OP Amalgamation Pillar 3 report 2024

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Overview of capital adequacy

This report discloses information on the capital adequacy of the consolidated group of the amalgamation of member cooperative banks, as specified in Part 8 of the Capital Requirements Regulation of the European Parliament and of the Council No. 575/2013 as amended (CRR) (Pillar III disclosures) in compliance with the delegated acts and guidelines issued by the European Banking Authority. Given that this information is based on the consolidated capital adequacy on the amalgamation, it is not directly comparable with other information disclosed on OP Financial Group. The Report is unaudited.

The amalgamation of cooperative banks consists of the amalgamation's central cooperative (OP Cooperative), the central cooperative's member credit institutions and the companies belonging to their consolidation groups. Although OP Financial Group's insurance companies do not belong to the amalgamation, investments made in them have a major impact on capital adequacy calculated in accordance with the capital adequacy regulations for credit institutions.

This document presents amounts that have been rounded to millions of euros. Therefore, the summations may display slight variations. The tables may include grayed-out sections which indicate that they are not required to be disclosed. Unless specifically mentioned otherwise, all figures in this document are presented in millions of euros.

OP Osuuskunta's LEI code is 7437003B5WFBOIEFY714.

Own Funds

EUR million	31 Dec 2024	31 Dec 2023
OP Financial Group's equity capital	18,110	16,262
The effect of insurance companies on the Group's shareholders' equity is excluded	-1,611	-1,297
Fair value reserve, cash flow hedge	140	212
Common Equity Tier 1 (CET1) before deductions	16,638	15,177
Intangible assets	-320	-314
Excess funding of pension liability and valuation adjustments	-243	-216
Items deducted from cooperative capital	-185	-198
Planned profit distribution	-176	-148
Insufficient coverage for non-performing exposures	-264	-190
Common Equity Tier 1 capital (CET1)	15,451	14,111
Tier 1 capital (T1)	15,451	14,111
Debenture loans	1,288	1,308
Debenture loans to which transitional provision is applied	22	57
General credit risk adjustments	83	120
Tier 2 capital (T2)	1,393	1,484
Own Funds	16,844	15,595

The table presents how OP Amalgamation's CET1 capital derives from OP Financial Group's equity capital. The CET1 capital was increased by banking earnings, of which the planned full-year profit distribution has been subtracted. The amount of Profit Shares in CET1 capital was EUR 3.1 billion (3.1).

OP Financial Group has applied transitional provisions regarding old debenture loans. IFRS 9 transitional provision has not been applied.

Risk exposure amount

OP Financial Group has used the Standardised Approach to measure capital requirement for credit risks, operational risks and market risks. Also counterparty credit risk is calculated according to the standardised approach (SA-CCR).

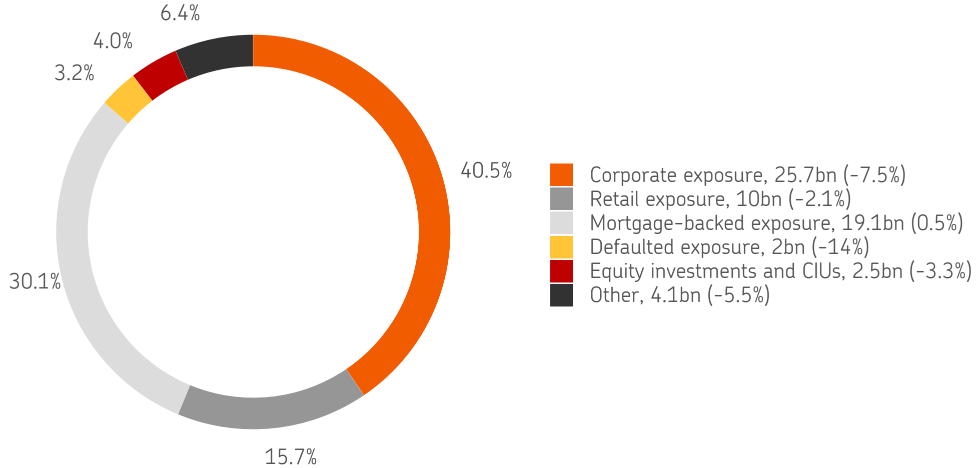
Risk exposure amount

EUR million	31 Dec 2024	31 Dec 2023
Credit and counterparty risk	63,330	65,997
Standardised Approach (SA)	63,330	65,997
Central government and central banks exposure	502	509
Credit institution exposure	525	603
Corporate exposure	25,656	27,591
Retail exposure	9,960	10,174
Mortgage-backed exposure	19,078	18,988
Defaulted exposure	2,026	2,309
Items of especially high risk	1,442	1,697
Covered bonds	697	608
Collective investment undertakings (CIU)	142	201
Equity investments	2,384	2,410
Other	918	907
Risks of the CCP's default fund	1	1
Securitisations	27	50
Market and settlement risk (Standardised Approach)	944	1,006
Operational risk (Standardised Approach)	4,936	4,156
Valuation adjustment (CVA)	210	217
Other risks*	2,309	2,084
Total risk exposure amount	71,756	73,511

*Risks not otherwise covered.

The total risk exposure amount (TREA) was EUR 71.8 billion (73.5). The risk-weighted assets for operational risk increased in line with income for previous years. Risk-weighted credit risk assets decreased.

Risk exposure amount (% of total exposure))



The future changes in the EU Capital Requirements Regulation (CRR3), which implement the final elements of Basel III, are assessed to have a slight deteriorating effect on the capital adequacy of OP Financial Group. These changes took effect on 1 January 2025.

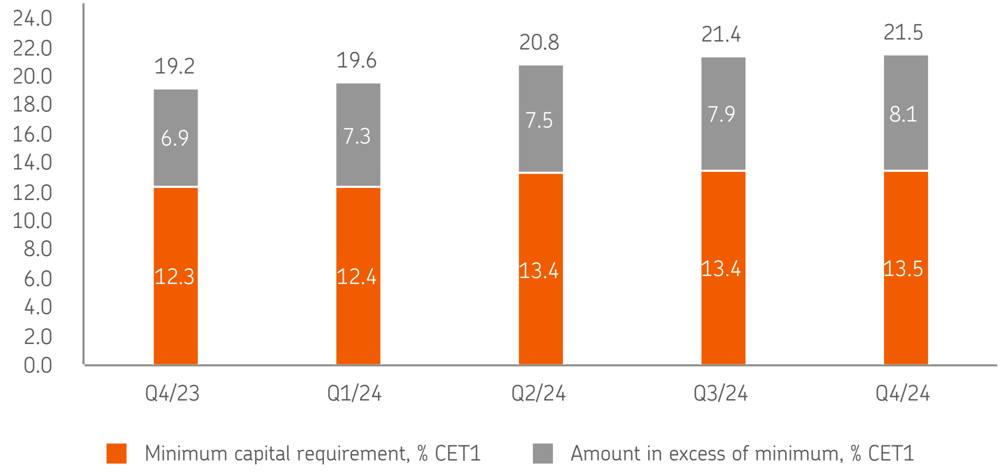
Capital Ratios

Ratios, %	31 Dec 2024	31 Dec 2023
CET1 capital ratio	21.5 %	19.2 %
Tier 1 ratio	21.5 %	19.2 %
Capital adequacy ratio	23.5 %	21.2 %

Ratios, fully loaded, %	31 Dec 2024	31 Dec 2023
CET1 capital ratio	21.5 %	19.2 %
Tier 1 ratio	21.5 %	19.2 %
Capital adequacy ratio	23.4 %	21.1 %

OP Financial Group's CET1 ratio was 21.5% (19.2), which exceeds the minimum regulatory requirement by 8.1 percentage points. The ratio was improved by the earnings performance for the period and a decrease in risk-weighted assets.

CET1 Capital Ratio (%)



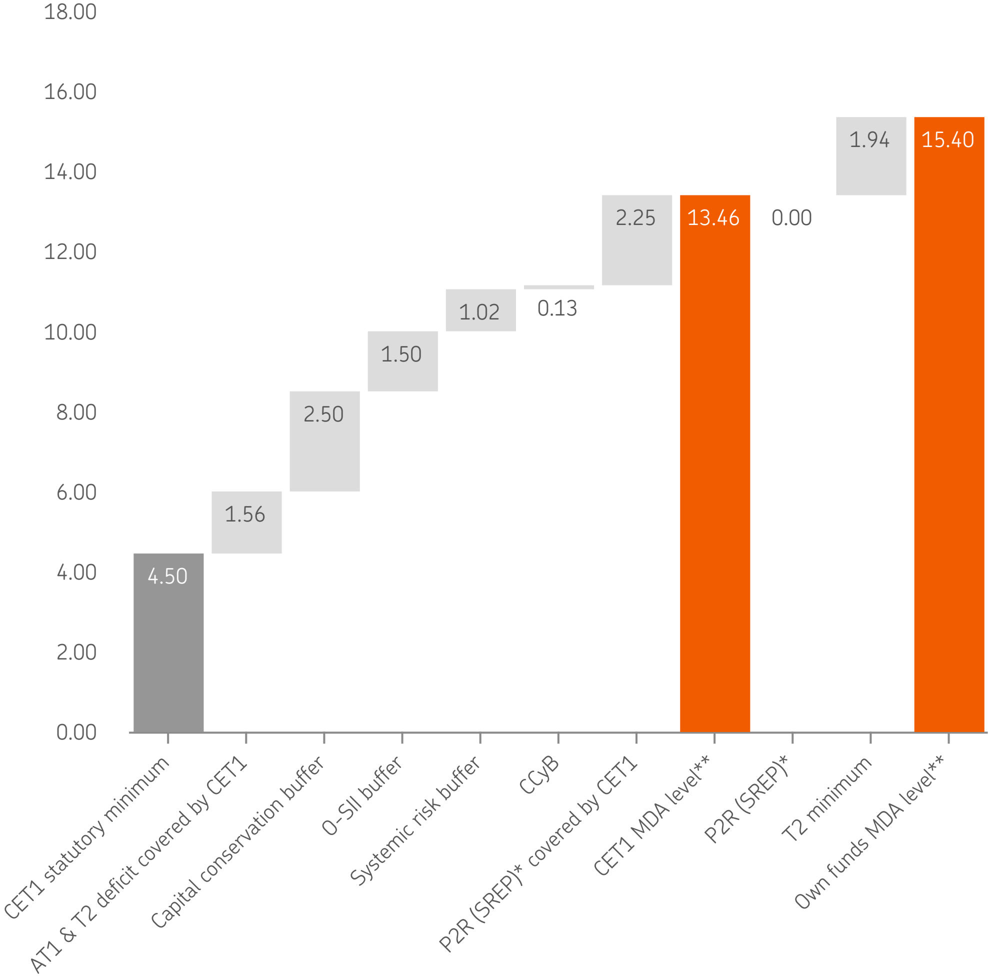
Capital requirement

Capital requirement, EUR million	31 Dec 2024	31 Dec 2023
Own funds	16,844	15,595
Capital requirement	11,052	10,558
Buffer for capital requirements	5,791	5,037

As a credit institution, OP Financial Group's capital adequacy is on a solid basis compared to the statutory requirements and those set by the authorities. The statutory minimum for the capital adequacy ratio is 8% and for the CET1 ratio 4.5%; the minimum requirement of 1.6% for AT1 and T2, which needs to be covered with CET1, raises the CET1 minimum to 6.0%. The requirement for the capital conservation buffer of 2.5% under the Act on Credit Institutions, the O-SII buffer requirement of 1.5%, the systemic risk buffer requirement of 1.0%, the countercyclical capital buffer requirement for foreign exposures, and the ECB's P2R requirement, in practice, the minimum total capital ratio to 15.4% and the minimum CET1 ratio to 13.5%, including the shortfalls of Additional Tier 1 (AT1) and Tier 2 (T2) capital.

The Finnish Financial Supervisory Authority (FIN-FSA) makes a macroprudential policy decision on a quarterly basis. In December 2024, the FIN-FSA reiterated its decision not to impose a countercyclical capital buffer requirement on banks.

Capital requirement



*P2R supervisory Pillar 2 requirement

**Maximum distributable amount

EU KM1 - Key metrics template

		a	b	c	d	e
		31 Dec 2024	30 Sep 2024	30 Jun 2024	31 Mar 2024	31 Dec 2023
Available own funds						
1	Common Equity Tier 1 (CET1) capital	15,451	15,321	14,902	14,358	14,111
2	Tier 1 capital	15,451	15,321	14,902	14,358	14,111
3	Total capital	16,844	16,722	16,341	15,816	15,595
Risk-weighted exposure amounts						
4	Total risk exposure amount	71,756	71,749	71,598	73,112	73,511
Capital ratios (as a percentage of risk-weighted exposure amount)						
5	Common Equity Tier 1 ratio (%)	21.53	21.35	20.81	19.64	19.20
6	Tier 1 ratio (%)	21.53	21.35	20.81	19.64	19.20
7	Total capital ratio (%)	23.47	23.31	22.82	21.63	21.21
Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)						
EU 7a	Additional own funds requirements to address risks other than the risk of excessive leverage (%)	2.25	2.25	2.25	2.25	2.25
EU 7b	of which: to be made up of CET1 capital (percentage points) *	1.27	1.27	1.27	1.27	1.27
EU 7c	of which: to be made up of Tier 1 capital (percentage points)	1.69	1.69	1.69	1.69	1.69
EU 7d	Total SREP own funds requirements (%)	10.25	10.25	10.25	10.25	10.25
Combined buffer and overall capital requirement (as a percentage of risk-weighet exosure amount)						
8	Capital conservation buffer (%)	2.50	2.50	2.50	2.50	2.50
EU 8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)					
9	Institution specific countercyclical capital buffer (%)	0.13	0.11	0.12	0.11	0.11
EU 9a	Systemic risk buffer (%)	1.02	1.02	1.00		
10	Global Systemically Important Institution buffer (%)					
EU 10a	Other Systemically Important Institution buffer (%)	1.50	1.50	1.50	1.50	1.50
11	Combined buffer requirement (%)	5.15	5.13	5.12	4.11	4.11
EU 11a	Overall capital requirements (%)	15.40	15.38	15.37	14.36	14.36
12	CET1 available after meeting the total SREP own funds requirements (%)	13.22	13.06	12.57	11.38	10.96
Leverage Ratio						
13	Total exposure measure	147,674	146,372	145,733	146,135	148,849
14	Leverage ratio (%)	10.46	10.47	10.23	9.82	9.48

		a	b	c	d	e
		31 Dec 2024	30 Sep 2024	30 Jun 2024	31 Mar 2024	31 Dec 2023
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 (%)					
EU 14b	of which: to be made up of CET1 capital (percentage points)					
EU 14c	Total SREP leverage ratio requirements (%)	3.00	3.00	3.00	3.00	3.00
Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)						
EU 14d	Leverage ratio buffer requirement (%)					
EU 14e	Overall leverage ratio requirement (%)	3.00	3.00	3.00	3.00	3.00
Liquidity Coverage Ratio*						
15	Total high-quality liquid assets (HQLA) (Weighted value -average)	27,350	27,144	26,460	26,373	27,543
EU 16a	Cash outflows - Total weighted value	16,447	16,199	15,820	15,687	15,713
EU 16b	Cash inflows - Total weighted value	2,323	2,339	2,301	2,312	2,330
16	Total net cash outflows (adjusted value)	14,124	13,861	13,519	13,375	13,383
17	Liquidity coverage ratio (%)	194	196	196	198	206
Net Stable Funding Ratio						
18	Total available stable funding	105,868	105,340	106,575	106,537	105,517
19	Total required stable funding	82,317	81,322	81,748	81,638	81,485
20	NSFR ratio (%)	129	130	130	130	129

* P2R may be covered with different capital buckets (CET1, AT1 and T2). Since OP Financial Group has not issued AT1 instruments, also AT1 bucket of P2R has been covered with CET1 and the P2R would be 2.25%. Rows 7b and 7c have been amended after their initial disclosure

** LCR amounts are calculated of average monthly values for each quarter and have been amended after their initial disclosure.

Net Stable Funding Ratio amount for December 2023 has been amended after their initial disclosure.

EU INS2 - Capital base of the financial conglomerate

	EUR million	a 31 Dec 2024	b 31 Dec 2023
	OP Financial Group's equity capital	18,110	16,262
	Other items included in Banking's Tier 1 and Tier 2 capital	1,393	1,484
	Other sector-specific items excluded from own funds	-636	-574
	Goodwill and intangible assets	-968	-1,000
	Insurance business valuation differences	740	855
	Proposed profit distribution	-176	-148
	Items under IFRS deducted from own funds*	-66	48
	Conglomerate's total own funds	**18,397**	**16,928**
	Regulatory own funds requirement for credit institutions**	10,697	10,227
	Regulatory own funds requirement for insurance operations***	1,706	1,511
1	**Conglomerate's total own funds requirement**	**12,403**	**11,738**
	Conglomerate's capital adequacy	**5,994**	**5,190**
2	**Conglomerate's capital adequacy ratio (own funds/ minimum of own funds requirement) (%)**	**148**	**144**

*Excess funding of pension liability, portion of cash flow hedge of fair value reserve

** Total risk exposure amount x 15.4%

*** Estimate of aggregate SCR under Solvency II

OP Financial Group's own funds, calculated according to the Act on the Supervision of Financial and Insurance Conglomerates (FiCo), exceeded the minimum amount specified in the Act by EUR 6.0 billion (5.2). Banking capital requirement was 15.4% (14.4), calculated on risk-weighted assets; the increase resulted from the adoption of the systemic risk buffer. The ratio of OP Financial Group's own funds to the minimum capital requirement was 148% (144). As a result of the buffer requirements for banking and the solvency requirements for insurance companies, the minimum FiCo solvency of 100% reflects the level within which the conglomerate can operate without regulatory obligations resulting from buffers below the required level.

EU OV1 - Overview of total risk exposure amounts

		Total risk exposure amounts (TREA)		Total own funds requirements
		a	b	c
EUR million		31 Dec 2024	30 Sep 2024	31 Dec 2024
1	Credit risk (excluding CCR)	64,747	64,813	5,180
2	Of which the standardised approach	62,438	62,504	4,995
6	Counterparty credit risk - CCR	1,103	983	88
7	Of which the standardised approach	881	777	70
EU 8a	Of which exposures to a CCP	13	8	1
EU 8b	Of which credit valuation adjustment - CVA	210	198	17
15	Settlement risk			
16	Securitisation exposures in the non-trading book (after the cap)	27	31	2
18	Of which SEC-ERBA (including IAA)	27	31	2
20	Position, foreign exchange and commodities risks (Market risk)	944	986	75
21	Of which the standardised approach	944	986	75
23	Operational risk	4,936	4,936	395
EU 23b	Of which standardised approach	4,936	4,936	395
24	Amounts below the thresholds for deduction (subject to 250% risk weight) (For information)	469	407	38
24b	Other risks (For information)	2,309	2,309	185
29	Total	71,756	71,749	5,741

The balances on rows 24 and 24b are included in the balance on row 1.

EU INS1 - Insurance participations

31 Dec 2024, EUR million		a Exposure value	b Risk exposure amount
1	Own fund instruments held in insurance or re-insurance undertakings or insurance holding company not deducted from own funds	2,306	2,306

31 Dec 2023, EUR million		a Exposure value	b Risk exposure amount
1	Own fund instruments held in insurance or re-insurance undertakings or insurance holding company not deducted from own funds	2,306	2,306

EU OVC - ICAAP information

a) Approach to assessing the adequacy of the internal capital

Capital adequacy assessment processes (so-called 'ICAAP processes') refer to strategies, policies, guidelines, practices, procedures, and systems used to identify, measure, manage, and monitor risks. These procedures ensure that all business risks of OP Financial Group are identified and that the group has sufficient quality capital to cover the risks. The procedures ensure a balance between capital, risks, and results, the continuity of operations, and strategic flexibility.

OP Financial Group's Risk Appetite Statement (RAS) and Risk Appetite Framework (RAF), including the appendices, form the basis for both quantitative and qualitative capital adequacy assessments. Capital adequacy is assessed both from an economic perspective and a regulatory perspective.

- From the economic perspective, assessment is based on identifying and measuring all significant risks which can lead to financial losses and reductions of internal capital.
- From the regulatory perspective, the assessment is based on ensuring that OP Financial Group continuously meets regulatory and supervisory capital requirements and withstands other external economic constraints at least in the medium term.

The calculation of internal capital adequacy is based on the risk-based capital ratio – the supply of capital compared to demand. Internal capital measures OP Financial Group's risk-taking capacity – the amount of own funds available to the Group for covering unexpected losses. Economic capital need is an estimate of the capital needed to ensure business continuity. The economic capital methods are used to estimate the amount of risk-based capital required to cover possible losses from business-related and business-environment risks.

Agreements made with customers are compiled into groups. Risks arising from these groups are managed by so-called revenue logic. Revenue logic is a framework within which earnings risks associated with operations are managed. A revenue logic framework covers agreements made for the specific service needs of customers, causing certain risks that OP Financial Group must bear (revenue logic-specific risk profile).

OP Financial Group's revenue logics are as follows:

- Banking through the balance sheet
- Banking – Markets
- Banking – Wealth management
- Non-life insurance
- Life insurance

OP Financial Group allocates internal capital, in other words risk-taking capacity, to revenue logics, on the basis of which revenue logics take business risks. Allocation is a strategic tool for managing risk-taking. The central cooperative's Board of Directors uses Group-level and revenue logic limits to manage the risk-based capital ratio between economic capital need and internal capital. Economic capital need is used as a risk-taking metric and internal capital measures the amount of available capital; both of these metrics have been defined by OP Financial Group itself. Internal capital adequacy assessment is prudent at the group level. This prudence is achieved for example by not allocating capital to risk taking and through management buffers.

In OP Financial Group's ICAAP assessment, in addition to evaluating capital adequacy, the continuous compliance with the requirements concerning the technical provisions of insurance companies is assessed. It also includes assessment, how well the risk profile covers the basic assumptions of the solvency capital requirement when the solvency capital requirement is calculated using the standard formula.

The ICAAP assessments are mainly based on a continuous risk management analysis, reported quarterly in OP Financial Group's Risk Analysis. The qualitative assessment of ICAAP procedures focuses on different themes throughout the year in each quarterly review. The assessment evaluates whether reliable results are obtained from the models, methods and assumptions applied, and whether such results are still relevant in light of the current situation and future developments. It focuses on compliance with OP Financial Group's risk management guidelines and supervisory regulations. The assessment also covers the compatibility of procedures with business strategy and risk appetite, and the consistent application of procedures in business, decision-making and risk management processes across the entire OP Financial Group.

OP Financial Group prepares an annual statement on capital adequacy (CAS, Capital Adequacy Statement).

The quality of calculation and other ICAAP procedures is ensured through internal assessment and control of qualitative and quantitative results, monitoring, and validations. Based on the observations raised in quality assurance, OP Financial Group continuously develops procedures in cooperation with its internal stakeholders.

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

N/A

Risk management objectives and policies

EU OVA - Institution risk management approach

a) Disclosure of concise risk statement approved by the management body

Please see the Declaration and Statement.

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

The principles for arranging risk management process are as follows:

- Strategy and RAS: The Risk Appetite Statement outlines and justifies which risks each business is ready to take and to what extent. Businesses are obliged to operate within the limits of these restrictions.
- Division of Responsibilities: The guidelines and decisions regarding the division of responsibilities in risk-taking define which risks different revenue logics and the legal entities and functions within them can take. This procedure ensures that risks do not accumulate uncontrollably, but rather that a considered division of responsibilities promotes risk diversification.
- Governance structures provide the foundation for ensuring that the key guiding principles and the policies and operating instructions that specify them are prepared and decided appropriately. Independent parties from the business assess and monitor each activity appropriately considering its quality, scope, and complexity, in addition to the business's own monitoring. The central cooperative's Board of Directors is the key decision-making body for risk management tasks. In addition, the central cooperative's Supervisory Council confirms decisions by the Board of Directors that apply to OP Financial Group's risk appetite. The Risk Committee of the Board of Directors assists the Board in performing duties related to risk-taking and risk management. The Committee has no independent decision-making powers. Based on a decision by the President and Group Chief Executive Officer, the Executive Management Team has set up a Risk Management Committee, Steering and Compliance Committee and Banking ALM Committee that approve instructions specifying the RAS and the RAF. The risk management-related tasks of various bodies are described in more detail in their respective charters. Sufficient resourcing and maintaining and developing expertise are ensured in the first, second, and third lines of defense functions.
- RAF: The Risk Appetite Framework defines the general strategic intents of the risk management process. The RAF sets the conditions for organizing the risk management process in OP Financial Group.
- Joint and several liability: Control of joint and several liability between the central cooperative and member banks is based on the document, Principles of corporate governance as required under Joint and Several Liability.
- Remuneration principles: OP Financial Group's remuneration schemes are built in line with the Group's mission, core values and targets. Remuneration does not incentivise unnecessary risk-taking contrary to the risk appetite set by management, or against the customer's interests. Remuneration is based on the same risk measurement methods and metrics as e.g. capital and liquidity adequacy assessment processes (ICAAP, ORSA or ILAAP). This includes the setting of remuneration and any risk adjustments made before its payment.
- Internal control, good business practices and corporate security: Principles of internal control, good corporate governance and good business practices and corporate security also set preconditions for practices.

c) Declaration approved by the management body on the adequacy of the risk management arrangements

Please see the Declaration and Statement.

d) Disclosure on the scope and nature of risk disclosure and/or measurement systems

e) Disclose information on the main features of risk disclosure and measurement systems

The Risk Appetite Statement and Risk Appetite Framework and risk policies (tailored to revenue logics) include risk limits and decision-making powers and the strategy for the management of risks. These documents are submitted for approval by the competent body. Combined, they constitute the Board of Directors' overall intent regarding risk management processes.

The principles, risk policies and proposals for limits and threshold values include the rationale for deciding on the proposed metrics and levels. For functions subject to limits and threshold values, such grounds provide clear justification of why risk-taking limits have been set, and why an escalation procedure is triggered if a limit breach, or clear threat of such a breach, occurs.

Each revenue logic has detailed operating instructions on risk-taking and risk management, and on the prerequisites for such activities. Together with principles and risk policies, the operating instructions form an extensive, regulatory compliant control framework applicable to the function concerned. Instructions are unambiguous, easy to understand and implementable in each revenue logic and process. Internal instructions follow the spirit of regulations, so that compliance with internal instructions guarantees regulatory compliance. The Risk Management function supervises each business, to ensure that it operates within the scope of the management's principles, policies and limits.

Strategic indicators and their specific limits are used to guide and limit OP Financial Group's risk taking in accordance with the Risk Appetite Statement.

The limit set on the ratio of overall risk-taking to OP Financial Group's internal capital reflects OP Financial Group's moderate risk appetite. The Group's internal capital is allocated to at least revenue logic-specific limits, while ensuring that the allocations are in line with the Group's strategy and annual targets.

During the year, the Board of Directors can decide on changes to strategic limits used to steer risk taking. The Supervisory Council is informed of such decisions and their grounds. In addition, limit breaches and their causes are reported to the Supervisory Council in accordance with the escalation procedure defined in the Risk Appetite Framework.

Based on the limits set in the Risk Appetite Statement, Risk Management and the businesses prepare more detailed proposals on limits and OP cooperative banks' monitoring limits. This is done in such a way that quantitative risks defined as significant within OP Financial Group are appropriately limited in revenue logic-specific risk policies. These quantitative limits are supplemented with principles included in risk policies, and key risk indicators and other guidelines issued by Risk Management, so that less-easily quantifiable risks are also covered. This ensures that the Group and its companies avoid taking excessive risks that might endanger the Group's or company's capital adequacy, profitability, liquidity and business continuity.

Business-independent reporting is built in such a way that it supports management decisions on business steering. It helps the management to prioritise activities that enable the continuous improvement of risk management processes at customer and portfolio level, and strengthens the basis of such processes.

Independent reporting on the risk management process shows

- whether business activities have complied with the qualitative and numerical frameworks set by the Board of Directors
- whether the set targets have been achieved and which aspects require most correction to fulfil the quality requirements set by the function and regulatory compliance.

The Risk Management function reports its observations to the management of OP Financial Group and its companies in the risk analysis compiled quarterly.

f) Strategies and processes to manage risks for each separate category of risk

One key practice of the risk management process at Group level is scenario work. This enables assessment of both the existing and future business on the basis of various assumptions. For the existing business, it involves analysis of how earnings, capital adequacy and other operational requirements would develop across the business portfolio, formed by various revenue logics at Group level, assuming the continuity of current business models. The core of the future business includes assessing how customer preferences and the competitive landscape would develop as the world changes, and how the current volumes of OP Financial Group's business and margins by revenue logic would change as business models transform. Based on the outcomes of Group-level scenarios, decisions can be made regarding individual businesses to optimise the whole or submit strategically significant cases to the Board of Directors.

Scenario work is strongly linked to strategic planning. Risk management processes at OP Financial Group level also involve assessment of whether OP Financial Group's various businesses are agile enough to adapt – organically or through business transactions – to changes in the external business environment. Critical consideration is given to the required capabilities, operational structures and operational dependencies between revenue logics, to ensure their continuous development.

Scenario and stress testing process

The scenario process is used to assess possible future developments and their effects on the capital adequacy, liquidity, risk profile, profitability and operational continuity of OP Financial Group or its entity. In this way, the continuity, sustainability and profitability of the strategy, operations and business model are assessed in the short, medium and long term.

Scenario work appropriately covers all risk types defined as material in the Risk Appetite Statement, as well as customer behaviour risks and identified drivers of change in the external business environment, such as climate and environmental risks. The purpose of the process is, in particular, to identify OP Financial Group's key risk factors and to analyse and estimate causality between events, its effects, and the impact of measures taken by the management (cause-event-effect-response thinking).

Severe types of scenario analyses form the basis of OP Financial Group's stress testing, which is a key part of proactive capital planning and own assessment of capital adequacy (ICAAP, ORSA) and liquidity (ILAAP). As part of the continuous ICAAP-ORSA-ILAAP process, the results of OP Financial Group's different scenario analyses and stress tests are reported in the risk analysis of OP Financial Group's Risk Management.

In OP Financial Group, the responsibilities and roles for stress testing and the scenario process are clearly defined. OP Financial Group's scenario and stress testing framework is comprehensively defined, including different use cases and related methods and assumptions, as well as high-quality and accurate data. The business has the responsibility for carrying out scenario analyses for the capital plan, funding plan and liquidity plan as well as the recovery plan based on them, all part of annual planning. It is the duty of independent Risk Management, in its role of second line of defence, to ensure the precision of the above-mentioned plans and have the responsibility for other uses defined in the scenario and stress testing framework. The Risk Management function maintains its own independent analytical capabilities and calculation tools. These tools can also be applied to carrying out e.g. reverse stress tests and other analyses.

Types and uses of scenario analyses and stress testing

The main focus of OP Financial Group's scenario and stress testing framework is on the scenario analysis of risks and phenomena significant to the business's profitability and risk exposures. These analyses are refined using separate risk type-specific analyses. In addition to this, sensitivity analyses of the main indicators of capital adequacy and liquidity are carried out in all risk types.

The Group-level analyses include the capital plan, funding plan and liquidity plan used in business planning, the recovery plan and resolution plan, and the Group-level reverse stress test that are made comprehensively at least once a year. Climate and environmental risk scenario analyses are also carried out. The purpose of these is to assess the vulnerability of business models in the climate scenarios of the future. Group-level analyses also take account of the dependencies between risk types.

The capital plan assesses long-term capital requirements and available capital in baseline scenario and multiple adverse scenarios and based on OP Financial Group's business strategy and action plan. Based on the results, the required actions can be taken to meet Group-level profit, risk, and capital position targets.

The purpose of a reverse stress test at Group level is to draw the Group Executive Management's attention to unlikely but extremely serious stress scenarios that, if realised, would threaten the bank's ability to operate, the sustainability of its business model, and its viability.

The Risk Management function has the responsibility for carrying out portfolio, company, risk type and revenue logic-specific scenario analyses and sensitivity analyses at least once a year and for reporting about them in OP Financial Group's risk analysis. The stress tests for each risk type complement and gauge the effectiveness of macro-level stress tests and scenario analyses covering the entire balance sheet and thus increase the coverage of the framework.

In addition, stress tests imposed by the supervisor and authorities are carried out In OP Financial Group. Stress testing is also a key tool for identifying and analysing concentration risks.

Scenario building

Scenario building starts with regular identification of risks and a causality analysis of events. The Risk Management function has the responsibility for risk identification in cooperation with the representatives of the businesses and other internal stakeholders.

The businesses and the Risk Management function are responsible for creating scenarios for uses in their areas of responsibility. A scenario takes account of all risk factors relevant to OP Financial Group. Scenario building includes an analysis of how external drivers of change affect OP Financial Group's risk position and the business model's profitability in different time frames. The estimates are based on both historical data and forward-looking information. The risk factors and phenomena appearing in regulatory stress test scenarios are also taken into account, where appropriate, in the building of scenarios for

OP Financial Group. Furthermore, the effect of stress events between different risk types is taken into account in the planning.

Stress testing is based on severe but plausible scenarios. Severity class is defined in accordance with the purpose of a stress test. The scenarios are internally consistent so that the identified risk factors behave logically in relation to each other.

Various assumptions defined in accordance with OP Financial Group's risk profile are combined in the annual planning scenarios (capital plans and the liquidity and funding plan). In addition, topical themes, changes in the business environment and regulation, and potential operational and reputational risk scenarios are taken into account. In the adverse scenarios of capital planning, the development is exceptionally harmful, such that the adverse impact on regulatory capital ratios becomes sufficiently significant.

