,401,317**	**11,423,547**		
030	Equity instruments	-	-	-	-	-	-	-	-
040	Debt securities	102,523	102,523	102,523	102,523	5,042,031	3,334,985	5,042,031	3,334,985
050	of which: covered bonds	-	-	-	-	1,410,977	1,410,977	1,410,977	1,410,977
060	of which: securitisations	-	-	-	-	-	-	-	-
070	of which: issued by general governments	102,523	102,523	102,523	102,523	1,959,072	719,008	1,959,072	719,008
080	of which: issued by financial corporations	-	-	-	-	2,973,896	2,638,637	2,973,896	2,638,637
090	of which: issued by non-financial corporations	-	-	-	-	121,277	-	121,277	-
120	Other assets	20,508,380	-			26,055,645	7,961,670		

EU AE2
Collateral received and own debt securities issued

Note: the disclosed values in the template are calculated as rolling quarterly medians of the corresponding reporting values over the previous twelve months by interpolation

		Unencumbered			
		Fair value of encumbered collateral received or own debt securities issued		Fair value of collateral received or own debt securities issued available for encumbrance	
			of which notionally eligible EHQLA and HQLA		of which EHQLA and HQLA
31 Dec 2025 (EUR 1,000)		010	030	040	060
130	**Collateral received by the disclosing institution**	**-**	**-**	**266,563**	**266,563**
140	Loans on demand	-	-	-	-
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	-	-	266,563	266,563
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**			**-**	**-**
250	**Total collateral received and own debt securities issued**	**21,458,787**	**154,784**		

31 Dec 2024 (EUR 1,000)		Fair value of encumbered collateral received or own debt securities issued		Unencumbered: Fair value of collateral received or own debt securities issued available for encumbrance	
			of which notionally eligible EHQLA and HQLA		of which EHQLA and HQLA
		010	030	040	060
130	**Collateral received by the disclosing institution**	-	-	508,156	508,156
140	Loans on demand	-	-	-	-
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	-	-	508,156	508,156
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**			**-**	**-**
250	**Total collateral received and own debt securities issued**	**20,615,645**	**102,523**		

EU AE3 Sources of encumbrance

Note: the disclosed values in the template are calculated as rolling quarterly medians of the corresponding reporting values over the previous twelve months by interpolation

31 Dec 2025 (EUR 1,000)		Matching liabilities, contingent liabilities or securities lent	Assets, collateral received and own debt securities issued other than covered bonds and securitisations encumbered
		010	030
010	Carrying amount of selected financial liabilities	52,663,104	21,458,787

31 Dec 2024 (EUR 1,000)		Matching liabilities, contingent liabilities or securities lent	Assets, collateral received and own debt securities issued other than covered bonds and securitisations encumbered
		010	030
010	Carrying amount of selected financial liabilities	48,514,217	20,598,484

EU AE4
Accompanying narrative information

(a) General narrative information on asset encumbrance

The previous disclosures represents the median values of quarterly data, on a rolling basis over the previous twelve months. The same scope of regulatory consolidation is used for the disclosures on asset encumbrance as for the liquidity requirements used to define HQLA eligibility. Only the assets of the Parent Company entail asset encumbrance.

(b) Narrative information on the impact of the business model on assets encumbrance and the importance of encumbrance to the institution's business model, which provides users with the context of the disclosures required in Template EU AE1 and EU AE2.

Financial assets classified as encumbered assets relate to loans that have been pledged to the Municipal Guarantee Board as counter collateral for guarantees it has given to MuniFin's funding, loans that are pledged to the central bank for possible monetary policy operations and collateral pertaining to derivatives. MuniFin does not have any covered bond or asset-backed security issuances.

During the reporting period, the medium values of encumbered assets related to loans pledged to Municipal Guarantee Board (EUR 14,246 million), loans pledged to Central Bank for possible monetary policy operations (EUR 4,846 million) and cash and security collateral related to derivatives (EUR 2,508 million). During the reporting period, all encumbered assets have been EUR nominated.

MuniFin maintains a sufficient liquidity portfolio of unencumbered, highly liquid assets at all times. MuniFin constantly monitors the amount of encumbered assets within the liquidity portfolio. MuniFin uses cash and securities for derivatives collateral management. However, the source of asset encumbrance in the liquidity portfolio was mostly repo related collateral management. During the reporting period, most of the assets within liquidity portfolio were unencumbered, of which EUR 12,386 million were HQLA eligible.

Other assets within template A, that have been classified as unencumbered, include cash with central banks, loans and advances, derivative contracts, intangible assets, tangible assets and other fixed assets.

The additional columns for asset quality indicators have been disclosed according to Article 2 (1) of the EBA/RTS/2017/03 to the templates A and B as of 31 December 2025.

16. ESG risks

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

MuniFin Group followed the Partnership for Carbon Accounting Financials (PCAF) methodology for calculating GHG financed emissions. For the assets in scope of template 1, the Group has utilised different methodologies for real estate related loans, business loans and motor vehicle loans. PCAF data quality scores reflect the type of data that was available to estimate financed emissions. PCAF data quality scores 1–2 include reported emissions, scores 2–3 physical activity-based emissions, and scores 4–5 economic activity-based emissions, as per PCAF guidance.

Real estate loans

PCAF's Global Standard section 5.5 methodology was followed. PCAF data quality score ranged from 3 to 5 for financing granted to finance real estate. Where available, MuniFin Group has used actual energy efficiency and area data of the property financed. Where this data was not available, these values were estimated using average energy efficiency and average property price per square meter. As per PCAF guidance, financed emissions for real estate cover scopes 1 and 2. Estimates are physical activity-based. External data sources used included Statistics Finland and PCAF database (CRREM Global Pathways emission factors). The chosen emission factor depends on whether the finance granted is towards residential or commercial real estate. In MuniFin Group's customer context commercial real estate refers to e.g. schools, community centers, hospitals, libraries, sports and other cultural facilities and residential real estate to affordable rental housing or right-of-occupancy housing.

Business loans

PCAF's Global Standard section 5.2 methodology was followed. PCAF data quality score for assets with other purposes ranged from 4 to 5. For business loans, as reported emission data or the specific purpose of the financing were not available, economic activity-based estimates for sector-specific emission (OECD IOT database) factors were used. Where financial information was not available, potential revenue generated from the outstanding loan was estimated using an asset turnover ratio that was based on sector/industrial activity. Financed emissions for business loans cover scopes 1, 2 and 3. To align with the PCAF phase-in approach for scope 3 reporting in lending, MuniFin Group has included scope 3 financed emissions of business loans from 2024 onwards.

Motor vehicle loans

PCAF's Global Standard section 5.6 methodology was followed. PCAF data quality score for motor vehicle loans was 5. Estimates for financed emissions are physical activity-based estimates for the type of the vehicle, typical fuel type used and average distance travelled had to be used in lack of actual data. External data sources used included Statistics Finland and EEA vehicle emission database.

All asset classes

The share of emissions belonging as MuniFin Group financed emissions were attributed based on the outstanding debt per property value, the outstanding debt amount per the total debt plus equity of the counterparty, and based on outstanding debt amount per the vehicle value, for real estate loans, business loans and motor vehicle loans, respectively. The methodology depends on the PCAF methodology used for each asset class.

Because financed emission calculation requires up to date emission factors as well as financial statement information, the Group has to manage the timing difference of the emission calculation and the Pillar 3 ESG reporting. The financed emissions used in the reporting were based on the latest available calculations. Due to the changes in outstanding values of the financing, the Group scaled the financed emissions to reflect the outstanding amount of the reporting date. As some lending has been granted after the emission calculation, financed emissions figures are not yet available for such assets.

It should be noted that the current PCAF emission calculation methodology does not cover scope 3 financed emissions for all asset classes. So far, the calculation of business loans is the only asset class that includes scope 3 since methodology and emission factors covering scope 3 are available. MuniFin Group closely monitors developments in this area and will add scope 3 emissions where feasible if a methodology becomes available for other asset classes.

MuniFin Group has reviewed its counterparties and can conclude that it does not have any exposure towards companies excluded from the EU Paris-aligned Benchmarks.

The Group has conducted a portfolio and market analysis considering the information to be reported in column c ("of which environmentally sustainable (CCM)"). MuniFin Group does not at the moment have a reliable way to prove its counterparties alignment with the EU Taxonomy as the Group's counterparties (mostly consisting of municipalities, joint municipal authorities, wellbeing services counties and corporate entities under their control) do not report this information and this information has not been collected from these counterparties in the past. This means that column c is reported as 0, except for exposures towards financial and insurance activities.

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
			Gross carrying amount					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO_2 equivalent) **							
	31 Dec 2025 (EUR million) Sector/subsector		Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation	Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures		Of which Stage 2 exposures	Of which non-performing exposures		Of which Scope 3 financed emissions	GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting	<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity
1	**Exposures towards sectors that highly contribute to climate change***	20,612	-	-	1,976	451	-3	-2	-1	279,171	44,712	-	737	1,727	2,903	15,244	26
2	A - Agriculture, forestry and fishing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3	B - Mining and quarrying	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	*B.05 - Mining of coal and lignite*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	*B.06 - Extraction of crude petroleum and natural gas*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	*B.07 - Mining of metal ores*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	*B.08 - Other mining and quarrying*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	*B.09 - Mining support service activities*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	C - Manufacturing	4	-	-	-	-	0	-	-	2,672	2,502	-	-	4	-	-	6
10	*C.10 - Manufacture of food products*	4	-	-	-	-	0	-	-	2,672	2,502	-	-	4	-	-	6
11	*C.11 - Manufacture of beverages*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	*C.12 - Manufacture of tobacco products*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	*C.13 - Manufacture of textiles*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	*C.14 - Manufacture of wearing apparel*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	*C.15 - Manufacture of leather and related products*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

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31 Dec 2025 (EUR million)		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		Gross carrying amount						Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO_2 equivalent) **		GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting					
Sector/subsector			Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation	Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures		Of which Stage 2 exposures	Of which non-performing exposures		Of which Scope 3 financed emissions		<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity
16	*C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17	*C.17 - Manufacture of pulp, paper and paperboard*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18	*C.18 - Printing and service activities related to printing*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	*C.19 - Manufacture of coke oven products*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	*C.20 - Production of chemicals*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
21	*C.21 - Manufacture of pharmaceutical preparations*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
22	*C.22 - Manufacture of rubber products*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
23	*C.23 - Manufacture of other non-metallic mineral products*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24	*C.24 - Manufacture of basic metals*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
25	*C.25 - Manufacture of fabricated metal products, except machinery and equipment*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
26	*C.26 - Manufacture of computer, electronic and optical products*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27	*C.27 - Manufacture of electrical equipment*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
28	*C.28 - Manufacture of machinery and equipment n.e.c.*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		Gross carrying amount						Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO_2 equivalent) **		GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting					
31 Dec 2025 (EUR million) Sector/subsector			Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation	Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures		Of which Stage 2 exposures	Of which non-performing exposures		Of which Scope 3 financed emissions		<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity
29	*C.29 - Manufacture of motor vehicles, trailers and semi-trailers*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	*C.30 - Manufacture of other transport equipment*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31	*C.31 - Manufacture of furniture*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
32	*C.32 - Other manufacturing*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
33	*C.33 - Repair and installation of machinery and equipment*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
34	D - Electricity, gas, steam and air conditioning supply	233	-	-	3	-	0	0	-	81,589	14,268	-	70	102	49	12	8
35	*D35.1 - Electric power generation, transmission and distribution*	128	-	-	1	-	0	0	-	35,567	6,220	-	41	81	6	-	6
36	*D35.11 - Production of electricity*	33	-	-	1	-	0	0	-	9,356	1,636	-	16	13	4	-	6
37	*D35.2 - Manufacture of gas; distribution of gaseous fuels through mains*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
38	*D35.3 - Steam and air conditioning supply*	105	-	-	2	-	0	0	-	46,023	8,048	-	29	21	43	12	10
39	E - Water supply; sewerage, waste management and remediation activities	1,048	-	-	17	-	0	0	-	79,984	25,753	-	144	267	409	229	14
40	F - Construction	138	-	-	45	-	0	0	-	1,135	178	-	24	35	12	68	18
41	*F.41 - Construction of buildings*	135	-	-	45	-	0	0	-	1,020	78	-	23	32	12	68	18
42	*F.42 - Civil engineering*	1	-	-	0	-	0	0	-	45	39	-	0	1	-	-	8
43	*F.43 - Specialised construction activities*	1	-	-	-	-	0	-	-	71	61	-	0	1	-	-	7

