

**ANNEX XXXIX - Prudential disclosures on ESG risks (Article 449a CRR)**

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**Table 1 - Qualitative information on Environmental risk**

in accordance with Article 449a CRR

Row number	Qualitative information - Free format	
	<b>Business strategy and processes</b>	
(a)	Institution's business strategy to integrate environmental factors and risks, taking into account the impact of environmental factors and risks on institution's business environment, business model, strategy and financial planning	
(b)	Objectives, targets and limits to assess and address environmental risk in short-, medium-, and long-term, and performance assessment against these objectives, targets and limits, including forward-looking information in the design of business strategy and processes	
(c)	Current investment activities and (future) investment targets towards environmental objectives and EU Taxonomy-aligned activities	
(d)	Policies and procedures relating to direct and indirect engagement with new or existing counterparties on their strategies to mitigate and reduce environmental risks	
	<b>Governance</b>	
(e)	Responsibilities of the management body for setting the risk framework, supervising and managing the implementation of the objectives, strategy and policies in the context of environmental risk management covering relevant transmission channels	
(f)	Management body's integration of short-, medium- and long-term effects of environmental factors and risks, organisational structure both within business lines and internal control functions	
(g)	Integration of measures to manage environmental factors and risks in internal governance arrangements, including the role of committees, the allocation of tasks and responsibilities, and the feedback loop from risk management to the management body covering relevant transmission channels	
(h)	Lines of reporting and frequency of reporting relating to environmental risk	
(i)	Alignment of the remuneration policy with institution's environmental risk-related objectives	
	<b>Risk management</b>	
(j)	Integration of short-, medium- and long-term effects of environmental factors and risks in the risk framework	
(k)	Definitions, methodologies and international standards on which the environmental risk management framework is based	
(l)	Processes to identify, measure and monitor activities and exposures (and collateral where applicable) sensitive to environmental risks, covering relevant transmission channels	
(m)	Activities, commitments and exposures contributing to mitigate environmental risks	
(n)	Implementation of tools for identification, measurement and management of environmental risks	
(o)	Results and outcome of the risk tools implemented and the estimated impact of environmental risk on capital and liquidity risk profile	
(p)	Data availability, quality and accuracy, and efforts to improve these aspects	
(q)	Description of limits to environmental risks (as drivers of prudential risks) that are set, and triggering escalation and exclusion in the case of breaching these limits	
(r)	Description of the link (transmission channels) between environmental risks with credit risk, liquidity and funding risk, market risk, operational risk and reputational risk in the risk management framework	

**Table 2 - Qualitative information on Social risk**

in accordance with Article 449a CRR

Row number	Qualitative information - Free format	
	<b>Business strategy and processes</b>	
(a)	Adjustment of the institution's business strategy to integrate social factors and risks taking into account the impact of social risk on the institution's business environment, business model, strategy and financial planning	
(b)	Objectives, targets and limits to assess and address social risk in short-term, medium-term and long-term, and performance assessment against these objectives, targets and limits, including forward-looking information in the design of business strategy and processes	
(c)	Policies and procedures relating to direct and indirect engagement with new or existing counterparties on their strategies to mitigate and reduce socially harmful activities	
	<b>Governance</b>	
(d)	Responsibilities of the management body for setting the risk framework, supervising and managing the implementation of the objectives, strategy and policies in the context of social risk management covering counterparties' approaches to:	
(i)	Activities towards the community and society	
(ii)	Employee relationships and labour standards	
(iii)	Customer protection and product responsibility	
(iv)	Human rights	
(e)	Integration of measures to manage social factors and risks in internal governance arrangements, including the role of committees, the allocation of tasks and responsibilities, and the feedback loop from risk management to the management body	
(f)	Lines of reporting and frequency of reporting relating to social risk	
(g)	Alignment of the remuneration policy in line with institution's social risk-related objectives	
	<b>Risk management</b>	
(h)	Definitions, methodologies and international standards on which the social risk management framework is based	
(i)	Processes to identify, measure and monitor activities and exposures (and collateral where applicable) sensitive to social risk, covering relevant transmission channels	
(j)	Activities, commitments and assets contributing to mitigate social risk	
(k)	Implementation of tools for identification and management of social risk	
(l)	Description of setting limits to social risk and cases to trigger escalation and exclusion in the case of breaching these limits	
(m)	Description of the link (transmission channels) between environmental risks with credit risk, liquidity and funding risk, market risk, operational risk and reputational risk in the risk management framework	