Climate and environmental factors are included in baseline and adverse scenarios. Climate and environmental risks relevant to business planning are taken into account in short-term and medium-term scenarios. Long-term scenarios, which are adaptations of scientific studies, extend beyond the normal business planning period and take account of the impacts of physical and transition risks on different risk types and sustainability of the business model.

g) Information on the strategies and processes to manage, hedge and mitigate risks, as well as on the monitoring of the effectiveness of hedges and mitigants

The risk management process is a whole which involves all tasks that help OP Financial Group to ensure that the following objectives of the risk management process are achieved:

- The business lines' customer business processes provide a solid foundation for high-quality customer service, while being cost-efficient, reliable, regulatory compliant and, whenever necessary, quickly restorable to working order. OP Financial Group has the operational flexibility required to adjust its processes rapidly enough to achieve its strategic goals and targets. In addition, these processes generate all the information needed for performing the tasks of key functions, analyzing operations, and management reporting.
- Businesses strike a balance between earnings, risks, capital and liquidity buffers, and cumulative risks at OP Financial Group's level can be identified and managed, for example, through principles on the division of responsibilities.
- The capital adequacy and liquidity of OP Financial Group's businesses, and of the entire Group, are at a level that enables OP Financial Group to make fully independent business decisions. Neither OP Financial Group nor its companies have other commitments that would prevent the implementation of measures in line with the strategy, at least not for an extended period.
- No internal or external party questions the validity of OP Financial Group's joint and several liability.

Once the above risk management objectives have been achieved, OP Financial Group's businesses can implement their strategy without significant hindrances from internal or external factors. This is how OP Financial Group's risk management processes support the implementation of OP Financial Group's strategy and the related monitoring.

Services provided to meet customer needs form the starting point for customer-level business and the related customer-level risk management processes. The process phases are always the same: continuous customer profiling, risk-based sizing/pricing of the service, and life cycle management of the agreement.

To manage the overall service solutions, OP Financial Group examines, as part of its strategic work, different products that can serve the customer for the same need. In this connection the suitability for the customer and profitability for OP Financial Group, and the operational risks caused by service production within OP Financial Group are weighed. Based on its review, decisions are made on whether there is a need to change the customer service priorities of various solutions.

Each operating process is a logical, customer service-driven concept that consists of OP's business processes and the related support processes. Through customer-level risk management based on the operating process approach, OP Financial Group supports its customers' opportunities for success, which is in turn a prerequisite for OP Financial Group's own success.

The factors critical for OP Financial Group's business success are the same in practice, but their weighting varies by revenue logic. Therefore, risk management processes are fine-tuned by revenue logic, within the framework of general risk management principles. This is carried out through revenue logic-specific risk policies and other detailed instructions of the businesses and Risk Management.

So-called specific risks accumulating from OP Financial Group's customers, and so-called general risks arising from market movements, are managed at portfolio level, primarily by revenue logic and in additionally on Group level, while taking account of dependencies between individual risk types.

Risk identification and evaluation

Risk identification and assessment are key elements in conducting a stable and profitable business. At OP Financial Group, risks are identified at the level of an individual operating process, company, revenue logic and Group.

Continuous and up-to-date risk identification and assessment lie at the heart of OP Financial Group's risk management process. Assessment results enable it to select proportionate risk management measures, ensure operational continuity, remain within the risk appetite framework, and form key risk indicators. Risk identification and assessment methods are vital to scenario work and the assessment of change factors in the business environment, through which they provide a basis for strategy work.

In OP Financial Group and its companies, risks are identified at the level of individual operational processes, companies, revenue logics and the Group. When identifying and assessing risks, the key issue is to identify risks associated with current operations and customer selection; risks arising from Group structures, shares of ownership, subsidiaries and other interdependent organisations; and risks related to partnership contracts and outsourcings. In addition, controls or mitigation methods are specified for identified risks deemed unacceptably large, and the effectiveness of controls is assessed.

Possible new threats, vulnerabilities and changes in the business environment are continuously analysed and assessed, to ensure capital and liquidity adequacy in the event of macroeconomic or financial system-wide disruptions. Another goal of risk identification and assessment is to identify long-term risks and changes in business models and business environments, which might impact on existing risks by reducing or increasing risk levels, or by forming new risks. Scenario analyses and stress tests are one way of assessing future risks. In terms of the connection between risk identification and scenario analysis, attention is paid to the fact that scenario analyses cover the short and long term, and are based on both historical data and future projections.

Risk assessment is based on a cause-event-effect chain, in which phenomenon-based risk factors cause changes in charted risks. The goal is to identify changes in the business models and business environments which might impact on existing risks by reducing or increasing risk levels, or by forming new risks. In general, risk identification does not necessarily mean identification of a new higher-level risk type or concept, but understanding changes in businesses and the business environment, and the impacts of such changes. The risk assessment includes, among others, aspects related to changes in climate and environment, social responsibility and governance..

Risks are always identified in their entirety (i.e., without considering the impact of potential risk mitigation measures). Only after a full risk assessment can a business be provided with a picture of the threats and opportunities associated with a risk's realisation.

Risk assessment is based on consistent procedures and methods. Consistent procedures enable impact analysis of the same change factors across revenue logics, and the use of uniform stress testing scenarios to ensure business continuity throughout OP Financial Group. To ensure consistent data collection and risk assessment, OP Financial Group has a risk register documenting identified risks with classifications.

OP Financial Group's Risk Appetite Statement sets parameters for risk identification and assessment. In OP Financial Group it is ensured that key risk indicators and key performance indicators are in line with the Risk Appetite Statement, to enable consistent monitoring and reporting.

Each business area creates a systematic overview of all identified risk factors or causes, so that it can identify and monitor factors affecting capital and liquidity adequacy, business continuity and strategic flexibility, on an ongoing basis.

The risk assessment results are included in strategy work, for example by using a SWOT analysis to evaluate whether an identified risk is in line with risk appetite and whether OP Financial Group can bear the newly identified risk, even in exceptional circumstances. During the strategy preparation stage, discussions are held about the development of risk-bearing capacity, and risk-taking possibilities in alternative business environment scenarios, new risks arising from realisation of the strategy, and factors related to strategic flexibility. The strategy preparation takes account of ICAAP, ORSA and ILAAP outcomes.

Significant risks impacting on the amount of revenue or capital are included in the calculation of economic capital and/or sizing of the liquidity buffer's adequacy. During risk assessment, risks can be defined as significant even if their measurement is not possible or rational using quantitative methods. Preparation for their realisation is principally covered by clear division of responsibilities and careful practices. If a significant risk is left outside the scope of economic capital or liquidity need, this is separately justified.

More detailed information on risk type-specific risk management procedures is available in risk type-specific tables.

Steering of risk taking by means of strategic indicators and their specific limits is described in the section d), e).

Declaration on the adequacy of risk management arrangements, and risk statement

In accordance with Article 435, paragraph 1 of Regulation (EU) No 575/2013 (CRR) of the European Parliament and of the Council, OP Financial Group must disclose a declaration approved by the management body, in other words the Board of Directors of OP Cooperative, on the adequacy of risk management arrangements, as well as a risk statement succinctly describing the institution's overall risk profile associated with the business strategy.

Declaration on the adequacy of risk management arrangements by OP Cooperative's Board of Directors on 5 February 2025

Based on risk reporting, OP Cooperative's Board of Directors regularly assesses compliance with OP Financial Group's Risk Appetite Statement and Risk Appetite Framework, OP Financial Group's Corporate Security Principles, and the risk policies of OP Financial Group and the various business divisions. Based on the information it has received, the Board of Directors states that the risk management systems used by OP Financial Group are adequate regarding OP Financial Group's risk profile and strategy.

Risk statement by OP Cooperative's Board of Directors on 5 February 2025

OP Financial Group's mission is to promote the sustainable prosperity, security and wellbeing of its owner-customers and operating region. In fulfilling its mission, OP Financial Group serves its customers by meeting their banking, wealth management and insurance needs.

Risk-taking starts from the fact that the Group mainly assumes risks associated with executing its mission. In all operations, the Group emphasises moderation and careful preparation in risk taking. Credit and insurance risks and maturity transformation risk are highlighted in OP Financial Group's risk profile.

OP Cooperative's Board of Directors affirms that the OP Financial Group's Risk Appetite Statement guidelines, determined by OP Cooperative's Board of Directors and confirmed by the Supervisory Council, clearly describe the bases and preconditions for OP Financial Group's risk-taking. Further, the Board considers the quantitative limits for risk-taking, which the guidelines set, to be in line with the strategy.

The Board of Directors also considers that, by means of the qualitative policies presented in the Risk Appetite Statement and limits, risk-taking capacity is allocated to businesses according to the Group's strategy and risk appetite.

OP Cooperative's Supervisory Council confirmed a number of limits for OP Financial Group for 2024, including the limits for capital adequacy, liquidity and risk appetite. The limits were used to ensure that OP Financial Group or any of its companies does not take excessive risks to endanger OP Financial Group's or its company's capital adequacy, profitability, liquidity and business continuity. The table below shows OP Financial Group's key limits and the actual values of risk-taking metrics based on the 31 December 2024 situation. Throughout the year, OP Financial Group's business risk-taking remained within the limits approved by the Board of Directors and confirmed by the Supervisory Council.

The qualitative principles and quantitative limits decided by the Board of Directors and confirmed by the Supervisory Council are supplemented and specified through other risk management instructions and more detailed risk policies applied by the business divisions. These have been used to ensure that risk-taking at OP Financial Group is based on each business's strategy, and that the company does not take excessive risks to endanger OP Financial Group's or the Group companies' capital adequacy, profitability, liquidity or business continuity.

Limits in accordance with OP Financial Group’s Risk Appetite Statement (RAS)

Limits in accordance with OP Financial Group’s Risk Appetite Statement (RAS)	31 Dec 2024	31 Dec 2023	Limit
Risk-taking capacity			
Common Equity Tier 1 (CET1) ratio, %	21.5	19.2	15.5
Capital adequacy ratio under the Act on the Supervision of Financial and Insurance Conglomerates (FiCo), %	148	144	110
Largest single customer risk / FiCo capital covering customer risks, %	4.0	5.1	10
Liquidity coverage ratio (LCR), %	193	199	120
Net stable funding ratio (NSFR), %	129	130	110
OP Financial Group			
Materialised operational risks (net), € million	9.34	5.47	50
Risk appetite and its allocation: economic capital need / OP Financial Group internal capital, %			
OP Financial Group	29.01	32.25	65.0
Banking in total, of which	22.49	24.78	48.5
Retail Banking	10.09	11.40	24.5
Corporate Banking	9.96	10.91	19.0
Group Treasury	2.15	2.04	4.0
Wealth/asset management	0.29	0.43	1.0
Non-life insurance	5.80	6.28	10.0
Life insurance	2.87	3.52	5.0
Other	0.70	0.68	1.5

EU OVB - Disclosure on governance arrangements

a) The number of directorships held by members of the management body
b) Information regarding the recruitment policy for the selection of members of the management body and their actual knowledge, skills and expertise

OP Cooperative's Board of Directors

The Supervisory Council of OP Financial Group's central cooperative (OP Cooperative) appoints the central cooperative's Board members and the President and Group Chief Executive Officer (who acts as OP Financial Group's CEO) and their deputy. In appointing Board members and the President and Group Chief Executive Officer, the Supervisory Council receives assistance from the Supervisory Council Nomination Committee, which consists of the Chair and Vice Chair of the OP Financial Group Nomination Committee, the Chair and first Vice Chair of the Supervisory Council and the Chair and Vice Chair of the Board of Directors.

The Board of Directors comprises the incumbent President and Group Chief Executive Officer and 9–13 other members appointed by the Supervisory Council. The Bylaws require that a minimum of four members of the Board of Directors must be independent of the central cooperative and other OP Financial Group companies. Board members' non-executive status is assessed in the manner required by the appointment criteria for Board members laid down in the charter of the central cooperative Supervisory Council Nomination Committee. Non-executive criteria are set and assessments conducted in accordance with the Act on Credit Institutions and the EBA and ESMA Guidelines on the assessment of the suitability of members of the management body.

Members of the Board of Directors must have the skills and knowledge required to perform their duties and sufficient knowledge of the financial industry. The Chair of the Board of Directors must have at least ten years of experience in demanding business executive duties, and other members must have at least five years of experience in similar duties or demanding expert duties related to those required of the members of the Board of Directors. The charter of the Supervisory Council Nomination Committee specifies the eligibility criteria applied to the members of the Board of Directors.

As regards governance diversity and how diversity is considered in the selection of the members of the Board of the Directors, please see the section "c) Information on the diversity policy with regard of the members of the management body".

The Board of Directors of OP Cooperative controls and supervises the operations of the central cooperative, the central cooperative consolidated and OP Financial Group. Information of the current Board of Directors can be found: https://www.op.fi/en/op-financial-group/about-us/corporate-governance/board-of-directors.

In 2024, the Board of Directors consisted of the following members:

Jaakko Pehkonen, b. 1960

Chair of the Board as of 1 January 2020

M.Sc. (Econ. & Bus. Adm.), D.Sc. (Econ. & Bus. Adm.), rahoitusneuvos (Finnish honorary title)

Relevant experience:

- University of Jyväskylä 1998: Professor of Economics 1998–
- University of Jyväskylä 1998: First Vice Rector 2010–2012
- University of Jyväskylä 1998: Dean, School of Business and Economics, 1999–2008

Other relevant positions:

- OP Financial Group Research Foundation: Chair of the Board of Directors 2013–2019, Member of the Board of Directors 2009–
- EduCluster Finland: member of the Board of Directors 2018–, Vice Chair of the Board of Directors 2019–2023, Chair of the Board of Directors 2023–
- OP Cooperative: Chair of the Supervisory Board 2013–2019, Member/Vice Chair of the Supervisory Board 2008–2012
- OP Keski-Suomi: Chair of the Board of Directors 2014–2019, Member/Vice Chair of the Board of Directors 2008–2014

Jarna Heinonen, b. 1965

Vice Chair of the Board as of 1 January 2020

M.Sc. (Econ. & Bus. Adm.), D.Sc. (Econ. & Bus. Adm.)

Relevant experience:

- University of Turku, School of Economics: Professor in Entrepreneurship 2008–
- University of Turku, School of Economics: Deputy Head of Department 2014–2020, Head of Department 2021–

Other relevant positions:

- OP Cooperative: Member of the Supervisory Board 2012–2019, Member of the Supervisory Board's Working Committee 2018–2019, Member/Chair of the Supervisory Board's Audit Committee 2012–2018
- OP Turun Seutu: Chair of the Board of Directors 2011–2019, Member of of the Board of Directors 2006–2011
- TOP Säätiö: Chair of the Board of Trustees 2017–, member of the Board of Trustees 2011–

Matti Kiuru, b. 1963

Member of the Board as of 1 January 2024

M.Sc. (Econ. & Bus. Adm.), eMBA

Previous Experience:

- OP Länsi-Suomi: Managing Director 2017–
- OP Länsi-Suomi: Bank Director/Sales Director 2006–2017
- Porin Seudun Osuuspankki: Bank Director/Sales Director 1989–2005

Other relevant positions:

- OP Cooperative: Member of the Supervisory Council 2021–2023
- Satakunta University Foundation: Vice Chair of the Board of Directors 2017–
- Western Finland Diaconia Institute and Diakon Oy: Member of the Board of Directors 2017–
- OP's employer association OPTA ry: Member of the Board of Directors 2021–2023, Chair 2023

Katja Kuosa-Kaartti, b. 1973

Member of the Board as of 1 January 2024

M.Sc. (Econ. & Bus. Adm.), Authorised Public Accountant and Auditor, Certified Board Member

Previous Experience:

- Tilintarkastus Kuosa-Kaartti Oy: Authorised Public Accountant and Auditor 2014–
- Tilintarkastus ja Talouspalvelut Kuosa-Kaartti: Authorised Public Accountant and Auditor 2003–2014
- Tokmanni Group Oyj: Financial Manager 2010–2012
- Kemppi Group Oy: Various financial management positions, most recently Financial Manager 2002–2010
- KPMG Wideri Oy Ab: Auditor 1996–2002

Other relevant positions:

- OP Cooperative: Member of the Supervisory Council 2016–2023, member of the Audit Committee of the Supervisory Council 2016–2019
- Ylä-Uudenmaan Osuuspankki: Chair of the Board of Directors 2023
- Orimattilan Osuuspankki: Chair of the Board of Directors 2013–2022, member of the Board of Directors 2008–2013
- OP-Eläkesäätiö pension foundation: Member of the Supervisory Council 2020–2023
- OP Bank Group Pension Fund: Chair of the Representative Assembly 2020–2022

Kati Levoranta, b. 1970

Member of the Board as of 1 January 2020

LL.M, Trained on the bench, LL.M, MBA

Relevant experience:

- P2X Solutions Oy: Executive Vice President,Chief Operational Officer 2023–
- P2X Solutions Oy: Executive Vice President, operational and commercial activities 2021–2022
- Rovio Entertainment Corporation: Chief Executive Officer 2016–2020
- Rovio Entertainment: Chief Legal Officer 2012–2015

- Nokia Siemens Networks Oy: Various positions 2007–2012
- Nokia Corporation: Legal Counsel 2005–2007

Other relevant positions:

- Finavia Corporation: Member of the Board of Directors 2021–, Chair of the Board of Directors 2022–
- Juuri Partners Oy: Member of the Board of Directors 2020–
- Central Chamber of Commerce: Member of the Board of Directors 2016–2020

Pekka Loikkanen, b. 1959

Member of the Board as of 1 January 2020

M.Sc. (Econ. & Bus. Adm.)

Relevant experience:

- PricewaterhouseCoopers Oy: Partner 2000–2020
- PricewaterhouseCoopers Oy: Regional Director 1997–2017, Accountant 1988–1992, Authorised Public Accountant (KHT) 1993–2020

Other relevant positions:

- BLC Turva Oy: Member of the Board of Directors 2021–
- Savonlinna BLC-osuuskunta: Member of the Board of Directors 2022–
- KPY Cooperative, member of the Board of Directors and Vice Chair 2022–
- Tanhuvaaran säätiö sr: Member of the Board of Directors 2021–

Tero Ojanperä, b. 1966

Member of the Board as of 1 July 2020

M.Sc. (Computer Science), Ph.D. (Electrical Engineering)

Relevant experience:

- Aalto University, Professor of Practice 2020–
- Silo AI Ltd: CEO 2017–2019
- Visionplus Fund: Founding Partner, Managing Partner 2012–2017
- Nokia Corporation: Executive Vice President, Consumer Internet Services; Chief Technology Officer, Chief Strategy Officer, Member of the Nokia Group Executive Board 2005–2011; Head of Nokia Research Center, Vice President at Nokia Networks, and various other expert and management positions 1990–2004

Other relevant positions:

- Fintraffic: Chair of the Board of Directors 2021–
- Betolar Oy: Chair of the Board of Directors 2020–2023, Vice Chair of the Board of Directors 2023–
- Siili Solutions Plc: Member of the Board of Directors 2020–
- Silo AI Ltd: Chair of the Board of Directors 2019–2024
- DNA Plc: Member of the Board of Directors 2014–2021
- Bittium Corporation: Member of the Board of Directors 2017–2019
- Veikkaus Ltd: Member of the Board of Directors, 2013–2017
- Tampere University of Technology: Chair of the Board of Directors, 2012–2018

Riitta Palomäki, b. 1957

Member of the Board as of 1 January 2020

M.Sc. (Econ. & Bus. Adm.)

Relevant experience:

- Uponor Corporation: CFO 2009–2017
- Kuusakoski Group Oy: CFO 2003–2009

Other relevant positions:

- Nordic Waterproofing Holding A/S: Member of the Board of Directors and Chair of the Audit Committee 2016–
- OP Cooperative: Member of the Supervisory Board 2017–2019, Member/Chair of the Audit Committee 2017–2019
- HKScan Corporation: Member of the Board of Directors and Chair of the Audit Committee 2017–2018
- Componenta Corporation: Member of the Board of Directors and Chair of the Audit Committee 2012–2017

Timo Ritakallio, b. 1962

Member of the Board as of 1 January 2020

D.Sc. (Tech.), LL.M., MBA

Relevant experience:

- OP Financial Group: President and Group Chief Executive Officer 2018–
- Ilmarinen Mutual Pension Insurance Company: President and CEO 2015–2018, Deputy CEO 2008–2014
- OP Financial Group: various positions 1993–2008

Other relevant positions:

- OP Corporate Bank plc: Chair of the Board of Directors 2018–
- Pohjola Insurance: Chair of the Board of Directors 2018–
- Kesko Corporation: Member of the Board of Directors 2021–
- Confederation of Finnish Industries: Member of the Board of Directors and Executive Committee 2020–2021
- Central Chamber of Commerce: Member of the Board of Directors 2019–2021, Chair of the Board of Directors 2022–
- Finance Finland: Member/Vice Chair of the Board of Directors 2017–2019, 2022–, Chair of the Board of Directors 2020–2021
- Finnish Olympic Committee: Chair of the Board of Directors 2016–2020
- Securities Market Association: Member/Chair of the Board of Directors 2014–2022

Petri Sahlström, b. 1971

Member of the Board as of 1 January 2022

M.Sc. (Econ.), D.Sc. (Econ.)

Relevant experience:

- University of Oulu: Professor of Accounting and Finance 2005–, Dean 2011–2017, Vice Dean 2010–2011, Head of Department 2008–2011
- University of Vaasa: Professor of Accounting and Finance 2003–2005, Head of Department 2003–2005

Other relevant positions:

- Oulu Chamber of Commerce: Member of the Economy and Legislation Committee, 2016–, Member of the Audit Committee 2010–2015
- OP Cooperative: Member of the Supervisory Council 2020–2021, Member of the Supervisory Board, 2016–2019, Member of the Supervisory Board's Risk Management Committee 2017–2019
- Oulun Osuuspankki: Board member 2011–2021, Chair of the Board of Directors 2018–2021
- Association of Business Schools in Finland: Chair, 2014–2016
- The Finnish Shareholders Association: Board member 2011–2016

Olli Tarkkanen, b. 1962

Member of the Board from 1 January 2020 to 31 December 2024

Master of Laws (LL.M.), eMBA

Relevant experience:

- OP Etelä-Pohjanmaa: Managing Director 2010–
- OP Iisalmi: Managing Director 2005–2010
- OP Etelä-Pohjanmaa: Finance Director 2004–2005
- OP Etelä-Pohjanmaa: Area Manager 2003–2004, Bank Lawyer 1999–2003

Other relevant positions:

- South Ostrobothnia Chamber of Commerce: Member of the Business and Industry Committee 2016–
- OP Cooperative: Second Vice Chair of the Supervisory Board 2016–2019; Member of the Supervisory Board and its Working Committee 2015–2019

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

OP Financial Group has a long-term approach to planning the composition of governing bodies. Effective work in governing bodies requires that their members have sufficiently diverse expertise, skills and experience.

In preparing the selection of members of the governing bodies, attention is paid to the person's added value to the body's composition in terms of, for example, fostering adequate diversity. Diversity is fostered by ensuring that candidates have a wide range of knowledge, skills and experience, and that various regions, genders and age groups are represented on OP's governing bodies.

New provisions have been added to the Limited Liability Companies Act regarding the gender distribution target of the boards of listed companies and its calculation principles. Corresponding regulations have been introduced in the Finnish Corporate Governance Code (2025). OP Financial Group's diversity principles were updated on 10 December 2024 to correspond with the gender distribution calculation principles of the Limited Liability Companies Act and the Corporate Governance Code.

The aim is that the Boards of Directors of OP cooperative banks, OP Cooperative and its credit institution subsidiaries and Pohjola Insurance and the Supervisory Councils of OP cooperative banks and OP Cooperative are represented by both genders at least on a 60/40% basis. The gender distribution of governing bodies is calculated using the rounding principles given in the table for calculating the gender distribution of boards of directors of listed companies, as provided in the Limited Liability Companies Act and the Corporate Governance Code. The Boards of Directors of other significant subsidiaries of OP Cooperative shall have representation from both genders.

With respect to the governing bodies of OP cooperative banks and subsidiaries of OP Cooperative, the above targets must be met by 30 June 2026, with the exception of OP cooperative banks involved in merger projects. Governing bodies formed as a result of a merger of OP cooperative banks must meet the gender diversity targets within a three-year transition period after the execution of the merger. To achieve this goal, among candidates with equal strengths in terms of skills and experience, the person who represents a gender that is in minority on the governing body is appointed a member of the management body.

In 2024, men made up 56% and women 44% of the members of the Supervisory Council of OP Cooperative, the central cooperative of OP Financial Group (in 2023: 61% and 39%, respectively). In the Board of Directors, 60% were men and 40% women (in 2023: 64% and 36%, respectively).

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

Risk Committee

The Risk Committee's legal and statutory duties include:

- assisting the Board of Directors in matters relating to the central cooperative's and the entire OP Financial Group's risk strategy and risk-taking, and in supervising compliance with the risk strategy determined by the Board of Directors
- assessing whether the prices charged for services that tie the capital of OP Financial Group's companies are in line with the company's business model and risk strategy and, if this is not the case, drawing up a plan to make corrections which is to be submitted for approval by the Board of Directors
- assisting the Remuneration Committee in establishing sound remuneration schemes, and assessing whether the remuneration schemes promote taking into account the company's risks and capital and liquidity requirements, as well as revenue allocation and probability.

To carry out its duties, the Committee, among other things:

- supervises the adequacy of the business's internal control, independent risk management and compliance, operational efficiency and reliability, and compliance with principles governing these operations.

Risk Committee's composition and meetings in 2024

- Pekka Loikkanen, Chair
- Petri Sahlström, Vice Chair
- Riitta Palomäki, member

In 2024, the Risk Committee had nine (9) meetings. The average attendance rate of its members stood at 100%. For more detailed information on members' attendance at meetings, see OP Financial Group's Remuneration Report for Governing Bodies.

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

At OP Financial Group, OP Cooperative's Board of Directors is the most important decision-making body for duties related to risk management. OP Cooperative's Supervisory Council confirms the decisions by the Board of Directors that apply to OP Financial Group's risk appetite. The Risk Committee of the Board of Directors assists the Board of Directors in performing duties related to risk-taking and risk management. Based on the decision by the President and Group Chief Executive Officer, the Executive Management Team has set up a Risk Management Committee, Steering and Compliance Committee and Banking ALM Committee that approve instructions and policy descriptions specifying the RAS and the RAF. The risk management-related tasks of various bodies are described in more detail in their respective charters.

The principles for the arrangement of OP Financial Group's risk management set by OP Cooperative's Board of Directors and prepared by OP Cooperative's senior management are as follows:

- Strategy and OP Financial Group's Risk Appetite Statement (RAS): The Risk Appetite Statement outlines and gives grounds for the risks each business is ready to take, and to what extent. Businesses are obliged to operate within the limits of these restrictions. If there is a need to change a business strategy quickly and this change has direct effects on risk-taking, the senior management ensures that the Chief Risk Officer is informed of the need to prepare changes in the instructions on risk-taking.
- Division of responsibilities: Senior management decides on how risk-taking responsibilities are divided. The Group defines what risks different revenue logics (product and service packages) can take and any potential elaborations on what risks legal entities and various functions can take within the revenue logics. Principles and decisions on the division of responsibilities between company roles prevent uncontrolled risk accumulation by ensuring that risks are diversified.
- Governance structures provide the basis on which key principles guide operations and the related policies, and operating instructions are appropriately prepared and resolved. In addition, governance structures provide a basis for the proper assessment and supervision of the quality, scope and complexity of each activity by expert, business-independent parties, in addition to the business's own monitoring. Senior management must ensure the maintenance and development of sufficient resourcing and expertise for the monitoring functions of the first, second and third line of defence.
- The Risk Appetite Framework (RAF): OP Financial Group's RAF defines the general strategic intents of the risk management process. The RAF steers senior management on how it must organise the risk management process at OP Financial Group.
- Joint and several liability: Control of joint and several liability between the central cooperative and member banks is based on the document, Principles of Corporate Governance as Required under Joint and Several Liability.
- Remuneration principles: OP Financial Group's remuneration schemes are built in line with the Group's mission, values and targets. Remuneration must not incentivise unnecessary risk-taking contrary to the risk appetite set by management, or against the customer's interests. Remuneration is based on the same risk measurement methods as e.g. capital and liquidity adequacy assessment processes whether this includes the setting of remuneration and any risk adjustments made before its payment.
- Internal control, good business practices and corporate security: Principles of internal control, good corporate governance and good business practices and corporate security also set preconditions for practices.

In 2024, the key areas of development included: 1) Increasing the predictability of capital adequacy assessment; 2) Ensuring the quality of capital adequacy calculation for market risk and preparing for changes in regulation concerning market risk; 3) Improving the discriminatory power and accuracy of credit risk measurement using new internal credit risk models; 4) Improving the clarity and effectiveness of risk reporting; 5) Developing security management reporting; 6) Developing the ICT infrastructure architecture of risk management; 7) Testing the plans of the confirmed resolution strategy, describing in more detail the practical implementation of a merger in resolution, speeding up liquidity reporting and improving data quality.

Credit risk

EU CR4 - Standardised approach - Credit risk exposure and CRM effects

31 Dec 2024, EUR million		Exposures before CCF and before CRM		Exposures post CCF and post CRM		RWAs and RWAs density	
		On-balance-sheet exposures	Off-balance-sheet exposures	On-balance-sheet exposures	Off-balance-sheet exposures	RWAs	RWAs density (%)
		a	b	c	d	e	f
1	Central governments or central banks	20,742	501	25,448	238	469	1.83
2	Regional government or local authorities	3,667	950	4,437	313	17	0.36
3	Public sector entities	52	24	75	1	15	20.30
4	Multilateral development banks	741		840	2		
5	International organisations	886		886			
6	Institutions	1,315	840	827	307	313	27.65
7	Corporates	24,494	15,556	22,193	4,536	24,977	93.45
8	Retail	15,750	8,239	12,800	1,072	9,960	71.80
9	Secured by mortgages on immovable property	54,478	774	54,478	348	19,078	34.80
10	Exposures in default	2,103	159	1,820	44	2,024	108.55
11	Exposures associated with particularly high risk	808	323	801	160	1,442	150.00
12	Covered bonds	6,973		6,973		697	10.00
13	Institutions and corporates with a short-term credit assessment						
14	Collective investment undertakings	9	3	9	3	142	1250.00
15	Equity	2,384		2,384		2,384	100.00
16	Other items	1,180		1,180		918	77.80
17	**Total**	**135,579**	**27,368**	**135,151**	**7,024**	**62,438**	**43.92**

Central government exposures include deferred tax assets which have not been deducted from the Group's own funds; these are treated with a risk weight of 250%. RWAs decreased during the year.

31 Dec 2023, EUR million		Exposures before CCF and before CRM		Exposures post CCF and post CRM		RWAs and RWAs density	
		On-balance-sheet exposures	Off-balance-sheet exposures	On-balance-sheet exposures	Off-balance-sheet exposures	RWAs	RWAs density (%)
		a	b	c	d	e	f
1	Central governments or central banks	22,002	469	26,390	190	474	1.78
2	Regional government or local authorities	2,938	938	3,763	281	19	0.48
3	Public sector entities	47	25	73	1	15	20.31
4	Multilateral development banks	568		708	2		
5	International organisations	708		708			
6	Institutions	1,129	1,094	807	467	369	28.98
7	Corporates	25,980	15,959	23,590	4,680	27,004	95.52
8	Retail	16,152	7,164	13,223	995	10,174	71.55
9	Secured by mortgages on immovable property	53,455	782	53,455	422	18,988	35.24
10	Exposures in default	2,321	186	2,014	56	2,308	111.48
11	Exposures associated with particularly high risk	919	443	911	220	1,697	150.00
12	Covered bonds	6,084		6,084		608	10.00
13	Institutions and corporates with a short-term credit assessment						
14	Collective investment undertakings	14	3	14	3	201	1250.00
15	Equity	2,410		2,410		2,410	100.00
16	Other items	1,179		1,179		907	76.92
17	**Total**	**135,905**	**27,065**	**135,331**	**7,317**	**65,175**	**45.69**

EU CR5 - Standardised approach

		Risk weight																
		0%	2%	4%	10%	20%	35%	50%	70%	75%	100%	150%	250%	370%	1250%	Others	Total	Of which unrated
31 Dec 2024, EUR million		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q
1	Central governments or central banks	25,498											188				25,686	
2	Regional government or local authorities	4,665				86											4,751	
3	Public sector entities					76		1									76	1
4	Multilateral development banks	842															842	
5	International organisations	886															886	
6	Institutions	89				725		302			17	0					1,133	82
7	Corporates	134				85		686			25,824						26,729	21,410
8	Retail									13,872							13,872	
9	Secured by mortgages on immovable property						47,876	6,949									54,825	
10	Exposures in default										1,546	319					1,864	
11	Exposures associated with particularly high risk											961					961	
12	Covered bonds	0			6,973												6,973	
13	Institutions and corporates with a short-term credit assessment																	
14	Collective investment undertakings														11		11	
15	Equity										2,384						2,384	
16	Other items										592					588	1,180	
17	**Total**	32,115			6,973	971	47,876	7,938		13,872	30,362	1,280	188		11	588	142,174	21,493

Exposure amounts were stable during the year.