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		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		Gross carrying amount						Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO_2 equivalent) **		GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting					
31 Dec 2025 (EUR million)	Sector/subsector		Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation	Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures		Of which Stage 2 exposures	Of which non-performing exposures		Of which Scope 3 financed emissions		<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity
44	G - Wholesale and retail trade; repair of motor vehicles and motorcycles	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
45	H - Transportation and storage	78	-	-	1	-	0	0	-	2,617	1,970	-	21	18	25	14	11
46	*H.49 - Land transport and transport via pipelines*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
47	*H.50 - Water transport*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
48	*H.51 - Air transport*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
49	*H.52 - Warehousing and support activities for transportation*	78	-	-	1	-	0	0	-	2,617	1,970	-	21	18	25	14	11
50	*H.53 - Postal and courier activities*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
51	I - Accommodation and food service activities	4	-	-	4	-	0	0	-	49	-	-	-	-	-	4	29
52	L - Real estate activities	19,106	-	-	1,906	451	-3	-2	-1	111,125	41	-	479	1,301	2,409	14,917	27
53	**Exposures towards sectors other than those that highly contribute to climate change***	7,398	-	97	23	1	0	0	0			-	6,472	754	37	135	3
54	K - Financial and insurance activities	7,194	-	97	-	-	0	-	-			-	6,461	727	6	1	2
55	Exposures to other sectors (NACE codes J, M - U)	204	-	-	23	1	0	0	0			-	11	27	31	135	22
56	**Total**	**28,009**	**-**	**97**	**2,000**	**452**	**-3**	**-2**	**-1**	**279,171**	**44,712**	**-**	**7,209**	**2,481**	**2,940**	**15,379**	**20**

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

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		Gross carrying amount					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO_2 equivalent)							
31 Dec 2024 (EUR million) Sector/subsector		Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation	Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures		Of which Stage 2 exposures	Of which non-performing exposures		Of which Scope 3 financed emissions	GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting	<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity
1	**Exposures towards sectors that highly contribute to climate change***	18,636	-	-	1,875	296	-2	-2	0	379,783	180,464	0	576	1,725	2,522	13,813	26
2	A - Agriculture, forestry and fishing	-	-	-	-	-	-	-	-			-	-	-	-	-	-
3	B - Mining and quarrying	-	-	-	-	-	-	-	-			-	-	-	-	-	-
4	*B.05 - Mining of coal and lignite*	-	-	-	-	-	-	-	-			-	-	-	-	-	-
5	*B.06 - Extraction of crude petroleum and natural gas*	-	-	-	-	-	-	-	-			-	-	-	-	-	-
6	*B.07 - Mining of metal ores*	-	-	-	-	-	-	-	-			-	-	-	-	-	-
7	*B.08 - Other mining and quarrying*	-	-	-	-	-	-	-	-			-	-	-	-	-	-
8	*B.09 - Mining support service activities*	-	-	-	-	-	-	-	-			-	-	-	-	-	-
9	C - Manufacturing	5	-	-	5	-	0	0	-	9,893	9,581	0	-	5	-	-	7
10	*C.10 - Manufacture of food products*	5	-	-	5	-	0	0	-	9,893	9,581	0	-	5	-	-	7
11	*C.11 - Manufacture of beverages*	-	-	-	-	-	-	-	-			-	-	-	-	-	-
12	*C.12 - Manufacture of tobacco products*	-	-	-	-	-	-	-	-			-	-	-	-	-	-
13	*C.13 - Manufacture of textiles*	-	-	-	-	-	-	-	-			-	-	-	-	-	-
14	*C.14 - Manufacture of wearing apparel*	-	-	-	-	-	-	-	-			-	-	-	-	-	-
15	*C.15 - Manufacture of leather and related products*	-	-	-	-	-	-	-	-			-	-	-	-	-	-
16	*C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials*	-	-	-	-	-	-	-	-			-	-	-	-	-	-

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
			Gross carrying amount					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO_2 equivalent)		GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting					
31 Dec 2024 (EUR million) Sector/subsector			Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation	Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures		Of which Stage 2 exposures	Of which non-performing exposures		Of which Scope 3 financed emissions		<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity
17	*C.17 - Manufacture of pulp, paper and paperboard*	-	-	-	-	-	-	-	-			-	-	-	-	-	-
18	*C.18 - Printing and service activities related to printing*	-	-	-	-	-	-	-	-			-	-	-	-	-	-
19	*C.19 - Manufacture of coke oven products*	-	-	-	-	-	-	-	-			-	-	-	-	-	-
20	*C.20 - Production of chemicals*	-	-	-	-	-	-	-	-			-	-	-	-	-	-
21	*C.21 - Manufacture of pharmaceutical preparations*	-	-	-	-	-	-	-	-			-	-	-	-	-	-
22	*C.22 - Manufacture of rubber products*	-	-	-	-	-	-	-	-			-	-	-	-	-	-
23	*C.23 - Manufacture of other non-metallic mineral products*	-	-	-	-	-	-	-	-			-	-	-	-	-	-
24	*C.24 - Manufacture of basic metals*	-	-	-	-	-	-	-	-			-	-	-	-	-	-
25	*C.25 - Manufacture of fabricated metal products, except machinery and equipment*	-	-	-	-	-	-	-	-			-	-	-	-	-	-
26	*C.26 - Manufacture of computer, electronic and optical products*	-	-	-	-	-	-	-	-			-	-	-	-	-	-
27	*C.27 - Manufacture of electrical equipment*	-	-	-	-	-	-	-	-			-	-	-	-	-	-
28	*C.28 - Manufacture of machinery and equipment n.e.c.*	-	-	-	-	-	-	-	-			-	-	-	-	-	-
29	*C.29 - Manufacture of motor vehicles, trailers and semi-trailers*	-	-	-	-	-	-	-	-			-	-	-	-	-	-

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
			Gross carrying amount					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO_2 equivalent)		GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting					
31 Dec 2024 (EUR million) Sector/subsector			Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation	Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures		Of which Stage 2 exposures	Of which non-performing exposures		Of which Scope 3 financed emissions		<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity
30	*C.30 - Manufacture of other transport equipment*	-	-	-	-	-	-	-	-			-	-	-	-	-	-
31	*C.31 - Manufacture of furniture*	-	-	-	-	-	-	-	-			-	-	-	-	-	-
32	*C.32 - Other manufacturing*	-	-	-	-	-	-	-	-			-	-	-	-	-	-
33	*C.33 - Repair and installation of machinery and equipment*	-	-	-	-	-	-	-	-			-	-	-	-	-	-
34	D - Electricity, gas, steam and air conditioning supply	281	-	-	12	-	0	0	-	91,713	60,976	0	138	85	48	11	6
35	*D35.1 - Electric power generation, transmission and distribution*	173	-	-	1	-	0	0	-	80,454	54,290	0	105	62	5	1	4
36	*D35.11 - Production of electricity*	57	-	-	1	-	0	0	-	32,063	23,639	0	40	13	4	0	4
37	*D35.2 - Manufacture of gas; distribution of gaseous fuels through mains*	-	-	-	-	-	-	-	-			-	-	-	-	-	-
38	*D35.3 - Steam and air conditioning supply*	108	-	-	11	-	0	0	-	11,259	6,686	0	33	23	42	10	9
39	E - Water supply; sewerage, waste management and remediation activities	996	-	-	21	-	0	0	-	169,998	107,594	0	76	371	355	194	14
40	F - Construction	140	-	-	47	0	0	0	0	1,113	152	0	8	49	16	67	18
41	*F.41 - Construction of buildings*	137	-	-	47	0	0	0	0	989	42	0	8	47	15	67	19
42	*F.42 - Civil engineering*	1	-	-	-	-	0	-	-	42	37	0	0	0	1	-	9
43	*F.43 - Specialised construction activities*	2	-	-	-	-	0	-	-	83	73	0	0	1	-	-	8

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
			Gross carrying amount					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO_2 equivalent)		GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting					
	31 Dec 2024 (EUR million) Sector/subsector		Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation	Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures		Of which Stage 2 exposures	Of which non-performing exposures		Of which Scope 3 financed emissions		<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity
44	G - Wholesale and retail trade; repair of motor vehicles and motorcycles	-	-	-	-	-	-	-	-			-	-	-	-	-	-
45	H - Transportation and storage	87	-	-	1	-	0	0	-	3,778	2,024	0	13	34	26	15	12
46	*H.49 - Land transport and transport via pipelines*	-	-	-	-	-	-	-	-			-	-	-	-	-	-
47	*H.50 - Water transport*	-	-	-	-	-	-	-	-			-	-	-	-	-	-
48	*H.51 - Air transport*	-	-	-	-	-	-	-	-			-	-	-	-	-	-
49	*H.52 - Warehousing and support activities for transportation*	87	-	-	1	-	0	0	-	3,778	2,024	0	13	34	26	15	12
50	*H.53 - Postal and courier activities*	-	-	-	-	-	-	-	-			-	-	-	-	-	-
51	I - Accommodation and food service activities	4	-	-	4	-	0	0	-	49		0	-	-	-	4	30
52	L - Real estate activities	17,122	-	-	1,785	296	-2	-2	0	103,239	138	0	341	1,182	2,077	13,523	27
53	**Exposures towards sectors other than those that highly contribute to climate change***	4,897	-	88	27	1	0	0	0				2,646	582	36	1,634	9
54	K - Financial and insurance activities	4,691	-	88	-	-	0	-	-				2,634	551	7	1,499	9
55	Exposures to other sectors (NACE codes J, M - U)	206	-	-	27	1	0	0	0				12	31	28	135	22
56	**Total**	**23,533**	**-**	**88**	**1,902**	**297**	**-2**	**-2**	**0**	**379,783**	**180,464**	**0**	**3,221**	**2,307**	**2,557**	**15,447**	**23**

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

Template 2
Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral

MuniFin Group reports the actual energy efficiency information of the collateral to the extent information has been received from customers or received using a public source by the energy performance certificate register maintained by the Centre for State-Subsidised Housing Construction (Varke). There are several versions of energy performance certificates used in Finland and reported energy efficiency information includes information calculated using standards of 2007, 2013 and 2018.

For collaterals, where information was not received or available, energy efficiency has been estimated. Estimation has been done in line with the threshold values set out in the latest energy performance certificate in Finland. Estimation of the energy efficiency of the immovable property is based on the building type and the year of construction. The Centre for State-Subsidised Housing Construction (Varke) maintains energy performance certificate register, and statistical information regarding the average energy efficiency has been collected from the register. There are some collaterals where energy efficiency information was not available and therefore columns b-g do not equal column a.

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	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
	Total gross carrying amount amount															
		Level of energy efficiency (EP score in kWh/m² of collateral)						Level of energy efficiency (EPC label of collateral)							Without EPC label of collateral	
31 Dec 2025 (EUR million) Counterparty sector		0; <= 100	> 100; <= 200	> 200; <= 300	> 300; <= 400	> 400; <= 500	> 500	A	B	C	D	E	F	G		Of which level of energy efficiency (EP score in kWh/m² of collateral) estimated
1 **Total EU area**	17,032	8,853	6,828	772	127	36	33	3,784	4,133	3,747	1,332	841	367	197	2,631	99%
2 Of which Loans collateralised by commercial immovable property	1	-	-	-	-	-	-	-	-	-	-	-	1	-	-	-
3 Of which Loans collateralised by residential immovable property	17,031	8,853	6,828	772	127	36	33	3,784	4,133	3,747	1,332	841	367	197	2,631	99%
4 Of which Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5 Of which Level of energy efficiency (EP score in kWh/m² of collateral) estimated	2,611	1,708	886	17	-	-	-								2,611	100%
6 **Total non-EU area**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7 Of which Loans collateralised by commercial immovable property	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8 Of which Loans collateralised by residential immovable property	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Of which Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10 Of which Level of energy efficiency (EP score in kWh/m² of collateral) estimated	-	-	-	-	-	-	-								-	-

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		Total gross carrying amount amount															
			Level of energy efficiency (EP score in kWh/m² of collateral)						Level of energy efficiency (EPC label of collateral)							Without EPC label of collateral	
31 Dec 2024 (EUR million)	Counterparty sector		0; <= 100	> 100; <= 200	> 200; <= 300	> 300; <= 400	> 400; <= 500	> 500	A	B	C	D	E	F	G		Of which level of energy efficiency (EP score in kWh/m² of collateral) estimated
1	**Total EU area**	14,938	7,208	6,392	717	118	38	36	2,333	3,770	3,648	1,133	710	317	204	2,823	99%
2	Of which Loans collateralised by commercial immovable property	1	-	1	-	-	-	-	-	-	-	-	-	1	-	-	-
3	Of which Loans collateralised by residential immovable property	14,937	7,208	6,392	717	118	38	36	2,333	3,770	3,648	1,133	710	317	204	2,823	99%
4	Of which Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Of which Level of energy efficiency (EP score in kWh/m² of collateral) estimated	2,790	1,832	941	17	-	-	-								2,790	100%
6	**Total non-EU area**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Of which Loans collateralised by commercial immovable property	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	Of which Loans collateralised by residential immovable property	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Of which Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Of which Level of energy efficiency (EP score in kWh/m² of collateral) estimated	-	-	-	-	-	-	-								-	-

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Template 3
Banking book - Climate Change transition risk: Alignment metrics

In accordance with the EBA Q&A 2023_6843, MuniFin Group will not be disclosing any information pertaining to Template 3 Banking book - Climate Change transition risk: Alignment metrics as of the reference date, December 31 2025. This is due to the fact that the Group does not hold any material exposures to the sectors specified in the pre-defined list of NACE sectors for Template 3. Specifically, the shipping and power industries constitute 0.59% of its total exposures, rendering them immaterial. Furthermore, it has been observed that procuring a scenario value for the alignment metric for these two sectors presents a significant challenge.