**Table 3 - Qualitative information on Governance risk**

in accordance with Article 449a CRR

Row number	Qualitative information - Free format	
	<b>Governance</b>	
(a)	Institution's integration in their governance arrangements governance performance of the counterparty, including committees of the highest governance body, committees responsible for decision-making on economic, environmental, and social topics	
(b)	Institution's accounting of the counterparty's highest governance body's role in non-financial reporting	
(c)	Institution's integration in governance arrangements of the governance performance of their counterparties including:	
(i)	Ethical considerations	
(ii)	Strategy and risk management	
(iii)	Inclusiveness	
(iv)	Transparency	
(v)	Management of conflict of interest	
(vi)	Internal communication on critical concerns	
	<b>Risk management</b>	
(d)	Institution's integration in risk management arrangements the governance performance of their counterparties considering:	
(i)	Ethical considerations	
(ii)	Strategy and risk management	
(iii)	Inclusiveness	
(iv)	Transparency	
(v)	Management of conflict of interest	
(vi)	Internal communication on critical concerns	

**Template 1: Banking book- Indicators of potential climate Change transition risk: Credit g**

Sector/subsector	
1	<b>Exposures towards sectors that highly contribute to climate change*</b>
2	A - Agriculture, forestry and fishing
3	B - Mining and quarrying
4	<i>B.05 - Mining of coal and lignite</i>
5	<i>B.06 - Extraction of crude petroleum and natural gas</i>
6	<i>B.07 - Mining of metal ores</i>
7	<i>B.08 - Other mining and quarrying</i>
8	<i>B.09 - Mining support service activities</i>
9	C - Manufacturing
10	<i>C.10 - Manufacture of food products</i>
11	<i>C.11 - Manufacture of beverages</i>
12	<i>C.12 - Manufacture of tobacco products</i>
13	<i>C.13 - Manufacture of textiles</i>
14	<i>C.14 - Manufacture of wearing apparel</i>
15	<i>C.15 - Manufacture of leather and related products</i>
16	<i>C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture o</i>
17	<i>C.17 - Manufacture of pulp, paper and paperboard</i>
18	<i>C.18 - Printing and service activities related to printing</i>
19	<i>C.19 - Manufacture of coke oven products</i>
20	<i>C.20 - Production of chemicals</i>
21	<i>C.21 - Manufacture of pharmaceutical preparations</i>
22	<i>C.22 - Manufacture of rubber products</i>
23	<i>C.23 - Manufacture of other non-metallic mineral products</i>
24	<i>C.24 - Manufacture of basic metals</i>
25	<i>C.25 - Manufacture of fabricated metal products, except machinery and equipment</i>
26	<i>C.26 - Manufacture of computer, electronic and optical products</i>
27	<i>C.27 - Manufacture of electrical equipment</i>
28	<i>C.28 - Manufacture of machinery and equipment n.e.c.</i>
29	<i>C.29 - Manufacture of motor vehicles, trailers and semi-trailers</i>
30	<i>C.30 - Manufacture of other transport equipment</i>
31	<i>C.31 - Manufacture of furniture</i>
32	<i>C.32 - Other manufacturing</i>
33	<i>C.33 - Repair and installation of machinery and equipment</i>
34	D - Electricity, gas, steam and air conditioning supply
35	<i>D35.1 - Electric power generation, transmission and distribution</i>
36	<i>D35.11 - Production of electricity</i>
37	<i>D35.2 - Manufacture of gas; distribution of gaseous fuels through mains</i>
38	<i>D35.3 - Steam and air conditioning supply</i>
39	E - Water supply; sewerage, waste management and remediation activities
40	F - Construction
41	<i>F.41 - Construction of buildings</i>
42	<i>F.42 - Civil engineering</i>
43	<i>F.43 - Specialised construction activities</i>

EBA Regular Use

44	G - Wholesale and retail trade; repair of motor vehicles and motorcycles
45	H - Transportation and storage
46	<i>H.49 - Land transport and transport via pipelines</i>
47	<i>H.50 - Water transport</i>
48	<i>H.51 - Air transport</i>
49	<i>H.52 - Warehousing and support activities for transportation</i>
50	<i>H.53 - Postal and courier activities</i>
51	I - Accommodation and food service activities
52	L - Real estate activities
53	<b>Exposures towards sectors other than those that highly contribute to climate change*</b>
54	K - Financial and insurance activities
55	Exposures to other sectors (NACE codes J, M - U)
56	TOTAL