In its capital adequacy measurement for credit risk under the Standardised Approach to determine the exposure's risk weight, OP Financial Group applies credit ratings by Moody's Investors Service, Fitch Ratings or Standard & Poor's Financial Services. External credit rating determines the receivable's credit rating category, which in turn determines the applicable risk weight. In case counterparty or exposure has two external credit ratings, the lower of the two is used. In case counterparty or exposure has three external credit ratings, the middle one is used. The security-specific credit rating of the issue programme or arrangement to which the receivable belongs is used, if available. If such a rating is not available, the issuer's general credit rating will be used, provided that it is available. External credit ratings are generally available for sovereign counterparties, institutions, corporates and covered bonds.

		Risk weight																
		0%	2%	4%	10%	20%	35%	50%	70%	75%	100%	150%	250%	370%	1250%	Others	Total	Of which unrated
31 Dec 2023, EUR million		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q
1	Central governments or central banks	26,390											190				26,580	
2	Regional government or local authorities	3,948				97											4,045	
3	Public sector entities					73		1									73	
4	Multilateral development banks	710															710	
5	International organisations	708															708	
6	Institutions	123				762		345			45	0					1,275	233
7	Corporates					217		558			27,495						28,270	24,208
8	Retail									14,218							14,218	
9	Secured by mortgages on immovable property						46,736	7,141									53,877	
10	Exposures in default										1,595	475					2,071	
11	Exposures associated with particularly high risk											1,131					1,131	
12	Covered bonds				6,084												6,084	
13	Institutions and corporates with a short-term credit assessment																	
14	Collective investment undertakings														16		16	
15	Equity										2,410						2,410	
16	Other items										595					584	1,179	
17	**Total**	**31,879**			**6,084**	**1,148**	**46,736**	**8,045**		**14,218**	**32,140**	**1,606**	**190**		**16**	**584**	**142,647**	**24,441**

Table has been amended following its initial disclosure.

EU CRD - Qualitative disclosure requirements related to standardised model

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

In its capital adequacy measurement for credit risk under the Standardised Approach to determine the exposure's risk weight, OP Financial Group applies credit ratings by Moody's Investors Service, Fitch Ratings or Standard & Poor's Financial Services. There were no changes over the disclosure period.

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

Central governments or central banks, Regional government or local authorities, Public sector entities, Multilateral development banks, International organisations, Institutions, Corporates, Covered bonds, Exposures to institutions and corporates with a short-term credit assessment.

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

External credit rating determines the receivable's credit rating category (credit quality step), which in turn determines the applicable risk weight. In case counterparty or exposure has two external credit ratings, the lower of the two is used. In case counterparty or exposure has three external credit ratings, the middle one is used.

The security-specific credit rating of the issue programme or arrangement to which the receivable belongs is used, if available. If such a rating is not available, the issuer's general credit rating will be used, provided that it is available.

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

N/A. The nominated ECAIs comply with the standard association published by the EBA.

EU CRC - Qualitative disclosure requirements related to CRM techniques

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

Financial assets and liabilities are offset in the balance sheet if OP Financial Group currently has a legally enforceable right of set-off in the normal course of business and in the event of default, insolvency or bankruptcy, and intends to settle the asset and liability on a net basis.

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

OP has guidelines and processes to ensure legal certainty and evaluation principles of collaterals. Collateral valuations are typically based on market value, real estate and comparable (housing shares) being typical collateral. Capital adequacy is based on these market values which are subject to haircuts which are assessed annually. Collateral portfolio is monitored at least on an annual basis. Housing collateral and collaterals for non-performing exposures are subject to more frequent monitoring. Housing collateral monitoring is based on housing price indexes.

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

Under the SA, OP Financial Group utilises the following collaterals specified in the capital adequacy regulations: residential and commercial buildings and shares entitling their holders to the possession of a residential or commercial apartment, deposits and securities (equities). Deposits and securities are financial collateral, as referred to in the regulatory framework, and alternative methods are available for their accounting treatment. OP Financial Group has treated financial collateral in the above approaches using the so-called comprehensive method and volatility adjustments given by the regulation. Only approved guarantors specified in the capital adequacy regulations may be used, such as guarantees granted by the Finnish State and other states, and those granted by municipalities and banks. Credit derivatives, offsetting balance-sheet or off-balance-sheet items were not used in credit risk mitigation.

Residential buildings and shares entitling their holders to the possession of an apartment in Finland pledged as collateral constitute the largest collateral type used in capital adequacy. The effect of other physical and financial collaterals on the capital adequacy of credit risks is much less significant.

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

Guarantees used as credit risk mitigation have been provided by a number of sources, the largest single one being the State of Finland.

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

Collateral risk concentrations are monitored at least annually. Significant collateral risk concentrations have not arisen in the monitoring process.

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

31 Dec 2024, EUR million		Unsecured carrying amount	Secured carrying amount	Of which secured by collateral	Of which secured by financial guarantees	Of which secured by credit derivatives
		a	b	c	d	e
1	Loans and advances	37,931	79,452	73,297	6,156	
2	Debt securities	5,603	8,094	6,973	1,121	
3	**Total**	**43,534**	**87,546**	**80,270**	**7,276**	
4	Of which non-performing exposures	277	2,147	1,959	188	
EU-5	Of which defaulted	268	2,113			

In the table all collaterals relating to the exposures have been presented. Relevant ECL has been deducted from the carrying amounts.

31 Dec 2023, EUR million		Unsecured carrying amount	Secured carrying amount	Of which secured by collateral	Of which secured by financial guarantees	Of which secured by credit derivatives
		a	b	c	d	e
1	Loans and advances	39,193	79,706	73,755	5,951	
2	Debt securities	5,380	6,907	6,084	822	
3	**Total**	**44,573**	**86,612**	**79,839**	**6,773**	
4	Of which non-performing exposures	369	2,240	2,070	170	
EU-5	Of which defaulted	353	2,147			

EU CR1-A - Maturity of exposures

		a	b	c	d	e	f
				Net exposure value			
31 Dec 2024, EUR million		On demand	<= 1 year	> 1 year <= 5 years	> 5 years	No stated maturity	Total
1	Loans and advances		3,523	25,963	68,350	6,673	104,509
2	Debt securities		679	7,739	4,610	0	13,029
3	**Total**		**4,202**	**33,702**	**72,960**	**6,673**	**117,538**

Cash balances at central banks (18 billion) are not included to the table.

		a	b	c	d	e	f
				Net exposure value			
31 Dec 2023, EUR million		On demand	<= 1 year	> 1 year <= 5 years	> 5 years	No stated maturity	Total
1	Loans and advances		4,382	24,807	68,001	7,285	104,475
2	Debt securities		788	6,518	4,432	2	11,740
3	**Total**		**5,171**	**31,324**	**72,433**	**7,288**	**116,216**

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							Collaterals 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			Accumu-lated partial write-off	On perfor-ming expo-sures	On non-perfor-ming expo-sures
31 Dec 2024, EUR million			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			
005	Cash balances at central banks and other demand deposits	18,024	18,024													
010	Loans and advances	97,227	84,982	12,220	2,907	33	2,702	-290	-82	-207	-485	-3	-438	-139	77,305	2,147
020	Central banks	567	567													
030	General governments	2,802	2,798	4				0	0	0					321	
040	Credit institutions	79	79	0				0	0	0					1	
050	Other financial corporations	2,018	1,634	384	6		6	-5	-1	-4	-3		-3	-2	1,677	2
060	Non-financial corporations	37,630	32,785	4,834	944	12	810	-152	-44	-107	-247	-2	-208	-75	27,065	669
070	Of which: SMEs	18,063	15,694	2,358	738	10	647	-70	-11	-59	-173	-2	-142	-54	16,982	549
080	Households	54,132	47,119	6,998	1,957	21	1,886	-133	-36	-96	-235	-1	-227	-63	48,241	1,476
090	Debt Securities	13,696	13,571	125	5		5	-2	-1	-1	-2		-2		8,094	
100	Central banks															
110	General governments	3,948	3,948					0	0						273	
120	Credit institutions	9,055	9,055					0	0						7,821	
130	Other financial corporations	122	113	8				0	0	0						
140	Non-financial corporations	570	454	116	5		5	-2	0	-1	-2		-2			
150	Off-balance sheet exposures	27,320	26,140	1,180	214	22	193	21	8	13	24	0	24		3,355	75
160	Central banks															
170	General governments	1,689	1,680	9				0	0	0					41	
180	Credit institutions	802	802					0	0						6	
190	Other financial corporations	950	943	7	2		2	0	0	0	0		0		79	0
200	Non-financial corporations	16,278	15,291	988	181	21	160	20	7	13	24	0	24		2,685	71
210	Households	7,601	7,425	176	32	0	31	0	0	0	0	0	0		545	4
220	Total	156,268	142,717	13,524	3,126	55	2,899	-312	-91	-221	-512	-3	-464	-139	88,755	2,222

		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							Collaterals 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					
31 Dec 2023, EUR million			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	Accumulated partial write-off	On performing exposures	On non-performing exposures
005	Cash balances at central banks and other demand deposits	19,797	19,797													
010	Loans and advances	96,797	81,251	15,528	3,186	29	2,989	-302	-61	-241	-580	0	-527		77,466	2,240
020	Central banks	593	593													
030	General governments	1,925	1,915	10	0		0	-2	0	-2	0		0		225	
040	Credit institutions	77	77					0	0						13	
050	Other financial corporations	2,519	2,158	361	8		7	-6	-2	-4	-6		-6		1,994	1
060	Non-financial corporations	37,822	31,385	6,428	1,142	15	1,010	-190	-46	-144	-304	0	-258		26,827	676
070	Of which: SMEs	17,399	13,713	3,678	819	5	701	-83	-12	-71	-222	0	-180		16,152	545
080	Households	53,862	45,124	8,728	2,036	14	1,971	-104	-13	-91	-270	0	-263		48,406	1,563
090	Debt Securities	12,286	12,221	65	3		3	-2	-1	-1	-1		-1		6,907	
100	Central banks															
110	General governments	3,418	3,418					0	0						260	
120	Credit institutions	7,798	7,798					0	0						6,588	
130	Other financial corporations	185	178	7				0	0	0						
140	Non-financial corporations	884	827	58	3		3	-1	-1	0	-1		-1		59	
150	Off-balance sheet exposures	26,989	25,280	1,709	248	8	240	16	4	11	29	0	29		4,991	75
160	Central banks															
170	General governments	1,743	1,696	46	0		0	0	0						136	
180	Credit institutions	1,078	1,078					0	0						39	
190	Other financial corporations	892	871	21	2		2	0	0	0					113	
200	Non-financial corporations	16,745	15,315	1,431	219	7	212	16	4	11	28	0	28		4,109	69
210	Households	6,531	6,320	211	28	0	27	0	0	0	0		0		593	6
220	Total	155,869	138,549	17,302	3,438	37	3,232	-320	-66	-253	-609	0	-556	0	89,363	2,315

Template has been amended following its initial disclosure.

Non-performing exposures decreased during the year.

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

31 Dec 2024, EUR million		a Gross carrying amount
010	Initial stock of non-performing loans and advances 31 Dec 2023	3,186
020	Inflows to non-performing portfolios	1,213
030	Outflows from non-performing portfolios	-1,492
040	Outflows due to write-offs	-220
050	Outflow due to other situations	-1,273
060	**Final stock of non-performing loans and advances 31 Dec 2024**	**2,907**

31 Dec 2023, EUR million		a Gross carrying amount
010	Initial stock of non-performing loans and advances 31 Dec 2022	2,573
020	Inflows to non-performing portfolios	2,358
030	Outflows from non-performing portfolios	-1,745
040	Outflows due to write-offs	-93
050	Outflow due to other situations	-1,652
060	**Final stock of non-performing loans and advances 31 Dec 2023**	**3,186**

Outflows due to other situations are non-performing loans and advances that are repaid or cured and reclassified as performing.

EU CQ1 - Credit quality of forborne exposures

31 Dec 2024, EUR 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	
		Performing forborne	Non-performing forborne			On performing forborne exposures	On non-performing forborne exposures		Of which collateral and financial guarantees received on non-performing exposures with forbearance measures
				Of which defaulted	Of which impaired				
10	Loans and advances	3,354	1,596	1,573	1,589	-44	-235	4,152	1,261
50	Other financial corporations	11				-2		8	
60	Non-financial corporations	1,016	506	502	504	-26	-133	1,132	363
70	Households	2,327	1,090	1,071	1,084	-16	-103	3,012	898
90	Loan commitments given	133	56	56	53	6	6	59	34
100	**Total**	**3,487**	**1,652**	**1,629**	**1,642**	**-50**	**-241**	**4,211**	**1,295**

31 Dec 2023, EUR 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	
		Performing forborne	Non-performing forborne			On performing forborne exposures	On non-performing forborne exposures		Of which collateral and financial guarantees received on non-performing exposures with forbearance measures
				Of which defaulted	Of which impaired				
010	Loans and advances	3,324	1,661	1,625	1,655	-18	-250	4,387	1,296
050	Other financial corporations	1	0	0	0	0	0	1	0
060	Non-financial corporations	534	443	441	441	-8	-135	751	276
070	Households	2,789	1,218	1,184	1,213	-10	-115	3,635	1,020
090	Loan commitments given	10	29	29	25	0	4	12	6
100	**Total**	**3,334**	**1,690**	**1,654**	**1,680**	**-18**	**-254**	**4,399**	**1,302**

EU CQ4 - Quality of non-performing exposures by geography

31 Dec 2024, EUR million		a	b	c	d	e	f	g
		Gross carrying/nominal amount						
			Of which non-performing					
				Of which defaulted	Of which subject 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**	**113,835**	**2,912**	**2,863**	**113,834**	**-779**		
020	Finland	96,644	2,837	2,791	96,644	-730		
030	Rest of EU	7,339	4	3	7,339	-2		
040	Other Nordic countries	3,325	52	51	3,325	-24		
050	Baltic States	3,010	13	12	3,010	-22		
060	Other	3,239	1	1	3,239	0		
070	Rest of Europe	116	2	2	116	0		
080	Asia	119	1	1	119	0		
90	USA	41	2	2	41	0		
100	**Off-balance-sheet exposures**	**27,534**	**214**	**208**			**45**	
110	Finland	23,900	176	172			39	
120	Rest of EU	692	2	0			0	
130	Other Nordic countries	1,212	32	31			3	
140	Baltic States	1,347	5	5			3	
150	Other	79	0	0			0	
160	Rest of Europe	53	0	0			0	
170	Asia	236	0	0			0	
180	USA	15	0	0			0	
190	**Total**	**141,369**	**3,126**	**3,071**	**113,834**	**-779**	**45**	

Cash balances at central banks (18 billion) are not included to the table.

		a	b	c	d	e	f	g
			Gross carrying/nominal amount					
			Of which non-performing					
31 Dec 2023, EUR million				Of which defaulted	Of which subject 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
10	**On-balance-sheet exposures**	**112,273**	**3,190**	**3,070**	**112,272**	**-885**		
20	Finland	96,263	3,085	2,968	96,262	-844		
30	Rest of EU	7,028	6	4	7,028	-3		
40	Other Nordic countries	3,022	74	74	3,022	-21		
50	Baltic States	2,966	16	16	2,966	-17		
60	Other	2,717	1	1	2,717	0		
70	Rest of Europe	118	3	3	118	0		
80	Asia	120	0	0	120	0		
90	USA	40	3	3	40	0		
100	**Off-balance-sheet exposures**	**27,237**	**248**	**242**			**44**	
110	Finland	23,298	203	196			33	
120	Rest of EU	719	0	0			0	
130	Other Nordic countries	1,069	37	37			3	
140	Baltic States	1,457	9	9			9	
150	Other	145	0	0			0	
160	Rest of Europe	61	0	0			0	
170	Asia	451	0	0			0	
180	USA	36	0	0			0	
190	**Total**	**139,510**	**3,438**	**3,312**	**112,272**	**-885**	**44**	

This table has been amended following its initial disclosure.

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

31 Dec 2024, EUR million		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	1,247	51	48	1,247	-17	
020	Mining and quarrying	147	5	5	147	-4	
030	Manufacturing	3,799	103	99	3,799	-59	
040	Electricity, gas, steam and air conditioning supply	4,302	14	14	4,302	-8	
050	Water supply	370	3	3	370	-1	
060	Construction	1,813	225	224	1,813	-115	
070	Wholesale and retail trade	3,528	69	68	3,528	-46	
080	Transport and storage	1,557	31	30	1,556	-11	
090	Accommodation and food service activities	249	26	25	249	-6	
100	Information and communication	1,092	17	16	1,092	-8	
110	Financial and insurance actvities	1,942	20	20	1,942	-21	
120	Real estate activities	15,295	289	288	15,295	-60	
130	Professional, scientific and technical activities	1,687	23	23	1,687	-13	
140	Administrative and support service activities	890	31	31	890	-10	
150	Public administration and defense, compulsory social security	66			66	0	
160	Education	35	1	1	35	0	
170	Human health services and social work activities	335	11	10	335	-4	
180	Arts, entertainment and recreation	149	24	24	149	-13	
190	Other services	71	2	2	71	-1	
200	**Total**	**38,574**	**944**	**931**	**38,573**	**-399**	

Loans and advances subject to impairment include financial assets at amortised cost and financial assets at fair value through other comprehensive income.

31 Dec 2023, EUR million		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
10	Agriculture, forestry and fishing	1,361	70	69	1,360	-30	
20	Mining and quarrying	122	6	6	122	-3	
30	Manufacturing	3,840	197	189	3,840	-81	
40	Electricity, gas, steam and air conditioning supply	4,677	15	15	4,677	-6	
50	Water supply	282	3	3	282	-1	
60	Construction	2,345	228	228	2,345	-134	
70	Wholesale and retail trade	3,979	88	85	3,979	-49	
80	Transport and storage	1,592	32	31	1,592	-12	
90	Accommodation and food service activities	271	29	29	271	-8	
100	Information and communication	1,174	15	14	1,174	-8	
110	Financial and insurance actvities	1,603	10	10	1,603	-5	
120	Real estate activities	14,803	366	363	14,803	-112	
130	Professional, scientific and technical activities	1,487	18	18	1,487	-14	
140	Administrative and support service activities	793	25	25	793	-10	
150	Public administration and defense, compulsory social security	32			32	0	
160	Education	37	1	1	37	0	
170	Human health services and social work activities	314	9	9	314	-5	
180	Arts, entertainment and recreation	151	28	28	151	-14	
190	Other services	102	2	2	102	-2	
200	**Total**	**38,964**	**1,142**	**1,126**	**38,963**	**-494**	

EU CQ7 - Collateral obtained by taking possession and execution processes

31 Dec 2024, EUR million		a	b
		Collateral obtained by taking possession	
		Value at initial recognition	Accumulated negative changes
010	Property, plant and equipment (PP&E)	0	
020	Other than PP&E	41	-40
040	Commercial Immovable property	5	-5
050	Movable property (auto, shipping, etc.)	36	-35
080	**Total**	**41**	**-40**

31 Dec 2023, EUR million		a	b
		Collateral obtained by taking possession	
		Value at initial recognition	Accumulated negative changes
010	Property, plant and equipment (PP&E)	0	0
020	Other than PP&E	33	-32
040	Commercial Immovable property	5	-4
050	Movable property (auto, shipping, etc.)	29	-28
080	**Total**	**33**	**-32**

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

	a	b	c	d	e	f	g	h	i	j	k	l
	Gross carrying amount/nominal amount											
	Performing exposures			Non-performing exposures								
31 Dec 2024, EUR million		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	18,024	18,024										
010 Loans and advances	97,227	97,133	94	2,907	2,341	100	136	149	113	34	34	2,859
020 Central banks	567	567										
030 General governments	2,802	2,802	0									
040 Credit institutions	79	79										
050 Other financial corporations	2,018	2,018		6	5	0		0	0			5
060 Non-financial corporations	37,630	37,620	10	944	765	29	41	55	32	9	13	931
070 Of which SMEs	18,063	18,055	9	738	588	29	36	48	24	5	8	731
080 Households	54,132	54,048	84	1,957	1,571	71	95	93	82	25	21	1,922
090 Debt Securities	13,696	13,696		5	5							5
100 Central banks												
110 General governments	3,948	3,948										
120 Credit institutions	9,055	9,055										
130 Other financial corporations	122	122										
140 Non-financial corporations	570	570		5	5							5
150 Off-balance-sheet exposures	27,320			214								208
160 Central banks												
170 General governments	1,689											
180 Credit institutions	802											
190 Other financial corporations	950			2								2
200 Non-financial corporations	16,278			181								175
210 Householdes	7,601			32								31
220 Total	156,268	128,853	94	3,126	2,346	100	136	149	113	34	34	3,071

31 Dec 2023, EUR million		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
5	**Cash balances at central banks and other demand deposits**	**19,797**	**19,797**										
10	**Loans and advances**	**96,798**	**96,703**	**94**	**3,186**	**2,600**	**100**	**118**	**118**	**157**	**54**	**38**	**3,067**
20	Central banks	593	593										
30	General governments	1,925	1,925		0	0							
40	Credit institutions	77	77										
50	Other financial corporations	2,519	2,519		8	6	0	2		0	0	0	8
60	Non-financial corporations	37,822	37,803	19	1,142	953	33	32	35	55	17	17	1,126
70	Of which SMEs	17,399	17,382	17	819	649	32	31	34	50	14	9	814
80	Households	53,862	53,787	75	2,036	1,642	67	85	83	102	37	21	1,934
90	**Debt Securities**	**12,286**	**12,286**		**3**	**3**							**3**
100	Central banks												
110	General governments	3,418	3,418										
120	Credit institutions	7,798	7,798										
130	Other financial corporations	185	185										
140	Non-financial corporations	884	884		3	3							3
150	**Off-balance-sheet exposures**	**26,989**			**248**								**242**
160	Central banks												
170	General governments	1,743			0								
180	Credit institutions	1,078											
190	Other financial corporations	892			2								2
200	Non-financial corporations	16,745			219								213
210	Householdes	6,531			28								27
220	Total	155,869	128,786	94	3,438	2,604	100	118	118	157	54	38	3,312

EU CRA - General qualitative information about credit risk

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

See EU OVA Declaration and statement

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

OP Financial Group manages its credit risk through the Group level guidelines and principles and quantitative risk limits. These are specified in Banking risk-taking policy lines, limits and threshold values, qualitative and quantitative targets, as well principles governing customer selection, collateral and covenants. Quantitative and qualitative target levels reflects the business targets, moderate risk appetite and balanced capital allocation for risk taking. Limits and threshold values set maximum limits for risk-taking. These help to ensure sufficient diversification of the loan portfolio, while avoiding the emergence of overly large risk concentrations.

Credit risk management is based on careful customer selection, active customer relationship management, good knowledge of customers, strong professional skills and comprehensive documentation. The day-to-day credit process and its effectiveness play a key role in the management of credit risks. Credit risk is also managed through selection of the range of products and product terms and conditions. Risk associated with new lending is managed through well thought-out customer selection and the avoidance of risk concentrations. In addition, techniques are used to reduce credit risks (collateral and guarantees) and active use is made of covenants. Managing risk associated with the loan portfolio is based on good customer relationship management and the proactive and consistent management of problem situations.

All credit risk decisions are made on a business-specific basis. Decision-making is guided by OP Financial Group's Risk Appetite Framework (RAF), Risk Appetite Statement (RAS) and the target risk profile specified in the risk policy. Decisions that deviate from the target risk profile specified in the risk policy are explained on a broader basis. The central cooperative's Risk Management assesses compliance of the most significant financing projects with the risk policy and provides the managements of OP Financial Group and Group banking entities with a situational picture of compliance with the risk policy.

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

Governance structures provide the basis on which key principles guide operations and the related policies, and operating instructions are appropriately prepared and resolved. In addition, governance structures provide a basis for proper assessment and supervision of the quality, scope and complexity of each activity by expert, business-independent parties, in addition to the business's own monitoring.

- The central cooperative's Board of Directors is the most important decision-making body for risk management tasks. In addition, the central cooperative's Supervisory Council confirms decisions by the Board of Directors that apply to OP Financial Group's risk appetite. The Risk Committee of the Board of Directors assists the Board in performing duties related to risk-taking and risk management. The Committee has no independent decision-making powers. Based on the decision by the President and Group Chief Executive Officer, the Executive Management Team has set up a Risk Management Committee, Steering and Compliance Committee and Banking ALM Committee that approve instructions and policy descriptions specifying the Risk Appetite Statement and the Risk Appetite Framework. OP Financial Group's Corporate Governance Statement provides more detailed information OP Financial Group's corporate governance.
- Senior management ensures the maintenance and development of sufficient resourcing and expertise for the monitoring functions of the first, second and third line of defence.
- First line of defence is responsible of implementing OP Financial Group's strategy concerning credit portfolios within the context of defined Credit Policy and its targeting and monitors and manages the risks stemming from the decision-making. First line of defence is also responsible of ensuring effective implementation of findings stemming from internal monitoring, risk management, compliance and internal audit
- Independent second line of defence is formed by Risk management and Compliance. Second line of defence is responsible of setting limits as part of the Risk Policy, ensures and monitors that the risk taking within the limits follows the set targets and supervises that the First line of defence operations are compliant

- Third line of defence formed independently from first and second line of defence by OP Financial Group's Internal Audit

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

OP Financial Group's risk management and compliance are based on the principle of three lines of defence. The first line of defence comprises business lines, the second line of defence comprises the Risk Management function and Compliance independent of the business lines/divisions and the third line of defence comprises Internal Audit. Each line of defence has its own role in performing the risk management process efficiently.

At OP Financial Group, the first line and the second line of defence in risk management cooperate on an ongoing basis. This is to ensure that all expertise needed to develop and manage operations is in use in advance. The lines of defence build the risk management process together where the special features of OP Financial Group's business are taken into consideration. Responsibilities of the first and second lines of defence have been clearly divided.

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

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

Definition of default

In the IFRS 9 based calculation, OP Financial Group applies the same definition of default as in internal credit risk models. OP Financial Group assesses default using its internal rating system based on payment behaviour. Defaults are recognised at exposure level for retail customers and customer level for corporate and small and medium sized enterprises. Corporate customers are reviewed in terms of a group of connected clients.

The customer is classified as a customer in default when the customer's repayment is considered unlikely, for example when the customer has registered payment default or it has been granted a forbearance in which the present value of the loan decreases by more than 1 per cent. Default extends to all credit obligations of an obligor in default among personal customers when a significant proportion (20 per cent) of personal customer exposures are defaulted. In addition, the contract is defaulted when a payment related to a financial asset is over 90 days past due, at the latest.

The customer's default ends when it no longer meets the criteria for the definition of default and the subsequent probation period of 6–12 months has ended.

The definition of default is based on Article 178 of Regulation (EU) No 575/2013 (CRR) of the European Parliament and of the Council and on the European Banking Authority's (EBA) guidelines on the application of the definition of default (EBA/GL/2016/07 and EBA/RTS/2016/06).

Definition of non-performing exposure

The definition of non-performing exposure is based on the definition of default and it includes the probation periods before the reclassification as performing. Non-performing exposure is defined in accordance with Article 47a of the Capital Requirements Regulation (EU) No. 575/2013. OP Financial Group uses non-performing exposures as the classification criterion for impairment stage 3. In addition, originated credit-impaired contracts are always within the scope of the lifetime expected credit loss (POCI).

Non-performing exposures are classified into Stage 3, i.e. its definition is the same as credit impaired financial assets due to credit risk under IFRS 9.

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

N/A

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

OP Financial Group can make a judgement-based ECL (Expected Credit Loss) provision in situations where an external factor changes rapidly. The provision is temporary and valid until the risk parameters used in the ECL calculation are updated to reflect the changed situation. So far, OP Financial Group has only used post-model management overlays that affect the amount of ECL. These judgement-based provisions are classified as general credit risk adjustments. All other provisions are assigned to specific credit risk adjustments.

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.

N/A. Definition is in line with Article 47b CRR.

CCR and Market risk

EU CCR1 - Analysis of CCR exposure by approach

Counterparty credit risk arising from derivative contracts is based on the daily market valuation of derivative contracts.

Counterparty credit risk associated with derivative contracts arises from receivables which OP Financial Group may have from its counterparties in case they default. OP Financial Group measures counterparty risk by Standardised Approach to Counterparty Credit Risk (SA-CCR). The exposure amount based on the SA-CCR is used in the calculation of regulatory capital requirement and of economic capital.

Capital adequacy requirement due to counterparty credit risk may arise from items related to banking book and the trading book. Capital adequacy requirement due to counterparty credit risk is calculated, for example, on OTC derivatives.

		a	b	c	d	e	f	g	h
31 Dec 2024, EUR million		Re-placement cost (RC)	Potential future exposure (PFE)	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre-CRM	Exposure value post-CRM	Exposure value	RWEA
1	SA-CCR (for derivatives)	456	939		1.4	3,994	1,954	1,954	887
6	**Total**					**3,994**	**1,954**	**1,954**	**887**

This template excludes own funds requirement for CVA and exposures to a central counterparty.

		a	b	c	d	e	f	g	h
31 Dec 2023, EUR million		Re-placement cost (RC)	Potential future exposure (PFE)	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre-CRM	Exposure value post-CRM	Exposure value	RWEA
1	SA-CCR (for derivatives)	537	959		1.4	4,156	2,095	2,095	816
6	**Total**					**4,156**	**2,095**	**2,095**	**816**

EU CCR2 - Transactions subject to own funds requirements for CVA risk

31 Dec 2024, EUR million		a Exposure value	b RWEA
1	Total transactions subject to the Advanced method		
4	Transactions subject to the Standardised method	532	210
EU-4	Transactions subject to the Alternative approach (Based on the Original Exposure Method)		
5	**Total transactions subject to own funds requirements for CVA risk**	**532**	**210**

Credit valuation adjustment risk is calculated according to the standardised approach.

31 Dec 2023, EUR million		a Exposure value	b RWEA
1	Total transactions subject to the Advanced method		
4	Transactions subject to the Standardised method	580	217
EU-4	Transactions subject to the Alternative approach (Based on the Original Exposure Method)		
5	**Total transactions subject to own funds requirements for CVA risk**	**580**	**217**

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

		Risk weight									
		0%	10%	20%	50%	70%	75%	100%	150%	Others	Total
31 Dec 2024, EUR million		a	d	e	f	g	h	i	j	k	l
1	Central governments or central banks	275									275
2	Regional government or local authorities	362		0							362
3	Public sector entities										
4	Multilateral development banks	149									149
5	International organisations										
6	Institutions			57	391						447
7	Corporates			11	38			669	2		719
8	Retail										
9	Institutions and corporates with a short-term credit assessment										
10	Other items							1	1		1
11	**Total**	**786**		**68**	**428**			**669**	**2**		**1,954**

Other items include rest of the exposures not shown in the separate lines. This template excludes own funds requirements for CVA risk and exposures to a central counterparty.

		Risk weight									
		0%	10%	20%	50%	70%	75%	100%	150%	Others	Total
31 Dec 2023, EUR million		a	d	e	f	g	h	i	j	k	l
1	Central governments or central banks	303									303
2	Regional government or local authorities	347		0							347
3	Public sector entities										
4	Multilateral development banks	340									340
5	International organisations										
6	Institutions			61	433						494
7	Corporates			17	27			554	12		610
8	Retail						0				0
9	Institutions and corporates with a short-term credit assessment										
10	Other items							1	0		1
11	**Total**	**989**		**78**	**460**		**0**	**555**	**12**		**2,095**

EU CCR5 - Composition of collateral for CCR exposures

		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, 31 Dec 2024, EUR million		Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated
1	Cash – domestic currency	213	982	558	294				35
2	Cash – other currencies		3	69					
3	Domestic sovereign debt			325					
4	Other sovereign debt								
5	Government agency debt								
6	Corporate bonds								
7	Equity securities								
8	Other collateral								744
9	**Total**	**213**	**985**	**951**	**294**				**779**

Collateral given to the central counterparty is segregated. Collateral with other counterparties is unsegregated.

		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, 31 Dec 2023, EUR million		Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated
1	Cash – domestic currency	506	1,110	0	301				3
2	Cash – other currencies	10		51	1				
3	Domestic sovereign debt			337					
4	Other sovereign debt								
5	Government agency debt								
6	Corporate bonds								
7	Equity securities								
8	Other collateral								48
9	**Total**	**516**	**1,110**	**388**	**302**				**51**

EU CCR6 - Credit derivatives exposures

31 Dec 2024, EUR million		a Protection bought	b Protection sold
Notionals			
1	Single-name credit default swaps		
2	Index credit default swaps	106	172
3	Total return swaps		
4	Credit options		
5	Other credit derivatives		8
6	**Total notionals**	**106**	**180**
Fair values			
7	Positive fair value (asset)	0	10
8	Negative fair value (liability)		-2

31 Dec 2023, EUR million		a Protection bought	b Protection sold
Notionals			
1	Single-name credit default swaps		
2	Index credit default swaps	16	113
3	Total return swaps		
4	Credit options		
5	Other credit derivatives		25
6	**Total notionals**	**16**	**138**
Fair values			
7	Positive fair value (asset)	0	9
8	Negative fair value (liability)		-9

EU CCR8 - Exposures to CCPs

31 Dec 2024, EUR Million		a Exposure value	b RWEA
1	**Exposures to QCCPs (total)**		13
2	Exposures for trades at QCCPs (excluding initial margin and default fund contributions); of which	255	5
3	(i) OTC derivatives	226	5
4	(ii) Exchange-traded derivatives	7	0
5	(iii) SFTs	22	0
6	(iv) Netting sets where cross-product netting has been approved		
7	Segregated initial margin	347	
8	Non-segregated initial margin	30	6
9	Prefunded default fund contributions	6	1
10	Unfunded default fund contributions		

31 Dec 2023, EUR Million		a Exposure value	b RWEA
1	**Exposures to QCCPs (total)**		6
2	Exposures for trades at QCCPs (excluding initial margin and default fund contributions); of which	319	5
3	(i) OTC derivatives	267	5
5	(ii) Exchange-traded derivatives	3	0
	(iii) SFTs	48	0
6	(iv) Netting sets where cross-product netting has been approved		
7	Segregated initial margin	445	
8	Non-segregated initial margin	3	1
9	Prefunded default fund contributions	2	0
10	Unfunded default fund contributions		

EU CCRA - Qualitative disclosure related to CCR

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

The counterparty credit exposure limits are defined based on exposure calculated using current exposure method, taking into account the planned derivative contracts with the counterparty, the credit quality of the counterparty, and collateralization.