Additionally, MuniFin Group does not have exposures to any other sector not included in the pre-defined list of NACE sectors for Template 3, where a feasible alignment metric and scenario value could be determined.

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

As of 31 December 2025, MuniFin Group does not have any exposures towards the top 20 carbon-intensive firms in the world. The list considered to identify the top 20 carbon-intensive firms in the world is the Carbon Majors Database and the reference date of the list is end of year 2024.

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

MuniFin Group uses dedicated external data sources recognised by EBA or provided by national governmental institutes to determine risks associated with climate change related physical hazards. The scope of acute physical risks includes significant flood risk areas in Finland, as floods are identified as only material physical risks, for MuniFin Group's loan portfolio exposures. Additionally, precipitation and wildfires have been assessed as part of acute risk evaluation, but data indicates that they do not pose significant risks to Finland. The significant flood risk areas in Finland are defined by Ministry of Agriculture and Forestry. Finnish Environmental Institute provides data of these areas, and that data was used to identify collaterals located on significant flood risk areas. Analysis is done at postal code level. Flood risk includes coastal flooding and river flooding.

The assessment of chronic physical risks includes the most common physical risks which are water scarcity and extreme heat. Sea level rise is not included as separate acute risk as coastal flooding is included in acute risks. The data source for both water scarcity and extreme heat is ThinkHazard and the analysis for MuniFin's banking book is conducted on county/region level. ThinkHazard classifies risks based on future occurrences of certain hazard. In addition to water scarcity, drought risk has been assessed using data from the Finnish Environment Institute, and this may exacerbate water scarcity. However, water scarcity, drought and extreme heat do not pose material risks for MuniFin's loan portfolio. Therefore, physical risks reported in the template consist only of flood risk since other physical risks did not exceed internally defined risk thresholds.

a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
31 Dec 2025 (EUR million)	Gross carrying amount													
	of which exposures sensitive to impact from climate change physical events													
	Breakdown by maturity bucket											Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		
Finland		<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity	of which exposures sensitive to impact from chronic climate change events	of which exposures sensitive to impact from acute climate change events	of which exposures sensitive to impact both from chronic and acute climate change events	Of which Stage 2 exposures	Of which non-performing exposures		of which Stage 2 exposures	Of which non-performing exposures
1 A - Agriculture, forestry and fishing	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2 B - Mining and quarrying	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3 C - Manufacturing	4	-	-	-	-	-	-	-	-	-	-	-	-	-
4 D - Electricity, gas, steam and air conditioning supply	233	23	17	5	1	5	-	45	-	-	-	0	-	-
5 E - Water supply; sewerage, waste management and remediation activities	1,048	13	25	107	21	13	-	166	-	-	-	0	-	-
6 F - Construction	138	-	7	9	6	15	-	22	-	14	-	0	0	-
7 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8 H - Transportation and storage	78	5	-	-	-	1	-	5	-	-	-	0	-	-
9 L - Real estate activities	19,106	65	312	306	1,566	25	-	2,248	-	309	61	-1	0	0
10 Loans collateralised by residential immovable property	17,031	42	256	177	1,453	26	-	1,928	-	227	59	0	0	0
11 Loans collateralised by commercial immovable property	1	-	-	-	-	-	-	-	-	-	-	-	-	-
12 Repossessed collaterals	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13 Other relevant sectors (breakdown below where relevant)	-	-	-	-	-	-	-	-	-	-	-	-	-	-

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	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
			Gross carrying amount												
			of which exposures sensitive to impact from climate change physical events												
			Breakdown by maturity bucket					of which exposures sensitive to impact from chronic climate change events	of which exposures sensitive to impact from acute climate change events	of which exposures sensitive to impact both from chronic and acute climate change events			Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		
31 Dec 2024 (EUR million)	Finland		<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity				Of which Stage 2 exposures	Of which non-performing exposures		of which Stage 2 exposures	Of which non-performing exposures
1	A - Agriculture, forestry and fishing	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2	B - Mining and quarrying	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3	C - Manufacturing	5	-	-	-	-	-	-	-	-	-	-	-	-	-
4	D - Electricity, gas, steam and air conditioning supply	281	27	11	10	3	6	-	51	-	-	-	0	-	-
5	E - Water supply; sewerage, waste management and remediation activities	996	24	34	107	22	13	-	187	-	-	-	0	-	-
6	F - Construction	140	0	5	12	7	16	-	24	-	14	0	0	0	0
7	G - Wholesale and retail trade; repair of motor vehicles and motorcycles	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	H - Transportation and storage	87	7	-	-	-	2	-	7	-	-	-	0	-	-
9	L - Real estate activities	17,122	81	240	257	1,440	25	-	2,018	-	297	54	-1	-1	0
10	Loans collateralised by residential immovable property	14,937	14	180	127	1,342	27	-	1,663	-	149	54	0	0	0
11	Loans collateralised by commercial immovable property	1	-	-	-	-	-	-	-	-	-	-	-	-	-
12	Repossessed collaterals	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Other relevant sectors (breakdown below where relevant)	-	-	-	-	-	-	-	-	-	-	-	-	-	-

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Template 6
Summary of GAR KPIs

	KPI			
31 Dec 2025	**Climate change mitigation**	**Climate change adaptation**	**Total (Climate change mitigation + Climate change adaptation)**	**% coverage (over total assets)***
GAR stock	0.26%	0.00%	0.26%	20.67%
GAR flow	0.21%	0.00%	0.21%	10.57%

* % of assets covered by the KPI over bank's total assets.

	KPI			
31 Dec 2024	**Climate change mitigation**	**Climate change adaptation**	**Total (Climate change mitigation + Climate change adaptation)**	**% coverage (over total assets)***
GAR stock	0.27%	0.11%	0.38%	17.05%
GAR flow	0.34%	0.00%	0.34%	6.46%

,

* % of assets covered by the KPI over bank's total assets.

Template 7
Mitigating actions: Assets for the calculation of GAR

For financial corporations, all taxonomy-related data has been collected from counterparties' annual NFRD reporting. The taxonomy-related data disclosed in this table for financial corporations have the reference date 31 December 2024. MuniFin Group's all household exposures (exposures to non-profit institutions serving households) are reported on row 24 "Households". For local governments financing, the row 30 "Other local government financing" includes all exposures where the use of proceeds is known according to the amended Commission Delegated Regulation (EU) 2021/2178 as of 1.1.2024.

Row 44 "Other assets" includes exposures to financial corporations not subject to NFRD, tangible assets, intangible assets, tax assets and other assets in the Group's balance-sheet.

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		Disclosure reference date T														
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				
31 Dec 2025 (EUR million)	Total gross carrying amount		Of which specialised lending		Of which transitional	Of which enabling			Of which specialised lending	Of which adaptation	Of which enabling			Of which specialised lending	Of which transitional/ adaptation	Of which enabling
GAR - Covered assets in both numerator and denominator																
1 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	11,502	5,320	97	-	7	6	56	0	-	-	0	5,376	97	-	7	6
2 **Financial corporation**	2,975	993	97	-	7	6	56	0	-	-	0	1,049	97	-	7	6
3 Credit institutions	2,975	993	97	-	7	6	56	0	-	-	0	1,049	97	-	7	6
4 Loans and advances	1,074	209	18	-	1	1	1	0	-	-	0	209	18	-	1	1
5 Debt securities, including UoP	1,901	784	79	-	6	5	56	0	-	-	-	840	79	-	6	5
6 Equity instruments	-	-	-		-	-	-	-		-	-	-	-		-	-
7 Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8 of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	-		-	-	-	-		-	-	-	-		-	-
12 of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	-		-	-	-	-		-	-	-	-		-	-
16 of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19 Equity instruments	-	-	-		-	-	-	-		-	-	-	-		-	-

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
			Disclosure reference date T														
			Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
			Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				
31 Dec 2025 (EUR million)		Total gross carrying amount		Of which specialised lending	Of which transitional	Of which enabling				Of which specialised lending	Of which adaptation	Of which enabling			Of which specialised lending	Of which transitional/ adaptation	Of which enabling
20	**Non-financial corporations (subject to NFRD disclosure obligations)**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
21	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
23	Equity instruments	-	-	-		-	-	-	-		-	-	-	-		-	-
24	**Households**	423	385	-	-	-	-						385	-	-	-	-
25	of which loans collateralised by residential immovable	314	314	-	-	-	-						314	-	-	-	-
26	of which building renovation loans	-	-	-	-	-	-						-	-	-	-	-
27	of which motor vehicle loans	-	-	-	-	-	-						-	-	-	-	-
28	**Local governments financing**	8,104	3,942	-	-	-	-	-	-	-	-	-	3,942	-	-	-	-
29	Housing financing	246	246	-	-	-	-	-	-	-	-	-	246	-	-	-	-
30	Other local governments financing	7,858	3,696	-	-	-	-	-	-	-	-	-	3,696	-	-	-	-
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
32	**Total GAR assets**	11,502	5,320	97	-	7	6	56	0	-	-	0	5,376	97	-	7	6

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		Disclosure reference date T														
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
			Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)			
31 Dec 2025 (EUR million)	Total gross carrying amount			Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which adaptation	Of which enabling			Of which specialised lending	Of which transitional/ adaptation	Of which enabling
Assets excluded from the numerator for GAR calculation (covered in the denominator)																
33 **EU Non-financial corporations (not subject to NFRD disclosure obligations)**	**20,824**															
34 Loans and advances	20,733															
35 Debt securities	91															
36 Equity instruments	-															
37 **Non-EU Non-financial corporations (not subject to NFRD disclosure obligations)**	-															
38 Loans and advances	-															
39 Debt securities	-															
40 Equity instruments	-															
41 Derivatives	620															
42 On demand interbank loans	43															
43 Cash and cash-related assets	0															
44 Other assets (e.g. Goodwill, commodities etc.)	**4,448**															
45 **Total assets in the denominator (GAR)**	**37,439**															

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		Disclosure reference date T														
		Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)						Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
			Of which environmentally sustainable (Taxonomy-aligned)						Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)		
31 Dec 2025 (EUR million)	Total gross carrying amount			Of which specialised lending	Of which transitional	Of which enabling				Of which specialised lending	Of which adaptation	Of which enabling			Of which specialised lending	Of which transitional/ adaptation	Of which enabling
Other assets excluded from both the numerator and denominator for GAR calculation																
46 Sovereigns	12,708															
47 Central banks exposure	5,207															
48 Trading book	283															
49 **Total assets excluded from numerator and denominator**	**18,199**															
50 **Total assets**	**55,638**															

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31 Dec 2024 (EUR million)	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		Disclosure reference date T														
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
			Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)			
	Total gross carrying amount			Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which adaptation	Of which enabling			Of which specialised lending	Of which transitional/ adaptation	Of which enabling
GAR - Covered assets in both numerator and denominator																
1 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	9,053	4,842	88	-	3	1	38	36	-	0	0	4,880	124	-	3	1
2 **Financial corporation**	1,820	662	88	-	3	1	38	36	-	0	0	700	124	-	3	1
3 Credit institutions	1,820	662	88	-	3	1	38	36	-	0	0	700	124	-	3	1
4 Loans and advances	601	153	7	-	1	1	0	0	-	0	0	153	7	-	1	1
5 Debt securities, including UoP	1,219	509	81	-	2	1	38	36	-	-	0	547	117	-	2	1
6 Equity instruments	-	-	-		-	-	-	-		-	-	-	-		-	-
7 Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8 of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	-		-	-	-	-		-	-	-	-		-	-
12 of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	-		-	-	-	-		-	-	-	-		-	-
16 of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19 Equity instruments	-	-	-		-	-	-	-		-	-	-	-		-	-