\* In accordance with the Commission Delegated Regulation EU) 2020/1818 supplementing Regulation





EBA Regular Use


n (EU) 2016/1011 as regards minimum standards for EU Climate Transition Benchmarks and EU Pa



EBA Regular Use


ris-aligned Benchmarks -Climate Benchmark Standards Regulation - Recital 6: Sectors listed in Sections A to H and Section I















1
2
3
4
5
6
7
8
9
10

**Template 2: Banking book - Indicators of potential climate change transition risk: Loans collateralised b**

Counterparty sector
<b>Total EU area</b>
Of which Loans collateralised by commercial immovable property
Of which Loans collateralised by residential immovable property
Of which Collateral obtained by taking possession: residential and commercial immovable properties
Of which Level of energy efficiency (EP score in kWh/m <sup>2</sup> of collateral) estimated
<b>Total non-EU area</b>
Of which Loans collateralised by commercial immovable property
Of which Loans collateralised by residential immovable property
Of which Collateral obtained by taking possession: residential and commercial immovable properties
Of which Level of energy efficiency (EP score in kWh/m <sup>2</sup> of collateral) estimated







**Template 3: Banking book - Indicators of potential climate change tr**

a		b
Sector		NACE Sectors (a minima)
1	Power	Please refer to the list below*
2	Fossil fuel combustion	
3	Automotive	
4	Aviation	
5	Maritime transport	
6	Cement, clinker and lime production	
7	Iron and steel, coke, and metal ore production	
8	Chemicals	
9	... potential additions relevant to the business model of the institution	

\*\*\* PiT distance to 2030 NZE2050 scenario in % (for each metric)

\* List of NACE sectors to be considered

<i>IEA sector</i>	Column b - NACE Sectors
<i>Sector in the template</i>	<i>sector</i>
<i>Maritime transport</i>	<i>shipping</i>
<i>Maritime transport</i>	<i>shipping</i>
<i>Maritime transport</i>	<i>shipping</i>
<i>Maritime transport</i>	<i>shipping</i>
<i>Maritime transport</i>	<i>shipping</i>
<i>Maritime transport</i>	<i>shipping</i>
<i>Maritime transport</i>	<i>shipping</i>
<i>Maritime transport</i>	<i>shipping</i>
<i>Maritime transport</i>	<i>shipping</i>
<i>Maritime transport</i>	<i>shipping</i>
<i>Maritime transport</i>	<i>shipping</i>
<i>Maritime transport</i>	<i>shipping</i>
<i>Power</i>	<i>power</i>
<i>Power</i>	<i>power</i>
<i>Power</i>	<i>power</i>
<i>Power</i>	<i>power</i>
<i>Power</i>	<i>power</i>
<i>Power</i>	<i>power</i>
<i>Power</i>	<i>power</i>
<i>Power</i>	<i>power</i>
<i>Power</i>	<i>power</i>
<i>Power</i>	<i>power</i>
<i>Power</i>	<i>power</i>
<i>Fossil fuel combustion</i>	<i>oil and gas</i>
<i>Fossil fuel combustion</i>	<i>oil and gas</i>
<i>Fossil fuel combustion</i>	<i>oil and gas</i>
<i>Fossil fuel combustion</i>	<i>oil and gas</i>
<i>Fossil fuel combustion</i>	<i>oil and gas</i>







**Transition risk: Alignment metrics**

c	d	e
Portfolio gross carrying amount (Mn EUR)	Alignment metric**	Year of reference

Sectors (a minima) - Sectors required	**Examples of metrics - non-exhaustive list. Institutions shall apply metrics defined by the IEA scenario
<i>code</i>	Average tonnes of CO2 per passenger-km Average gCO <sub>2</sub> /MJ and Average share of high carbon technologies (ICE).
301	
3011	
3012	
3315	
50	
501	
5010	
502	
5020	
5222	
5224	
5229	
27	
2712	
3314	
35	
351	
3511	
3512	
3513	
3514	
4321	
91	
910	
192	
1920	
2014	

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352	
3521	Average tons pf CO2 per GJ.
3522	and
3523	Average share of high carbon
4612	technologies (ICE).
4671	
6	
61	
610	
62	
620	
24	
241	
2410	
242	
2420	
2434	
244	
2442	
2444	
2445	
245	Average tonnes of CO2 per
2451	tonne of output
2452	and
25	Average share of high carbon
251	technologies (ICE).
2511	
4672	
5	
51	
510	
52	
520	
7	
72	
729	
8	Average tons pf CO2 per GJ.
9	and
235	
2351	Average tonnes of CO2 per
2352	tonne of output
236	and
2361	Average share of high carbon
2363	technologies (ICE).
2364	
811	
89	
3030	
3316	Average share of sustainable
511	aviation fuels