The Group confirms counterparty exposure limits (including those applied to central counterparties) at least once a year and, in this context, also checks the status of collateral applied to the limits for derivative transactions.

The management of credit risk not based on customer relationships is primarily based on the creditworthiness of single counterparties, measured by the ratings of a rating institution recognised at OP Financial Group.

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

Credit risk arising from financial counterparties is reduced through collateral, which means the use of ISDA Credit Support Annex (CSA) contract associated with the ISDA general agreement. In the collateral system, the counterparty provides cash or securities in security for the receivable. Collateral matching between counterparties is performed daily. In respect of guarantees and collateral securities, the Group applies the same practices as in credit risk.

The effect of the credit risk to the market value of the derivative is taken into account in the balance sheet valuation by adding a credit value adjustment at counterparty level.

3) Description of policies with respect to Wrong-Way risk as defined in Article 291 of the CRR

OP Financial Group's portfolio of derivatives consists mainly of interest rate derivatives in which significant correlation between the creditworthiness of the counterparty and the value of the derivative contract is considered unlikely.

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

In addition to the derivatives sold to customers, market-based foreign exchange transactions and derivatives needed in the modification of the bank's own liquidity and banking book's risk exposure expose OP Financial Group to counterparty risk. The Group must reduce this to an acceptable level as a consequential risk. The foreign exchange trading and interest rate derivatives have to be distributed to sufficiently many counterparties to ensure that the accumulation of an individual name or country will not become larger than desired.

In addition, the OP Financial Group's risk appetite framework sets following general objectives for the risk management process:

- The business lines' customer business processes provide a solid foundation for high-quality customer service, while being cost-efficient, reliable, regulatory compliant and, whenever necessary, quickly restorable to working order. OP Financial Group has the operational flexibility required to adjust its processes rapidly enough to achieve its strategic goals and targets. In addition, these processes generate all information needed for the performance of tasks in key functions, in functional analysis, and in management reporting.
- Businesses strike a balance between earnings, risks, capital and liquidity buffers, and cumulative risks at OP Financial Group's level can be identified and managed, for example, through principles on the division of responsibilities.
- The capital adequacy and liquidity of OP Financial Group's businesses, and of the entire Group, are at a level that enables OP Financial Group to make fully independent business decisions. Neither OP Financial Group nor its companies have other commitments that would prevent them from carrying out strategy-based measures for a prolonged period.
- No internal or external party questions the validity of OP Financial Group's joint and several liability.

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

If S&P had downgraded OP Financial Group's credit rating from AA– to A on 31 December 2024, an additional collateral worth EUR 5 million would have been required. If the credit rating had been downgraded in 2023, additional collateral of EUR 5 million would have been required.

EU MR1 - Market risk under the standardised approach

		a	a
		31 Dec 2024	31 Dec 2023
EUR million		RWEAs	RWEAs
	Outright products		
1	Interest rate risk (general and specific)	837	906
2	Equity risk (general and specific)	0	0
4	Commodity risk	18	17
	Options		
6	Delta-plus approach	0	0
7	Scenario approach	88	83
9	**Total**	**944**	**1,006**

EU MRA - Qualitative disclosure requirements related to market risk

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

- An explanation of management's strategic objectives in undertaking trading activities, as well as the processes implemented to identify, measure, monitor and control the institution's market risks

- A description of their policies for hedging and mitigating risk and strategies and processes for monitoring the continuing effectiveness of hedges

OP Financial Group's trading in capital market products has been centralised to OP Corporate Bank's Markets function. This includes the pricing and market hedging of interest rate hedging products for loans granted by OP cooperative banks and OP Corporate Bank, separate interest rate hedges, foreign exchange trading, structured investment products, trading in bonds and commodity derivatives. The risks taken include market risks such as interest rate risk in different currencies, currency risk, volatility risk related to options, credit spread risks, and credit risks such as counterparty and issuer risks. Repurchases of structured investment products also generate a degree of equity risk. Markets is responsible for managing the Group's currency exposure and does foreign exchange transactions on the market according to needs. Markets manages risk exposures by actively trading on the market. Markets monitors risks and earnings on a daily basis. In addition, Risk Management reports Markets' risks to the Board of Directors' Risk Committee and the senior management, as part of OP Financial Group's risk analysis.

Market risk arising from banking through the balance sheet is chiefly due to the management of OP Financial Group's liquidity buffer and OP Corporate Bank's portfolio of bonds. OP Corporate Bank's Group Treasury manages OP Financial Group's banking liquidity buffer. The market risk in both of these is monitored daily, and Risk Management reports on it to the Board of Directors' Risk Committee and the senior management as part of OP Financial Group's risk analysis.

The liquidity buffer portfolio is monitored and managed using market risk management methods:

- The Banking risk policy determines the risk measurement methods and risk-taking limits, as well as other restrictions.

- An investment plan is prepared for the investment portfolio, describing business models, the goals of investment activities and the principles of portfolio management. OP Corporate Bank's Board of Directors approves the investment plan.
- The Group ensures sufficient portfolio diversification by means of restrictions by issuer.

In addition, OP Corporate Bank invests in corporate bonds. OP Corporate Bank's bond portfolio is OP Corporate Bank's equivalent to a lending business.

The following methods are used to manage and monitor OP Corporate Bank's bond portfolio:

- The banking risk policy determines the risk measurement methods and risk-taking limits, and other restrictions.
- An investment plan is prepared for the portfolio, describing the goals of investment activities and the principles of portfolio management.
- Investment decisions for the portfolio comply with OP Corporate Bank's corporate responsibility principles.

Economic capital is calculated in relation to market risks taken by the Markets function and in the management of the liquidity buffer and OP Corporate Bank's bond portfolio. The risk policy sets limits and frameworks for business models. The risk policy is prepared in such a way that the risks are visible for each business model and any risk-taking that goes beyond the business model is tightly constrained.

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

Market risk is managed by the business as explained in EU MRA a). It is governed on the top level by the Risk Appetite Framework and the relevant risk policy.

The second line of defence (Risk Management) monitors risk taking daily and communicates with the first line of defence through regular meetings. The observations of the independent risk management function are reported to the senior management and the Board of Directors' Risk Committee at least quarterly through the risk analysis. The second line of defence market risk management function reports through the CRO to senior management.

c) Scope and nature of risk reporting and measurement systems

Market risks taken by the Markets function are measured using the expected shortfall measure, as well as various sensitivity and nominal value metrics for specific products and positions. The impacts of market movements that are significant to the business are assessed via stress tests. This is important in order to understand the risks of rare market movements and those with a major impact.

For the liquidity buffer and OP Corporate Bank's bond portfolio, market risk is measured using value at risk, with stress tests and sensitivity values as additional metrics.

ESG disclosures

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

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
Table is presented in five parts on pages 61-65		Gross carrying amount (Mln EUR)					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (Mln EUR)			GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)							
Sector/subsector, 31 Dec 2024			Of which exposures towards companies excluded from EU Paris-aligned Bench-marks**	Of which environ-mentally sustain-able (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: 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*	32,591	1,272	1,099	3,965	819	-331	-84	-215	3,960,550	2,907,746	36.59 %	17,868	3,155	4,656	6,912	7
2	A - Agriculture, forestry and fishing	1,322			360	51	-18	-7	-10	372,967	106,477	13.53 %	689	303	247	83	7
3	B - Mining and quarrying	147	96	0	7	5	-4	0	-3	89,030	80,298	30.37 %	96	8		44	8
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	3			0	2	-2	0	-2	681	248		3	0			2
7	B.08 - Other mining and quarrying	99	68	0	6	3	-2	0	-2	87,744	79,829	33.91 %	65	3		31	8
8	B.09 - Mining support service activities	45	28		1	0	0	0	0	605	221		28	5		12	8
9	C - Manufacturing	3,837		227	370	106	-61	-13	-42	1,729,787	1,600,604	54.74 %	2,500	192	6	1,139	3
10	C.10 - Manufacture of food products	321		0	49	15	-8	-1	-6	567,886	541,863	61.68 %	248	31	0	43	5
11	C.11 - Manufacture of beverages	129			11	4	-2	0	-2	69,300	63,400	92.71 %	116	1		12	4
12	C.12 - Manufacture of tobacco products	0			0		0	0								0	20
13	C.13 - Manufacture of textiles	6			3	1	-1	0	0	629	516	4.67 %	3	0	0	3	10

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		Gross carrying amount (Mln EUR)					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (Mln EUR)			GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)							
Sector/subsector, 31 Dec 2024			Of which exposures towards companies excluded from EU Paris-aligned Bench-marks**	Of which environ-mentally sustain-able (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: 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
14	C.14 - Manufacture of wearing apparel	9			5	2	-1	0	-1	971	809	17.39 %	4	1	0	4	11
15	C.15 - Manufacture of leather and related products	1			0	1	0	0	0	119	98		1	0	0	0	10
16	C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials	197		0	52	10	-9	-4	-5	19,264	13,033	15.68 %	143	5	3	46	7
17	C.17 - Manufacture of pulp, paper and paperboard	678		16	5	8	-2	0	-2	64,712	50,509	74.58 %	57	48		573	15
18	C.18 - Printing and service activities related to printing	31			6	1	0	0	0	3,279	2,330		21	4	0	6	7
19	C.19 - Manufacture of coke oven products	273		77	2	2	-2	0	-2	455,566	434,846	99.07 %	252	4		17	4
20	C.20 - Production of chemicals	89		0	8	1	0	0	0	110,837	89,956	82.14 %	73	2		14	6
21	C.21 - Manufacture of pharmaceutical preparations	129			3		0	0		8,466	7,520	58.84 %	128			1	2
22	C.22 - Manufacture of rubber products	402		4	10	1	-2	-1	0	40,240	34,844	32.80 %	346	6		49	5
23	C.23 - Manufacture of other non-metallic mineral products	76		0	28	3	-2	-1	-1	12,488	7,137		57	6	0	13	6
24	C.24 - Manufacture of basic metals	184		88	11	0	0	0	0	1,358	984		105	2	0	77	9

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		Gross carrying amount (Mln EUR)					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (Mln EUR)			GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)							
Sector/subsector, 31 Dec 2024			Of which exposures towards companies excluded from EU Paris-aligned Bench-marks**	Of which environ-mentally sustain-able (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: 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
25	C.25 - Manufacture of fabricated metal products, except machinery and equipment	288		0	62	21	-7	-2	-5	52,056	37,836	0.76 %	186	46	1	55	7
26	C.26 - Manufacture of computer, electronic and optical products	78		4	8	4	-3	0	-3	14,211	13,486	61.25 %	66	2		10	4
27	C.27 - Manufacture of electrical equipment	79		0	6	1	-1	0	0	4,062	3,462		39	8		31	10
28	C.28 - Manufacture of machinery and equipment n.e.c.	591		37	50	25	-14	-1	-12	288,321	284,797	62.95 %	443	11	0	137	5
29	C.29 - Manufacture of motor vehicles, trailers and semi-trailers	36		0	13	1	-1	0	0	3,016	2,713		24	4		9	7
30	C.30 - Manufacture of other transport equipment	10		0	4	0	0	0	0	944	852		6	1	0	3	8
31	C.31 - Manufacture of furniture	21			8	3	-1	0	0	2,666	1,918		13	2	0	6	8
32	C.32 - Other manufacturing	137			16	1	-2	-1	0	2,633	1,881	68.20 %	133	1		3	
33	C.33 - Repair and installation of machinery and equipment	71		0	12	2	-1	0	-1	6,764	5,813		35	9	1	26	10
34	**D - Electricity, gas, steam and air conditioning supply**	**4,374**	**1,177**	**632**	**165**	**14**	**-9**	**-2**	**-6**	**628,811**	**130,675**	**50.61 %**	**3,746**	**421**	**57**	**151**	**4**
35	D35.1 - Electric power generation, transmission and distribution	4,226	1,136	630	126	7	-6	-1	-3	600,729	125,715	52.72 %	3,687	382	24	133	4

Sector/subsector, 31 Dec 2024		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		Gross carrying amount (Mln EUR)					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (Mln EUR)			GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)		GHG emissions: gross carrying amount percentage of the portfolio derived from company-specific reporting					
			Of which exposures towards companies excluded from EU Paris-aligned Bench-marks**	Of which environ-mentally sustain-able (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
36	D35.11 - Production of electricity	2,965	630	467	78	7	-5	-1	-3	264,146	67,204	53.40 %	2,684	192	21	68	4
37	D35.2 - Manufacture of gas; distribution of gaseous fuels through mains	28	14	0	21	6	-3	0	-3	1,294	401		20	1	1	5	7
38	D35.3 - Steam and air conditioning supply	120	27	1	18	1	0	0	0	26,788	4,558	19.13 %	38	38	31	12	9
39	E - Water supply; sewerage, waste management and remediation activities	370		3	27	3	-1	0	0	55,688	37,752	19.14 %	264	84	18	4	5
40	F - Construction	1,813		22	544	225	-115	-28	-82	58,320	50,914		939	145	81	648	11
41	F.41 - Construction of buildings	1,127		13	306	177	-86	-12	-71	19,512	17,069		428	48	68	583	14
42	F.42 - Civil engineering	233		9	79	16	-15	-12	-3	6,377	5,561		164	46	3	20	5
43	F.43 - Specialised construction activities	453		0	159	32	-14	-5	-8	32,431	28,283		347	51	10	45	5
44	G - Wholesale and retail trade; repair of motor vehicles and motorcycles	3,528		3	491	69	-46	-14	-21	814,164	781,268	35.47 %	2,303	231	10	985	7
45	H - Transportation and storage	1,607		2	298	31	-11	-2	-7	160,135	84,309	28.07 %	1,330	193	33	52	4
46	H.49 - Land transport and transport via pipelines	1,018			196	22	-8	-2	-5	92,160	61,902	37.69 %	867	113	4	34	4
47	H.50 - Water transport	67		2	5	0	0	0	0	33,549	7,018		65	0		1	4
48	H.51 - Air transport	7			0		0	0		54	32		6	0		0	5
49	H.52 - Warehousing and support activities for transportation	468		0	93	8	-3	-1	-2	34,140	15,186	26.99 %	346	76	29	16	5
50	H.53 - Postal and courier activities	48			4	0	0	0	0	232	171		44	3	0	0	4

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		Gross carrying amount (Mln EUR)					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (Mln EUR)			GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)		GHG emissions: gross carrying amount percentage of the portfolio derived from company-specific reporting					
	Sector/subsector, 31 Dec 2024		Of which exposures towards companies excluded from EU Paris-aligned Bench-marks**	Of which environ-mentally sustain-able (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
51	I - Accommodation and food service activities	249			47	26	-6	-1	-5	20,059	15,148		172	57	6	15	5
52	L - Real estate activities	15,345		210	1,659	289	-60	-17	-38	31,589	20,302	26.86 %	5,831	1,521	4,199	3,793	12
53	Exposures towards sectors other than those that highly contribute to climate change*	6,557		98	1,008	130	-72	-27	-34				5,601	364	59	534	4
54	K - Financial and insurance activities	2,142		11	477	20	-21	-12	-4				2,057	35	2	48	3
55	Exposures to other sectors (NACE codes J, M - U)	4,415		87	531	110	-50	-15	-30				3,544	328	57	486	5
56	TOTAL	39,149	1,272	1,197	4,974	949	-402	-111	-249	5,352,558	4,204,751	33.79 %	23,469	3,519	4,715	7,446	7

* 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

**in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation

Template discloses information on exposures towards non-financial sectors, which are more prone to transition risk.

Column B includes exposures towards companies that would be excluded from Paris Aligned Benchmarks, according to Regulation 2020/1818 Article 12. Exclusion criteria is based on analysis conducted for the population covering 95% of the total population within the most relevant sectors for this regulation. Publicly available data sources and financial statements submitted to OP Financial Group were used in the analysis.

GHG emissions are integrated in the Pillar 3 reporting from 30 June 2024 onwards. Estimated GHG emissions are reported in the OP Financial Group Annual Review and calculations follow the Partnership for Carbon Accounting Financials (PCAF) that is an interpretation of the GHG Protocol for the financial sector. However due to methodological differences between Pillar 3 regulation and PCAF standard, the figures do not fully correspond to OP Financial Group's reported financed emissions in Annual Review 2024.

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
	Table is presented in five parts on pages 66-70		Gross carrying amount (Mln EUR)				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (Mln EUR)			GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)		GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting					
	Sector/subsector, 31 Dec 2023		Of which exposures towards companies excluded from EU Paris-aligned Bench-marks**	Of which environ-mentally sustain-able (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
1	Exposures towards sectors that highly contribute to climate change*	33,673	2,491	1,029	5,770	1,036	-438	-130	-270				18,163	3,522	4,397	7,591	8
2	A - Agriculture, forestry and fishing	1,427			408	70	-30	-5	-25				761	296	279	91	7
3	B - Mining and quarrying	131	85	0	8	6	-3	0	-3				68	19	0	44	9
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	3				2	-2	0	-2				3				1
7	B.08 - Other mining and quarrying	94	55	0	8	3	-1	0	-1				51	2	0	41	10
8	B.09 - Mining support service activities	34	30		0	1	0	0	0				15	17		3	6
9	C - Manufacturing	3,990		290	668	200	-81	-13	-63				2,513	250	12	1,215	3
10	C.10 - Manufacture of food products	446			61	60	-16	-3	-12				331	40	1	74	6
11	C.11 - Manufacture of beverages	150			85	5	-3	-1	-2				139	1		10	4
12	C.12 - Manufacture of tobacco products	0			0		0	0								0	20
13	C.13 - Manufacture of textiles	9			4	1	-1	0	0				4	2	0	3	10

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		Gross carrying amount (Mln EUR)					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (Mln EUR)			GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)		GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting					
Sector/subsector, 31 Dec 2023			Of which exposures towards companies excluded from EU Paris-aligned Bench-marks**	Of which environ-mentally sustain-able (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
14	C.14 - Manufacture of wearing apparel	12			5	4	-1	0	-1				5	0	0	6	12
15	C.15 - Manufacture of leather and related products	3			0	2	-1	0	-1				1	1		1	10
16	C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials	189		0	13	23	-7	0	-6				134	14	3	38	7
17	C.17 - Manufacture of pulp, paper and paperboard	673		17	82	6	-2	0	-2				57	56		561	15
18	C.18 - Printing and service activities related to printing	34			4	1	-1	0	0				19	10	0	4	6
19	C.19 - Manufacture of coke oven products	321		92		9	-2	0	-2				270	7		44	5
20	C.20 - Production of chemicals	114		0	9	1	-1	0	0				95	4		15	5
21	C.21 - Manufacture of pharmaceutical preparations	57					0	0					56			1	3
22	C.22 - Manufacture of rubber products	392		63	106	1	-2	-1	-1				345	5	3	39	3
23	C.23 - Manufacture of other non-metallic mineral products	71		0	11	3	-1	0	-1				53	8	0	10	6
24	C.24 - Manufacture of basic metals	160		63	7	4	-1	0	-1				54	2		104	14

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
			Gross carrying amount (Mln EUR)				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (Mln EUR)			GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)		GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting					
	Sector/subsector, 31 Dec 2023		Of which exposures towards companies excluded from EU Paris-aligned Bench-marks**	Of which environ-mentally sustain-able (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
25	C.25 - Manufacture of fabricated metal products, except machinery and equipment	305		0	57	23	-8	-1	-7				204	49	1	51	6
26	C.26 - Manufacture of computer, electronic and optical products	89		3	28	10	-7	0	-7				72	1		16	6
27	C.27 - Manufacture of electrical equipment	89		1	7	3	-2	0	-1				58	6		26	7
28	C.28 - Manufacture of machinery and equipment n.e.c.	558		19	40	29	-15	-1	-13				379	23	1	156	6
29	C.29 - Manufacture of motor vehicles, trailers and semi-trailers	49		0	23	1	-1	-1	-1				24	7	0	17	9
30	C.30 - Manufacture of other transport equipment	70		32	1	5	-4	0	-3				65	1	0	4	2
31	C.31 - Manufacture of furniture	29			9	5	-2	0	-1				19	2	0	8	8
32	C.32 - Other manufacturing	99			105	1	-3	-1	0				95	1	0	3	0
33	C.33 - Repair and installation of machinery and equipment	72		0	10	3	-2	0	-2				36	11	2	23	9
34	**D - Electricity, gas, steam and air conditioning supply**	**4,749**	**2,405**	**681**	**629**	**15**	**-6**	**-2**	**-2**				**4,143**	**465**	**50**	**90**	**3**
35	D35.1 - Electric power generation, transmission and distribution	4,597	2,329	673	615	7	-4	-2	-1				4,079	416	20	82	3

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		Gross carrying amount (Mln EUR)					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (Mln EUR)			GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)		GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting					
	Sector/subsector, 31 Dec 2023		Of which exposures towards companies excluded from EU Paris-aligned Bench-marks**	Of which environ-mentally sustain-able (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
36	D35.11 - Production of electricity	3,315	1,481	673	466	7	-3	-1	-1				3,048	213	6	48	3
37	D35.2 - Manufacture of gas; distribution of gaseous fuels through mains	49	32	8	2	7	-1	0	-1				39	1	1	7	5
38	D35.3 - Steam and air conditioning supply	104	45	0	12	0	0	0	0				25	48	29	1	8
39	**E - Water supply; sewerage, waste management and remediation activities**	**282**		**10**	**27**	**3**	**-1**	**0**	**-1**				**159**	**93**	**15**	**15**	**6**
40	**F - Construction**	**2,345**		**28**	**1,029**	**228**	**-134**	**-66**	**-62**				**1,122**	**156**	**117**	**950**	**12**
41	F.41 - Construction of buildings	1,558		20	880	177	-104	-51	-48				556	70	66	866	15
42	F.42 - Civil engineering	242		8	52	25	-15	-9	-6				157	16	36	33	6
43	F.43 - Specialised construction activities	545		0	97	27	-16	-7	-8				409	70	15	51	5
44	**G - Wholesale and retail trade; repair of motor vehicles and motorcycles**	**3,987**		**3**	**580**	**88**	**-49**	**-15**	**-22**				**2,633**	**276**	**14**	**1,064**	**7**
45	**H - Transportation and storage**	**1,643**		**2**	**132**	**32**	**-12**	**-2**	**-9**				**1,322**	**208**	**51**	**61**	**5**
46	H.49 - Land transport and transport via pipelines	1,079			81	22	-9	-1	-7				898	139	5	37	4
47	H.50 - Water transport	80		1	1	0	0	0	0				78	1		1	4
48	H.51 - Air transport	7			0		0	0					7	0		0	2
49	H.52 - Warehousing and support activities for transportation	418		0	48	9	-3	0	-2				300	50	46	22	6
50	H.53 - Postal and courier activities	59			1	0	0	0	0				40	19	0	0	4

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
			Gross carrying amount (Mln EUR)				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (Mln EUR)			GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)							
	Sector/subsector, 31 Dec 2023		Of which exposures towards companies excluded from EU Paris-aligned Bench-marks**	Of which environ-mentally sustain-able (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
51	I - Accommodation and food service activities	271			77	29	-8	-1	-7				176	68	9	18	5
52	L - Real estate activities	14,847		16	2,212	366	-112	-27	-76				5,265	1,691	3,849	4,042	12
53	Exposures towards sectors other than those that highly contribute to climate change*	6,178		60	731	106	-58	-15	-34				5,176	534	70	399	4
54	K - Financial and insurance activities	1,939		8	119	10	-5	-2	-1				1,733	174	3	27	3
55	Exposures to other sectors (NACE codes J, M - U)	4,240		52	612	95	-53	-13	-34				3,443	359	66	371	5
56	TOTAL	39,851	2,491	1,089	6,501	1,142	-496	-145	-304				23,339	4,056	4,467	7,990	7

* 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

**in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation

This table has been amended following its initial disclosure.

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

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		Total gross carrying amount amount (in MEUR)															
			Level of energy efficiency (EP score in kWh/m² of collateral)						Level of energy efficiency (EPC label of collateral)							Without EPC label of collateral	
Counterparty sector, 31 Dec 2024			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	52,822	5,444	14,279	19,218	3,499	111	33	1,393	6,422	2,621	4,390	2,811	475	109	34,601	70.41 %
2	Of which Loans collateralised by commercial immovable property	8,344	234	789	383	105	10	16	100	763	219	122	95	52	41	6,952	2.10 %
3	Of which Loans collateralised by residential immovable property	44,478	5,210	13,489	18,834	3,394	101	17	1,294	5,659	2,402	4,268	2,716	423	68	27,649	87.59 %
4	Of which Collateral obtained by taking possession: residential and commercial immovable properties	0														0	
5	Of which Level of energy efficiency (EP score in kWh/m² of collateral) estimated	24,363	1,582	7,249	13,540	1,991										24,363	100.00 %

Template discloses information on loans collateralized with residential immovable property and of repossessed real estate collaterals, including information of the level of energy efficiency of the collaterals. Information is based on EPC labels downloaded from the Housing Finance and Development Centre of Finland (ARA) if EPC is available and it can be linked to a collateral. If EPC is not available or can not be linked to a collateral, then statistical modelling is used given the necessary data to model is available for a collateral.

EPC label of a collateral is reported as equivalent to 2018 Finnish EPC regulation. In other words, EPCs based on 2013 regulation are converted to be equivalent to 2018 regulation.

A statistical model is used to estimate energy consumptions for buildings without an EPC. The model is based on ARA's EPC data. The modelling is done primarily using data of OP's collateral database. In some cases all necessary data for modelling (e.g construction year or the main heating source) is not available. Then the modelling is carried out using official Finnish building data (applies only for buildings built since 2007). Even after using this data, for some collaterals the energy efficiency information cannot be determined due to data availability.

Energy efficiency information of collaterals is allocated to loans in proportion to value of loan and value of collateral.

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		Total gross carrying amount amount (in MEUR)															
			Level of energy efficiency (EP score in kWh/m² of collateral)						Level of energy efficiency (EPC label of collateral)							Without EPC label of collateral	
Counterparty sector, 31 Dec 2023			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**	**53,021**	**4,200**	**12,348**	**18,413**	**2,825**	**94**	**18**	**1,097**	**5,579**	**2,077**	**3,460**	**2,161**	**374**	**95**	**38,176**	**60.39 %**
2	Of which Loans collateralised by commercial immovable property	8,511	157	500	265	77	7	3	62	452	163	85	60	42	27	7,620	1.54 %
3	Of which Loans collateralised by residential immovable property	44,509	4,043	11,848	18,147	2,749	87	15	1,036	5,127	1,914	3,376	2,101	332	68	30,555	75.06 %
4	Of which Collateral obtained by taking possession: residential and commercial immovable properties	0														0	
5	Of which Level of energy efficiency (EP score in kWh/m² of collateral) estimated	23,053	879	6,509	14,021	1,644	0									23,053	100.00 %

This table has been amended following its initial disclosure.

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

	a	b	c	d	e	f	g
31 Dec 2024	Sector	NACE Sectors (a minima)	Portfolio gross carrying amount (Mn EUR)	Alignment metric	Year of reference	Distance to IEA NZE2050 in % ***	Target (year of reference + 3 years)
1	Power	3511, 3512, 3513, 3514, 3530	3,891	gCO2/kWh power generation	2024	-79.49%	59
2	Power	3511, 3512, 3513, 3514, 3530	3,891	Share of low-emission sources in total generation	2024	20.78%	1
3	Power	3511, 3512, 3513, 3514, 3530	3,891	Share of high carbon fuels in total generation	2024	-50.51%	0
4	Maritime transport	5020	43	gCO2e/tkm	2024	56.07%	6
5	Maritime transport	5020, 5030	53	Share of low-emission fuels in final energy consumption	2024	-76.97%	0
6	Iron and steel, coke, and metal ore production	2410	161	tCO2e/tonne steel production	2024	53.96%	1
7	Iron and steel, coke, and metal ore production	2410	161	Share of scrap in metallic inputs	2024	31.23%	0
8	Iron and steel, coke, and metal ore production	2410	161	Share of near zero emission iron production	2024	-88.00%	0

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

Disclosures included in this template cover all sectors that encompass all relevant carbon intensive financed activities, namely in power, shipping and steel sectors. The metrics are based on International Energy Agency Net Zero Emissions by 2050 Scenario (IEA NZE 2050 scenario). For relevant sectors, the metrics include both intensity and technology-based metrics if they are available in IEA NZE 2050 scenario. The data for the metrics are retrieved from companies' reported information. If company-specific information is not available, global historical average data from IEA is used as a proxy (IEA (2023), Net Zero Roadmap: A Global Pathway to Keep the 1.5 °C Goal in Reach, IEA, Paris). Sectors Fossil fuel combustion, Automotive, Aviation, Cement, clinker and lime production and Chemicals are excluded from the reporting template either because the available metrics from the IEA NZE 2050 scenario for a sector are not applicable to the underlying exposures on a company level (i.e. there are no exposures to companies with carbon intensive activities in these sectors) or because there is minimal exposure to these sectors.

Distances and forward-looking three-year targets are set against the IEA NZE 2050 scenario, using a linear trajectory between the base year 2022 and the target year 2030 levels for each metric respectively, except for the gCO2/kWh power generation metric for Power sector, whose forward-looking target follows the sector specific target set by OP Financial Group. However, the alignment metric's distance depicted in this template does not correspond to the sector specific target. This is due to variations in methodologies between Pillar 3 regulation and the sector specific target. The exposures' underlying activities shall be considered aligned if the level of the indicator is below that of the benchmark for decreasing benchmarks (carbon intensive activities) or above for increasing benchmarks (low carbon activities).

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

a	b	c	d	e
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	Number of top 20 polluting firms included

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

OP Amalgamation does not have exposures towards the most carbon intensive counterparties in the world.

OP Financial Group uses the CDP 2023: Full GHG Emissions Dataset. The dataset includes a total of 13 502 companies globally.

OP had no exposures towards TOP-20 carbon intensive firms on 31th December 2024.

Carbon intensive in this context is defined as the highest emitting companies in the world measured as absolute GHG emissions in Scope 1 and 2 categories.

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

Table is presented in three parts on pages 75-77.

	a		b	c	d	e	f	g	h	i	j	k	l	m	n	o
			Gross carrying amount (Mln EUR)													
				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	Of which Stage 2 exposures	Of which non-performing exposures	Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		
31 Dec 2024	Geographical area subject to climate change physical risk - acute and chronic events			<= 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
1	A - Agriculture, forestry and fishing	Finland	1,221	582	292	244	80	7	270		928	271	48	-16	-6	-9
2	B - Mining and quarrying	Finland	121	42	3		31	10		54	22	3	5	-3	0	-3
3	C - Manufacturing	Finland	3,590	1,379	96	3	729	8	1,307		901	93	40	-23	-3	-17
4	D - Electricity, gas, steam and air conditioning supply	Finland	3,877	2,301	243	6	69	4		1,192	1,426	13	7	-5	-1	-3
5	E - Water supply; sewerage, waste management and remediation activities	Finland	254	21	32	18	1	8	2		70	4	1	0	0	0
6	F - Construction	Finland	1,688	764	140	79	616	12		1,598		328	164	-82	-18	-61
7	G - Wholesale and retail trade; repair of motor vehicles and motorcycles	Finland	2,771	78	25	1	34	8	0	135	3	17	1	-3	-3	0
8	H - Transportation and storage	Finland	994	644	148	25	32	5		849		97	26	-8	-2	-5
9	L - Real estate activities	Finland	14,805													
10	Loans collateralised by residential immovable property	Finland	44,172	11	22	97	80	17		211		18	8	-1	0	-1
11	Loans collateralised by commercial immovable property	Finland	7,499	28	28	12	2	8		70		19	7	-1	0	-1
12	Repossessed collaterals	Finland	0													
13	Other relevant sectors (breakdown below where relevant)	Finland	5,206	207	134	10	111	9		343	120	15	15	-4	0	-3

14	A - Agriculture, forestry and fishing	Other countries	100
15	B - Mining and quarrying	Other countries	26
16	C - Manufacturing	Other countries	247
17	D - Electricity, gas, steam and air conditioning supply	Other countries	497
18	E - Water supply; sewerage, waste management and remediation activities	Other countries	116
19	F - Construction	Other countries	124
20	G - Wholesale and retail trade; repair of motor vehicles and motorcycles	Other countries	757
21	H - Transportation and storage	Other countries	613
22	L - Real estate activities	Other countries	540
23	Loans collateralised by residential immovable property	Other countries	307
24	Loans collateralised by commercial immovable property	Other countries	844
25	Repossessed colalterals	Other countries	
26	Other relevant sectors (breakdown below where relevant)	Other countries	1,601

	a		b	c	d	e	f	g	h	i	j	k	l	m	n	o
			Gross carrying amount (Mln EUR)													
				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		
31 Dec 2024	Geographical area subject to climate change physical risk - acute and chronic events			<= 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-perfor-ming exposures		of which Stage 2 exposures	Of which non-perfor-ming exposures
27	A - Agriculture, forestry and fishing	Total	1,322	582	292	244	80	7	270		928	271	48	-16	-6	-9
28	B - Mining and quarrying	Total	147	42	3		31	10		54	22	3	5	-3	0	-3
29	C - Manufacturing	Total	3,837	1,379	96	3	729	8	1,307		901	93	40	-23	-3	-17
30	D - Electricity, gas, steam and air conditioning supply	Total	4,374	2,301	243	6	69	4		1,192	1,426	13	7	-5	-1	-3
31	E - Water supply; sewerage, waste management and remediation activities	Total	370	21	32	18	1	8	2		70	4	1	0	0	0
32	F - Construction	Total	1,813	764	140	79	616	12		1,598		328	164	-82	-18	-61
33	G - Wholesale and retail trade; repair of motor vehicles and motorcycles	Total	3,528	78	25	1	34	8	0	135	3	17	1	-3	-3	0
34	H - Transportation and storage	Total	1,607	644	148	25	32	5		849		97	26	-8	-2	-5
35	L - Real estate activities	Total	15,345													
36	Loans collateralised by residential immovable property	Total	44,478	11	22	97	80	17		211		18	8	-1	0	-1
37	Loans collateralised by commercial immovable property	Total	8,344	28	28	12	2	8		70		19	7	-1	0	-1
38	Repossessed collaterals	Total	0													
39	Other relevant sectors (breakdown below where relevant)	Total	6,806	207	134	10	111	9		343	120	15	15	-4	0	-3

This template discloses information on exposures that are exposed to chronic and acute climate change hazards. Physical risk analysis is conducted for each industry in Finland and based on multiple data sources including NOAA, Aqueduct and World Bank. The result of the analysis depends on the industry in which the customer operates, and whether the analysis indicates if the industry in question faces physical risks in Finland. For this reporting period analysis was done for Finnish companies as this covers around 95% of the exposures. All risks have not necessarily been identified and the risk analysis will be improved specifically for corporate groups and multinational companies.