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
			Disclosure reference date T														
			Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
				Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)			
31 Dec 2024 (EUR million)		Total gross carrying amount			Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which adaptation	Of which enabling			Of which specialised lending	Of which transitional/ adaptation	Of which enabling
20	**Non-financial corporations (subject to NFRD disclosure obligations)**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
21	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
23	Equity instruments	-	-	-		-	-	-	-		-	-	-	-		-	-
24	**Households**	354	310	-	-	-	-						310	-	-	-	-
25	of which loans collateralised by residential immovable	233	233	-	-	-	-						233	-	-	-	-
26	of which building renovation loans	-	-	-	-	-	-						-	-	-	-	-
27	of which motor vehicle loans	-	-	-	-	-	-						-	-	-	-	-
28	**Local governments financing**	6,879	3,869	-	-	-	-	-	-	-	-	-	3,869	-	-	-	-
29	Housing financing	249	249	-	-	-	-	-	-	-	-	-	249	-	-	-	-
30	Other local governments financing	6,630	3,621	-	-	-	-	-	-	-	-	-	3,621	-	-	-	-
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
32	**Total GAR assets**	9,053	4,842	88	-	3	1	38	36	-	0	0	4,880	124	-	3	1

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		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
			Disclosure reference date T														
			Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)			
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)						Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
				Of which environmentally sustainable (Taxonomy-aligned)						Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)		
31 Dec 2024 (EUR million)		Total gross carrying amount			Of which specialised lending	Of which transitional	Of which enabling				Of which specialised lending	Of which adaptation	Of which enabling			Of which specialised lending	Of which transitional/ adaptation	Of which enabling
Assets excluded from the numerator for GAR calculation (covered in the denominator)																	
33	**EU Non-financial corporations (not subject to NFRD disclosure obligations)**	**18,853**															
34	Loans and advances	18,781															
35	Debt securities	71															
36	Equity instruments	-															
37	**Non-EU Non-financial corporations (not subject to NFRD disclosure obligations)**	-															
38	Loans and advances	-															
39	Debt securities	-															
40	Equity instruments	-															
41	Derivatives	1,266															
42	On demand interbank loans	61															
43	Cash and cash-related assets	0															
44	Other assets (e.g. Goodwill, commodities etc.)	**2,999**															
45	**Total assets in the denominator (GAR)**	**32,232**															

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	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		Disclosure reference date T														
		Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)						Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
			Of which environmentally sustainable (Taxonomy-aligned)						Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)		
31 Dec 2024 (EUR million)	Total gross carrying amount			Of which specialised lending	Of which transitional	Of which enabling				Of which specialised lending	Of which adaptation	Of which enabling			Of which specialised lending	Of which transitional/ adaptation	Of which enabling
Other assets excluded from both the numerator and denominator for GAR calculation																
46 Sovereigns	12,602															
47 Central banks exposure	7,809															
48 Trading book	451															
49 **Total assets excluded from numerator and denominator**	**20,863**															
50 **Total assets**	**53,094**															

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Template 8
GAR (%)

31 Dec 2025 (EUR million) % (compared to total covered assets in the denominator)	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
	Disclosure reference date T: KPIs on stock															
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)					
	Proportion of eligible assets funding taxonomy relevant sectors					Proportion of eligible assets funding taxonomy relevant sectors					Proportion of eligible assets funding taxonomy relevant sectors					
		Of which environmentally sustainable					Of which environmentally sustainable					Of which environmentally sustainable				Proportion of total assets covered
			Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which adaptation	Of which enabling			Of which specialised lending	Of which transitional/ adaptation	Of which enabling	
1 **GAR**	14.21%	0.26%	0.00%	0.02%	0.02%	0.15%	0.00%	0.00%	0.00%	0.00%	14.36%	0.26%	0.00%	0.02%	0.02%	20.67%
2 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	14.21%	0.26%	0.00%	0.02%	0.02%	0.15%	0.00%	0.00%	0.00%	0.00%	14.36%	0.26%	0.00%	0.02%	0.02%	20.67%
3 Financial corporations	2.65%	0.26%	0.00%	0.02%	0.02%	0.15%	0.00%	0.00%	0.00%	0.00%	2.80%	0.26%	0.00%	0.02%	0.02%	5.35%
4 Credit institutions	2.65%	0.26%	0.00%	0.02%	0.02%	0.15%	0.00%	0.00%	0.00%	0.00%	2.80%	0.26%	0.00%	0.02%	0.02%	5.35%
5 Other financial corporations	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
6 of which investment firms	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
7 of which management companies	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
8 of which insurance undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
9 Non-financial corporations subject to NFRD disclosure	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10 Households	1.03%	0.00%	0.00%	0.00%	0.00%						1.03%	0.00%	0.00%	0.00%	0.00%	0.76%
11 of which loans collateralised by residential immovable property	0.84%	0.00%	0.00%	0.00%	0.00%						0.84%	0.00%	0.00%	0.00%	0.00%	0.56%
12 of which building renovation loans	0.00%	0.00%	0.00%	0.00%	0.00%						0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
13 of which motor vehicle loans	0.00%	0.00%	0.00%	0.00%	0.00%						0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
14 Local government financing	10.53%	0.00%	0.00%	0.00%	0.00%						10.53%	0.00%	0.00%	0.00%	0.00%	14.57%
15 Housing financing	0.66%	0.00%	0.00%	0.00%	0.00%						0.66%	0.00%	0.00%	0.00%	0.00%	0.44%
16 Other local governments financing	9.87%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	9.87%	0.00%	0.00%	0.00%	0.00%	14.12%
17 Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%	0.00%	0.00%	0.00%						0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

31 Dec 2025 (EUR million) % (compared to total covered assets in the denominator)	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae	af
	Disclosure reference date T: KPIs on flow															
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)					
	Proportion of new eligible assets funding taxonomy relevant sectors					Proportion of new eligible assets funding taxonomy relevant sectors					Proportion of new eligible assets funding taxonomy relevant sectors					
		Of which environmentally sustainable					Of which environmentally sustainable					Of which environmentally sustainable				
			Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which adaptation	Of which enabling			Of which specialised lending	Of which transitional/ adaptation	Of which enabling	Proportion of total new assets covered
1 **GAR**	4.65%	0.21%	0.00%	0.01%	0.06%	0.24%	0.00%	0.00%	0.00%	0.00%	4.90%	0.21%	0.00%	0.01%	0.06%	10.57%
2 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	4.65%	0.21%	0.00%	0.01%	0.06%	0.24%	0.00%	0.00%	0.00%	0.00%	4.90%	0.21%	0.00%	0.01%	0.06%	10.57%
3 Financial corporations	2.68%	0.21%	0.00%	0.01%	0.06%	0.24%	0.00%	0.00%	0.00%	0.00%	2.93%	0.21%	0.00%	0.01%	0.06%	3.18%
4 Credit institutions	2.68%	0.21%	0.00%	0.01%	0.06%	0.24%	0.00%	0.00%	0.00%	0.00%	2.93%	0.21%	0.00%	0.01%	0.06%	3.18%
5 Other financial corporations	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
6 of which investment firms	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
7 of which management companies	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
8 of which insurance undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
9 Non-financial corporations subject to NFRD disclosure	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10 Households	0.41%	0.00%	0.00%	0.00%	0.00%						0.41%	0.00%	0.00%	0.00%	0.00%	0.12%
11 of which loans collateralised by residential immovable property	0.41%	0.00%	0.00%	0.00%	0.00%						0.41%	0.00%	0.00%	0.00%	0.00%	0.12%
12 of which building renovation loans	0.00%	0.00%	0.00%	0.00%	0.00%						0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
13 of which motor vehicle loans	0.00%	0.00%	0.00%	0.00%	0.00%						0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
14 Local government financing	1.56%	0.00%	0.00%	0.00%	0.00%						1.56%	0.00%	0.00%	0.00%	0.00%	7.27%
15 Housing financing	0.14%	0.00%	0.00%	0.00%	0.00%						0.14%	0.00%	0.00%	0.00%	0.00%	0.04%
16 Other local governments financing	1.42%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.42%	0.00%	0.00%	0.00%	0.00%	7.23%
17 Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%	0.00%	0.00%	0.00%						0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

31 Dec 2024 (EUR million) % (compared to total covered assets in the denominator)	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
	Disclosure reference date T: KPIs on stock															
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)					
	Proportion of eligible assets funding taxonomy relevant sectors					Proportion of eligible assets funding taxonomy relevant sectors					Proportion of eligible assets funding taxonomy relevant sectors					
		Of which environmentally sustainable					Of which environmentally sustainable					Of which environmentally sustainable				Proportion of total assets covered
			Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which adaptation	Of which enabling			Of which specialised lending	Of which transitional/ adaptation	Of which enabling	
1 **GAR**	15.02%	0.27%	0.00%	0.01%	0.00%	0.12%	0.11%	0.00%	0.00%	0.00%	15.14%	0.38%	0.00%	0.01%	0.00%	17.05%
2 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	15.02%	0.27%	0.00%	0.01%	0.00%	0.12%	0.11%	0.00%	0.00%	0.00%	15.14%	0.38%	0.00%	0.01%	0.00%	17.05%
3 Financial corporations	2.05%	0.27%	0.00%	0.01%	0.00%	0.12%	0.11%	0.00%	0.00%	0.00%	2.17%	0.38%	0.00%	0.01%	0.00%	3.43%
4 Credit institutions	2.05%	0.27%	0.00%	0.01%	0.00%	0.12%	0.11%	0.00%	0.00%	0.00%	2.17%	0.38%	0.00%	0.01%	0.00%	3.43%
5 Other financial corporations	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
6 of which investment firms	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
7 of which management companies	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
8 of which insurance undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
9 Non-financial corporations subject to NFRD disclosure	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10 Households	0.96%	0.00%	0.00%	0.00%	0.00%						0.96%	0.00%	0.00%	0.00%	0.00%	0.67%
11 of which loans collateralised by residential immovable property	0.72%	0.00%	0.00%	0.00%	0.00%						0.72%	0.00%	0.00%	0.00%	0.00%	0.44%
12 of which building renovation loans	0.00%	0.00%	0.00%	0.00%	0.00%						0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
13 of which motor vehicle loans	0.00%	0.00%	0.00%	0.00%	0.00%						0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
14 Local government financing	12.00%	0.00%	0.00%	0.00%	0.00%						12.00%	0.00%	0.00%	0.00%	0.00%	12.96%
15 Housing financing	0.77%	0.00%	0.00%	0.00%	0.00%						0.77%	0.00%	0.00%	0.00%	0.00%	0.47%
16 Other local governments financing	11.23%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	11.23%	0.00%	0.00%	0.00%	0.00%	12.49%
17 Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%	0.00%	0.00%	0.00%						0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

31 Dec 2024 (EUR million) % (compared to total covered assets in the denominator)	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae	af
	Disclosure reference date T: KPIs on flow															
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)					
	Proportion of new eligible assets funding taxonomy relevant sectors					Proportion of new eligible assets funding taxonomy relevant sectors					Proportion of new eligible assets funding taxonomy relevant sectors					
		Of which environmentally sustainable					Of which environmentally sustainable					Of which environmentally sustainable				
			Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which adaptation	Of which enabling			Of which specialised lending	Of which transitional/ adaptation	Of which enabling	Proportion of total new assets covered
1 **GAR**	8.98%	0.34%	0.00%	0.01%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	8.99%	0.34%	0.00%	0.01%	0.01%	6.46%
2 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	8.98%	0.34%	0.00%	0.01%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	8.99%	0.34%	0.00%	0.01%	0.01%	6.46%
3 Financial corporations	3.85%	0.34%	0.00%	0.01%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	3.86%	0.34%	0.00%	0.01%	0.01%	1.39%
4 Credit institutions	3.85%	0.34%	0.00%	0.01%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	3.86%	0.34%	0.00%	0.01%	0.01%	1.39%
5 Other financial corporations	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
6 of which investment firms	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
7 of which management companies	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
8 of which insurance undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
9 Non-financial corporations subject to NFRD disclosure	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10 Households	0.19%	0.00%	0.00%	0.00%	0.00%						0.19%	0.00%	0.00%	0.00%	0.00%	0.03%
11 of which loans collateralised by residential immovable property	0.06%	0.00%	0.00%	0.00%	0.00%						0.06%	0.00%	0.00%	0.00%	0.00%	0.01%
12 of which building renovation loans	0.00%	0.00%	0.00%	0.00%	0.00%						0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
13 of which motor vehicle loans	0.00%	0.00%	0.00%	0.00%	0.00%						0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
14 Local government financing	4.94%	0.00%	0.00%	0.00%	0.00%						4.94%	0.00%	0.00%	0.00%	0.00%	5.04%
15 Housing financing	0.05%	0.00%	0.00%	0.00%	0.00%						0.05%	0.00%	0.00%	0.00%	0.00%	0.01%
16 Other local governments financing	4.88%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	4.88%	0.00%	0.00%	0.00%	0.00%	5.03%
17 Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%	0.00%	0.00%	0.00%						0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Template 9
Mitigating actions: BTAR