EBA Regular Use

5110	and Average tonnes of CO2 per passenger-km
512	
5121	
5223	
2815	
29	Average tonnes of CO2 per passenger-km and Average share of high carbon technologies (ICE).
291	
2910	
292	
2920	
293	
2932	

f	g
Distance to IEA NZE2050 in % ***	Target (year of reference + 3 years)

**Template 4: Banking book - Indicators of potential climate change transitio**

	a	b	c	d
	Gross carrying amount (aggregate)	Gross carrying amount towards the counterparties compared to total gross carrying amount (aggregate)*	Of which environmentally sustainable (CCM)	Weighted average maturity
1				

\*For counterparties among the top 20 carbon emitting companies in the world

**in risk: Exposures to top 20 carbon-intensive firms**

e
Number of top 20 polluting firms included

**Template 5: Banking book - Indicators of potential climate change physical risk: Exposures su**

a	
Variable: Geographical area subject to climate change physical risk - acute and chronic events	
1	A - Agriculture, forestry and fishing
2	B - Mining and quarrying
3	C - Manufacturing
4	D - Electricity, gas, steam and air conditioning supply
5	E - Water supply; sewerage, waste management and remediation activities
6	F - Construction
7	G - Wholesale and retail trade; repair of motor vehicles and motorcycles
8	H - Transportation and storage
9	L - Real estate activities
10	Loans collateralised by residential immovable property
11	Loans collateralised by commercial immovable property
12	Repossessed colaterals
13	Other relevant sectors (breakdown below where relevant)







l	m	n	o
Of which non-performing exposures	Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Of which non-performing exposures
		of which Stage 2 exposures	

**Template 6. Summary of GAR KPIs**

	<b>Climate change mitigation</b>	<b>Climate change adaptation</b>
<b>GAR stock</b>		
<b>GAR flow</b>		

\* % of assets covered by the KPI over banks' total assets

KPI	
<b>Total (Climate change mitigation + Climate change adaptation)</b>	<b>% coverage (over total assets)*</b>

**Template 7 - Mitigating actions: Assets for the calculation of GAR**

Million EUR	
<b>GAR - Covered assets in both numerator and denominator</b>	
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation
2	<b>Financial corporations</b>
3	Credit institutions
4	Loans and advances
5	Debt securities, including UoP
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
20	<b>Non-financial corporations (subject to NFRD disclosure obligations)</b>
21	Loans and advances
22	Debt securities, including UoP
23	Equity instruments
24	<b>Households</b>
25	of which loans collateralised by residential immovable property
26	of which building renovation loans
27	of which motor vehicle loans
28	<b>Local governments financing</b>

29	Housing financing
30	Other local governments financing
31	Collateral obtained by taking possession: residential and commercial immovable properties
32	<b>TOTAL GAR ASSETS</b>
<b>Assets excluded from the numerator for GAR calculation (covered in the denominator)</b>	
33	<b>EU Non-financial corporations (not subject to NFRD disclosure obligations)</b>
34	Loans and advances
35	Debt securities
36	Equity instruments
37	<b>Non-EU Non-financial corporations (not subject to NFRD disclosure obligations)</b>
38	Loans and advances
39	Debt securities
40	Equity instruments
41	Derivatives
42	On demand interbank loans
43	Cash and cash-related assets
44	Other assets (e.g. Goodwill, commodities etc.)
45	<b>TOTAL ASSETS IN THE DENOMINATOR (GAR)</b>
<b>Other assets excluded from both the numerator and denominator for GAR calculation</b>	
46	Sovereigns
47	Central banks exposure
48	Trading book
49	<b>TOTAL ASSETS EXCLUDED FROM NUMERATOR AND DENOMINATOR</b>
50	<b>TOTAL ASSETS</b>






















































**Template 8 - GAR (%)**

		a
		Proport
% (compared to total covered assets in the denominator)		
1	<b>GAR</b>	
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	
3	Financial corporations	
4	Credit institutions	
5	Other financial corporations	
6	of which investment firms	
7	of which management companies	
8	of which insurance undertakings	
9	Non-financial corporations subject to NFRD disclosure obligations	
10	Households	
11	of which loans collateralised by residential immovable property	
12	of which building renovation loans	
13	of which motor vehicle loans	
14	Local government financing	
15	Housing financing	
16	Other local governments financing	
17	Collateral obtained by taking possession: residential and commercial immovable properties	