For real estate collaterals analysis was done on flood risk which was interpreted as acute risk. Acute flood risk analysis for real estate collaterals was conducted using flood scenario maps from Finnish Environmental Institute. It was deemed that a real estate collateral is subject to an acute flood risk if any of the coordinates of collateral's buildings is within the once-in-20-years flood risk scenario area.

Template 6 - Summary of GAR KPIs

31 Dec 2024	KPI			
	Climate change mitigation	Climate change adaptation	Total (Climate change mitigation + Climate change adaptation)	% coverage (over total assets)*
GAR stock	6.56%	0.01%	6.58%	80.42%
GAR flow	6.55%	0.00%	6.55%	32.46%

* % of assets covered by the KPI over banks´ total assets

31 Dec 2023	KPI			
	Climate change mitigation	Climate change adaptation	Total (Climate change mitigation + Climate change adaptation)	% coverage (over total assets)*
GAR stock	5.92%	0.02%	5.94%	80.05%
GAR flow	4.77%	0.20%	4.98%	30.55%

* % of assets covered by the KPI over banks´ total assets

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

31 Dec 2024, table is presented in three parts on pages 79-81.

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		31 Dec 2024															
			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)			
	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	61,972	49,779	7,360		606	154	49	13		0	13	49,828	7,374		606	167
2	Financial corporations	7,125	2,404	101		4	2	8	0		0	0	2,412	101		4	3
3	Credit institutions	5,037	1,406	101		4	2	8	0		0	0	1,414	101		4	3
4	Loans and advances	13	0	0		0	0	0	0		0		0	0		0	0
5	Debt securities, including UoP	5,024	1,406	101		4	2	8	0		0	0	1,414	101		4	3
6	Equity instruments																
7	Other financial corporations	2,088	999					0	0		0		999	0		0	
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	2,076	999					0	0		0		999	0		0	
17	Loans and advances	0						0	0		0		0	0		0	
18	Debt securities, including UoP																
19	Equity instruments	2,075	999										999				
20	Non-financial corporations (subject to NFRD disclosure obligations)	7,439	2,574	1,197		602	151	41	13		0	13	2,614	1,210		602	164
21	Loans and advances	7,183	2,437	1,113		535	148	39	12		0	12	2,476	1,125		535	160
22	Debt securities, including UoP	256	137	84		67	3	1	1			1	138	85		67	4
23	Equity instruments	1															

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		31 Dec 2024															
			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)			
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
24	**Households**	47,408	44,801	6,062									44,801	6,062			
25	of which loans collateralised by residential immovable property	44,478	42,129	6,062									42,129	6,062			
26	of which building renovation loans	2,105	1,859										1,859				
27	of which motor vehicle loans	2,674	2,421										2,421				
28	**Local governments financing**																
29	Housing financing																
30	Other local governments financing																
31	Collateral obtained by taking possession: residential and commercial immovable properties	0															
32	TOTAL GAR ASSETS	61,972	49,779	7,360		606	154	49	13		0	13	49,828	7,374		606	167
	Assets excluded from the numerator for GAR calculation (covered in the denominator)																
33	**EU Non-financial corporations (not subject to NFRD disclosure obligations)**	31,125															
34	Loans and advances	30,794															
35	Debt securities	319															
36	Equity instruments	12															
37	**Non-EU Non-financial corporations (not subject to NFRD disclosure obligations)**	597															
38	Loans and advances	597															
39	Debt securities																
40	Equity instruments																
41	Derivatives	681															
42	On demand interbank loans	121															
43	Cash and cash-related assets	209															
44	Other assets (e.g. Goodwill, commodities etc.)	17,426															
45	TOTAL ASSETS IN THE DENOMINATOR (GAR)	112,130															

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
			31 Dec 2024														
			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)			
	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	6,750															
47	Central banks exposure	18,470															
48	Trading book	2,077															
49	TOTAL ASSETS EXCLUDED FROM NUMERATOR AND DENOMINATOR	27,297															
50	TOTAL ASSETS	139,427															

31 Dec 2023, table is presented in three parts on pages 82-84.

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		31 Dec 2023															
			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)			
	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	60,422	49,294	6,656		631	178	42	24		5	20	49,337	1,113		636	197
2	Financial corporations	6,534	2,191										2,191				
3	Credit institutions	4,282	1,166										1,166				
4	Loans and advances	8	0										0				
5	Debt securities, including UoP	4,274	1,166										1,166				
6	Equity instruments																
7	Other financial corporations	2,252	1,025										1,025				
8	of which investment firms																
9	Loans and advances																
10	Debt securities, including UoP																
11	Equity instruments																
12	of which management companies	140	19										19				
13	Loans and advances	140	19										19				
14	Debt securities, including UoP																
15	Equity instruments																
16	of which insurance undertakings	2,077	1,006										1,006				
17	Loans and advances	0	0										0				
18	Debt securities, including UoP																
19	Equity instruments	2,077	1,006										1,006				
20	Non-financial corporations (subject to NFRD disclosure obligations)	7,063	2,325	1,089		631	178	42	24		5	20	2,368	1,113		636	197
21	Loans and advances	6,678	2,173	979		567	139	39	22		5	18	2,212	1,001		572	156
22	Debt securities, including UoP	384	152	110		64	39	4	2			2	156	112		64	41
23	Equity instruments	1															

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		31 Dec 2023															
			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)			
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
24	**Households**	46,825	44,778	5,567									44,778	5,567			
25	of which loans collateralised by residential immovable property	44,509	42,696	5,567									42,696	5,567			
26	of which building renovation loans	2,248	2,032										2,032				
27	of which motor vehicle loans	2,019	1,816										1,816				
28	**Local governments financing**																
29	Housing financing																
30	Other local governments financing																
31	Collateral obtained by taking possession: residential and commercial immovable properties	0															
32	TOTAL GAR ASSETS	60,422	49,294	6,656		631	178	42	24		5	20	49,337	6,680		636	197
	Assets excluded from the numerator for GAR calculation (covered in the denominator)																
33	**EU Non-financial corporations (not subject to NFRD disclosure obligations)**	32,327															
34	Loans and advances	31,811															
35	Debt securities	503															
36	Equity instruments	12															
37	**Non-EU Non-financial corporations (not subject to NFRD disclosure obligations)**	475															
38	Loans and advances	475															
39	Debt securities																
40	Equity instruments																
41	Derivatives	1,227															
42	On demand interbank loans	195															
43	Cash and cash-related assets	160															
44	Other assets (e.g. Goodwill, commodities etc.)	17,672															
45	TOTAL ASSETS IN THE DENOMINATOR (GAR)	112,479															

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
			31 Dec 2023														
			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)			
	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	5,343															
47	Central banks exposure	20,195															
48	Trading book	2,492															
49	TOTAL ASSETS EXCLUDED FROM NUMERATOR AND DENOMINATOR	28,030															
50	TOTAL ASSETS	140,508															

Template has been amended following its initial disclosure.

Template 8 - GAR (%)

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		31 Dec 2024: KPIs on stock															
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)					
Table is presented in two parts on pages 85-86.		Proportion of eligible assets funding taxonomy relevant sectors					Proportion of eligible assets funding taxonomy relevant sectors					Proportion of eligible assets funding taxonomy relevant sectors					Proportion of total assets covered
			Of which environmentally sustainable					Of which environmentally sustainable					Of which environmentally sustainable				
% (compared to total covered assets in the denominator)				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	44.39%	6.56%		0.54%	0.14%	0.04%	0.01%		0.00%	0.01%	44.44%	6.58%		0.54%	0.15%	80.42%
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	80.33%	11.88%		0.98%	0.25%	0.08%	0.02%		0.00%	0.02%	80.40%	11.90%		0.98%	0.27%	44.45%
3	Financial corporations	33.74%	1.42%		0.05%	0.03%	0.11%	0.00%		0.00%	0.00%	33.86%	1.42%		0.05%	0.04%	5.11%
4	Credit institutions	27.91%	2.00%		0.08%	0.05%	0.16%	0.01%		0.00%	0.00%	28.07%	2.01%		0.08%	0.05%	3.61%
5	Other financial corporations	47.83%										47.83%					1.50%
6	of which investment firms																
7	of which management companies																
8	of which insurance undertakings	48.11%										48.11%					1.49%
9	Non-financial corporations subject to NFRD disclosure obligations	34.60%	16.09%		8.09%	2.03%	0.54%	0.18%		0.00%	0.18%	35.15%	16.27%		8.09%	2.21%	5.34%
10	Households	94.50%	12.79%									94.50%	12.79%				34.00%
11	of which loans collateralised by residential immovable property	94.72%	13.63%									94.72%	13.63%				31.90%
12	of which building renovation loans	88.32%										88.32%					1.51%
13	of which motor vehicle loans	90.53%										90.53%					1.92%
14	Local government financing																
15	Housing financing																
16	Other local governments financing																
17	Collateral obtained by taking possession: residential and commercial immovable properties																0.00%

		q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae	af
		31 Dec 2024: 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					Proportion of total new assets covered
			Of which environmentally sustainable					Of which environmentally sustainable					Of which environmentally sustainable				
% (compared to total covered assets in the denominator)				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	39.37%	6.55%		1.00%	0.44%	0.02%	0.00%			0.00%	39.39%	6.55%		1.00%	0.44%	32.46%
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	76.36%	12.71%		1.94%	0.85%	0.03%	0.00%			0.00%	76.40%	12.71%		1.94%	0.85%	16.73%
3	Financial corporations	10.01%	0.56%		0.03%	0.03%	0.01%	0.00%		0.00%		10.02%	0.56%		0.03%	0.03%	0.46%
4	Credit institutions	10.01%	0.56%		0.03%	0.03%	0.01%	0.00%		0.00%		10.02%	0.56%		0.03%	0.03%	0.46%
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	29.70%	14.85%		8.96%	3.93%	0.15%	0.01%			0.01%	29.85%	14.87%		8.96%	3.95%	3.62%
10	Households	92.16%	12.54%									92.16%	12.54%				12.65%
11	of which loans collateralised by residential immovable property	92.13%	15.97%									92.13%	15.97%				9.93%
12	of which building renovation loans	66.71%										66.71%					0.55%
13	of which motor vehicle loans	91.87%										91.87%					2.60%
14	Local government financing																
15	Housing financing																
16	Other local governments financing																
17	Collateral obtained by taking possession: residential and commercial immovable properties																

Table is presented in two parts on pages 87-88.

	% (compared to total covered assets in the denominator)	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		31 Dec 2023: 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					Proportion of total assets covered
			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	
1	GAR	43.83%	5.92%		0.56%	0.16%	0.04%	0.02%			0.02%	43.86%	5.94%		0.57%	0.18%	80.05%
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	81.58%	11.02%		1.04%	0.29%	0.07%	0.04%		0.01%	0.03%	81.65%	11.06%		1.05%	0.33%	43.00%
3	Financial corporations	33.53%										33.53%					4.65%
4	Credit institutions	27.24%										27.24%					3.05%
5	Other financial corporations	45.50%										45.50%					1.60%
6	of which investment firms																
7	of which management companies	13.66%										13.66%					0.10%
8	of which insurance undertakings	48.41%										48.41%					1.48%
9	Non-financial corporations subject to NFRD disclosure obligations	32.92%	15.42%		8.94%	2.51%	0.60%	0.34%		0.06%	0.28%	33.52%	15.76%		9.00%	2.79%	5.03%
10	Households	95.63%	11.89%									95.63%	11.89%				33.33%
11	of which loans collateralised by residential immovable property	95.93%	12.51%									95.93%	12.51%				31.68%
12	of which building renovation loans	90.43%										90.43%					1.60%
13	of which motor vehicle loans	89.95%										89.95%					1.44%
14	Local government financing																
15	Housing financing																
16	Other local governments financing																
17	Collateral obtained by taking possession: residential and commercial immovable properties																

		q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae	af
		31 Dec 2023: 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					Proportion of total new assets covered
			Of which environmentally sustainable					Of which environmentally sustainable					Of which environmentally sustainable				
% (compared to total covered assets in the denominator)				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	41.73%	4.77%		0.15%	0.14%	0.22%	0.20%		0.02%	0.19%	41.95%	4.98%		0.17%	0.33%	30.55%
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	69.79%	7.98%		0.26%	0.23%	0.37%	0.34%		0.03%	0.31%	70.15%	8.32%		0.28%	0.55%	18.27%
3	Financial corporations	27.87%										27.87%					1.48%
4	Credit institutions	27.87%										27.87%					1.48%
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	25.22%	2.39%		0.97%	0.88%	1.40%	1.30%		0.11%	1.19%	26.62%	3.69%		1.08%	2.07%	4.81%
10	Households	92.89%	11.21%									92.89%	11.21%				11.97%
11	of which loans collateralised by residential immovable property	92.99%	14.57%									92.99%	14.57%				9.22%
12	of which building renovation loans	68.79%										68.79%					0.54%
13	of which motor vehicle loans	92.10%										92.10%					2.63%
14	Local government financing																
15	Housing financing																
16	Other local governments financing																
17	Collateral obtained by taking possession: residential and commercial immovable properties																

Template has been amended following its initial disclosure.

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

31 Dec 2024

a	b	c	d	e	f
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
Bonds (e.g. green, sustainable, sustainability-linked under standards other than the EU standards)	Non-financial corporations	95	yes	no	Investments to counterparties Green Bonds. Counterparties Green Finance Frameworks are aligned with ICMA Green Bond Principles.
	Of which Loans collateralised by commercial immovable property	65	yes	no	
Loans (e.g. green, sustainable, sustainability-linked under standards other than the EU standards)	Non-financial corporations Green loans	3,014	yes	no	Loans to finance projects and businesses in accordance with OP Green Bond Framework 2024 dedicated to Renewable energy, Green buildings, Pollution prevention and control including sustainable water management, Clean transportation, Biodiversity conservation and environmentally sustainable management of living natural resources and land use, and Energy Efficiency, as well as in accordance with clients' own green frameworks or European Investment Fund's Sustainability Guarantee Use Case document.
	Of which Loans collateralised by commercial immovable property	902	yes	no	
	Non-financial corporations Sustainability linked loans	2,929	yes	no	Loans to finance businesses that are committed to sustainability and have a defined sustainability strategy. The loans support counterparties in achieving their climate and sustainabillity targets.
	Of which Loans collateralised by commercial immovable property	642	yes	no	
	Households	0	yes	no	Energy renovation loans for households, exl. apartment buildings. Loans are dedicated to energy efficiency improvement actions. Eligible actions have referrence with the EU Taxonomy substantial Contribution Criteria 7.3, 7.4, 7,6 and 9.3. in the Climate Delegated Acts of the EU Taxonomy for climate change mitigation.
	Of which Loans collateralised by residential immovable property	0	yes	no	
	Of which building renovation loans	0	yes	no	

This template covers other climate change mitigating actions and includes exposures of the institutions that are not EU taxonomy aligned, but that still support counterparties in the transition and adaptation process for the objective of climate change mitigation. It is expected, that some of these exposures will be reported on taxonomy related templates in the future.

Green loans are to finance activities that have a positive environmental impacts. The use of proceeds are linked to the specific green activities and the company should be able to meet the reporting requirements. Sustainability-linked loans are for companies committed to sustainability improvements. The proceeds can be used for general corporate purposes. Companies must report according to agreed sustainability performance metrics (KPIs). Reported sustainability-linked loans in this template have climate targets. Margin will be adjusted according to performance.

It should be noted that there are differences when sustainable financing volumes are compared across the OP Financial Group's sustainability-related disclosures. Disclosures in this template include on-balance exposures only.

Tables 1, 2, 3 – Qualitative information on ESG risks

Business strategy and processes

To adapt to the constantly evolving business environment, which is further shaped by risks stemming from ESG factors, OP Financial Group has a strategy process in which it assesses, reshapes, and implements its strategy on an ongoing basis. As part of the ongoing strategy process, OP Financial Group systematically assesses its business environment and operating model to be able to make and implement new strategic choices when needed.

OP Financial Group's strategy is based on worldviews, or alternative descriptions of developments in the business environment, over the next 3–5 years. The materialisation of the worldviews is monitored continuously, and they are updated regularly. The developments in the business environment are monitored from the perspectives of the economy, customer behaviour, competition, technology and regulation. The strategy work involves identifying which phenomena are to be considered in the strategy and its implementation.

OP Financial Group's sustainability program and its policy priorities implement OP's strategy, guiding the sustainability and corporate responsibility actions. The sustainability programme covers three areas: climate and the environment, people and communities, and corporate governance. Responsible business is one of OP Financial Group's strategic priorities.

OP Financial Group's sustainability programme and its goals respond to the changing operating environment, the grown expectations of stakeholders and the increased regulatory requirements. The objectives selected for the Climate and the environment theme under the programme relate to sustainable financing and investment products, sustainable insurance operations, decreasing OP's emissions and the customers' emissions, circular economy, and biodiversity. OP requires that large companies subject to high climate transition risk prepare company-specific emission reduction plans by the end of 2025.

OP Financial Group leverages the opportunities provided by climate and environmental perspectives in the development of its financing, investment, and insurance products. OP Financial Group wants to enable the transition to a more sustainable future together with the customers and support the customers' preparation for the effects of climate change and their shift towards low-carbon operations.

As a financier, insurer, investor and developer of services and products, OP Financial Group supports its customers and other stakeholders in the sustainability transition of their business operations or other functions. OP Financial Group works with its customers to enable a more sustainable future

OP Corporate Bank is committed to achieving carbon neutral corporate loan portfolios by 2050. OP Asset Management and OP Fund Management Company have made the same commitment regarding the funds they manage together.

OP Financial Group has incorporated social responsibility indicators into its sustainability programme. These include fostering a diverse competence base within its business units, ensuring that employees perceive recruitments and career transitions as fair, and incentivizing continuous development. Additionally, OP Financial Group is committed to improving financial literacy to provide everyone with equal opportunities to manage their finances. The group also aims to assist customers with special needs by promoting their independent, multichannel, and easy use of banking and insurance services, as well as enhancing their digital skills. OP Financial Group's Human Rights Policy, which OP Financial Group monitors in the sustainability programme, guides its actions with regard to salient human rights impacts and the development of related indicators.

OP Financial Group continuously develops methodologies and practices to ensure that respect for human rights is embedded in all activities. Through OP Financial Group's processes, which are aligned with the principles of corporate sustainability due diligence defined in the UN Guiding Principles on Business and Human Rights (UNGP) and OECD Guidelines for Multinational Enterprises, OP aims to avoid, prevent and reduce both potential and actual harmful human rights impacts. OP Financial Group published its Human Rights Statement and Policy in 2023.

Governance

Responsibilities of the management body in the context of ESG risk management covering relevant transmission channels

The Board of Directors of OP Cooperative oversees the impact of climate and environmental factors, and other risk factors, on the group's risk exposure. All business units and centres of excellence integrate climate and environmental risk perspectives into OP Financial Group's operations and processes, with support from the Risk Management function and the Group ESG function. The Board supervises the management of these matters by setting strategic priorities, indicators, and policies for monitoring, including those related to climate and environmental risks. Additionally, the Board regularly addresses ESG matters, encompassing climate and the environment, people and communities, and corporate governance.

The Sustainability Program and its policy priorities implement OP Financial Group's strategy. The Board of Directors approves the Sustainability Program, which is then further confirmed by the Supervisory Council. OP Financial Group has an ESG Committee, appointed by the Executive Management Team, to support the management of ESG and other sustainability and corporate responsibility matters. The ESG Committee monitors, controls, and reports on the implementation of the sustainability programme, prepares Group-level policy priorities, and oversees sustainability and corporate responsibility regulation. Furthermore, the ESG Committee ensures the high-quality implementation of ESG matters in compliance with regulations, authority orders, decisions, and principles approved by the Executive Management Team, Board of Directors, and Supervisory Council, as well as the expectations of customers and other stakeholders.

Perspectives related to climate and environmental risk factors are integrated into the group's operations and processes, business units, and centres of excellence. The integration of these perspectives is supported by the ESG function and the Risk Management function. External change factors, such as climate, nature loss, scientific and technological innovations, demographics, and geopolitics, are assessed to understand their impacts on customers' values, preferences, actions, and future success. OP Financial Group advises customers on current business environment requirements and the impacts of external factors on their operations. Through advice and business decisions (customer selection, pricing, product development, and consultation), the group helps customers succeed in the future and current business environment, while securing long-term profitability and compliance with values.

The risk management function regularly identifies climate and environmental risk drivers, assessing their connection to various risk types that affect OP Financial Group's business models. This function conducts stress testing, scenario analyses, and other quantitative evaluations related to climate and environmental matters. Additionally, it participates in group-level ESG-related work as a second line of defense, providing expertise and oversight. The development of ESG, climate, and environmental risks is monitored and reported to management.

OP Financial Group has comprehensive and proportionate governance and control systems, considering the quality, scope, and diversity of its operations. These systems ensure effective management of the group in accordance with sound and prudent business principles. Additionally, they ensure that the group's governing bodies can effectively oversee management.

In addition to the Board of Directors and Executive Management Team, ESG and responsibility matters are regularly addressed in the business units' management teams. The daily responsibility work and implementation of the sustainability program are managed by the ESG managers and specialists within the business units.

The highest governing bodies of OP Cooperative address ESG issues at least quarterly. Executives with ESG responsibility have been appointed to the Executive Management Team and Risk Management function. Additionally, the Executive Management Team has established an ESG Committee to assist in managing OP Group's ESG issues and to support the ESG work of the OP Cooperative's business units, competence centres, and Member Cooperative Banks.

The Board of Directors, as the highest supervisory body, is responsible for OP Cooperative's supervision and setting strategic priorities. The Board monitors the implementation of the Sustainability Program and reviews the progress of key ESG initiatives on a quarterly basis through an ESG overview. Furthermore, quarterly risk analysis, including ESG risks, is reported to the Board.

The Board approves OP Financial Group's Sustainability Report. The Audit Committee oversees the completeness and reliability of OP Financial Group's financial reporting and sustainability reporting.

The Board's Risk Committee provides statements to the Board as needed and monitors and critically reviews ESG risks and ESG strategy management in OP Financial Group. The committee reviews the quarterly risk analysis, which considers ESG risks comprehensively.

The Board's Risk Committee also reviews the ESG overview before it is presented to the Board of Directors.

The Risk Appetite Framework (RAF) document, part of OP Financial Group's internal instructions framework, outlines the general strategic intents of the risk management process. It sets preconditions for how senior management is expected to organize the risk management process, including environmental risk factors, within the group.

Lines of reporting and frequency of reporting relating to ESG risk

The Board of Directors supervises the management of climate and environmental matters and approves OP Financial Group's strategic priorities and indicators and policies subject to monitoring, including those related to ESG risk factors. The Board of Director's quarterly ESG review considers a wide range of ESG themes, including changes in the operating environment. Current ESG matters and results of climate and environmental risk assessment work as well as regularly reported ESG risk metrics are also included in quarterly risk analysis reporting to OP management.

OP Financial Group monitors the financed emissions of selected portfolios, e.g., energy production, agriculture, and housing loans, for which OP has set emission intensity reduction targets for the year 2030 and various other metrics regarding physical and transition risks, which are included in quarterly risk analysis reporting to inform the management and relevant stakeholders.

In 2024, OP has enhanced its credit risk monitoring capabilities to include ESG-risks, with a particular focus on environmental risks. These ESG-risks, which impact credit risks, are now monitored quarterly as part of the broader credit risk monitoring process within relevant management bodies.

The integration of ESG factors in all risk taking, risk management and processes for evaluating the adequacy of capital and liquidity (ICAAP, ORSA and ILAAP) require extensive development work within business functions and assurance functions. ESG factors are being embedded in the management's risk reporting in stages, while seeking synergies with external sustainability reporting.

In corporate banking, environmental risk reporting, including the ESG classification of corporate counterparties and financed greenhouse gas emissions, is made available to management through a centralized reporting service. This data is updated in near real-time for financial information, while background ESG data is updated in tranches. OP Financial Group also compiles quarterly credit risk monitoring reports that include, among other things, the aforementioned environmental risk matters.

Environmental risks are also included in the annual sustainability reporting (CSRD) and CDP reporting of OP Financial Group.

Alignment of the remuneration policy with institution's ESG risk-related objectives

OP Financial Group's Remuneration Policy supports the implementation of OP Financial Group's mission as well as the strategy and the annual business targets derived from the strategy. The following Group-level principles, which guide all remuneration at OP Financial Group, lie behind the Remuneration Policy: Remuneration is in line with OP Financial Group's core values, mission and strategy, and it contributes to their implementation. Remuneration schemes comply with regulation and the Finnish Corporate Governance Code where applicable, take account of responsibility issues and sustainability risks, and do not encourage excessive risk-taking. Furthermore, remuneration aligns with OP's Equality and Non-Discrimination Plan, ensuring fairness across age groups and genders based on job grades.

OP Financial Group wants to take sustainability into account in the remuneration of its top management, as responsibility is a key part of OP Financial Group's operations and values. In addition, responsible business operations are one of OP Financial Group's strategic priorities. In 2024 Executive Management team scorecard had ESG targets with a 5% weighting.

Integration of short-, medium- and long-term effects of ESG factors and risks in the risk framework

Drivers of change in the business environment, such as technological or climate change and other sustainability factors (ESG factors – Environmental, Social and Governance), affect the needs and preferences of customers and other members of society. ESG factors are external megatrends – examples of root causes on OP Financial Group's risk map. They are defined as change factors affecting different risk types, not as separate risks, in the group level risk identification processes.

The transition towards a low-carbon and more environmentally sustainable economy will have direct and indirect impacts. These include, for example, climate or environmental policy decisions, technological development, market confidence, and changes in customer choices. Physical and transition risks will impact OP Financial Group's business and financial success through customers and other stakeholders, in particular. If they materialize, such risks may affect the risk profile, capitalization, liquidity, and continuity of daily business in various ways.

In line with the OP Financial Group's Risk Appetite Statement (=RAS) external change factors (such as climate, nature loss, scientific and technological innovations, demographics and geopolitics) are assessed in order to understand the impacts of such factors on customers' preferences, actions and future success.

OP Financial Group uses stress testing and scenario analysis to identify key risks, assess their significance, and translate the group's risk appetite into limits and risk policy guidelines. Scenario analysis is a tool to estimate where key performance indicators and other thresholds set by top management would be breached. Stress tests aim to cover all significant types of risk and risk factors that have been identified and assessed as significant in the Risk Appetite Framework.

The scenarios used in the assessment include evaluations of the effects of climate and environmental risks over the short, medium, and long term (spanning over five years and extending beyond several decades). The scenarios include alternatives in which climate change follows scientifically anticipated developments (e.g., scenarios of the Intergovernmental Panel on Climate Change).

Climate and environmental risks are divided into physical and transition risks, and the magnitude of their impacts on OP's different risk types are assessed on several time horizons as part of risk management's climate and environmental scenario analysis. Currently, credit risk management's climate and environmental scenario analysis utilizes a medium-term time horizon up to 10 years, based on the interim target of the Paris Climate Agreement (2030) supplemented with EBA's recommendations of using a minimum time horizon of 10 years. The possibility of extending the analysis to reach a longer time-horizon is being examined. Actions towards a longer-reaching scenario analysis will be taken if found necessary. Market risk management's climate and environment stress test extends to the year 2050, covering short-, medium- and long-term effects. Liquidity risk management's scenario analysis on covered bonds extends to the year 2029.

Definitions, methodologies and international standards on which the ESG risk management framework is based

OP Financial Group conducts an annual ESG risk materiality analysis. The materiality analysis serves as an overview of the environmental, social and governance risks relating to OP Financial Group's operations and business, ensuring that ESG risks are identified, measured, and managed effectively. The materiality analysis is based on the supervisory expectations as well as the regulation applicable to OP Financial Group's business, and the guidelines issued by the European Banking Authority. The results of the materiality analysis are utilised in the strategy process and implemented to the various processes and business operations of OP Financial Group.

Physical and transition risks may impact OP Financial Group's business and financial success through customers, suppliers and other stakeholders and through own operations. For identifying the material physical and transition risks in its business, OP Financial Group assesses the risks and their transmission channels in the most significant portfolios and processes. In addition to identifying the key risks and risk drivers, the analysis considers the risk impact chains and the potential risk mitigation actions.

OP Financial Group offers sustainable investment products as well as sustainable and green loans tailor-made for projects beneficial to the climate and environment to its customers. The products and services are built in line with Loan Market Association's (LMA) and International Capital Markets Association's (ICMA) principles and guidelines. In 2024, OP Corporate Bank has updated its Green Bond Framework to align more closely with the criteria of the EU Taxonomy. As a result, OP Financial Group now includes the EU Taxonomy as part of its green lending criteria for corporates.

In its environmental risk management framework, OP Financial Group considers and applies international standards such as the Kunming-Montreal Global Biodiversity Framework, the Partnership for Biodiversity Accounting Financials initiative (PBAF), the Partnership for Carbon Accounting Financials (PCAF), and ENCORE.

For sustainability reporting, OP has previously complied with NFRD (Non-financial Reporting Directive) and has reported in accordance with CSRD (Corporate Sustainability Reporting Directive) standards from 2024 onwards. OP Financial Group also follows the guidelines of and reports according to UNEP FI (United Nations Environment – Finance Initiative), UNPRI (United Nations Principles for Responsible Investments) and CDP (Carbon Disclosure Project).

OP Financial Group defines which climate and environmental factors affect its business strategy in the short, medium, and long term. The scenarios used in the assessment include evaluations of the effects of climate and environmental risks over the short, medium, and long term. The scenarios include alternatives where climate change follows scientifically anticipated developments, such as those from the Intergovernmental Panel on Climate Change (IPCC). NGFS scenarios and SSP & RCP global warming trajectories are also utilized in constructing scenarios.

The methodology for climate risk stress testing consists of the following components:

i) Evaluation of the relevance and significance of risks, enabling the design of scenario narratives, selection of scenarios, and effective stress testing.

ii) Scenarios for climate and environmental factors based on the evaluation of risk relevance and significance and grounded in scientific research on impact mechanisms and economic effects. The scenarios should include both physical and transitional risk scenarios.

iii) Modelling of climate and environmental factors for the portfolio under consideration, including physical and transitional risks according to the scenarios.

iv) Impact calculations based on climate and environmental risk scenarios and portfolio-specific calculation methods. The results complement the understanding of risks relevant to OP Financial Group and thus also feed into the risk identification process.

Climate and environmental risk scenario analyses and stress tests at OP Financial Group are designed to consider at least the following aspects from both a normative and economic perspective:

- The possible impact of physical and transitional risks,
- The possible development of climate and environmental risks in different scenarios,
- The possible realisation of climate and environmental risks in the short, medium, and long term in different scenarios.

Stress testing of OP Financial Group is regulated by Capital requirements regulation and Solvency II frameworks. OP Financial Group utilizes the ECB report on good practices for climate stress testing and the BIS Principles for sound stress testing practices and supervision as guidelines for its climate and environmental stress testing and scenario analysis methodology. OP Financial Group uses NGFS Phase II, Phase IV and IPCC scenarios as the base scenarios in its climate and environmental scenario analysis. OP Financial Group's stress testing is strongly related to its ICAAP, ILAAP and ORSA methodologies.

As a conclusion of the analyses, it can be stated that in the short term the assessed level of climate and environmental risks is low to moderate. In the longer term there is potential for increased but still moderate risk levels.

Qualitative information on Environmental Risk

Processes to identify, measure and monitor activities and exposures (and collateral where applicable) sensitive to environmental risks, covering relevant transmission channels

As environmental risks have cascading effects and multiple transmission channels, OP Financial Group pursues to analyse and monitor environmental risks and their effects in OP Financial Group's business in a holistic manner.