Template 9.1
Mitigating actions:
Assets for the calculation of BTAR

31 Dec 2025 (EUR million)		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		Disclosure reference date T															
		Total gross carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)						Of which environmentally sustainable (Taxonomy-aligned)			
					Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which adaptation	Of which enabling			Of which specialised lending	Of which transitional/ adaptation	Of which enabling
1	**Total GAR Assets**	11,502	5,320	97	-	7	6	56	0	-	-	0	5,376	97	-	7	6
Assets excluded from the numerator for GAR calculation (covered in the denominator) but included in the numerator and denominator of the BTAR																	
2	**EU Non-financial corporations (not subject to NFRD disclosure obligations)**	20,824	20,403	-	-	-	-	-	-	-	-	-	20,403	-	-	-	-
3	Loans and advances	20,733	20,403	-	-	-	-	-	-	-	-	-	20,403	-	-	-	-
4	of which loans collateralised by commercial immovable property	1	-	-	-	-	-						-	-	-	-	-
5	of which building renovation loans	2,912	2,912	-	-	-	-						2,912	-	-	-	-
6	Debt securities	91	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	**Non-EU Non-financial corporations (not subject to NFRD disclosure obligations)**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	**Total BTAR assets**	32,327	25,723	97	-	7	6	56	0	-	-	0	25,779	97	-	7	6

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31 Dec 2025 (EUR million)	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		Disclosure reference date T														
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)						TOTAL (CCM + CCA)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)						Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
	Total gross carrying amount	Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)						Of which environmentally sustainable (Taxonomy-aligned)			
		Of which specialised lending		Of which transitional		Of which enabling	Of which specialised lending		Of which adaptation		Of which enabling		Of which specialised lending		Of which transitional/ adaptation	Of which enabling
Assets excluded from the numerator of BTAR (covered in the denominator)																
13 Derivatives	620															
14 On demand interbank loans	43															
15 Cash and cash-related assets	0															
16 Other assets (e.g. Goodwill, commodities etc.)	4,448															
17 Total assets in the denominator	**37,439**															
Other assets excluded from both the numerator and denominator for BTAR calculation																
18 Total assets excluded from numerator and denominator	**18,199**															
19 Total assets	**55,638**															

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		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
			Disclosure reference date T														
			Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
				Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)			
31 Dec 2024 (EUR million)		Total gross carrying amount			Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which adaptation	Of which enabling			Of which specialised lending	Of which transitional/ adaptation	Of which enabling
1	**Total GAR Assets**	9,053	4,842	88	-	3	1	38	36	-	0	0	4,880	124	-	3	1
Assets excluded from the numerator for GAR calculation (covered in the denominator) but included in the numerator and denominator of the BTAR																	
2	**EU Non-financial corporations (not subject to NFRD disclosure obligations)**	18,853	18,416	-	-	-	-	-	-	-	-	-	18,416	-	-	-	-
3	Loans and advances	18,781	18,416	-	-	-	-	-	-	-	-	-	18,416	-	-	-	-
4	of which loans collateralised by commercial immovable property	1	-	-	-	-	-						-	-	-	-	-
5	of which building renovation loans	2,521	2,521	-	-	-	-						2,521	-	-	-	-
6	Debt securities	71	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	**Non-EU Non-financial corporations (not subject to NFRD disclosure obligations)**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	**Total BTAR assets**	27,905	23,257	88	-	3	1	38	36	-	0	0	23,296	124	-	3	1

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31 Dec 2024 (EUR million)	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		Disclosure reference date T														
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
	Total gross carrying amount	Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				
			Of which specialised lending		Of which transitional	Of which enabling			Of which specialised lending	Of which adaptation	Of which enabling			Of which specialised lending	Of which transitional/ adaptation	Of which enabling
Assets excluded from the numerator of BTAR (covered in the denominator)																
13 Derivatives	1,266															
14 On demand interbank loans	61															
15 Cash and cash-related assets	0															
16 Other assets (e.g. Goodwill, commodities etc.)	2,999															
17 Total assets in the denominator	**32,232**															
Other assets excluded from both the numerator and denominator for BTAR calculation																
18 Total assets excluded from numerator and denominator	**20,863**															
19 Total assets	**53,094**															

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Template 9.2
BTAR %

31 Dec 2025 (EUR million) % (compared to total covered assets in the denominator)	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
	Disclosure reference date T: KPIs on stock															
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)					
	Proportion of eligible assets funding taxonomy relevant sectors					Proportion of eligible assets funding taxonomy relevant sectors					Proportion of eligible assets funding taxonomy relevant sectors					
		Of which environmentally sustainable					Of which environmentally sustainable					Of which environmentally sustainable				Proportion of total assets covered
			Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which adaptation	Of which enabling			Of which specialised lending	Of which transitional/ adaptation	Of which enabling	
1 **BTAR**	68.71%	0.26%	0.00%	0.02%	0.02%	0.15%	0.00%	0.00%	0.00%	0.00%	68.86%	0.26%	0.00%	0.02%	0.02%	58.10%
2 **GAR**	14.21%	0.26%	0.00%	0.02%	0.02%	0.15%	0.00%	0.00%	0.00%	0.00%	14.36%	0.26%	0.00%	0.02%	0.02%	20.67%
3 EU Non-financial corporations not subject to NFRD disclosure obligations	54.50%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	54.50%	0.00%	0.00%	0.00%	0.00%	37.43%
4 of which loans collateralised by commercial immovable property	0.00%	0.00%	0.00%	0.00%	0.00%						0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
5 of which building renovation loans	7.78%	0.00%	0.00%	0.00%	0.00%						7.78%	0.00%	0.00%	0.00%	0.00%	5.23%
6 Non-EU country counterparties not subject to NFRD disclosure obligations	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

31 Dec 2025 (EUR million) % (compared to total covered assets in the denominator)	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae	af
	Disclosure reference date T: KPIs on flows															
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)					
	Proportion of new eligible assets funding taxonomy relevant sectors					Proportion of new eligible assets funding taxonomy relevant sectors					Proportion of new eligible assets funding taxonomy relevant sectors					
		Of which environmentally sustainable					Of which environmentally sustainable					Of which environmentally sustainable				Proportion of total new assets covered
			Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which adaptation	Of which enabling			Of which specialised lending	Of which transitional/ adaptation	Of which enabling	
1 **BTAR**	22.54%	0.21%	0.00%	0.01%	0.06%	0.24%	0.00%	0.00%	0.00%	0.00%	22.79%	0.21%	0.00%	0.01%	0.06%	16.63%
2 **GAR**	4.65%	0.21%	0.00%	0.01%	0.06%	0.24%	0.00%	0.00%	0.00%	0.00%	4.90%	0.21%	0.00%	0.01%	0.06%	10.57%
3 EU Non-financial corporations not subject to NFRD disclosure obligations	17.89%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	17.89%	0.00%	0.00%	0.00%	0.00%	6.05%
4 of which loans collateralised by commercial immovable property	0.00%	0.00%	0.00%	0.00%	0.00%						0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
5 of which building renovation loans	2.97%	0.00%	0.00%	0.00%	0.00%						2.97%	0.00%	0.00%	0.00%	0.00%	0.84%
6 Non-EU country counterparties not subject to NFRD disclosure obligations	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

31 Dec 2024 (EUR million) % (compared to total covered assets in the denominator)	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
	Disclosure reference date T: KPIs on stock															
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)					
	Proportion of eligible assets funding taxonomy relevant sectors					Proportion of eligible assets funding taxonomy relevant sectors					Proportion of eligible assets funding taxonomy relevant sectors					
		Of which environmentally sustainable					Of which environmentally sustainable					Of which environmentally sustainable				Proportion of total assets covered
			Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which adaptation	Of which enabling			Of which specialised lending	Of which transitional/ adaptation	Of which enabling	
1 **BTAR**	72.16%	0.27%	0.00%	0.01%	0.00%	0.12%	0.11%	0.00%	0.00%	0.00%	72.27%	0.38%	0.00%	0.01%	0.00%	52.56%
2 **GAR**	15.02%	0.27%	0.00%	0.01%	0.00%	0.12%	0.11%	0.00%	0.00%	0.00%	15.14%	0.38%	0.00%	0.01%	0.00%	17.05%
3 EU Non-financial corporations not subject to NFRD disclosure obligations	57.14%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	57.14%	0.00%	0.00%	0.00%	0.00%	35.51%
4 of which loans collateralised by commercial immovable property	0.00%	0.00%	0.00%	0.00%	0.00%						0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
5 of which building renovation loans	7.82%	0.00%	0.00%	0.00%	0.00%						7.82%	0.00%	0.00%	0.00%	0.00%	4.75%
6 Non-EU country counterparties not subject to NFRD disclosure obligations	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

31 Dec 2024 (EUR million) % (compared to total covered assets in the denominator)	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae	af
	Disclosure reference date T: KPIs on flows															
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)					
	Proportion of new eligible assets funding taxonomy relevant sectors					Proportion of new eligible assets funding taxonomy relevant sectors					Proportion of new eligible assets funding taxonomy relevant sectors					
		Of which environmentally sustainable					Of which environmentally sustainable					Of which environmentally sustainable				Proportion of total new assets covered
			Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which adaptation	Of which enabling			Of which specialised lending	Of which transitional/ adaptation	Of which enabling	
1 **BTAR**	40.51%	0.34%	0.00%	0.01%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	40.51%	0.34%	0.00%	0.01%	0.01%	11.54%
2 **GAR**	8.98%	0.34%	0.00%	0.01%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	8.99%	0.34%	0.00%	0.01%	0.01%	6.46%
3 EU Non-financial corporations not subject to NFRD disclosure obligations	31.53%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	31.53%	0.00%	0.00%	0.00%	0.00%	5.08%
4 of which loans collateralised by commercial immovable property	0.00%	0.00%	0.00%	0.00%	0.00%						0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
5 of which building renovation loans	9.57%	0.00%	0.00%	0.00%	0.00%						9.57%	0.00%	0.00%	0.00%	0.00%	1.36%
6 Non-EU country counterparties not subject to NFRD disclosure obligations	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Template 9.3
Summary table - BTAR %

	KPI			
31 Dec 2025	Climate change mitigation (CCM)	Climate change adaptation (CCA)	Total (CCM + CCA)	% coverage (over total assets)
BTAR stock	0.26%	0.00%	0.26%	58.10%
BTAR flow	0.21%	0.00%	0.21%	16.63%

	KPI			
31 Dec 2024	Climate change mitigation (CCM)	Climate change adaptation (CCA)	Total (CCM + CCA)	% coverage (over total assets)
BTAR stock	0.27%	0.11%	0.38%	52.56%
BTAR flow	0.34%	0.00%	0.34%	11.54%

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Template 10
Other climate change mitigating actions that are not covered in the EU Taxonomy

Column f: Qualitative information on the nature of the mitigating actions

Bonds (rows 1–4):
MuniFin Group's sustainable investments are executed according to the Group's Sustainable Investment Framework. Sustainable investments are internally divided into three categories: green, social and sustainable bonds. The Sustainable Investment Framework requires investments to be aligned with the core components of the respective International Capital Markets Association (ICMA) sustainable bond guidelines to be included in the thematic portfolio. ESG performance of issuers was incorporated into the Group's liquidity portfolio management in 2016 and the framework was first published in 2021.

Many of the eligible assets in MuniFin Group's liquidity portfolio address EU Taxonomy's environmental objectives 1 and 2 (climate change mitigation and climate change adaptation). Asset categories financed include renewable energy, energy efficiency, green buildings, pollution prevention and control, clean transportation, sustainable management of living natural resources etc. Underlying issuer frameworks seem to focus on transition risks rather than physical risks. Some rare mentions of physical risks can be found in relation to new building projects, where new buildings are built in such a manner that they are not prone to significant physical climate risks (e.g. flooding, storm surges, landslides).

Reflecting the current state of the market, issuers of the bonds in the liquidity portfolio consider EU taxonomy but have not yet aligned their frameworks accordingly. This leads to portfolio assets being on aggregate partially aligned with the taxonomy and thus cannot be classified as fully aligned. Most common reason for deviations on the issuer side is lack of data on the underlying asset pool. Also, some of the internal asset categorisation done by issuers differ from the taxonomy and some project categories might not be included in regulation, which is why issuers have opted not to introduce detailed requirements into their own frameworks, until the market and regulation are more developed and coherent.

Loans (rows 5–11):
MuniFin Group's green finance is granted according to the latest version of the MuniFin Green Bond Framework. The framework aligns with the core components of the Green Bond Principles published by the International Capital Markets Association (ICMA) and seeks to comply with best market practices. MuniFin Group has granted green finance using portfolio approach since 2016 with the latest framework dated in August 2025.