**Template 9 - Mitigating actions: BTAR****Template 9.1 - Mitigating actions: Assets for the calculation of BTAR**

Million EUR	
1	<b>Total GAR Assets</b>
<b>Assets excluded from the numerator for GAR calculation (covered in the denominator) but included in the numerator and denominator of the BTAR</b>	
2	<b>EU Non-financial corporations (not subject to NFRD disclosure obligations)</b>
3	Loans and advances
4	of which loans collateralised by commercial immovable property
5	of which building renovation loans
6	Debt securities
7	Equity instruments
8	<b>Non-EU Non-financial corporations (not subject to NFRD disclosure obligations)</b>
9	Loans and advances
10	Debt securities
11	Equity instruments
12	<b>TOTAL BTAR ASSETS</b>
<b>Assets excluded from the numerator of BTAR (covered in the denominator)</b>	
13	Derivatives
14	On demand interbank loans
15	Cash and cash-related assets
16	Other assets (e.g. Goodwill, commodities etc.)
17	<b>TOTAL ASSETS IN THE DENOMINATOR</b>
<b>Other assets excluded from both the numerator and denominator for BTAR calculation</b>	
18	<b>TOTAL ASSETS EXCLUDED FROM NUMERATOR AND DENOMINATOR</b>
19	<b>TOTAL ASSETS</b>

**Template 9.2 - BTAR %**

% (compared to total covered assets in the denominator)	
1	<b>BTAR</b>
2	<b>GAR</b>
3	EU Non-financial corporations not subject to NFRD disclosure obligations
4	of which loans collateralised by commercial immovable property
5	of which building renovation loans
5	Non-EU country counterparties not subject to NFRD disclosure obligations

**Template 9.3 - Summary table - BTAR %**

	KPI
	Climate change mitigation (CCM)
<b>BTAR stock</b>	
<b>BTAR flow</b>	















a	b	c	d	e	f	g
Disclosure						
<b>Climate Change Mitigation (CCM)</b>					<b>Climate C</b>	
Proportion of eligible assets funding taxonomy relevant sectors					Proportion of eligible as	
	Of which environmentally sustainable					Of
		Of which specialised lending	Of which transitional	Of which enabling		

		% coverage (over total assets)*
<b>Climate change adaptation (CCA)</b>	<b>Total (CCM + CCA)</b>	



























o	p
CA)	
ectors (Taxonomy-eligible)	
ustainable (Taxonomy-aligned)	
Of which transitional/adaptation	Of which enabling





















**Template 10 - Other climate change mitigating actions that are not covered**

a	
Type of financial instrument	
1	Bonds (e.g. green, sustainable, sustainability-linked under standards other than the EU standards)
2	
3	
4	
5	Loans (e.g. green, sustainable, sustainability-linked under standards other than the EU standards)
6	
7	
8	
9	
10	
11	

**Template 10 - Other climate change mitigating actions that are not covered**

a	
Type of financial instrument	
1	Bonds (e.g. green, sustainable, sustainability-linked under standards other than the EU standards)
2	
3	
4	
5	Loans (e.g. green, sustainable, sustainability-linked under standards other than the EU standards)
6	
7	
8	
9	
10	
11	

**and in the EU Taxonomy**

b
Type of counterparty
Financial corporations
Non-financial corporations
Of which Loans collateralised by commercial immovable property
Other counterparties
Financial corporations
Non-financial corporations
Of which Loans collateralised by commercial immovable property
Households
Of which Loans collateralised by residential immovable property
Of which building renovation loans
Other counterparties

**and in the EU Taxonomy**

b
Type of counterparty
Financial corporations
Non-financial corporations
Of which Loans collateralised by commercial immovable property
Other counterparties
Financial corporations
Non-financial corporations
Of which Loans collateralised by commercial immovable property
Households
Of which Loans collateralised by residential immovable property
Of which building renovation loans
Other counterparties

c	d
Gross carrying amount (million EUR)	Type of risk mitigated (Climate change transition risk)

c	d
Gross carrying amount (million EUR)	Type of risk mitigated (Climate change transition risk)

e	f
Type of risk mitigated (Climate change physical risk)	Qualitative information on the nature of the mitigating actions

e	f
Type of risk mitigated (Climate change physical risk)	Qualitative information on the nature of the mitigating actions