OP Financial Group conducts a group level ESG risk materiality analysis annually. The materiality analysis serves as an overview of the environmental, social and governance risks relating to OP Financial Group's operations and business, ensuring that ESG risks are identified, measured, and managed effectively. The outputs of the analysis are then utilized in more detailed risk identification and assessment.

By utilizing the risk identification process, the Group's Risk Management maintains a catalogue of identified risks and their underlying factors. The results of the risk identification process are used in the preparation of risk policies when specifying risk management principles, measures, objectives and limits based on risk-bearing capacity and risk appetite. The results are also used to maintain the economic capital requirement and stress testing framework.

OP Financial Group has identified liquidity specific risks for risk management purposes. Climate and environmental related risk factors have also been considered regarding their impact on funding, liquidity capabilities and market access. Materiality of the risk factors and exposures has been further assessed on the climate and environmental related risks. Based on the assessments, the coverage of ESG-related risks in liquidity specific stress testing has been re-evaluated. As a result, an internal climate and environmental related liquidity stress scenario was introduced. The liquidity risks associated with credit and mortgage-backed covered bond financing have been examined through a scenario analysis, which takes into account the stresses caused by the key risk drivers of climate and environmental scenarios. Market risks of the liquidity buffer are further examined via climate-related market risk scenarios.

A climate-related market risk stress test based on NGFS (Network for Greening the Financial System) scenarios (orderly, disorderly and hot-house) is applied to trading and non-trading bond portfolios, as well as unilateral credit value adjustment (UCVA). The stress test consists of interest rate scenarios based on geographical location and credit spread scenarios that target carbon-sensitive sectors.

Operational risks related to environmental factors are also identified in the risk identification process. Additionally, risks are identified and assessed in separate self-assessments (RCSAs) that are made for processes, services, and systems. The assessments consider several transmission channels, including impact on profitability and increase in legal costs. As a part of designing new products and processes, risk assessment process is conducted including identification of relevant environment related risks. The operational effects of physical climate and environmental risks such as extreme weather phenomena have been assessed both for OP's own physical assets as well as OP's suppliers and supply chains using adverse climate scenarios based on the NGFS Hot House scenario and local climate projections by IPCC21 extending to the year 2050.

The environmental related risks are monitored through updating loss events in a group wide operational risk management system. In addition, the RCSAs are updated when potential risks change. To complement these, the Risk Management function maintains scenarios for both individual risks and for the whole OP Financial Group level risks. The scenarios are used to assess the impact of selected environmental risks. The significance of different environmental related operational risks is assessed in the materiality analysis.

In the loan origination process, OP Financial Group considers ESG themes and risks related to environmental, social and governance factors in accordance with the EBA (European Banking Authority) Guidelines on loan origination and monitoring.

OP performs ESG analyses for counterparties that meet the criteria set out in OP's ESG Analysis Framework. The identification of the group for ESG analysis utilizes a dataset provided by an external provider, which covers European companies. Based on the data, the exposure of each industry to different ESG themes and the risks related to those themes is determined. In the qualitative ESG analysis, environmental themes that are deemed material for the company's industry are evaluated. The evaluation focuses on industry-specific risks related to material themes, their potential business impacts (revenue, costs, investments), and the mitigation strategies that the company has identified to address these risks and potential negative business impacts. The material themes to be analyzed are determined from the following environmental themes: carbon emissions, product carbon footprint, financing environmental impact, insurance climate risk, water stress, biodiversity and land, toxic emissions and waste, packaging material waste management, and electronic waste. ESG analyses are conducted yearly, and the findings of the qualitative ESG analysis are taken into account in the expert credit rating process. Thus, potential ESG risks have an impact on counterparties' credit ratings.

OP Financial Group has identified several potential climate and environmental risks relevant to collateral management. The identified risks for both residential property collateral and commercial real estate have been assessed, and based on materiality analysis, the most significant physical risks are floods, while the most significant transition risks are related to energy efficiency.

Flood risk is a material risk for OP Financial Group's real estate collateral properties (excl. forests). The probability of flood risk depends on the location, so the risk should be examined based on the location of the site. Seawater and water flood areas and the frequency of floods are examined with the help of data obtained from the flood map service maintained by the Finnish Environment Institute (Syke). The risk is assessed on the basis of the probability and severity of flooding.

If the collateral object is a building, it may pose a transition risk due to poor energy efficiency. This transition risk is identified, for example, based on the energy certificate, energy class, and heating method. The transition risk is assessed in relation to the requirements of the Energy Efficiency Directive and only applies to buildings for which an energy certificate is required by law, such as residential, office, and commercial premises.

OP Financial Group uses a separate tool for assessing ESG-related risks in collaterals. The group also uses external data to monitor all real estate collaterals in terms of actual floods.

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

OP Financial Group has in 2023 set emissions targets for three sectors, based on a materiality analysis. OP Financial Group's sector-specific emissions reduction targets are: in energy production, a 50% reduction of emissions intensity from the 2022 level by 2030, in agriculture, a 30% reduction of absolute emissions from the 2022 level by 2030, in housing loans, a 45% reduction of emissions intensity from the 2022 level by 2030.

Limits for the emission intensity of the housing and energy production loan portfolios as well as OP investment funds have been included in OP Financial Group's risk policy in order to guide risk taking along the emission reduction trajectories dictated by OP's emission intensity targets for the portfolios and funds to be met by 2030. A limit for a minimum ratio of green loans to all loans granted to the energy production sector has also been set and included in OP Financial Group's risk policy. The development of the aforementioned metrics behind the limits are monitored and reported to the management as part of the quarterly risk analysis reporting in 2025. Furthermore, OP Financial Group has exclusionary strategies in place for coal, oil and natural gas in its lending and investment funds.

The risk management function partakes in OP Financial Group's climate change adaptation actions with climate- and environment-related physical and transition risk scenario analyses and stress testing of different customer segments and risk types. The results of the scenario analysis and stress testing are utilized in the ICAAP and ILAAP proceedings and risk reporting to provide climate and environmental credit risk information to the management and to support the risk and credit policies of the group. Additionally, the risk management function monitors several other ESG- and sustainability-related metrics regarding the credit portfolio, which are also included in internal risk reporting to the management.

Activities, commitments and exposures contributing to mitigate environmental risks

OP Financial Group offers sustainable investment products as well as sustainable and green loans tailor-made for projects beneficial to the climate and environment to its customers. OP Corporate Bank's Green Bond Framework identifies sustainable targets, and the appropriate funds gained through a green bond are allocated to sustainable corporate finance. The green bonds support green transition, and proceeds raised with them are allocated to sustainable corporate finance. Eligible sectors to be funded through the bonds include, for example, renewable energy, green buildings, and environmentally sustainable management of living natural resources and land use. In retail banking, a green loan to SMEs and housing companies has been launched.

As part of the ESG related target setting, OP Financial Group is constantly reviewing the operating environment and the need to set up new emission reduction targets. Based on the materiality analysis and PCAF calculation for the year 2024, the previously set sector specific emission reduction targets for the three most significant sectors (energy, agriculture, and housing loans) were considered appropriate and hence remained unchanged.

OP Financial Group has committed to reducing the energy intensity of its financed emissions in the energy production sector by 50 % from the year 2022 to the year 2030. A similar commitment of 30 % has been set for agriculture and 45 % for housing loans using the same time horizon. OP requires that large companies subject to high climate transition risk prepare company-specific emission reduction plans by the end of 2025. Limits for the emission intensity of the housing loan and energy production credit portfolios and investment funds have been included in OP Financial Group's risk policy to follow the emission reduction trajectories dictated by OP's emission intensity targets for the portfolios to be met by 2030. A limit for a minimum ratio of green loans to all loans given to the energy production sector has also been set and included in Banking Risk Policy. The development of the aforementioned metrics behind the limits are monitored and reported to the management as part of the quarterly risk analysis reporting in 2025. OP Financial Group has exclusionary strategies in place for coal, oil and natural gas in its lending and investment funds.

OP Financial Group's climate change adaptation actions are supported by climate and environment-related physical and transition risk scenario analyses and stress testing for different customer segments. The results of the scenario analysis and stress testing are utilized in ICAAP and ILAAP and environmental reporting to provide climate and environmental credit risk information to the management and to support the Banking Risk Policy of the group. Additionally, Risk management function monitors several ESG and sustainability related metrics regarding the credit portfolio, which are also included in quarterly internal risk reporting to the management.

OP Financial Group seeks to be pioneer in promoting biodiversity. OP Financial Group's Biodiversity roadmap contains measures for sustainable corporate finance, investment funds, insurance companies, agriculture and forestry, OP cooperative banks and procurement. In terms of sustainable corporate finance, OP Financial Group aims to increase the financing of nature-positive projects and support its corporate customers in their efforts to reduce their adverse impacts to biodiversity.

Operational risks related to environmental factors are subject to active operational risk management practices. Mitigation measures for potential risks identified in processes, services and systems, are designed and recorded in the operational risk management system. Business continuity disruptions in important and critical processes caused by environmental drivers, are mitigated through business continuity plans. Additionally, mitigation measures are designed and implemented after loss events when needed.

Current investment activities and (future) investment targets towards environmental objectives and EU Taxonomy-aligned activities

Current Investment Targets

EU Taxonomy-aligned exposures

OP Corporate Bank has updated its Green Bond Framework to more closely follow the criteria of the EU Taxonomy. Following the framework, OP Corporate Bank will start reporting to investors the share of EU Taxonomy-aligned share of its portfolio. Due to the updated framework, OP Financial Group considers EU Taxonomy as part of its set of green lending criteria for corporates.

Green Bonds & Sustainable Financing:

OP Financial Group's sustainable lending portfolio was EUR 8.6 bn on 31 December 2024. The portfolio is not taxonomy-aligned but includes both sustainability-linked and green loans.

Future investment targets

Expansion of sustainable lending and investments:

OP Financial Group has set targets for sustainable lending and sustainable investment funds in the Sustainability Program.

- Target for sustainable financing products to account for at least 8 billion euros of total commitments by the end of 2025.
- Target for sustainable funds to account for 60% of fund assets by the end of 2025.

Both targets have already been achieved. The sustainability program will be updated in 2025. The updated program will include updated targets.

OP Asset Management utilises taxonomy data assessed by an external service provider in its investment activities when analysing investee companies. Some of OP Fund Management Company's funds have a minimum allocation for investments that are aligned with EU taxonomy. The realised allocation on fund level is reported annually.

Policies and procedures relating to direct and indirect engagement with new or existing counterparties on their strategies to mitigate and reduce environmental risks

The financial sector has a key role in the fight against climate change particularly in financing and investment operations, but also as part of sustainable insurance and indemnification. OP Financial Group wants its operations to have a positive effect on the climate and environment and enable a change towards a more sustainable future together with its customers. OP Financial Group supports its customers' preparation for the effects of climate change and their shift towards low-carbon operations. OP Financial Group offers its corporate customers green loans for projects beneficial to the climate and the environment.

OP Financial Group has integrated ESG risk factors into its corporate lending practices by categorizing counterparties into different ESG classifications. Clients with an elevated ESG exposure are analysed with a focus on material sustainability issues. In cases where exposure to environmental factors is high, specific environmental aspects are assessed. Additionally, OP Financial Group expects clients in the energy sector to report greenhouse gas emission data to the bank, and companies operating in high transition risk industries are required to prepare convincing climate transition plans.

In addition, OP has introduced a manual ESG Early Warning/Unlikeliness to Pay (EWI/UtP) indicator for large corporate counterparties. This indicator enhances monitoring throughout the credit lifecycle by flagging cases where ESG-related credit risk growth is identified.

OP Financial Group has implemented a policy of not providing finance for new coal power plants or coal mines, including companies that plan to build them. The Group will also not develop new corporate finance relationships with customers whose financial dependence on coal used for power generation accounts for over 5% of their net sales. However, this policy may be deviated from if the corporate customer is committed to shifting towards a low-carbon economy and demonstrates a credible plan to withdraw from coal.

Furthermore, OP Financial Group has adjusted its policy on financing, insuring and investing in oil and gas exploration and production. Direct equity and fixed income investments by OP mutual funds exclude institutions and companies involved in coal, oil and gas exploration and production. OP Financial Group will not finance or insure new corporate customers that engage in so-called unconventional oil and gas extraction, or the exploration or production of oil or gas in Arctic areas.

Data availability, quality and accuracy, and efforts to improve these aspects

OP Financial Group is committed to supporting sustainable development, and ESG data helps identify and promote lending to companies with sustainable practices. ESG data is crucial for making informed investment decisions, as understanding the ESG profiles of corporate clients provides deeper insights into their operations, enabling more tailored products and services.

The challenge of obtaining comprehensive ESG-data, both quantitative and qualitative, from corporate customers is being actively addressed. OP has intensified its engagement with corporate customers through deeper negotiations about ESG-risks. During 2024 OP has developed IT tools for systematic ESG-data management. As the estimated ESG-risk of a corporate customer increases, so do the expectations for reliable ESG-data, including detailed transition plans. To meet these expectations, OP is working closely with customers to ensure the provision of accurate ESG-data, whether directly from the customer or through third-party sources. Additionally, efforts are underway to establish a standardized digital information flow for ESG-reports, ensuring seamless and consistent data exchange.

Key data on customers for risk management purposes includes emission data of companies in OP's credit portfolio, energy performance data on housing and CRE loan collaterals, as well as the location of physical assets used as collaterals for the loans, considering physical climate risks. Where data is unavailable, proxies and simulation methods are considered, such as is the case with OP's financed emissions calculations according to the PCAF standard. Due to scarce availability of Energy Performance Certificate data on housing and CRE loan collaterals, a significant portion of energy efficiency data for real estate collaterals is modelled, as well. External data is used to estimate collaterals' exposure to physical climate-related risks, for example flooding.

OP Financial Group's ESG Data management and reporting framework has been updated with new components. ESG Data Office has been established to build, own, and operate key ESG data products to enable a more thorough utilisation and analysis of collected data, as well as to facilitate and lead data governance and data management work of ESG matters. Additionally, a Use Case Library has been developed to manage and facilitate the documentation on the requirements concerning ESG data development and capabilities. Furthermore, a funnel for ESG development has been drafted and a holistic process for driving ESG development and operations has been developed.

Results and outcome of the risk tools implemented and the estimated impact of environmental risk on capital and liquidity risk profile

As environmental risks have cascading effects and multiple transmission channels, OP Financial Group pursues to analyse and monitor environmental risks and their effects in OP Financial Group's business in a holistic manner.

In the loan origination process, OP Financial Group considers ESG themes and risks related to environmental, social and governance factors in accordance with the EBA (European Banking Authority) Guidelines on loan origination and monitoring. In the ESG analysis the selected industries and customers are reviewed on a sector-specific basis in respect of the ESG themes.

OP Financial Group has identified several potential climate and environmental risks relevant to collateral management. The material physical climate risks for both residential property collateral and commercial real estate have been assessed. The analysis indicates that by 2050, climate change will escalate these risks for Finnish real estate, but due to Finland's geographical location, they remain moderate overall.

Credit risk is the most significant risk type for OP Financial Group when measured in risk-weighted assets. Key portfolios under most climate and environmental related credit risks have been identified and risk drivers for the portfolios and their sub-sectors have been assessed. These portfolios include e.g. agriculture, forestry, energy production, heavy industries (machine, chemical, mining and metal industries), housing and covered bonds, construction, commercial real estate, and logistics. Based on further risk identification and risk assessment, a quantitative climate and environmental scenario analysis has been conducted for the corporate customers in agriculture, forestry, energy production, heavy industries (machine, chemical, mining and metal industries), and private customer portfolios. The credit risk scenario analysis covers a period of 5-10 years up to the year 2034.

The cash flow-based climate and environmental scenario analysis for credit risks utilizing NGFS scenarios (Orderly, Disorderly, Hot House) and SSP & RCP climate warming scenarios analyse the magnitude and distribution of the impact of the most significant identified risk factors on customers' credit risk parameters. The development of economic capital requirements, expected credit losses, risk-weighted assets, and non-performing exposures is analysed annually according to OP Group's scenario and stress testing framework. The scenarios are tailored to fit the Finnish economy and specific portfolios. In the Orderly scenario, the green transition of the economy and political climate measures will progress as expected, in a controlled manner. Investments in sustainable and low-emission technologies remain strong and prove profitable as demand increasingly shifts toward low-emission products and services guided by market and regulation. In this scenario, companies are successful in adapting to known changes in regulation and market demand. In the Disorderly scenario, the sustainable structural change of the economy progresses unevenly, and climate-related market and regulatory changes are unexpected and unbalanced. Political risks related to the use of forests and biofuels, the imbalance of the supply and demand of energy, tightening energy efficiency requirements for buildings, and uncertain investment prospects increase risks in the Disorderly scenario. In the Hot House scenario, political and market-led climate measures remain minor, and physical climate risks are accentuated. Investments in the green transition prove less profitable than expected in this scenario.

The results of the credit risk scenario analysis are utilized as a part of OP Financial Group's Internal Capital Adequacy Assessment Process (ICAAP), and based on the analysis, the overall impact of climate and environmental risks is expected to remain moderate over the next five years. If the green transition progresses in a controlled and market-led manner, risk levels are expected to decrease moderately. If market-based change remains weak, the green transition will more likely be associated with political interventions and other transition risks, which are expected to increase credit risks moderately mainly in the energy and forestry sector as well as in the housing loan portfolios. The direct physical risks of climate change are expected to remain moderate over the next five years with comparably small effects on OP’s credit portfolios.

In addition to credit risk, climate and environmental risk drivers are also taken into account in the scenario analysis of other risk types. The liquidity risks of credit and mortgage-backed covered bond financing have been examined through a scenario analysis extending to 2029, taking into account the stresses caused by key climate and environmental risk drivers. The tightening energy efficiency requirements of investors has been identified as a transition risk, and in the analysis, physical climate risks are assumed to be reflected as increased flood risk. Based on the analysis, the liquidity risk associated with flood risks is low. The liquidity risk associated with more stringent energy efficiency regulation is the most significant identified risk in covered bond financing.

The market risk stress test is based on NGFS scenarios (Orderly, Disorderly, Hot House) and includes both trading and non-trading bond portfolios, as well as unilateral credit value adjustments (UCVA). The narratives of the NGFS scenarios are utilized in the stress test without separate assumptions or customization. The market risk stress test extends to the year 2050. Two types of scenarios have been used for bond portfolios: credit spread scenarios and interest rate scenarios, of which only credit spread scenarios are used for UCVA. The impact of the scenarios on loss levels is minor relative to the size of the portfolios.

Climate and environmental related risk factors have also been considered regarding their impact on funding, liquidity capabilities and market access. The main effects on liquidity risk derive from changes in the value of liquid assets, availability of collateral and possible deposit outflows. For example, liquidity impact could be realized through net cash outflows, availability of both secured and unsecured funding or depletion of liquidity buffers. Materiality of the risk factors and exposures has been further assessed on the climate and environmental related risks. It has been concluded that climate and environmental risk factors may have an additional liquidity impact, although the impact is linked to the already identified risks in the liquidity risk catalogue (material of which are e.g., deposit outflow, wholesale funding, and asset values). Based on the assessments, the coverage of ESG-related risks in liquidity specific stress testing has been re-evaluated. As a result, an internal climate and environmental related liquidity stress scenario was introduced. Market risks of the liquidity buffer are further examined via climate-related market risk scenarios.

The environmental related risks are monitored through updating loss events in a group wide operational risk management system. In addition, the RCSAs are updated when potential risks changed. To complement these, the Risk Management function maintains scenarios for both individual risks and for the whole OP Financial Group level risks. The scenarios are used to assess the impact of selected environmental risks. The significance of different environmental related operational risks is assessed in the materiality analysis. Based on this, operational risks related to physical climate risk drivers have been identified as material.

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

Strategic indicators and their specific limits are used to guide and limit OP Financial Group's risk taking in accordance with OP Financial Group's Risk Appetite Statement. Based on the limits set in the Risk Appetite Statement, Risk Management and the businesses prepare more detailed proposals on limits and OP cooperative banks' monitoring limits. This is done in such a way that quantitative risks defined as significant within OP Financial Group are appropriately limited in revenue logic-specific risk policies. Quantitative limits are supplemented with principles included in risk policies and other guidelines issued by Risk Management, so that less-easily quantifiable risks are also covered. This is to ensure that neither the Group nor any of its companies takes excessive risks that endanger the Group's or the company's capital adequacy, profitability, liquidity and business continuity.

Limits for the emission intensity of the housing and energy production credit portfolios and investment funds have been included in OP Financial Group's risk policy in order to follow the emission reduction trajectories dictated by OP's emission intensity targets for the portfolios to be met by 2030. A limit for a minimum ratio of green loans to all loans granted to the energy production sector has also been set and included in OP Financial Group's risk policy. The development of the aforementioned metrics behind the limits are monitored and reported to the management as part of the quarterly risk analysis reporting in 2025. OP Financial Group has exclusionary strategies in place for coal, gas and oil in its lending and investment funds. The results of the scenario analysis and stress testing are utilised in ICAAP, ILAAP and environmental reporting to provide climate and environmental credit risk information to the management and to support the risk and credit policies of the group. Additionally, the Risk Management function monitors several ESG and sustainability related metrics regarding the credit portfolio, which are also included in the internal risk reporting to the management.

A limit breach or a clear threat of a breach leads to an obligation to trace the cause of the breach and to present an action plan for returning risk-taking within the limit. The party setting the limit assesses the action plan and monitors its implementation and can authorise the Risk Management function to engage in control tasks. Breach of an early warning threshold value imposes a notification obligation on the party that set the value, but the business retains its independent decision-making power. Breach of the target level does not lead to risk management escalation measures in addition to regular business controls and management reporting.

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

Physical climate-related risks can arise from sudden events, such as extreme weather events (e.g., droughts, floods), or longer-term changes (chronic risks) in the climate, including increases in temperature and precipitation, increases in extreme weather events, and changes in physical conditions such as sea-level rise. These physical risks can have economic consequences for financial institutions, including direct damage to physical assets such as commercial property, and indirect impacts from supply chain disruptions and effects on parties along the value chain, e.g., loan and insurance counterparties. Changes in water availability, procurement, and quality can also affect the financial performance of OP Financial Group's counterparties, as can food security and extreme temperature changes that impact a company's facilities, operations, supply chain, transportation needs, and employee safety.

Physical risks primarily affect credit risk, both in retail and wholesale portfolios, for example, through asset damage and associated borrower repair costs or business disruption. It also affects operational risk through a possible impact on OP Financial Group's ability to provide critical financial services, such as accessing online banking services. In addition, OP Financial Group considers the physical risk impacts on its reputation and operational risks that are related to customers' changing perceptions of OP Financial Group or its internal actions (e.g., OP Financial Group's own carbon footprint) or external events (e.g., suspension of credit operations for assets located in high-risk areas), which can damage stakeholder trust and the reputation of OP Financial Group in the eyes of customers and investors.

Climate change has been identified as a source of reputational risk that relates to customers' or the community's changing perceptions of OP Financial Group's contribution to or undermining of the transition to a low-carbon economy. Reputational risks can affect both the clients and the value chain of OP Financial Group as well as OP Financial Group itself.

Political risks constitute a significant proportion of identified transition risk drivers affecting OP Financial Group. Political and legal actions related to climate change continue to evolve as governments introduce new sustainable and environmental measures. Their goals are generally divided into two categories: political actions aimed at limiting activities that promote the harmful effects of climate change, or political actions aimed at promoting adaptation to climate change. Some examples include the introduction of carbon prices, shifting energy use toward lower emissions, introducing energy-efficient solutions, and promoting more sustainable land-use practices. Failure to implement sustainable and environmental protection measures by the government can expose OP Financial Group to legal risk. Failure to disclose climate risks or neglecting their management can also expose OP Financial Group to litigation risk from investors, customers, and employees. An important transmission channel of political risk drivers to OP Financial Group's credit risk is through its counterparties' debt-servicing capacity if their business environment changes abruptly, revenues plummet or costs increase unexpectedly.

Technological risk factors, such as technological improvements or innovations that support the transition to a low-carbon, energy-efficient economy can have a significant impact on OP Financial Group through effects on its counterparties. For example, the development and use of renewable technologies such as renewable energy, battery technology, energy efficiency, and carbon capture and storage affect the competitiveness of certain actors/counterparties, their production and distribution costs, and ultimately the demand for their products and services. Retail customers are required to make technical improvements to make their properties more environmentally friendly (installation of heat pumps or solar panels). Improvements can also affect the customer's debt-servicing capacity and/or collateral value.

Climate change can affect the supply and demand for certain goods and raw materials, products, and services as climate-related risks and opportunities are increasingly considered. These risk effects include those caused both by transition as well as physical risk events, the mixture of which is dictated by the climate scenario in question.

Regarding market risk, climate and environmental risks can affect values of financial assets. These may realize through changes in, e.g., bond spreads.

For a bank with a structure such as that of OP Financial Group, credit risk factors are of utmost importance. Climate and environmental risks are analysed separately for mortgages and corporate loans. Energy efficiency certificates (EPC ratings) are a key transition risk element for the housing loan portfolio. The EPC rating of properties indicates the vulnerability of borrowers to i) rising energy prices in orderly and disorderly climate scenarios and ii) the long-term targets set by the Ministry of the Environment for the upgrading of low-EPC-rated properties (Renovation Strategy - Ministry of the Environment). To support the assessment of risk significance and materiality, missing EPC ratings must be completed using publicly available databases and national registries. If these ratings are not available, a proxy method based on selected approaches is used. Physical climate and environmental risks affect the mortgage loan portfolio mostly through effects on collateral values. For residential property collateral, the likelihood of forest fires, freshwater, and storm water floods is expected to rise, yet they're currently considered low. According to the analysis, the storm water flood risk has already been observed to have increased, and the risk is rising due to heavy rainfall caused by climate change. However, the overall financial impact on repair costs is low, as most properties in the portfolio aren't affected by the identified physical risks. For commercial real estate, the primary risks are flood risks and rainfall pattern changes, while for forest and agricultural lands, the risks extend to temperature shifts, storms, forest fires, and the spread of plant diseases and invasive species.

In assessing the significance of transition risks for corporate exposures, OP Financial Group focuses primarily on the extent to which they are exposed to high-emitting sectors that are most susceptible to the effects of transition risks and rising carbon costs. Regarding the definition of high-emitting sectors, for example, the Intergovernmental Panel on Climate Change (IPCC) report on climate change mitigation provides an analysis of global direct and indirect emissions by economic sector. It highlights high-emitting sectors such as energy, agriculture, forestry, and other land use, as well as the transportation and building sectors (commercial and residential buildings). Reports from the Finnish Climate Panel, particularly on adaptation measures, costs, and regional dimensions, describe Finland's situation regarding the challenges and opportunities of climate change. Client sectors more vulnerable to changes in the physical environment, nature, and climate, such as forestry, fishery and agriculture would naturally be more affected by physical climate risks, such as drought, extreme weather phenomena and the subsequently lowered resilience to pests, the populations of which are likely to also increase in climate scenarios with higher increases in global temperature.

Climate and environmental credit risk drivers are being identified with an internal expert group regularly. Identified risks are divided to physical and transition risks, and the magnitude of their impacts on OP Financial Group’s different credit portfolios are assessed on several time horizons as part of climate and environmental scenario analysis. The magnitude and distribution of the effects of different risk drivers on client companies' credit risk parameters, capital demand and expected loss levels are then assessed with forward-looking methodologies, which enable analyses on different time horizons.

Limits for the emission intensity of the housing and energy production credit portfolios and investment funds have been included in OP Financial Group's risk policy in order to follow the emission reduction trajectories dictated by OP's emission intensity targets for the portfolios to be met by 2030. OP Financial Group has exclusionary strategies in place for coal, oil and natural gas in its lending and investment funds. A limit for a minimum ratio of green loans to all loans given to the energy production sector has also been set and included in OP Financial Group's risk policy. Credit risk management partakes into OP Financial Group's climate change adaptation actions with climate- and environment-related physical and transition risk scenario analyses and stress testing of different customer segments. The results of the scenario analysis and stress testing are utilised in capital planning and environmental reporting to provide climate and environmental credit risk information to the management and to support the risk and credit policies of the group. Additionally, risk management monitors several ESG and sustainability related metrics regarding the credit portfolio, which are also included in internal risk reporting to the management.

The environmental driver’s manifestation in operational risk and its subcategories are based on the risk identification process and the materiality assessment. The results are included in the OP risk catalogue. The identified operational risk transmission subchannels include Clients and business practices, Damage to physical assets and personnel, Business continuity and Processes. Furthermore, the potential financial and reputational impact in operational risk transmission channel is assessed in RCSAs, materiality assessment and scenario analysis. Any major operational risks with reputational implications could also affect OP Financial Group’s liquidity through outflow of deposits or availability of funding.

Qualitative information on Social Risk

Policies and procedures relating to direct and indirect engagement with new or existing counterparties on their strategies to mitigate and reduce socially harmful activities

OP Financial Group expects its product suppliers and service providers to conform with OP Financial Group's Supplier Code of Conduct, OP Financial Group's General Procurement Terms and Conditions, OP's Code of Business Ethics and any applicable legislation and international agreements. The supplier's responsibility is assessed during supplier approval, tendering exercises and then regularly during the actual partnership in line with the agreed procedures. Supplier audits are risk based.

OP Financial Group applies exclusion policies in its investment business to exclude controversial counterparties. Exclusion is typically based on activities that violate international norms or OECD guidelines, the manufacture of certain types of weapons, tobacco companies, or fossil fuels.

Active ownership is an essential part of the responsibility of OP funds and OP funds comprehensively utilise different active ownership methods to engage with investment counterparties its asset management.

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 social risk

The Risk Appetite Statement sets a framework for OP Financial Group's strategic planning process in line with risk appetite. Continuous monitoring of the business and competitive environment forms the basis of the strategy process. Risk Management analyses implementation of the RAS in OP Financial Group's quarterly risk analysis.

In line with the OP Financial Group's Risk Appetite Statement (RAS) external change factors are assessed in order to understand the impacts of such factors on customers' preferences, actions and future success.

The Risk Appetite Framework (RAF), which is part of OP Financial Group's internal instructions framework, outlines the general strategic intents of the risk management process. It sets preconditions for how senior management is expected to organize the risk management process, including social risk factors, within the group.

Together with the Risk Appetite Framework (RAF), the Risk Appetite Statement (RAS) provides a basis for risk taking by our businesses and for managing such risk. The RAF is subject to the approval of the central cooperative's Board of Directors. The RAF and RAS guide operational planning within OP Financial Group. The Board of Directors approves the Banking Risk Policy that further specifies the RAF and RAS. Banking Risk policy includes further guidance on how ESG factors should be assessed.

Definitions, methodologies and international standards on which the social risk management framework is based

OP Financial Groups Human Rights Statement describes OP's approach to respect human rights in its own operations and value chain. OP Financial Group respects all internationally recognised human rights, such as those included in the UN's Universal Declaration of Human Rights. OP Financial Group's activities promoting human rights are guided by e.g. the UN Guiding Principles On Business and Human Rights, UNGP and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. In accordance with the above principles, OP Financial Group has identified and assessed human rights impact with regard to OP Financial Group as a whole, including its value chain. Respecting human rights is a part of OP Financial Group's sustainability programme, which is reviewed regularly with the management. OP Financial Group is also a signatory to the UN Global Compact initiative, a commitment that the Group employees follow in their work.

OP Financial Group's Human Rights Policy describes OP's approach to respecting human rights and preventing, mitigating and remedying any salient, adverse human rights impacts identified. Reviews of the Human Rights Policy and human rights impacts cover all of OP Financial Group's operations, including customers, sectors, supply chains and suppliers operating in the value chain.

The Human Rights Policy defines adverse impacts on human rights as those which deprive an individual of the possibility to exercise their human rights, or which weaken the realisation of human rights. A potential human rights impact is one which could occur but has yet to transpire. An actual impact, on the other hand, is an adverse impact which has occurred.

Processes to identify, measure and monitor activities and exposures (and collateral where applicable) sensitive to social risk, covering relevant transmission channels

Change drivers in the business environment, such as technological or climate change and ESG factors affect the needs and preferences of customers and other members of society. ESG factors are external megatrends – examples of root causes on OP Financial Group's risk map. They are defined as change factors affecting different risk types, not as separate risks, in the group level risk identification processes.

By utilizing a continuous risk identification process, the Group's Risk Management maintains a catalogue of identified risks and their underlying factors, including social risk factors. The results of the risk identification process are used in the preparation of risk policies when specifying risk management principles, measures, objectives and limits based on risk-bearing capacity and risk appetite.

OP Financial Group conducts an annual ESG risk materiality analysis. The materiality analysis serves as an overview of the environmental, social and governance risks relating to OP Financial Group's operations and business, ensuring that ESG risks are identified, measured, and managed effectively. The materiality analysis is based on the supervisory expectations as well as the regulation applicable to OP Financial Group's business, and the guidelines issued by the European Banking Authority. The results of the materiality analysis are utilised in the strategy process and implemented to the various processes and business operations of OP Financial Group.

OP Financial Group assesses and manages its relevant potential operational risks regularly. Risks are identified and assessed in separate risk control and self-assessments (RCSAs) that are made for processes, services, and systems. The risks are entered in the OP-wide operational risk management system which has been in use since the beginning of year 2022. It enables a systematic and comparable quantitative assessment of operational risks. ESG related risk drivers, when applicable, are identified in connection with potential operational risks. Six of the operational risk categories identified in the risk catalogue include ESG related risks. Two of the categories are especially related to social risk driver: Employment practices and workplace safety, as well as Damage to physical assets. The categorisation is in line with EBA GL 2025/01.