The projects are classified in six categories: buildings, transportation, renewable energy, water and wastewater management, climate change adaptation and biodiversity. In preparation of the eligibility criteria, MuniFin Group has taken into account the EU Green Taxonomy on a best effort basis. In addition to the mandatory requirements in the MuniFin Green Bond Framework, the project category specific eligibility criteria may include non-compulsory criteria to be considered and promoted in order to make environmentally-friendly investments more attractive to the Group's customers and facilitate the implementation of the EU Taxonomy.

For the time being, the Group sees that neither the international nor domestic market is not ready for the full use of the EU Green Taxonomy as a criteria for all green financing. MuniFin Group's green loan portfolio consists of projects since 2016. Thus, all the information required to assess taxonomy alignment is not available.

The aim of green finance is to create positive effects for the environment and society. Green finance is granted to the Group's customers – i.e. Finnish municipalities, joint municipal authorities, municipality owned companies and affordable social housing companies projects that promote the transition to low carbon and climate resilient growth. The Group's portfolio includes projects such as energy efficient buildings, energy efficiency renovations, public transportation and bioenergy heating plants. The projects financed are primarily new projects (less than 12 months old from the project completion at the time of approval).

The impacts of the projects in MuniFin Group's green loan portfolio include among others avoided or reduced CO2 emissions, energy savings, and production of renewable energy. Through such impacts, the projects contribute to climate change mitigation and the physical risks climate change causes.

The idea behind green finance is that the projects are more aligned with sustainable economy. Many project characteristics that allow projects to be included in the Group green portfolio make the investments less prone to transition risks. For example, focus on energy efficiency of the buildings and the renewable methods for energy production and transportation lead into lower transition risk in comparison to more carbon intensive alternatives.

In addition, MuniFin Group introduced a new sustainability-linked loan in the beginning of 2025. With this loan product, MuniFin Group supports the goals of the Paris Climate Agreement and promotes climate action aimed at mitigating and adapting to climate change. The loan is designed to recognise and encourage municipal climate efforts by offering more affordable financing to municipalities that achieve their emission reduction targets. To qualify for the loan, a municipality must have an approved climate plan. A margin discount is granted if the municipality achieves the set emission reduction target.

	a	b	c	d	e	f
31 Dec 2025	Type of financial instrument	Type of counterparty	Gross carrying amount (million EUR)	Type of risk mitigated (Climate change transition risk)	Type of risk mitigated (Climate change physical risk)	Qualitative information on the nature of the mitigating actions
1	Bonds (e.g. green, sustainable, sustainability-linked under standards other than the EU standards)	Financial corporations	704	Yes	Yes	For qualitative information on the nature of the mitigation actions, please see text above "bonds (row 1–4)".
2		Non-financial corporations	-	-	-	
3		Of which Loans collateralised by commercial immovable property	-	-	-	
4		Other counterparties	48	Yes	Yes	
5	Loans (e.g. green, sustainable, sustainability-linked under standards other than the EU standards)	Financial corporations	-	-	-	For qualitative information on the nature of the mitigation actions, please see text above "loans (row 5–11)".
6		Non-financial corporations	5,006	Yes	Yes	
7		Of which Loans collateralised by commercial immovable property	-	-	-	
8		Households	73	Yes	Yes	
9		Of which Loans collateralised by residential immovable property	73	Yes	Yes	
10		Of which building renovation loans	-	-	-	
11		Other counterparties	4,570	Yes	Yes	

	a	b	c	d	e	f
31 Dec 2024	Type of financial instrument	Type of counterparty	Gross carrying amount (million EUR)	Type of risk mitigated (Climate change transition risk)	Type of risk mitigated (Climate change physical risk)	Qualitative information on the nature of the mitigating actions
1	Bonds (e.g. green, sustainable, sustainability-linked under standards other than the EU standards)	Financial corporations	397	Yes	Yes	For qualitative information on the nature of the mitigation actions, please see text above "bonds (row 1–7)".
2		Non-financial corporations	-	-	-	
3		Of which Loans collateralised by commercial immovable property	-	-	-	
4		Households	-	-	-	
5		Of which Loans collateralised by residential immovable property	-	-	-	
6		Of which building renovation loans	-	-	-	
7		Other counterparties	34	Yes	Yes	
8	Loans (e.g. green, sustainable, sustainability-linked under standards other than the EU standards)	Financial corporations	-	-	-	For qualitative information on the nature of the mitigation actions, please see text above "loans (row 8–14)".
9		Non-financial corporations	3,456	Yes	Yes	
10		Of which Loans collateralised by commercial immovable property	-	-	-	
11		Households	14	Yes	Yes	
12		Of which Loans collateralised by residential immovable property	14	Yes	Yes	
13		Of which building renovation loans	-	-	-	
14		Other counterparties	3,388	Yes	Yes	

17. CRR reference table

Pillar 3 disclosures in accordance with the Articles 435–455 of CRR.

CRR ref.	High level summary	Reference
Article 435	**Disclosure of risk management objectives and policies**	
1(a)	Strategies and processes to manage risks;	Pillar III Disclosure Report 2025 Part 1, chapter 2
1(b)	Governance structure and organisation;	Pillar III Disclosure Report 2025 Part 1, chapter 2.2 Corporate Governance Statement 2025, Part B
1(c)	Scope and nature of risk reporting and measurement systems;	Pillar III Disclosure Report 2025 Part 1
1(d)	Policies for hedging and mitigating risk;	Pillar III Disclosure Report 2025 Part 1
1(e)	Declaration approved by the management body on the adequacy of risk management arrangements;	Pillar III Disclosure Report 2025 Part 1, chapter 2.5
1(f)	Concise risk statement approved by the management body succinctly describing the institution's overall risk profile associated with the business strategy. i) key ratios and figures ii) information on intragroup transactions	Pillar III Disclosure Report 2025 Part 1, chapter 2.5
2(a)	Number of directorships held by members of the Board of Directors;	Corporate Governance Statement 2025, pages 11-12
2(b)	Recruitment policy for the selection of members of the Board of Directors and their actual knowledge, skills and expertise;	Corporate Governance Statement 2025, pages 7-12
2(c)	Policy on diversity with regard to selection of members of the Board of Directors;	Corporate Governance Statement 2025, pages 9-10
2(d)	Separate risk committee and the number of times the risk committee has met;	Corporate Governance Statement 2025, page 14
2(e)	Description of the information flow on risk to the management body.	Pillar III Disclosure Report 2025 Part 1

17. CRR reference table

CRR ref.	High level summary	Reference
Article 436	**Disclosure of scope of application**	
(a)	The name of the institution;	Pillar III Disclosure Report 2025 Part 1, chapters 1.1 and 1.2, Annual Report 2025 and website www.munifin.fi
(b)	Reconciliation between the consolidated financial statements;	Pillar III Disclosure Report 2025 Part 2, chapter 2 Templates EU LI3 and EU LIA
(c)	Breakdown of assets and liabilities of the consolidated financial statements;	Pillar III Disclosure Report 2025 Part 2, chapter 2 Template EU LI1
(d)	Reconciliation identifying the main sources of differences between the carrying value amounts in the financial statements;	Pillar III Disclosure Report 2025 Part 2, chapter 2 Templates EU LI2 and EU LIA
(e)	Breakdown of the amounts of the constituent elements of an institution's prudent valuation adjustment;	Pillar III Disclosure Report 2025 Part 2, chapter 2 Template EU PV1
(f)	Practical or legal impediments to transfer funds between parent and subsidiaries;	Not applicable
(g)	Capital shortfalls in subsidiaries outside the scope of consolidation;	Not applicable
(h)	If applicable, the circumstance of making use of the provisions laid down in Articles 7 and 9.	Not applicable
Article 437	**Disclosure of own funds**	
1(a)	A full reconciliation of own funds and balance sheet;	Pillar III Disclosure Report 2025 Part 2, chapter 3 Templates EU CC1 and EU CC2
1(b)	A description of the main features of the Common Equity Tier 1 and Additional Tier 1 instruments and Tier 2 instruments issued by the institution;	Pillar III Disclosure Report 2025 Part 2, chapter 3 Template EU CCA
1(c)	Full terms and conditions of all Common Equity Tier 1, Additional Tier 1 and Tier 2 instruments;	Pillar III Disclosure Report 2025 Part 2, chapter 3 Template EU CCA
1(d) (i)-(iii)	Separate disclosure of the nature and amounts of the following: (i) each prudential filter applied pursuant to Articles 32 to 35; (ii) each deduction made pursuant to Articles 36, 56 and 66; (iii) items not deducted in accordance with Articles 47, 48, 56, 66 and 79;	Pillar III Disclosure Report 2025 Part 2, chapter 3 Template EU CC1
1(e)	A description of all restrictions applied to the calculation of own funds;	Pillar III Disclosure Report 2025 Part 2, chapter 3 Template EU CC1
1(f)	A comprehensive explanation of the basis on which capital ratios are calculated where those capital ratios are calculated by using elements of own funds determined on a basis other than the basis laid down in this Regulation.	Pillar III Disclosure Report 2025 Part 2, chapter 3 Template EU CC1

CRR ref.	High level summary	Reference
Article 437a	**Disclosure of own funds and eligible liabilities**	
	Institutions that are subject to Article 92a or 92b shall disclose information regarding their own funds and eligible liabilities.	Not applicable to MuniFin Group as MuniFin Group is not a G-SII institution.
Article 438	**Disclosure of own funds requirements and risk-weighted exposure amounts**	
(a)	A summary of the approach to assessing the adequacy of its internal capital to support current and future activities;	Pillar III Disclosure Report 2025 Part 1, chapter 2.9 Corporate Governance Statement 2025, page 21
(b)	The amount of the additional own funds requirements based on the SREP and its composition;	Pillar III Disclosure Report 2025 Part 2, chapter 1 Template EU KM1
(c)	Upon demand from the supervisory authority, the result of the institution's ICAAP;	Not applicable. No such demand has been made by the supervisory authority.
(d)	Total risk-weighted exposure amount and the corresponding total own funds requirement;	Pillar III Disclosure Report 2025 Part 2, chapter 1 Template EU OV1
(da)	where required to calculate the un-floored total risk exposure amount as calculated in accordance with Article 92(4), and the standardised total risk exposure amount as calculated in accordance with Article 92(5), to be broken down by the different risk categories or risk exposure classes, as applicable, set out in Part Three and, where applicable, an explanation of the effect on the calculation of own funds and risk-weighted exposure amounts that results from applying capital floors and not deducting items from own funds	Not applicable
(e)	The on- and off-balance sheet exposures, the risk-weighted exposure amounts and associated expected losses for specialised lending and equity exposures;	Not applicable
(f)	The exposure value and the risk-weighted exposure amount of own funds instruments held in any insurance undertaking, reinsurance undertaking or insurance holding company;	Not applicable
(g)	The supplementary own funds requirement and the capital adequacy ratio of the financial conglomerate;	Not applicable
(h)	The variations in the risk-weighted exposure amounts of the current disclosure period compared to immediately preceding disclosure period that result from the use of internal models.	Not applicable

17. CRR reference table

CRR ref.	High level summary	Reference
Article 439	**Exposure to counterparty credit risk**	
(a)	A description of the methodology used to assign internal capital and credit limits for counterparty credit exposures;	Pillar III Disclosure Report 2025 Part 1, chapter 3
(b)	A description of policies related to guarantees and other credit risk mitigants, such as the policies for securing collateral and establishing credit reserves;	Pillar III Disclosure Report 2025 Part 1, chapter 3
(c)	A description of policies for wrong-way risk;	Pillar III Disclosure Report 2025 Part 1, chapter 3
(d)	The amount of collateral the institution would have to provide if its credit rating was downgraded;	Pillar III Disclosure Report 2025 Part 2, chapter 10 Template EU CCR5
(e)	The amount of segregated and unsegregated collateral received and posted per type of collateral	Pillar III Disclosure Report 2025 Part 2, chapter 10 Template EU CCR5
(f)	For derivative transactions, the exposure values before and after the effect of the credit risk mitigation;	Pillar III Disclosure Report 2025 Part 2, chapter 10 Template EU CCR1
(g)	For securities financing transactions, the exposure values before and after the effect of the credit risk mitigation;	Not applicable
(h)	The exposure values after credit risk mitigation effects and the associated risk exposure for credit valuation adjustment capital charge;	Pillar III Disclosure Report 2025 Part 2, chapter 10 Template EU CCR1 Pillar III Disclosure Report 2025 Part 2, chapter 11 Template EU CVA1
(i)	The exposure value to central counterparties and the associated risk exposures;	Pillar III Disclosure Report 2025 Part 2, chapter 10 Template EU CCR8
(j)	Notional amounts of credit derivative transactions and distribution of credit derivative products;	Not applicable
(k)	The estimate of alfa if the institution has received the permission of the competent authorities to estimate alfa;	Not applicable
(l)	Separately, the disclosures included in point (e) of Article 444 and point (g) of Article 452;	Pillar III Disclosure Report 2025 Part 2, chapter 10 Template EU CCR3
(m)	For institutions using the methods set out in Sections 4 to 5 of Chapter 6 of Title II Part Three, the size of on- and off-balance-sheet derivative business.	Pillar III Disclosure Report 2025 Part 2, chapter 10

CRR ref.	High level summary	Reference
Article 440	**Disclosure of capital buffers**	
(a)	The geographical distribution of credit exposures relevant for the calculation of countercyclical capital buffer;	Pillar III Disclosure Report 2025 Part 2, chapter 4 Template EU CCyB1
(b)	The amount of institution specific countercyclical capital buffer.	Pillar III Disclosure Report 2025 Part 2, chapter 4 Template EU CCyB2
Article 441	**Disclosure of indicators of global systemic importance**	
	Indicator values used for determining the score of the institution.	Not applicable
Article 442	**Disclosure of exposures to credit risk and dilution risk**	
(a)	The scope and definitions for accounting purposes of past due and impaired;	Pillar III Disclosure Report 2025 Part 2, chapter 7 Table EU CRB
(b)	A description of the approaches and methods adopted for determining specific and general credit risk adjustments;	Pillar III Disclosure Report 2025 Part 2, chapter 7 Table EU CRB
(c)	Information on the amount and quality of performing, non-performing and forborne exposures for loans, debt securities and off-balance-sheet exposures;	Pillar III Disclosure Report 2025 Part 2, chapter 7 Templates EU CR1, EU CQ1, EU CQ3, EU CQ4 and EU CQ5
(d)	An ageing analysis of accounting past due exposures;	Pillar III Disclosure Report 2025 Part 2, chapter 7 Template EU CQ3
(e)	The gross carrying amounts of defaulted and non-defaulted exposures, the accumulated specific and general credit risk adjustments, the accumulated write-offs and the net carrying amounts and their distribution by geographical area;	Pillar III Disclosure Report 2025 Part 2, chapter 7 Templates EU CQ4 and EU CQ5
(f)	Any changes in the gross amount of defaulted on- ja off-balance-sheet exposures;	Pillar III Disclosure Report 2025 Part 2, chapter 7 Templates EU CR1 and EU CR2
(g)	The breakdown of loans and debt securities by residual maturity.	Pillar III Disclosure Report 2025 Part 2, chapter 7 Template EU CR1-A

17. CRR reference table

CRR ref.	High level summary	Reference
Article 443	**Disclosure of encumbered and unencumbered assets**	
	Information on encumbered and unencumbered assets.	Pillar III Disclosure Report 2025 Part 2, chapter 15
Article 444	**Disclosure of the use of the Standardised Approach**	
(a)	Names of the nominated ECAIs and ECAs and the reasons for any changes;	Pillar III Disclosure Report 2025 Part 2, chapter 9 Template EU CRD
(b)	The exposure classes for which each ECAI or ECA is used;	Pillar III Disclosure Report 2025 Part 2, chapter 9 Template EU CRD
(c)	A description of the process used to transfer the issuer and issue credit assessments onto items not included in the trading book;	Pillar III Disclosure Report 2025 Part 2, chapter 9 Template EU CRD
(d)	The association of the external rating of each nominated ECAI or ECA with the risk-weights that correspond to the credit quality steps as set out in the CRR in Part Three, Title II, Chapter 2, taking into account that this information needs not be disclosed if the institution complies with the standard association published by EBA;	Not applicable as MuniFin Group complies with the standard association published by EBA.
(e)	The exposure values and the exposure values after credit risk mitigation associated with each credit quality step prescribed in the CRR in Part Three, Title II, Chapter 2 as well as those deducted from own funds.	Pillar III Disclosure Report 2025 Part 2, chapter 9 Templates EU CR4 and EU CR5
Article 445	**Disclosures of exposure to market risk under the standardised approach**	
1.	Overview of the trading book positions	Pillar III Disclosure Report 2025 Part 1
2(a)	financial instruments other than securitisation instruments held in the trading book, with a breakdown by risk class, and a separate identification of the own funds requirements for default risk;	Not applicable.
2(b)	securitisation instruments not held in the ACTP, with a separate identification of the own funds requirements for credit spread risk and of the own funds requirements for default risk;	Not applicable.
2(c)	securitisation instruments held in the ACTP, with a separate identification of the own funds requirements for credit spread risk and of the own funds requirements for default risk.	Not applicable.

CRR ref.	High level summary	Reference
Article 445a	**Disclosure of CVA risk**	
1(a)	an overview of their processes to identify, measure, hedge and monitor their CVA risk;	Pillar III Disclosure Report 2025 Part 2, chapter 11, Template EU CVAA
1(b)	whether institutions meet all of the conditions set out in Article 273a(2); where those conditions are met, whether institutions have chosen to calculate the own funds requirements for CVA risk using the simplified approach set out in Article 385; where institutions have 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;	Pillar III Disclosure Report 2025 Part 2, chapter 11, Template EU CVAA
1(c)	the total number of counterparties for which the standardised approach is used, with a breakdown by counterparty types.	Not applicable.
2(a)	Institutions using standardised approach: the structure and the organisation of their internal CVA risk management function and governance;	Not applicable.
2(b)	Institutions using standardised approach: their total own funds requirements for CVA risk under the standardised approach with a breakdow	Not applicable.
2(c)	Institutions using standardised approach: an overview of the eligible hedges used in that calculation, with a breakdown by type of instruments set out in Article 386(2).	Not applicable.
3(a)	Institutions using the basic approach: their total own funds requirements for CVA risk under the basic approach, and the components BACVAtotal and BACVAcsr-hedged;	Not applicable.
3(b)	Institutions using the basic approach: an overview of the eligible hedges used in that calculation, with a breakdown by type of instruments set out in Article 386(3).	Not applicable.
Article 446	**Disclosure of operational risk**	
(a)	The main characteristics and elements of their operational risk management framework	Pillar III Disclosure Report 2025 Part 1, chapter 6
(b)	their own funds requirement for operational risk equal to the business indicator component calculated in accordance with Article 313;	Pillar III Disclosure Report 2025 Part 2, chapter 12, Templates EU OR2 and EU OR3
(c)	the business indicator, calculated in accordance with Article 314(1), and the amounts of each of the business indicator components and their sub-components for each of the three years relevant for the calculation of the business indicator	Pillar III Disclosure Report 2025 Part 2, chapter 12, Template EU OR2
(d)	the amount of the reduction of the business indicator for each exclusion from the business indicator in accordance with Article 315(2), as well as the corresponding justifications for such exclusions.	Pillar III Disclosure Report 2025 Part 2, chapter 12, Template EU OR2
2(a)	their annual operational risk losses for each of the last 10 financial years, calculated in accordance with Article 316(1);	Not applicable.
2(b)	the number of exceptional operational risk events and the amounts of the corresponding aggregated net operational risk losses that were excluded from the calculation of the annual operational risk loss in accordance with Article 320(1), for each of the last 10 financial years, and the corresponding justifications for those exclusions.	Not applicable.

CRR ref.	High level summary	Reference
Article 447	**Disclosures of key metrics**	
(a)	The composition of own funds and own funds requirements;	Pillar III Disclosure Report 2025 Part 2, chapter 1 Template EU KM1
(aa)	where applicable, the risk-based capital ratios as calculated in accordance with Article 92(2), by using the un-floored total risk exposure amount instead of the total risk exposure amount	Pillar III Disclosure Report 2025 Part 2, chapter 1 Template EU KM1
(b)	The total risk exposure amount;	Pillar III Disclosure Report 2025 Part 2, chapter 1 Templates EU KM1 and EU OV1
(c)	Where applicable, the amount and composition of additional own funds which the institutions are required to hold in accordance with point (a) of Article 104(1) of Directive 2013/36/EU;	Pillar III Disclosure Report 2025 Part 2, chapter 1 Template EU KM1
(d)	Combined buffer requirement which the institutions are required to hold in accordance with Chapter 4 of Title VII of Directive 2013/36/EU;	Pillar III Disclosure Report 2025 Part 2, chapter 1 Template EU KM1
(e)	Leverage ratio and the total exposure amount;	Pillar III Disclosure Report 2025 Part 2, chapter 1 Template EU KM1
(f)	Information in relation to liquidity coverage ratio;	Pillar III Disclosure Report 2025 Part 2, chapter 1 Template EU KM1
(g)	Information in relation to net stable funding requirement;	Pillar III Disclosure Report 2025 Part 2, chapter 1 Template EU KM1
(h)	Own funds and eligible liabilities ratios and components as calculated in accordance with Articles 92a and 92b.	Pillar III Disclosure Report 2025 Part 2, chapter 1 Template EU KM1

17. CRR reference table

CRR ref.	High level summary	Reference
Article 448	**Disclosures of exposure to interest rate risk on positions not held in the trading book**	
1(a)	The changes in the economic value of equity calculated under the six supervisory shock scenarios;	Pillar III Disclosure Report 2025 Part 2, chapter 13 Template EU IRRBB1
1(b)	The changes in the net interest income calculated under the two supervisory shock scenarios;	Pillar III Disclosure Report 2025 Part 2, chapter 13 Template EU IRRBB1
1(c)	A description of key modelling and parametric assumptions to calculate in the economic value of equity and in the net interest income;	Pillar III Disclosure Report 2025 Part 1, chapter 4
1(d)	An explanation of the significance of the risk disclosed and of any significant variations of those risk measures;	Pillar III Disclosure Report 2025 Part 1, chapter 4
1(e)	The description of how institutions define, measure and mitigate and control interest rate risk of non-trading book activities;	Pillar III Disclosure Report 2025 Part 1, chapter 4
1(f)	The description of the overall risk management and mitigation strategies;	Pillar III Disclosure Report 2025 Part 1, chapter 4
1(g)	Average and longest repricing maturity assigned to non-maturity deposits.	Not applicable.
Article 449	**Disclosure of exposures to securitisation positions**	
	Exposure to securitisation positions	Not applicable.
Article 449a	**Disclosure of environmental, social and governance risks (ESG risks)**	
	Information on ESG risks, including physical risks and transition risks	Pillar III Disclosure Report 2025 Part 1, chapter 9 Part 2, chapter 16
Article 449b	**Disclosure of aggregate exposure to shadow banking entities**	
	Institutions shall disclose the information concerning their aggregate exposure to shadow banking entities, as referred to in Article 394(2), second subparagraph	Not applicable.

CRR ref.	High level summary	Reference
Article 450	**Disclosure of remuneration policy**	
1(a)	Information concerning the decision-making process of remuneration committee;	Corporate Governance Statement 2025 page 14 Pillar III Disclosure Report 2025 Part 1, section 8
1(b)	Information on link between pay and performance;	Pillar III Disclosure Report 2025 Part 1, chapter 8
1(c)	The most important design characteristics of the remuneration system, including information on the criteria used for performance measurement and risk adjustment, deferral policy and vesting criteria;	Pillar III Disclosure Report 2025 Part 1, chapter 8
1(d)	Ratios between fixed and variable remuneration set in accordance with Article 94(1)(g) of the CRDIV;	Pillar III Disclosure Report 2025 Part 2, chapter 14 Template EU REM1
1(e)	Information on the performance criteria on which the entitlement to shares, options or variable components of remuneration is based;	Pillar III Disclosure Report 2025 Part 1, chapter 8 MuniFin does not grant variable remuneration in the form of shares or options.
1(f)	The main parameters and rationale for any variable component scheme and any other non-cash benefits;	Pillar III Disclosure Report 2025 Part 1, chapter 8
1(g)	Aggregate quantitative information on remuneration, broken down by business area;	Pillar III Disclosure Report 2025 Part 2, chapter 14 Template EU REM5
1(h)	Aggregate quantitative information on remuneration, broken down by senior management and members of staff whose actions have a material impact on the risk profile of the institution;	Pillar III Disclosure Report 2025 Part 2, chapter 14 Template EU REM2
1(i)	The number of individuals being remunerated EUR 1 million or more per financial year.	Not applicable. There were no individuals employed by MuniFin Group in 2025 being remunerated EUR 1 million or more.
1(j)	Upon demand from the Member State or competent authority, the total remuneration for each member of the management body or senior management;	Not applicable. No such demand has been made by the supervisory authority.
1(k)	Information on whether the institution benefits from a derogation laid down in Article 94(3) of CRDIV.	Not applicable.
2	The quantitative information on the remuneration of institutions' collective management body referred to in this Article shall also be made available to the public, differentiating between executive and non-executive members.	Pillar III Disclosure Report 2025 Part 2, chapter 14