Risk identification is facilitated by a Group-wide system for operational risks, the so-called risk library system, which comprises the risk library, the cause and impact library, as well as the controls library. Social risk factor perspectives are included in both the risk library and the cause and impact library. For each identified risk, there is an obligatory evaluation of several impact channels including financial impacts as well as increase in legal and liability costs. Reputational impact is evaluated for each potential risk separately. The assessment is done using a 4-level scale and is supplemented with identification of target groups of reputational impact. Both, the financial and reputational impact affect the risk level that is automatically defined for all assessed potential risks. Also, controls and risk mitigation actions are designed, documented and monitored within the RCSAs. The RCSAs are kept up to date and updates are recorded in the operational risk management system when potential risks change.

As a part of designing new products and processes, a risk assessment process is conducted, and relevant social related risks are included when identified. In addition, OP conducts risk-based audits, which include ESG-risks, towards its own suppliers as a part of its third-party risk management operations. The results of the audits are considered in the third-party risk management process and procurement decisions. The social risks are monitored through updating loss events in a group wide operational risk management system.

The Risk Management function monitors the development of the ESG maturity of the sectors of corporate loan counterparties. The development of the ESG maturity of the counterparties is reported to the management as part of the quarterly risk analysis reporting.

OP Financial Group performs a human rights assessment its operations. The assessment covers OP Financial Group's business, personnel and supply chains. The assessment is based on the impact assessment method (taking account of the scale, scope, irremediability and likelihood of human rights-related risks) presented in the UN Guiding Principles on Business and Human Rights (UNGP). The assessment is reviewed annually.

OP Financial Group has a range of human rights impacts and responsibilities, depending on the role in which is is acting:

- As an employer, OP the responsibility to treat all employees and potential employees and applicants fairly, equally and impartially, while respecting their human rights.
- In business relations OP uses its influence to promote the realisation of human rights and prevent adverse human rights impacts in its customers' business activities, and in operations in which OP invests. OP Financial Group treats its customers equally and with respect when doing business with them.
- As a large purchaser, OP is responsible for ensuring that its supply chain partners respect human rights in their production of products and services.

In the loan origination, OP performs ESG analyses for counterparties that meet the criteria set out in the ESG Analysis Framework. The identification of the group for ESG analysis utilizes dataset provided by external provider, which covers European companies. Based on the data, the exposure of each industry to different ESG themes and risks related to those themes is determined. In the qualitative ESG analysis, social themes that are deemed material for the company's industry are evaluated. The evaluation focuses on industry-specific risks related to material themes, their potential business impacts (revenue, costs, investments), and the mitigation strategies that the company has identified to mitigate these risks and potential negative business impacts. The material themes to be analysed are determined from the following social themes: labour management, health and safety, human capital development, supply chain labour standards, product safety and quality, chemical safety, consumer financial protection, privacy and data security, responsible investment, insuring health and demographic risk, controversial sourcing, community relations. ESG analyses are conducted yearly and findings of qualitative ESG analysis are taken into account in expert credit rating process. Thus, potential ESG risks have impact on counterparties credit ratings.

OP Financial Group regularly reviews and reports on its human rights impacts as part of sustainability reporting. Detailed report on human right related risks are published in OP Financial Group's Human Rights Policy, which was published in 2023. Moreover, OP develops and updates the human rights risk assessment work and the related action plans as part of other business-related decision-making. The continuous monitoring includes the further development of consultation with stakeholders, particularly those subject to potential adverse impacts. For example, OP Financial Group's ESG Forum, which was set up in 2023, allows to better foster open dialogue with various actors and listen to the parties that may be impacted by our actions. The ESG forum brings together representatives of relevant stakeholder groups ranging from the owner-customers, employees, the environment and social responsibility to the different segments of the financial and corporate world, who might be impacted by OP Financial Group's or its stakeholders actions. The opinions of the ESG forum's representatives are heard in joint meetings and collected by various questionnaires.

Activities, commitments and assets contributing to mitigate social risk

As OP Financial Group is owned by its customers, the Code of Business Ethics states that OP has a particular obligation and opportunity to act for the benefit of customers and the operating region, even when transformations in society and the economy create new needs and opportunities. The Group's Risk Appetite Statement outlines that OP must know its customers and familiarise itself with their operations and background to the extent required for the good management of customer relationships. Thus OP can identify customers' needs and offer the most suitable products and services to each customer in a responsible manner and treat the customers equally and with a professional approach. OP consistently strives to identify and prevent potential conflicts of interest in advance by adhering to internal guidelines related to the management of conflicts of interest and the prevention of corruption. These situations are processed and documented appropriately.

In the loan origination process, OP Financial Group considers ESG themes and risks in accordance with the EBA (European Banking Authority) Guidelines on loan origination and monitoring. In the ESG analysis, selected industries and customers are reviewed on a sector-specific basis concerning ESG themes. This helps to identify risks in customers' businesses, support strategic business development, and offer sustainable financing solutions for customers' needs. When making an ESG analysis of a company and projects, OP assesses the environmental, social and governance risks that are material for the sector. The ESG industry category assigned to the company determines the level of ESG analysis required for new loan decisions. The analysis of social factors includes for example occupational safety, personnel development, data protection, product safety and supply chain sustainability. In addition, OP has introduced a manual ESG Early Warning/ Unlikeliness to Pay (EWI/UtP) indicator for large corporate counterparties. This indicator enhances monitoring throughout the credit lifecycle by flagging cases where ESG-related credit risk growth is identified.

OP Asset Management conducts a quarterly screening of its investments for international norm violations based on an analysis provided by an external service provider. If a norm violation is detected, the primary option is to engage with the company to influence its operations. The secondary option is to divest from the holding.

OP maintains the customers' trust by keeping customer data confidential, and by engaging in security and precautionary measures to ensure service continuity. With the aid of the data governance model, OP ensures that data management is responsible and in compliance with regulations. The responsible collection and processing of data is also an integral part of OP Financial Group's sustainability programme. In addition to the continuous improvement of customer experience and services, data provides opportunities for reinforcing the business profitability, efficiency and risk management.

OP Financial Group's approach to using AI is based on respect for human rights. OP promotes equality and culture of fairness and ensure that AI systems, data and algorithms do not use discriminatory models. OP values diversity in its organisations because it helps to achieve fairness, equality and unbiased AI.

OP Financial Group organisations regularly analyse operational risks involved in their respective businesses. Risk and control self-assessments are based on the organisations' evaluations of their operational risks and risk management. In the assessment process, the organisations identify and evaluate the most important operational risks associated with their operations. Risk identification is facilitated by a Group-wide system for operational risks, the so-called risk library system, which comprises the risk library, the cause and impact library, as well as the controls library. Social risk factor perspectives are included in both the risk library and the cause and impact library. No new products, services, business models or systems are introduced until the associated risks and any changes in the risks have been assessed. Outsourcing and new partnerships are also subject to the same assessment. Regular risk reviews are held to keep the Executive Management Team and the Board of Directors informed of any significant risks that have materialised. Significant phenomena identified and analysed in the assessments are brought to the Group Executive Management's attention in quarterly reviews.

Implementation of tools for identification and management of social risk

When making an ESG analysis of a company and projects, OP assesses the environmental, social and governance risks that are material for the sector. The ESG industry category assigned to the company determines the level of ESG analysis required for new loan decisions. The analysis of social factors includes for example occupational safety, data protection, product safety and supply chain sustainability.

In relation to its employees, OP Financial Group uses an equal opportunity survey to monitor the realisation of equal and impartial treatment. Based on this, further measures are planned and the results are reported to management and employees. For persons working for OP Financial Group, current human rights impacts are mapped and monitored by actively listening to employees' experiences. Annual surveys are conducted on employee wellbeing and job satisfaction. A wider-ranging employee survey on subjects such as equality and equal opportunities is conducted every second year..

OP Financial Group organisations regularly analyse operational risks involved in their respective businesses. Risk and control self-assessments are based on the organisations' evaluations of their operational risks and risk management. Risk identification is facilitated by a Group-wide system for operational risks, the so-called risk library system, which comprises the risk library, the cause and impact library, as well as the controls library. Social risk factor perspectives are included in both the risk library and the cause and impact library. No new products, services, business models or systems are introduced until the associated risks and any changes in the risks have been assessed. Outsourcing and new partnerships are also subject to the same assessment.

Based on the results of the continuous risk assessment process, the Group's Risk Management function maintains a catalogue of identified risks and their underlying factors. The results are used in the preparation of risk policies when specifying risk management principles, measures, objectives and limits based on risk-bearing capacity and risk appetite, and in maintaining economic capital and the stress testing framework.

OP Financial Group uses stress tests to assess how various serious, albeit potential, situations calibrated on a historical basis, and those differing from the assumptions of risk models, may affect the liquidity, risk profile, profitability, and capital adequacy of the Group and/or its companies. Stress tests assess the effect of both individual stress factors and the joint effect of multiple variables acting simultaneously. Scenarios in stress testing utilise OP Financial Group's Strategy's worldviews which cover various development paths for the economy as well as customer behaviour, competitive environment, technology and regulation.

OP uses a Security Notification tool, with which employees report on hazardous and threatening situations, and safety observations, encountered at work. Operational security at OP is supported by guidelines, security services and a range of structural and technical security solutions. These measures are used to protect staff and customers, property and information from external threats.

OP Financial Group's companies have reporting channel (whistleblowing channel) for reporting violations and abuses. Anyone can make a report to the channel at any time (24/7) through OP Group's intranet or public website. In addition, each branch of OP Corporate Bank in the Baltic countries has a reporting channel available.

Description of setting limits to social risk and cases to trigger escalation and exclusion in the case of breaching these limits

Responsible investing of OP Financial Group implies exclusion of companies based on negative screening criteria: international norm violations, banned weapons, tobacco production and climate-related financial risks. The list of exclusions is public and is updated if necessary. In addition to the general negative screening criteria, OP excludes more industries and companies in Article 8 and 9 funds which promote ESG characteristics and pursue sustainability objectives.

In accordance with OP Corporate Bank's Green Bond Framework, the proceeds of the Green Bonds are not allocated to projects or assets dedicated to weapons and ammunition, nuclear or fossil-fuel energy generation, gambling and casinos, or any other identified high-risk projects or assets defined in OP Financial Group's internal policies, namely AML and sanctions policy, customer selection guidelines and credit policies.

OP Financial Group's strategic indicators and their specific limits are used to guide and limit OP's risk taking in accordance with the Risk Appetite Statement. Based on the limits set in the Risk Appetite Statement, Risk Management and the businesses prepare more detailed proposals on limits and OP cooperative banks' monitoring limits. This is done in such a way that quantitative risks defined as significant within OP Financial Group are appropriately limited in revenue logic-specific risk policies. Quantitative limits are supplemented with principles included in risk policies and other guidelines issued by Risk Management Function, so that less-easily quantifiable risks are also covered. Social risk factors are included in the risk limit for operational risks.

A limit breach or a clear threat of a breach leads to an obligation to trace the cause of the breach and to present an action plan for returning risk-taking within the limit. The party setting the limit assesses the action plan and monitors its implementation and can authorise the Risk Management Function to engage in control tasks. Breach of an early warning threshold value imposes a notification obligation on the party that set the value, but the business retains its independent decision-making power. Breach of the target level does not lead to risk management escalation measures in addition to regular business controls and management reporting.

Description of the link (transmission channels) between social risks with credit risk, liquidity and funding risk, market risk, operational risk and reputational risk in the risk management framework

Drivers of change in the business environment, such as technological or social and other sustainability factors, affect the needs and preferences of customers and other members of society. On OP Financial Group's risk map, social and other ESG factors are seen as external megatrends – examples of root causes. They are defined as change factors affecting different risk types, not as separate risks in the group level risk identification process. When identifying these change factors, it is vital to assess the diverse links to OP's risks but also to assess potential direct or indirect risk concentrations.

Social risks can impact the creditworthiness of borrowers, affecting their ability to meet financial obligations. For corporate customers, the creditworthiness assessment includes ESG-related questions that support the consideration of the most significant sustainability perspectives in customer work and decision-making. When making an ESG analysis of a company and projects, OP assesses the environmental, social and governance risks that are material for the sector. The ESG industry category assigned to the company determines the level of ESG analysis required for new loan decisions. The analysis of social factors includes for example occupational safety, data protection, product safety and supply chain sustainability.

ESG risk drivers of OP's credit portfolio are being identified with an internal expert group regularly. The magnitude and distribution of the effects of different risk drivers on client companies' credit risk parameters, capital demand and expected loss levels are assessed with forward-looking methodologies, which enable analyses on different time horizons.

Social risks can lead to sudden changes in market conditions, affecting the liquidity profile of assets and the availability of funding. Transmission channels related to reputation risks, operational risks, stakeholder risks, regulatory risks and investor risks may create a link from social risk factors to liquidity and funding risk.

Regarding market risk, social risk drivers can affect values of financial assets. These may realize through changes in e.g., bond spreads.

The social risk drivers's manifestation in operational risks is maintained in the OP risk catalogue and the operational risks' library. The identified operational risk transmission channel includes employment practices and workplace safety. This contains both the work environment and HR as well as physical safety risks categories. OP also includes data privacy breaches and third-party management failures in its operational risk management framework. Based on the risk library, relevant potential risks related to social drivers are identified and updated in self-assessments (RCSAs) separately for processes, services, and systems. Similarly, social related loss events are identified. Each potential risk and loss event including its financial and reputational impacts is assessed and recorded in a centralised operational risk management system. Any major operational risks with reputational implications could also affect OP Financial Group's liquidity through outflow of deposits or availability of funding.

Qualitative information on Governance risk

Institution's integration in their governance arrangements the governance performance of the counterparty

Counterparty governance considerations are an integral part of the creditworthiness assessments conducted within OP Financial Group. The current analysis encompasses an assessment of the owners' significance to the company's financial performance, as well as an evaluation of the board of directors' and Chief Executive Officer's experience and knowledge within the counterparty's industry.

Assessments that incorporate the aforementioned aspects are incorporated into the conventional creditworthiness assessments and are approved as part of the standard credit assessment process.

In addition, the OP Corporate Bank Credit's Credit Analysis team conducts ESG analyses on clients with elevated exposure to ESG risk factors. OP performs ESG analyses for counterparties that meet the criteria set out in the ESG Analysis Framework. The identification of the group for ESG analysis utilizes dataset provided by external provider, which covers European companies. The corporate governance section of the ESG analysis addresses two different theme-based areas: Corporate Governance and Corporate Behavior. ESG analyses are conducted yearly and findings of qualitative ESG analysis are taken into account in expert credit rating process. Thus, potential ESG risks have impact on counterparties credit ratings.

The corporate behavior section of the ESG Analysis evaluates the extent to which sustainability is taken into account in the company's operations and whether the company operates ethically. The section includes an assessment of counterparties' highest committee or position regarding non-financial reporting. The evaluation framework for aspects related to good governance is defined in such a way that it addresses, among other things, the following issues: ethical considerations, strategy and risk management, inclusiveness, transparency, conflict of interest management, and internal communication on critical concerns.

In the corporate governance sub-section of the ESG analysis, general corporate governance practices are evaluated. This includes aspects related to the company's board, ownership structure, shareholder rights, accounting practices, and the remuneration of the board and management.

In addition, OP has introduced a manual ESG Early Warning/Unlikeliness to Pay (EWI/UtP) indicator for large corporate counterparties. This indicator enhances monitoring throughout the credit lifecycle by flagging cases where ESG-related credit risk growth is identified.The Risk Management Function monitors the development of the ESG maturity of the sectors of corporate loan counterparties. The development of the ESG maturity of the counterparties is reported to the management as part of the quarterly risk analysis reporting.

Other disclosures

Liquidity requirements

EU LIQ1 - Quantitative information of LCR

		a	b	c	d	e	f	g	h
	Scope of consolidation: consolidated	Total unweighted value (average)				Total weighted value (average)			
EU 1a	Quarter ending on 31 Dec 2024	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)					27,350	27,144	26,460	26,373
CASH - OUTFLOWS									
2	Retail deposits and deposits from small business customers, of which:	54,815	54,423	54,253	54,225	3,530	3,509	3,504	3,502
3	Stable deposits	37,639	37,486	37,434	37,578	1,882	1,874	1,872	1,879
4	Less stable deposits	16,460	16,323	16,298	16,200	1,648	1,635	1,632	1,623
5	Unsecured wholesale funding, of which:	22,554	21,931	20,937	20,463	9,447	9,269	8,903	8,751
6	Operational deposits (all counterparties) and deposits in networks of cooperative banks	7,107	6,958	6,659	6,447	1,751	1,712	1,637	1,583
7	Non-operational deposits (all counterparties)	14,443	13,930	13,221	12,952	6,693	6,514	6,211	6,105
8	Unsecured debt	1,004	1,043	1,056	1,063	1,004	1,043	1,056	1,063
9	Secured wholesale funding					174	90	41	26
10	Additional requirements, of which:	10,879	11,388	11,691	12,116	1,953	2,054	2,176	2,246
11	Outflows related to derivative exposures and other collateral requirements	754	836	891	905	754	836	891	905
12	Outflows related to loss of funding on debt products	83	83	127	127	83	83	127	127
13	Credit and liquidity facilities	10,041	10,468	10,673	11,083	1,115	1,134	1,158	1,214
14	Other contractual funding obligations	308	293	223	208	168	157	89	73
15	Other contingent funding obligations	17,589	17,062	16,861	16,620	1,176	1,121	1,107	1,089
16	**TOTAL CASH OUTFLOWS**					**16,447**	**16,199**	**15,820**	**15,687**

		a	b	c	d	e	f	g	h
	Scope of consolidation: consolidated	Total unweighted value (average)				Total weighted value (average)			
EU 1a	Quarter ending on 31 Dec 2024	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
CASH - INFLOWS									
17	Secured lending (e.g. reverse repos)								
18	Inflows from fully performing exposures	2,709	2,729	2,828	2,868	1,871	1,885	1,964	1,971
19	Other cash inflows	1,453	1,429	1,311	1,303	452	454	337	341
20	TOTAL CASH INFLOWS	4,162	4,158	4,139	4,171	2,323	2,339	2,301	2,312
EU-20a	Fully exempt inflows								
EU-20b	Inflows subject to 90% cap								
EU-20c	Inflows subject to 75% cap	4,162	4,158	4,139	4,171	2,323	2,339	2,301	2,312
TOTAL ADJUSTED VALUE									
EU-21	LIQUIDITY BUFFER					27,350	27,144	26,460	26,373
22	TOTAL NET CASH OUTFLOWS					14,124	13,861	13,519	13,375
23	LIQUIDITY COVERAGE RATIO (%)					194	196	196	198

The liquidity coverage ratio figures are presented as month-end averages for each quarter.

OP Financial Group's funding position and liquidity is strong.

On 31 December 2024, the average margin of OP Financial Group's senior and senior non-preferred wholesale funding and covered bonds was 37 basis points (34). During the reporting period, OP Financial Group issued long-term bonds worth EUR 3.6 billion (5.2).

The amounts for December 2023 and March 2024 have been amended following their initial disclosure.

EU LIQB - Qualitative information of LCR

a) Explanations on the main drivers of LCR results and the evolution of the contribution

OP Financial Group's average LCR of 194% (twelve months average) has been calculated in accordance with the Commission Delegated Regulation (EU) 2015/61 and the EBA Guidelines on LCR disclosure to complement the disclosure of liquidity risk management under Article 435 CRR. The Group's Liquidity Coverage Ratio (LCR) was 193% as of December 31, 2024, or €14.1 billion of excess over the regulatory minimum of 100 %. This compares to 199%, or €14.8 billion of excess liquidity at December 31, 2023. The main drivers of LCR outflows throughout the year are deposits and off balance sheet items. The HQLA is primarily held in Level 1 bonds, cash and central bank reserves.

b) Explanations on the changes in the LCR over time

OP Financial Group's LCR has been clearly above regulatory and internal thresholds throughout the last 12 months. Changes in LCR over time are mainly explained by changes in non-retail deposits, and maturing wholesale funding.

c) Explanations on the actual concentration of funding sources

Diversification of funding in terms of tenors, regions and products is an important element of liquidity risk management framework. Non-maturity deposits are the main form of funding. Funding from retail customer deposits is very diversified and is based on long-term customer relationships. It is therefore largely considered stable funding. Wholesale funding must be diversified. This reduces the Group's dependence on individual funding sources and the risks associated with price and availability of funding. A high-quality home loan portfolio secures a low-cost financing for banking. Refinancing risk associated with OP Mortgage Bank's secured wholesale funding is low and it can be considered a stable funding source. Sufficient unsecured long-term wholesale funding also ensures the fulfilment of the regulatory requirements (MREL, NSFR) and rating targets. Moderate asset encumbrance (AE) ensures the availability of unsecured long-term wholesale funding and the adequacy of liquidity contingency items. Short-term wholesale funding is used to primarily react to changes in the liquidity position.

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

The HQLA as of 31 December 2024 of €29.2 billion is primarily held in Level 1 bonds, cash and central bank reserves (94.9%), Level 2A bonds (4.3%) and Level 2B bonds (0.7%). This compares to €29.8 billion as of December 31, 2023 primarily held in Level 1 bonds, cash and central bank reserves (94.7%). In table EU LIQ1, HQLA is presented as month-end-averages for each quarter.

e) Derivative exposures and potential collateral calls

The majority of outflows related to derivative exposures and other collateral requirements are in relation to derivative contractual cash outflows that are offset by derivative cash inflows. The impact of an adverse market scenario on derivatives is based on the 24 month historical lookback approach and the potential posting of additional collateral as a result of a 3 notch downgrade of OP Financial Group's credit rating (as per regulatory requirements).

f) Currency mismatch in the LCR

The LCR is calculated for EUR currency. In case other currencies are identified as significant currencies (having liabilities > 5 % of total group liabilities excluding regulatory capital and off balance sheet liabilities) in accordance with the Commission Delegated Regulation (EU) 2015/61 the LCR is calculated in those currencies. Asset positions in all currencies are being monitored.

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

N/A

EU LIQ2 - Net Stable Funding Ratio

		a	b	c	d	e
		Unweighted value by residual maturity				
31 Dec 2024, EUR million		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	Weighted value
Available stable funding (ASF) Items						
1	Capital items and instruments	16,277			1,288	17,565
2	Own funds	16,277			1,288	17,565
3	Other capital instruments					
4	Retail deposits		55,056	279	17	51,734
5	Stable deposits		38,108	196	5	36,394
6	Less stable deposits		16,948	83	13	15,341
7	Wholesale funding		30,469	5,964	22,346	36,568
8	Operational deposits		8,725			4,362
9	Other wholesale funding		21,744	5,964	22,346	32,206
10	Interdependent liabilities					
11	Other liabilities	468	4,173			
12	NSFR derivative liabilities	468				
13	All other liabilities and capital instruments not included in the above categories		4,173			
14	**Total available stable funding (ASF)**					**105,868**

31 Dec 2024, EUR million		a Unweighted value by residual maturity No maturity	b < 6 months	c 6 months to < 1yr	d ≥ 1yr	e Weighted value
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					720
EU-15a	Assets encumbered for more than 12m in cover pool		378	403	14,455	12,951
16	Deposits held at other financial institutions for operational purposes					
17	Performing loans and securities:		7,341	4,530	70,675	60,195
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		409	161	1,559	1,681
20	Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		5,142	3,197	37,277	55,670
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		178	108	3,542	21,169
22	Performing residential mortgages, of which:		1,383	1,139	29,003	
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		1,327	1,085	26,950	
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		407	33	2,836	2,844
25	Interdependent assets					
26	Other assets		4,040	394	5,213	6,359
27	Physical traded commodities					
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs				458	389
29	NSFR derivative assets					
30	NSFR derivative liabilities before deduction of variation margin posted		1,114			56
31	All other assets not included in the above categories		2,926	394	4,755	5,914
32	Off-balance sheet items		5,054	2,453	19,853	2,092
33	**Total RSF**					**82,317**
34	**Net Stable Funding Ratio (%)**					**129 %**

EU LIQA - Liquidity risk management

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

OP Financial Group aims to continue serving its customers on a long-term basis and in also exceptionally tough market conditions. Its strategic goal is to ensure that customer business remains undisrupted in each revenue logic.

Planning of wholesale funding takes proactive account of funding needs arising from expected growth differentials between the receivables and deposit portfolio on the balance sheet, funding maturity and other internal objectives, and regulatory requirements. Planning also assesses the certainty and price sensitivity of refinancing in different market conditions.

To ensure the liquidity of the banking operation, the liquidity buffer held by the Group Treasury is kept large enough to continue and stabilise operations in scenarios in which we lose large quantities of deposits, and wholesale funding becomes less available or unobtainable. Such a scenario may be due to a general market disruption or a problem specific to OP Financial Group.

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

The central cooperative's Board of Directors is the most important decision-making body for risk management tasks. In addition, the central cooperative's Supervisory Council confirms decisions by the Board of Directors that apply to OP Financial Group's risk appetite. The Risk Committee of the Board of Directors assists the Board in performing duties related to risk-taking and risk management. The Committee has no independent decision-making powers. Based on the decision by the President and Group Chief Executive Officer, the Executive Management Team has set up a Risk Management Committee, Steering and Compliance Committee and Banking ALM Committee that approve instructions and policy descriptions specifying the Risk Appetite Statement and the Risk Appetite Framework. Entities' risk management-related tasks are described in more detail in the entities' charters. OP Financial Group's Corporate Governance Statement provides more detailed information OP Financial Group's corporate governance.

OP Financial Group's risk management and regulatory procedures are built around the three lines of defence principle established in the financial sector. The first line of defence comprises the businesses. The second line of defence consists of Risk Management and Compliance as assurance functions independent of businesses. Internal Audit, which is independent of other lines of defence, acts as the third line of defence. Each line of defence has its own role in performing the risk management process efficiently.

Liquidity management and control within the amalgamation

The central cooperative senior management is responsible for organising OP Financial Group's centralised liquidity risk management according to liquidity strategy principles of the OP Financial Group Risk Appetite Framework. It must ensure that management and supervision of the amalgamation's liquidity accord with the scope and quality of business, and fulfil regulatory requirements at all times. In banking, the management pays attention not only to growth and profitability targets but also to liquidity features. Our customer service product development function seeks solutions that meet customer needs, but which also reduce the liquidity risk associated with the balance sheet structure of OP Financial Group's businesses.

Liquidity regulation as such is not applied to the amalgamation's companies. With the ECB's permission, the central cooperative may give member banks special permission to deviate from the liquidity regulation. As the central institution of the amalgamation of cooperative banks, OP Cooperative has granted its member credit institutions special permission, under the Act on the Amalgamation of Deposit Banks. Pursuant to the Act, the liquidity requirements set for credit institutions mentioned in Part VI of the EU Capital Requirements Regulation are not applied to OP Cooperative's member credit institutions. Liquidity based on the regulation is subject to supervision and reporting at the level of the cooperative banks' amalgamation. To fulfil the prerequisite for granting special permission, the central cooperative gives the amalgamation's companies instructions on the risk management needed to secure liquidity and meet other qualitative requirements, and supervises compliance with these instructions.

As OP Financial Group's treasury, OP Corporate Bank plc is tasked with securing the liquidity of the entire Group and each OP cooperative bank or Group company. OP Financial Group deposits its entities' liquidity in its Treasury's cheque account with the Bank of Finland. This means that the Group always manages its overall liquidity position through the central bank cheque account. OP Financial Group's Treasury is in charge of the Group's wholesale funding, manages the Group's short-term liquidity, maintains the liquidity buffer, manages the Group's minimum reserve on a centralised basis, and is responsible for managing intraday liquidity risk. In addition, OP Financial Group's Group

Treasury ensures that liquidity and maintenance of the minimum reserve are managed in accordance with each country's regulatory requirements. OP Corporate Bank manages the Group's wholesale funding on a centralised basis, in the form of debt capital and equity capital, while OP Mortgage Bank manages wholesale funding based on covered bonds. Companies that fall within the scope of joint liability seek financing from Group Treasury and other companies from OP Corporate Bank's banking operation.

In a severe liquidity crisis caused by money and capital market disruptions or other events, or in preparing for such a crisis, the central cooperative's Board of Directors can, upon a proposal by the President and Group CEO, decide to oblige the amalgamation's member banks to place part of their loan portfolio with OP Mortgage Bank as collateral for the covered bond issued by OP MB through an intermediary loan. The loan amounts needed are based on the Group-level need and are determined for each bank. The decision may be put into practice immediately. Member banks are committed to immediately executing any measures related to the decision.

The primary funding sources of OP cooperative banks' lending include equity capital, deposit funding and funding for intermediary loans from OP Mortgage Bank.

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

As described in the previous section, OP Financial Group's Treasury is in charge of the Group's liquidity management on a centralised basis. Every Group company is responsible for its daily liquidity management by ensuring that the company has sufficient funds in their account with OP Corporate Bank or credit limit to carry out payment transactions of customers and the company. OP cooperative banks deposit their extra liquidity with Group Treasury.

The counterparty to OP cooperative banks in the management of funding risk is always either Group Treasury (part of OP Corporate Bank plc in organisational terms) or the Group's mortgage bank (OP Mortgage Bank). For the management of their funding risk, OP cooperative banks may use only Group Treasury products and operating models.

Liquidity regulation as such is not applied to the amalgamation's companies. With the ECB's permission, the central cooperative may give member banks special permission to deviate from the liquidity regulation, as described in the previous section titled Liquidity management and control within the amalgamation.

Identifying liquidity risks

OP Financial Group's Treasury and other business units plus Risk Management continuously identify and assess risks associated with funding and business and other business environment. In the risk assessment of new products, services, business models, processes and systems, every business must also take account of liquidity risks. At least once a year, the Risk Management function and representatives of the business concerned make a comprehensive liquidity risk assessment to ensure that the internal liquidity adequacy assessment process (ILAAP) is appropriate and adequate in relation to the Group's liquidity risks.

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

Assessment and measurement

The central cooperative consolidated assesses the future cash flows of receivables, liabilities and off-balance-sheet commitments based on the contract maturity date, repayment programme, expert assessments or statistical models based on customer behaviour history.

Structural funding risk is measured by the Net Stable Funding Ratio (NSFR), which determines the amount of stable funding sources expected to span over one year in proportion to assets requiring stable funding. Structural funding risk is also reported as the difference between cash inflows and outflows in different maturities.

From the perspective of the relevant authority, funding liquidity risk is measured using the Liquidity Coverage Ratio (LCR). The sufficiency of the liquidity requirement in terms of time is assessed though maturing items on the balance sheet, wherein agreements are not renewed but ended at maturity. Based on the economic perspective, OP Financial Group measures the sufficiency of the liquidity buffer through stress testing.

The time diversification of wholesale funding is controlled by using cumulative 12-month and 3-month limits that restrict maximum maturity concentrations. The 12-month limit that restricts the maximum includes wholesale funding of bond format. The 3-month limit that restricts the maximum includes all wholesale funding. When it comes to deposit funding, the Group monitors the concentration of the largest deposit volumes. Concentrations by counterparty and instrument are also subject to monitoring.

The central cooperative consolidated measures its asset encumbrance by proportioning encumbered assets to the aggregate amount of balance sheet assets and collateral securities.

Risk assessment and measurement methods related to liquidity buffer investments are defined as part of market risks.

Liquidity risk reporting

The central cooperative consolidated reports liquidity risks to the central cooperative's management on a regular basis, switching to weekly or daily reporting if the liquidity preparedness level is raised. OP Financial Group's companies report regularly to boards of directors on liquidity risks. As part of OP Financial Group's risk analysis, Risk Management reports quarterly to the Risk Committee, which operates under the central cooperative's Board of Directors, on liquidity risks.

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

Funding plan

OP Financial Group's funding plan defines guidelines for wholesale funding for the next few years. In its funding plan, OP Financial Group must take account of its member banks' estimate of the funding need for years to come. Implementation of the plan is monitored regularly and the plan is updated, where needed, during the year. Deposit funding is primarily based on the business strategy and plan. The funding plan specifies the sources of wholesale funding and presents how the Group covers its need for key wholesale funding sources in view of market depth and sufficient diversification. It also defines the related decision-making powers. Moreover, the funding plan must take account of unfavourable scenarios lasting several years, and of any abrupt changes in key funding items.

OP Financial Group's liquidity and wholesale funding plan and authorisations to raise capital are subject to approval by the Boards of Directors of OP Corporate Bank and OP Mortgage Bank.

Non-euro liquidity management

OP Financial Group carries out non-euro funding due to the diversification of funding sources. Since almost all the Group's receivables are in euros, the Group mainly converts its non-euro funding into euros through derivative transactions in connection with an issue.

According to liquidity regulation, a non-euro currency is significant if non-euro liabilities account for over 5 per cent of the amalgamation's balance sheet total. The Group monitors significant currencies every month when it produces its liquidity report for the supervisor. Foreign currencies account for only a small proportion of the balance sheet and the liquidity risk due to currency availability has been minimised by the operating model.

Management of intraday liquidity

OP Financial Group's Treasury monitors intraday funding sources and anticipates and monitors the execution of intraday payments. The Group holds intraday funding sources at an amount that allows it to make payments due on the banking day.

Based on the liquidity contingency plan, the Group can raise its level of preparedness even if intraday liquidity is disturbed in order to ensure efficient operations in the case of an increased threat of a crisis.

Liquidity buffer

From the financial perspective, the liquidity buffer consists of deposits in the Bank of Finland and unencumbered notes and bonds eligible as collateral for central bank refinancing held by OP Corporate Bank. It also includes other notes and bonds held by OP Corporate Bank marketable on the secondary market and unencumbered corporate loans eligible as collateral for central bank refinancing.