CRR ref.	High level summary	Reference
Article 451	**Disclosure of leverage ratio**	
1(a)	The leverage ratio and how the institution applies Article 499(2);	Pillar III Disclosure Report 2025 Part 2, chapter 5 Template EU LR2 - LRCom
1(b)	A breakdown of the total exposure measure as well as a reconciliation of the total exposure measure with the relevant information disclosed in published financial statements;	Pillar III Disclosure Report 2025 Part 2, chapter 5 Templates EU LR1 - LRSum, EU LR2 - LRCom and EU LR3 - LRSpl
1(c)	Where applicable, the amount of exposures calculated in accordance with Articles 429(8) and 429a(1) and the adjusted leverage ratio calculated in accordance with Article 429a(7);	Pillar III Disclosure Report 2025 Part 2, chapter 5
1(d)	A description of the processes used to manage the risk of excessive leverage;	Pillar III Disclosure Report 2025 Part 2, chapter 5 Table EU LRA
1(e)	A description of the factors that had an impact on the leverage ratio during the period to which the disclosed leverage ratio refers.	Pillar III Disclosure Report 2025 Part 2, chapter 5 Table EU LRA
1(f)	the amount of the additional own funds requirements based on the supervisory review process as referred to in Article 104(1), point (a), of Directive 2013/36/EU to address the risk of excessive leverage and its composition.	Not applicable.
2	Public development credit institutions as defined in Article 429a(2) shall disclose the leverage ratio without the adjustment to the total exposure measure determined in accordance with point (d) of the first subparagraph of Article 429a(1).	Pillar III Disclosure Report 2025 Part 2, chapter 5 Template EU LR2 - LRCom
3	In addition to points (a) and (b) of paragraph 1 of this Article, large institutions shall disclose the leverage ratio and the breakdown of the total exposure measure referred to in Article 429(4) based on averages calculated in accordance with the implementing act referred to in Article 430(7).	Pillar III Disclosure Report 2025 Part 2, chapter 5 Template EU LR2 - LRCom
Article 451a	**Disclosure of liquidity requirement**	
1	Institutions that are subject to Part Six shall disclose information on their liquidity coverage ratio, net stable funding ratio and liquidity risk management in accordance with this Article.	Pillar III Disclosure Report 2025 Part 1, chapter 5
2(a) - (c)	Components of the LCR	Pillar III Disclosure Report 2025 Part 2, chapter 6 Template EU LIQ1
3(a) - (c)	Components of the NSFR	Pillar III Disclosure Report 2025 Part 2, chapter 6 Template EU LIQ2
4	Institutions shall disclose the arrangements, systems, processes and strategies put in place to identify, measure, manage and monitor their liquidity risk.	Pillar III Disclosure Report 2025 Part 1, chapter 5

17. CRR reference table

CRR ref.	High level summary	Reference
Article 451b	**Disclosure of crypto-asset exposures and related activities**	**Not applicable.**
Article 452	**Disclosure of the use of the IRB Approach to credit risk**	
	IRB Approach to credit risk	Not applicable.
Article 453	**Disclosure of the use of credit risk mitigation techniques**	
(a)	The core features of the policies and processes for, and an indication of the extent to which the entity makes use of, on- and off-balance sheet netting;	Pillar III Disclosure Report 2025 Part 1, chapter 3
(b)	The core features of the policies and processes for eligible collateral valuation and management;	Pillar III Disclosure Report 2025 Part 1, chapter 3
(c)	A description of the main types of collateral taken by the institution to mitigate credit risk;	Pillar III Disclosure Report 2025 Part 1, chapter 3
(d)	The main types of guarantor and credit derivative counterparty and their creditworthiness;	Pillar III Disclosure Report 2025 Part 1, chapter 3
(e)	Information about market or credit risk concentrations within the credit mitigation taken;	Pillar III Disclosure Report 2025 Part 1, chapter 3 and chapter 4
(f)	The exposure value covered/not-covered by eligible credit protection for exposures under the Standardised Approach or the IRB Approach;	Pillar III Disclosure Report 2025 Part 2, chapter 9 Template EU CR4
(g)	The corresponding conversion factor and the credit risk mitigation associated with the exposure and the incidence of credit risk mitigation techniques with and without substitution effect;	Pillar III Disclosure Report 2025 Part 2, chapter 9 Template EU CR4
(h)	For institutions calculating risk-weighted exposure amounts under the Standardised Approach, the on- and off-balance-sheet exposure value by exposure class before and after the application of conversion factors and any associated credit risk mitigation;	Pillar III Disclosure Report 2025 Part 2, chapter 9 Template EU CR4
(i)	For institutions calculating risk-weighted exposure amounts under the Standardised Approach, the risk-weighted exposure amount and the ratio between that risk-weighted exposure amount and the exposure value after applying the corresponding conversion factor and the credit risk mitigation associated with the exposure; the disclosure set out in this point shall be made separately for each exposure class;	Pillar III Disclosure Report 2025 Part 2, chapter 9 Template EU CR4
(j)	For institutions calculating risk-weighted exposure amounts under the IRB Approach, the risk-weighted exposure amount before and after recognition of the credit risk mitigation impact of credit derivatives.	Not applicable.
Article 454	**Disclosure of the use of the Advanced Measurement Approaches to operational risk**	
	Advanced Measurement Approaches to operational risk	Not applicable.
Article 455	**Use of Internal Market Risk Models**	
	Internal Market Risk Models	Not applicable.

18. Information not disclosed due to non-materiality, proprietary or confidential nature or not applicable to MuniFin Group

Reference	Reason for not disclosing	Information provided in Pillar III Disclosure
European Commission Implementing Regulation (EU) 2024/3172 laying down implementing technical standards to public disclosures by institutions of the information referred to in Titles II and III of Part Eight of CRR (ITS), Article 2 - Disclosure of risk management objectives and policies Annex I - Table EU OVA (b) CRR Article 435(1)(b): The approved limits of risks to which the institution is exposed.	Risk Appetite Framework (RAF) limits and thresholds are defined strictly confidential. Limits and thresholds are of strategic nature and as such defined confidential. The Financial Supervisory Authorities have full access to MuniFin Group's RAF limits and thresholds.	RAF is described in detail in Part 1 Governance and risk methodologies, chapter 2 Risk management objectives and policies, subchapter 2.5 MuniFin Group's overall risk profile associated with the business strategy and business model and MuniFin Group's Risk Declaration.
European Commission Implementing Regulation (EU) 2024/3172 laying down implementing technical standards to public disclosures by institutions of the information referred to in Titles II and III of Part Eight of CRR, Article 22 - Disclosure of environmental, social and governance risks (ESG risks), Annex I - Table 1 - Qualitative information on Environmental risk , row number (b) Annex I - Table 2 - Qualitative information on Social risk, row number (b) Objectives, targets and limits to assess and address environmental and social risks.	Risk Appetite Framework (RAF) limits and thresholds are defined strictly confidential. Limits and thresholds are of strategic nature and as such defined confidential. The Financial Supervisory Authorities have full access to MuniFin Group's RAF limits and thresholds.	RAF is described in detail in Part 1 Governance and risk methodologies, chapter 2 Risk management objectives and policies, subchapter 2.5 MuniFin Group's overall risk profile associated with the business strategy and business model and MuniFin Group's Risk Declaration.

18. Information not disclosed due to non-materiality, proprietary or confidential nature or not applicable to MuniFin Group

Reference	Reason for not disclosing	Information provided in Pillar III Disclosure
European Commission Implementing Regulation (EU) 2024/3172 laying down implementing technical standards to public disclosures by institutions of the information referred to in Titles II and III of Part Eight of CRR, Article 9 - Disclosure of exposures to credit risk, dilution risk and credit quality Annex I - Templates EU CR2a, EU CQ2, EU CQ6 and EU CQ8	Templates EU CR2a, EU CQ2, EU CQ6 and EU CQ8 are applicable only to significant credit institutions with a gross NPL ratio of 5% or above. As the NPL ratio does not exceed 5%, MuniFin Group has not disclosed these templates.	MuniFin Group complies with the ITS disclosure requirements by disclosing the templates applicable to all credit institutions.
European Commission Implementing Regulation (EU) 2024/3172 laying down implementing technical standards to public disclosures by institutions of the information referred to in Titles II and III of Part Eight of CRR, Article 9 - Disclosure of exposures to credit risk, dilution risk and credit quality Annex I - Template EU CQ7	MuniFin Group has not obtained collateral by taking possession and execution processes.	
European Commission Implementing Regulation (EU) 2024/3172 laying down implementing technical standards to public disclosures by institutions of the information referred to in Titles II and III of Part Eight of CRR, Article 12 - Disclosure of the use of the IRB approach to credit risk Annex I - Section 11, All templates	MuniFin Group does not apply IRB approach.	
European Commission Implementing Regulation (EU) 2024/3172 laying down implementing technical standards to public disclosures by institutions of the information referred to in Titles II and III of Part Eight of CRR, Article 13 - Disclosure of specialised lending and equity exposures under the simple riskweighted approach Annex I - Template EU CR10	MuniFin Group does not hold such exposures.	

18. Information not disclosed due to non-materiality, proprietary or confidential nature or not applicable to MuniFin Group

Reference	Reason for not disclosing	Information provided in Pillar III Disclosure
European Commission Implementing Regulation (EU) 2024/3172 laying down implementing technical standards to public disclosures by institutions of the information referred to in Titles II and III of Part Eight of CRR, Article 14 - Disclosure of exposures to counterparty credit risk Annex I - Templates EU CCR4, EU CCR6 and EU CCR7	MuniFin Group does not apply IRB approach or internal model method for CCR. MuniFin Group does not hold credit derivatives.	
European Commission Implementing Regulation (EU) 2024/3172 laying down implementing technical standards to public disclosures by institutions of the information referred to in Titles II and III of Part Eight of CRR, Article 15 - Disclosure of exposures to securitisation positions Annex I - Section 14, All templates	MuniFin Group does not hold such exposures.	
European Commission Implementing Regulation (EU) 2024/3172 laying down implementing technical standards to public disclosures by institutions of the information referred to in Titles II and III of Part Eight of CRR, Article 16 - Disclosure of use of standardised approach and of the alternative internal models for market risk Annex I - Templates MRB, MR1, MR2 and MR3	MuniFin Group continues to disclose the Market Risk information in accordance with the previous regulatory framework and previous ITS, due to the postponement of the application of the FRTB regulation. This approach is also in line with the guidance provided in the EBA Mapping Tool (v. 4.2).	MuniFin Group discloses the Template MR1 in accordance with the European Commission Implementing Regulation (EU) 2021/637 laying down implementing technical standards to public disclosures by institutions of the information referred to in Titles II and III of Part Eight of CRR.
European Commission Implementing Regulation (EU) 2024/3172 laying down implementing technical standards to public disclosures by institutions of the information referred to in Titles II and III of Part Eight of CRR, Article 17 - Disclosure of credit valuation adjustment risk Annex I - Templates CVAB, CVA2, CVA3, CVA4	MuniFin Group does not apply Standardised Approach or the Full Basic Approach for credit valuation adjustment risk.	

18. Information not disclosed due to non-materiality, proprietary or confidential nature or not applicable to MuniFin Group

Reference	Reason for not disclosing	Information provided in Pillar III Disclosure
European Commission Implementing Regulation (EU) 2024/3172 laying down implementing technical standards to public disclosures by institutions of the information referred to in Titles II and III of Part Eight of CRR, Article 18 - Disclosure of operational risk Annex I - Template OR1	Institutions with a business indicator equal to or exceeding EUR 750 million shall disclose the template EU OR1. Therefore, MuniFin Group does not disclose the template.	
European Commission Implementing Regulation (EU) 2024/3172 laying down implementing technical standards to public disclosures by institutions of the information referred to in Titles II and III of Part Eight of CRR, Article 1 - Disclosure of key metrics and overview of risk-weighted exposure amounts Templates EU INS1 and EU INS2	MuniFin Group is not classified as a financial conglomerate and does not have own funds instruments held in insurance.	
European Commission Implementing Regulation (EU) 2024/3172 laying down implementing technical standards to public disclosures by institutions of the information referred to in Titles II and III of Part Eight of CRR, Article 1 - Disclosure of key metrics and overview of risk-weighted exposure amounts Templates EU CMS1 and EU CMS2	MuniFin Group does not use internal models for the calculation of risk weighted exposure amounts and does not use IRB approaches to calculate credit risk RWEAs.	
Commission Implementing Regulation (EU) 2021/763 laying down implementing technical standards for the application of Regulation (EU) No 575/2013 European Parliament and of the Council with regard to the supervisory reporting and public disclosure of the minimum requirement for own funds and eligible liabilities Templates EU KM2, EU TLAC1, EU iLAC, EU TLAC2 and EU TLAC3	MuniFin Group is not a resolution entity nor identified as a G-SII or part of a G-SII.	

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