From the regulatory perspective, OP Financial Group's liquidity buffer consists of the liquidity buffer that fulfils the criteria for liquidity buffer requirement provisions (LCR buffer).

The Group's Treasury is responsible for preparing the investment plan at least once a year. The bond investments in the liquidity buffer held by the Treasury are included in it. OP Corporate Bank's Board of Directors approves the plan. The investment plan applies the restrictions and objectives set in OP Financial Group's Risk Appetite Statement (RAS) and Risk Policy for market risk, credit risk and funding liquidity risk. To the appropriate extent, the investment plan establishes a framework for testing the liquidity of notes and bonds.

The central cooperative consolidated diversifies investments, for example, by product, counterparty and country, in view of both internal risk appetite and external regulatory requirements.

Collateral management and asset encumbrance

In this context, collateral securities mean OP Financial Group's assets used as collateral to fulfil liquidity needs, either in normal or stress conditions. Group Treasury monitors collateral on a centralised basis, and is responsible for its use and transfer.

Home loans serving as collateral for covered bonds issued by OP Mortgage Bank constitute the largest source of asset encumbrance in the balance sheet. The derivatives business is the other main source of asset encumbrance. From the perspective of preparing for liquidity needs, the central cooperative consolidated restricts asset encumbrance through the quantitative limits specified in its Risk Policy.

To increase liquidity potential, it is necessary to identify the eligibility of the balance sheet receivables as collateral and create readiness to use receivables as collateral.

Securing liquidity in stress conditions

OP Financial Group maintains a level of liquid assets, and a funding and investment portfolio structure, which give us an extremely high likelihood of implementing our current business models and maintaining our strategic flexibility. To ensure the liquidity of the banking operation, the liquidity buffer held by the Group Treasury must be large enough to continue and stabilise operations in scenarios in which we lose large quantities of deposits, and wholesale funding becomes less available or unobtainable. Such a scenario may be due to a general market disruption or a problem specific to OP Financial Group.

OP Financial Group's liquidity contingency plan establishes a framework that safeguards the Group's ability to meet its payment obligations, even during a liquidity crisis.

Furthermore, OP Financial Group's Recovery Plan includes liquidity management recovery measures.

Liquidity risk reporting

The central cooperative consolidated reports liquidity risks to the central cooperative's management on a regular basis, switching to weekly or daily reporting if the liquidity preparedness level is raised. OP Financial Group's companies report regularly to boards of directors on liquidity risks. As part of OP Financial Group's risk analysis, Risk Management reports quarterly to the Risk Committee, which operates under the central cooperative's Board of Directors, on liquidity risks.

Liquidity management and control within the amalgamation

The strategies, policies and processes for mitigating liquidity risk in the amalgamation are defined in internal risk documentation. The liquidity risk appetite is defined in op Financial Group's Risk Appetite Statement (RAS) and the liquidity strategy is defined in OP Financial Group's Risk Appetite Framework (RAF). The liquidity risk limits are defined in Banking Risk Policy. Liquidity risk management is centralized in the Group's Treasury. The role of centralized liquidity risk management and the implementation of liquidity regulations in the amalgamation have been described earlier.

In a severe liquidity crisis caused by money and capital market disruptions or other events, or in preparing for such a crisis, the central cooperative's Board of Directors can, upon a proposal by the President and Group CEO, decide to oblige the amalgamation's member banks to place part of their loan portfolio with OP Mortgage Bank as collateral for the covered bond issued by OP MB through an intermediary loan. The loan amounts needed are based on the Group-level need and are determined for each bank. The decision may be put into practice immediately. Member banks are committed to immediately executing any measures related to the decision.

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

Securing liquidity in stress conditions

OP Financial Group's liquidity contingency plan establishes a framework that safeguards the Group's ability to meet its payment obligations, even during a liquidity crisis. The plan provides well-defined operational guidelines and operating models for reducing liquidity risk: these enable the detection of elevated liquidity risks and steer OP Financial Group towards timely and appropriate measures if the threat of a crisis has grown. It specifies control and monitoring practices for each liquidity level, which become more rigorous as escalation proceeds. The liquidity contingency plan is subject to approval by the central cooperative's senior management.

Furthermore, OP Financial Group's Recovery Plan includes liquidity management recovery measures.

g) An explanation of how stress testing is used

Liquidity stress testing

The adequacy of OP Financial Group's liquidity buffer and buffer items is assessed through various scenarios. OP Financial Group-specific and market-specific scenarios, as well as their combination, are used as stress scenarios. The scenarios must cover both short- and long-term stress conditions. When measuring member bank-specific structural funding risk, the liquidity requirement based on the regulatory stress scenario is counted as a deposit in Treasury on a bank-specific basis. A reverse stress test is used in connection with the Group's Recovery Plan. Senior management confirms the scenarios to be used, use and reporting of stress test results.

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

Please see the Declaration and statement in the table EU OVA.

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

These ratios may include:

·Concentration limits on collateral pools and sources of funding (both products and counterparties)

·Customised measurement tools or metrics that assess the structure of the bank's balance sheet or that project cash flows and future liquidity positions, taking into account off-balance sheet risks which are specific to that bank

·Liquidity exposures and funding needs at the level of individual legal entities, foreign branches and subsidiaries, taking into account legal, regulatory and operational limitations on the transferability of liquidity

·Balance sheet and off-balance sheet items broken down into maturity buckets and the resultant liquidity gaps

Please see the Declaration and statement in the table EU OVA.

Securitisation positions

EU SEC1 - Securitisation exposures in the non-trading book

		l	m	n	o
		Institution acts as investor			
		Traditional			
31 Dec 2024, EUR million		STS	Non-STS	Synthetic	Sub-total
1	**Total exposures**	**271**			**271**
2	Retail (total)	172			172
3	residential mortgage				
4	credit card				
5	other retail exposures	172			172
6	re-securitisation				
7	Wholesale (total)	99			99
8	loans to corporates				
9	commercial mortgage				
10	lease and receivables	99			99
11	other wholesale				
12	re-securitisation				

		l	m	n	o
		Institution acts as investor			
		Traditional			
31 Dec 2023, EUR million		STS	Non-STS	Synthetic	Sub-total
1	**Total exposures**	**500**			**500**
2	Retail (total)	294			294
3	residential mortgage				
4	credit card				
5	other retail exposures	294			294
6	re-securitisation				
7	Wholesale (total)	206			206
8	loans to corporates				
9	commercial mortgage				
10	lease and receivables	206			206
11	other wholesale				
12	re-securitisation				

OP Financial Group acts only as an investor in the securitisation process and it has no resecuritised positions.

SEC-ERBA (External Ratings Based Approach) has been applied to securitisation positions. OP Financial Group pays special attention to bonds' structural and collateral-related features in its investment in securitised assets.

EU SEC4 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as investor

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	EU-p	EU-q
		Exposure values (by RW bands/deductions)					Exposure values (by regulatory approach)				RWEA (by regulatory approach)				Capital charge after cap			
31 Dec 2024, EUR million		≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250 % RW	1250% RW/ deduc-tions	SEC-IRBA	SEC-ERBA (incl. IAA)	SEC-SA	1250% RW/ deduc-tions	SEC-IRBA	SEC-ERBA (incl. IAA)	SEC-SA	1250% RW/ deduc-tions	SEC-IRBA	SEC-ERBA (incl. IAA)	SEC-SA	1250% RW/ deduc-tions
1	**Total exposures**	**271**						**271**				**27**				**2**		
2	Traditional securitisation	271						271				27				2		
3	Securitisation	271						271				27				2		
4	Retail underlying	172						172				17				1		
5	Of which STS	172						172				17				1		
6	Wholesale	99						99				10				1		
7	Of which STS	99						99				10				1		

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	EU-p	EU-q
		Exposure values (by RW bands/deductions)					Exposure values (by regulatory approach)				RWEA (by regulatory approach)				Capital charge after cap			
31 Dec 2023, EUR million		≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250 % RW	1250% RW/ deduc-tions	SEC-IRBA	SEC-ERBA (incl. IAA)	SEC-SA	1250% RW/ deduc-tions	SEC-IRBA	SEC-ERBA (incl. IAA)	SEC-SA	1250% RW/ deduc-tions	SEC-IRBA	SEC-ERBA (incl. IAA)	SEC-SA	1250% RW/ deduc-tions
1	**Total exposures**	**500**						**500**				**50**				**4**		
2	Traditional securitisation	500						500				50				4		
3	Securitisation	500						500				50				4		
4	Retail underlying	294						294				29				2		
5	Of which STS	294						294				29				2		
6	Wholesale	206						206				21				2		
7	Of which STS	206						206				21				2		

EU SECA - Qualitative disclosure requirements related to securitisation exposures

a) Description of securitisation and re-securitisation activities; including their risk management and investment objectives in connection with those activities, their role in securitisation and re-securitisation transactions whether they use the Simple Transparent and Standardised (STS) securitisation framework and the extent to which they use securitisation transactions to transfer the credit risk of the securitised exposures to third parties with, where applicable, a separate description of their synthetic securitisation risk transfer policy

OP Financial Group acts only as an investor in the securitisation process and it has no resecuritised positions. All positions are senior and STS applicable. All securitisation positions are classified as HQLA.

b) The type of risk they are exposed to in their securitisation and re-securitisation activities by level of seniority of the relevant securitisation positions, providing a distinction between STS ans non-STS positions and:

i) risk retained in own-originated transactions;

ii) risk incurred in relation to transactions originated by third parties

All positions are in senior level STS investments.

c) Institutions' approaches to calculating the risk-weighted exposure amounts that they apply to their securitisation activities, including the types of securitisation positions to which each approach applies with a distinction between STS and non-STS positions

SEC-ERBA (External Ratings Based Approach) has been applied to securitisation positions. All positions were STS instruments and classified in the banking book.

d) A list of SSPEs falling into any of the following categories, with a description of their types of exposures to those SSPEs, including derivatives contracts:

(i) SSPEs which acquire exposures originated by the institutions;

(ii) SSPEs sponsored by the institutions;

(iii) SSPEs and other legal entities for which the institutions provide securitisation-related services, such as advisory, asset servicing or management services;

(iv) SSPEs included in the institutions' regulatory scope of consolidation

N/A

e) A list of any legal entities in relation to which the institutions have disclosed that they have provided support in accordance with Chapter 5 of Title II of Part Three CRR

N/A

f) A list of legal entities affiliated with the institutions and that invest in securitisations originated by the institutions or in securitisation positions issued by SSPEs sponsored by the institutions

N/A

g) A summary of their accounting policies for securitisation activity, including where relevant a distinction between securitisation and re-securitisation positions

N/A

f) The names of the ECAIs used for securitisations and the types of exposure for which each agency is used

N/A

i) Where applicable, a description of the Internal Assessment Approach as set out in Chapter 5 of Title II of Part Three CRR including the structure of the internal assessment process and the relation between internal assessment and external ratings of the relevant ECAI disclosed in accordance with point (i), the control mechanisms for the internal assessment process including discussion of independence, accountability, and internal assessment process review, the exposure types to which the internal assessment process is applied and the stress factors used for determining credit enhancement levels

N/A

Interest rate risks of non-trading book activities

EU IRRBB1 - Interest rate risks of non-trading book activities

		a	b	c	d
		Changes of the economic value of equity		Changes of the net interest income	
	Supervisory shock scenarios	Current period 31 December 2024	Last period 30 June 2024	Current period 31 December 2024	Last period 30 June 2024
1	Parallel up	-335	-139	229	272
2	Parallel down	-192	79	-385	-306
3	Steepener	304	279		
4	Flattener	-343	-286		
5	Short rates up	-428	-331		
6	Short rates down	297	326		

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

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

The banking book comprises the on- and off-balance sheet items of OP Financial Group's banking that are not defined as items for entry in the trading book. Each member bank in the amalgamation bears the interest rate risk in its banking book, and is responsible for managing the risk.

Interest rate risk in the banking book is measured against parallel and non-parallel shifts of the yield curve. Optionalities included in assets and liabilities are taken into account in models used to measure interest rate risk. Economic capital is allocated in relation to interest-rate risk in the banking book.

OP Financial Group has procedures for hedging against increases and decreases in interest rates. In principle, hedging is therefore implemented in a manner that fulfils the requirements of hedge accounting.

The risk policy sets limits, at company and Group level, on interest rate risk in the banking book. The central cooperative's risk management function provides monthly interest-rate risk reports at company and Group level, and reports to the management, on a quarterly basis, on the realisation and possible breaches of the risk policy limits.

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

Senior management is responsible for arranging the management of interest rate risks in the banking book within OP Financial Group's banking activities, in accordance with the principles of the interest rate risk management strategy. The strategy is described in OP Financial Group's Risk Appetite Framework. In accordance with the strategy, each member bank in the amalgamation bears the interest rate risk in its banking book, and is responsible for managing such a risk.

In the banking risk policy, OP Cooperative's Board of Directors sets limits for net interest income and economic value of equity risk metrics for each company and at OP Financial

Group level. Escalation procedures applied to limit breaches are described in OP Financial Group's Risk Appetite Framework.

Fair value and cash flow hedges are used for hedging risks in the banking book. In principle, hedging is therefore implemented in a manner that fulfils the requirements of hedge accounting.

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

Net interest income (NII) risk is measured by calculating the net interest income risk with a constant balance sheet assumption for a three-year period and then divided by 3 to get the average risk per year during the next three years. Using 3 years as calculation horizon is conservative choice compared to standard 1 year horizon since a large portion of assets are tied to 12 month Euribor.

Economic value of equity (EVE) risk is measured by calculating the value change of discounted cash flows (excluding equity). Calculation is based on run-off balance sheet, cash flows of commercial margins are included and a risk-free Euribor swap curve is used for discounting.

IRRBB measures are calculated and reported on a monthly basis.

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

Parallel interest rate shocks and shocks causing changes to the shape of the yield curve are both used in interest rate risk calculations. The EBA's standardised interest rate shock scenarios and internally defined scenarios are used to depict shocks that change the shape of the yield curve. Customer behavioural models used in IRRBB calculations are stress tested from NII and EVE metrics point of view on a quarterly basis.

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

There is no difference between the calculations: internally reported results are the same as those referred to in Template IRRBB1.

f) A high-level description of how the bank hedges its IRRBB, as well as the associated accounting treatment (if applicable)

Derivative instruments are used for interest rate hedging. Hedging is performed internally for each company, and externally for OP Financial Group. Effectiveness of hedges is verified on at least a quarterly basis. The ineffective portion of the hedge is recognised in profit or loss.

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

The “Passing on changes in the market interest rate to deposit interest rates” model is used to assess the interest rate sensitivity of non-maturity deposits. This model is used in both NII and EVE risk measures.

A loan prepayment model is used to assess customer behaviour regarding early repayment of loans and the resulting credit cash flows in addition to what is provided for in loan agreement terms and conditions. This model is used in both NII and EVE risk measures.

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

Both NII and EVE risk measures are well within the internal limits and SOT limits set by the supervisor.

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

The reported NII risk is a three year cumulative net interest income risk divided by three, representing the NII risk scaled to one-year. This differs from the SOT NII specification which uses only 1 year calculation horizon.

In EVE risk calculation, a permanent floor of -1% is applied to the interest rate curve. The floor for net interest income risk calculation is -2%.

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

The average repricing maturity of non-maturity deposits is approximately 3 years. All non-maturity deposits have a repricing maturity of 5 years or less.

Leverage Ratio

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

		a	b
		Applicable amount	Applicable amount
EUR million		31 Dec 2024	31 Dec 2023
1	Total assets as per published financial statements	161,168	160,391
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation	-22,520	-20,767
8	Adjustments for derivative financial instruments	1,377	846
9	Adjustment for securities financing transactions (SFTs)	0	0
10	Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	8,340	8,596
11	(Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital)	-83	-120
12	Other adjustments	-607	-97
13	**Total exposure measure**	**147,674**	**148,849**

EU LR2 - LRCom: Leverage ratio common disclosure

EUR million		CRR leverage ratio exposures a 31 Dec 2024	CRR leverage ratio exposures b 31 Dec 2023
On-balance sheet exposures (excluding derivatives and SFTs)			
1	On-balance sheet items (excluding derivatives, SFTs, but including collateral)	136,325	136,803
5	(General credit risk adjustments to on-balance sheet items)	-83	-120
6	(Asset amounts deducted in determining Tier 1 capital)	-781	-658
7	**Total on-balance sheet exposures (excluding derivatives and SFTs)**	**135,461**	**136,025**
Derivative exposures			
8	Replacement cost associated with SA-CCR derivatives transactions (ie net of eligible cash variation margin)	1,930	2,149
9	Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions	1,944	2,078
13	**Total derivatives exposures**	**3,874**	**4,228**
Securities financing transaction (SFT) exposures			
16	Counterparty credit risk exposure for SFT assets	0	0
18	**Total securities financing transaction exposures**	**0**	**0**

EUR million		CRR leverage ratio exposures a 31 Dec 2024	b 31 Dec 2023
Other off-balance sheet exposures			
19	Off-balance sheet exposures at gross notional amount	27,435	27,121
20	(Adjustments for conversion to credit equivalent amounts)	-19,095	-18,525
21	(General provisions deducted in determining Tier 1 capital and specific provisions associated with off-balance sheet exposures)		
22	**Off-balance sheet exposures**	**8,340**	**8,596**
Excluded exposures			
EU-22k	(Total exempted exposures)		
Capital and total exposure measure			
23	**Tier 1 capital**	**15,451**	**14,111**
24	**Total exposure measure**	**147,674**	**148,849**
Leverage Ratio			
25	**Leverage ratio (%)**	**10.46**	**9.48**
EU-25	Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%)	10.46	9.48
25a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) (%)	10.46	9.48
26	Regulatory minimum leverage ratio requirement (%)	3.00	3.00
EU-26a	Additional own funds requirements to address the risk of excessive leverage (%)		
EU-26b	of which: to be made up of CET1 capital (percentage points)		
27	Leverage ratio buffer requirement (%)		
EU-27a	Overall leverage ratio requirement (%)	3.00	3.00

EUR million		CRR leverage ratio exposures a 31 Dec 2024	b 31 Dec 2023
Choice on transitional arrangements and relevant exposures			
EU-27b	Choice on transitional arrangements for the definition of the capital measure	Transitional	Transitional
Disclosure of mean values			
30	Total exposure measure (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	147,674	148,849
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)	147,674	148,849
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) (%)	10.46	9.48
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) (%)	10.46	9.48

OP Financial Group has not applied the temporary relief allowed by the ECB or IFRS9 transitional provisions to own funds.

EU LRA - LR qualitative information

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

By means of ALM and capital management, the Group ensures that leverage will remain controlled in view of maturity transformation and that adequate tools will remain available for leverage management. OP Financial Group has set its capital adequacy target sufficiently high, in which case leverage will not be high or the minimum leverage ratio will not decrease close to the minimum level. The Group monitors leverage by means of its internal target levels for the leverage ratio and of capital adequacy; in addition, the Group monitors, for example, the net stable funding ratio (NSFR) and the asset encumbrance (AE).

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

The leverage ratio for OP Financial Group's Banking was 10.5% (9.5). The higher ratio was particularly due to a decrease in central bank deposits, and earnings performance. The regulatory minimum requirement is 3.0%.

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

		a	b
		Leverage ratio exposures	Leverage ratio exposures
EUR million		31 Dec 2024	31 Dec 2023
EU-1	**Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:**	**136,242**	**136,684**
EU-2	Trading book exposures	354	299
EU-3	Banking book exposures, of which:	135,888	136,385
EU-4	Covered bonds	6,973	6,084
EU-5	Exposures treated as sovereigns	25,954	25,970
EU-6	Exposures to regional governments, MDB, international organisations and PSE not treated as sovereigns	134	292
EU-7	Institutions	1,248	1,040
EU-8	Secured by mortgages of immovable properties	54,469	53,428
EU-9	Retail exposures	15,710	16,135
EU-10	Corporates	24,495	26,030
EU-11	Exposures in default	2,337	2,469
EU-12	Other exposures (eg equity, securitisations, and other non-credit obligation assets)	4,568	4,935

Countercyclical capital buffers

EU CCyB1 - Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer

		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 million		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 (%)	Countercyclical buffer rate (%)
10	Breakdown by country:													
	Finland	101,871		87			101,958	4,493	7		4,500	56,248	90.09	
	Germany	1,669				30	1,699	21		0	21	259	0.42	0.75
	France	1,661				26	1,688	15		0	15	192	0.31	1.00
	Lithuania	1,662					1,662	123			123	1,534	2.46	1.00
	Norway	1,586		4			1,590	55	0		56	695	1.11	2.50
	Sweden	1,541		19			1,560	74	1		75	934	1.50	2.00
	Estonia	1,113					1,113	78			78	979	1.57	1.50
	Latvia	703					703	49			49	618	0.99	0.50
	Belgium	500					500	6			6	72	0.11	1.00
	Netherlands	443		4			447	11	0		11	141	0.23	2.00
	Luxembourg	177				142	319	13		1	14	173	0.28	0.50
	Denmark	175		2			177	8	0		8	96	0.15	2.50
	Ireland	4		1		73	78	0	0	1	1	10	0.02	1.50
	Czech	4					4	0			0	2	0.00	1.25
	Iceland	1					1	0			0	0	0.00	2.50
	Cyprus	1					1	0			0	0	0.00	1.00
	Slovakia	1					1	0			0	0	0.00	1.50
	Slovenia	0					0	0			0	0	0.00	0.50
	Bulgaria	0					0	0			0	0	0.00	2.00
	Romania	0					0	0			0	0	0.00	1.00
	Croatia	0					0	0			0	0	0.00	1.50
	Hungary	0					0	0			0	0	0.00	0.50
	Other	1,689					1,689	39			39	484	0.77	
20	Total	114,358		212		364	114,934	4,975	16	3	4,994	62,426	100.00	

		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 2023, EUR million		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 (%)	Countercyclical buffer rate (%)
10	Breakdown by country:													
	Finland	102,170		131		60	102,361	4,626	10	0	4,636	57,955	89.95	0.00
	Lithuania	1,669					1,669	126			126	1,575	2.44	1.00
	Sweden	1,590		13			1,603	81	1		82	1,027	1.59	2.00
	Germany	1,518				57	1,575	26	0	0	26	330	0.51	0.75
	Norway	1,309		1			1,310	43	0		43	542	0.84	2.50
	France	1,169				58	1,227	13		0	13	166	0.26	0.50
	Estonia	1,108					1,108	84			84	1,047	1.63	1.50
	Luxembourg	169				234	402	13		2	15	188	0.29	0.50
	Netherlands	354		1			355	10	0		10	131	0.20	1.00
	Ireland	10		2		91	103	1	0	1	1	19	0.03	1.00
	Denmark	76		2			78	2	0		2	26	0.04	2.50
	Czech	17					17	1			1	16	0.02	2.00
	Iceland	1					1	0			0	0	0.00	2.00
	Slovenia	1					1	0			0	1	0.00	0.50
	Cyprus	0					0	0			0	0	0.00	0.50
	Slovakia	0					0	0			0	0	0.00	1.50
	Bulgaria	0					0	0			0	0	0.00	2.00
	Romania	0					0	0			0	0	0.00	1.00
	Croatia	0					0	0			0	0	0.00	1.00
	Other	3,270					3,270	113			113	1,410	2.19	0.00
20	Total	114,430		149		500	115,080	5,139	12	4	5,155	64,432	100.00	

EU CCyB2 - Amount of institution-specific countercyclical capital buffer

31 Dec 2024, EUR million		a
1	Total risk exposure amount	71,756
2	Institution specific countercyclical capital buffer rate (%)	0.13
3	Institution specific countercyclical capital buffer requirement	92

31 Dec 2023, EUR million		a
1	Total risk exposure amount	73,511
2	Institution specific countercyclical capital buffer rate (%)	0.11
3	Institution specific countercyclical capital buffer requirement	81

Operational risk

EU OR1 - Operational risk own funds requirements and risk-weighted exposure amounts

31 Dec 2024, EUR million		a	b	c	d	e
		Relevant indicator			Own funds require-ments	Risk exposure amount
		Year-3	Year-2	Last year		
1	Banking activities subject to basic indicator approach (BIA)					
2	Banking activities subject to standardised (TSA) / alternative standardised (ASA) approaches	2,439	2,572	3,759	395	4,936
3	Subject to TSA:	2,439	2,572	3,759		
4	Subject to ASA:					

31 Dec 2023, EUR million		a	b	c	d	e
		Relevant indicator			Own funds require-ments	Risk exposure amount
		Year-3	Year-2	Last year		
1	Banking activities subject to basic indicator approach (BIA)					
2	Banking activities subject to standardised (TSA) / alternative standardised (ASA) approaches	2,253	2,439	2,572	332	4,156
3	Subject to TSA:	2,253	2,439	2,572		
4	Subject to ASA:					

EU ORA - Qualitative information on operational risk

a) Disclosure of the risk management objectives and policies

Operational risk management aims to ensure the efficiency and quality of key individual processes and the operational processes they combine to form, as well as their continuity in abnormal circumstances. Every OP Financial Group company's management is responsible for organising operational risk management according to these goals, and in view of the special features of each business.

Through operational risk management, the OP Financial Group ensures that the risks do not cause unforeseen financial losses or have other harmful consequences. Operational risk management does not have to eliminate risk altogether, but it must at least mitigate risks to bring them into line with risk appetite.

Operational risk management is based on continuous risk identification and assessments. Risk identification takes into account factors such as forthcoming and emerging business risks, ESG-related impacts, insider risks due to human action, security threats and external requirements. The required risk mitigation measures are designed using a risk-based approach. Identification of operational risks includes assessing their financial and other adverse impacts on the continuity of critical functions, while taking account of reputational risks and good governance. Operational risk management methods are applied also to model risk management.

Realised risk events and near-miss events, and operational risks and their causes and impacts, are continuously monitored. Stress testing and scenarios are used to assess the sufficiency of operational risk management methods and of the economic capital allocated in case risks are realised.

Before new or significantly modified products, services, business models, processes systems or outsourcings are launched at OP Financial Group, they are risk assessed using procedures approved by the central cooperative's Risk Management. Each business is responsible for conducting the risk assessment procedure. Functions in the second line of defence can escalate decision-making on the introduction of new products, according to Central cooperative consolidated's management and decision-making system, if the project is high-risk, important in principle, and the risks involved are new.

The primary goal of OP Financial Group's continuity management is to ensure the continuity of functions critical and important to business and vital to security of supply if a disruption occurs. Each party in charge of vital functions also ensures that the related continuity management is sufficient and up to date.

The central cooperative's Risk Management function is in charge of OP Financial Group's operational risk management framework, and its maintenance and development. The Risk Management function maintains a risk library system for classification of operational risk at OP Financial Group, and conducts regular reviews to ensure that the library is comprehensive and up to date.

In addition to standardised operational risk management procedures and means of mitigating individual risks, companies within OP Financial Group can take out insurance to transfer the impacts of materialised operational risks outside the company and Group.

b) Disclosure of the approaches for the assessment of minimum own funds requirements

Own funds requirement for operational risk is calculated according to the standardised approach.

c) Description of the AMA methodology approach used (if applicable)

N/A

d) Disclose the use of insurance for risk mitigation in the Advanced Measurement Approach (if applicable)

N/A

Own funds

EU CC1 - Composition of regulatory own funds

EUR million		a Amounts 31 Dec 2024	a Amounts 31 Dec 2023	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	3,292	3,356	
	of which: profit shares (Non-voting cooperative share)	3,255	3,335	CC2_1
	of which: cooperative shares	222	219	CC2_1
	of which: cooperative capital deducted from own funds	-185	-198	
2	Retained earnings	9,709	8,407	CC2_2
3	Accumulated other comprehensive income (and other reserves)	1,631	1,549	CC2_3
EU-5a	Independently reviewed interim profits net of any foreseeable charge or dividend	1,505	1,308	CC2_4
6	**Common Equity Tier 1 (CET1) capital before regulatory adjustments**	**16,137**	**14,620**	
Common Equity Tier 1 (CET1) capital: regulatory adjustments				
7	Additional value adjustments (negative amount)	-22	-34	
8	Intangible assets (net of related tax liability) (negative amount)	-320	-314	CC2_5
11	Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value	140	212	CC2_6
15	Defined-benefit pension fund assets (negative amount)	-197	-154	CC2_7
27a	Other regulatory adjustments	-288	-219	CC2_8
28	**Total regulatory adjustments to Common Equity Tier 1 (CET1)**	**-687**	**-509**	
29	**Common Equity Tier 1 (CET1) capital**	**15,451**	**14,111**	
Additional Tier 1 (AT1) capital: instruments				
36	**Additional Tier 1 (AT1) capital before regulatory adjustments**			
Additional Tier 1 (AT1) capital: regulatory adjustments				
43	**Total regulatory adjustments to Additional Tier 1 (AT1) capital**			
44	**Additional Tier 1 (AT1) capital**			
45	**Tier 1 capital (T1 = CET1 + AT1)**	**15,451**	**14,111**	

		a	a	b
		Amounts	Amounts	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
EUR million		31 Dec 2024	31 Dec 2023	
Tier 2 (T2) capital: instruments				
46	Capital instruments and the related share premium accounts	1,293	1,308	CC2_9
EU-47b	Amount of qualifying items referred to in Article 494b(2) CRR subject to phase out from T2	22	57	CC2_9
50	Credit risk adjustments	83	120	
51	**Tier 2 (T2) capital before regulatory adjustments**	**1,398**	**1,484**	
Tier 2 (T2) capital: regulatory adjustments				
52	Direct, indirect and synthetic holdings by an institution of own T2 instruments and subordinated loans (negative amount)	-5		
57	**Total regulatory adjustments to Tier 2 (T2) capital**	-5		
58	**Tier 2 (T2) capital**	**1,393**	1,484	
59	**Total capital (TC = T1 + T2)**	**16,844**	**15,595**	
60	**Total Risk exposure amount**	**71,756**	73,511	

EUR million		a Amounts 31 Dec 2024	a Amounts 31 Dec 2023	b Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
Capital ratios and requirements including buffers				
61	Common Equity Tier 1 capital	21.53 %	19.20 %	
62	Tier 1 capital	21.53 %	19.20 %	
63	Total capital	23.47 %	21.21 %	
64	Institution CET1 overall capital requirements	10.92 %	9.88 %	
65	of which: capital conservation buffer requirement	2.50 %	2.50 %	
66	of which: countercyclical capital buffer requirement	0.13 %	0.11 %	
67	of which: systemic risk buffer requirement	1.02 %		
EU-67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer requirement	1.50 %	1.50 %	
EU-67b	of which: additional own funds requirements to address the risks other than the risk of excessive leverage	1.27 %	1.27 %	
68	Common Equity Tier 1 capital (as a percentage of risk exposure amount) available after meeting the minimum capital requirements	13.22 %	10.96 %	
Amounts below the thresholds for deduction (before risk weighting)				
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)	188	190	CC2_10
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)	83	120	
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach	792	825	

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

31 Dec 2024, EUR million		a Balance sheet as in published financial statements As at period end	b Under regulatory scope of consolidation As at period end	c Reference
Assets - Breakdown by asset classes according to the balance sheet in the published financial statements				
1	Cash and balances at central banks	18,110	18,110	
2	Receivables from credit institutions	808	763	
3	Receivables from customers	98,629	98,715	
4	Derivative contracts	2,497	2,490	
5	Investment assets	23,537	16,452	
6	Assets covering unit-linked contracts	14,172		
7	Reinsurance contract assets	102		
8	Intangible assets	1,022	368	CC2_5
9	Property, plant and equipment	392	386	
10	Other assets	1,780	1,277	
11	of which pension assets	249	246	CC2_7
12	Income tax receivables	42	22	
13	Deferred tax assets	77	65	CC2_10
14	**Total assets**	**161,168**	**138,648**	

31 Dec 2024, EUR million		a Balance sheet as in published financial statements As at period end	b Under regulatory scope of consolidation As at period end	c Reference
Liabilities - Breakdown by liability classes according to the balance sheet in the published financial statements				
1	Liabilities to credit institutions	91	92	
2	Liabilities to customers	80,455	81,048	
3	Derivative contracts	2,324	2,329	
4	of which DVA	-30	-30	CC2_8
5	Insurance contract liabilities	11,796		
6	Liabilities from investment agreements	9,140		
7	Debt securities issued to the public and debentures	33,198	33,198	
8	Provisions and other liabilities	3,526	3,246	
9	of which loss allowance, off balance sheet items	45	45	
10	Income tax liabilities	55	40	
11	Deferred tax liabilities	1,027	753	
12	Subordinated liabilities	1,444	1,444	CC2_9
13	**Total liabilities**	143,058	122,150	

≡

31 Dec 2024, EUR million		a Balance sheet as in published financial statements As at period end	b Under regulatory scope of consolidation As at period end	c Reference
Equity capital				
1	Share of OP Financial Group's owners			
2	Cooperative capital			
3	Cooperative share	222	222	CC2_1
4	Profit share	3,255	3,255	CC2_1
5	Fair value reserve	-249	-251	CC2_3
6	of which cash flow hedge reserve	-140	-140	CC2_6
7	Other reserves	2,172	2,123	CC2_3
8	Retained earnings	12,569	11,149	
9	Profit for previous financial years	10,848	9,709	CC2_2
10	Actuarial gains and losses	-254	-241	CC2_3
11	Profit for the financial year	1,975	1,681	CC2_4
12	Non-controlling interests	141		
13	**Total Equity capital**	**18,110**	**16,498**	
14	**Total liabilities and equity**	**161,168**	**138,648**	

The differences between the balance sheets of OP Financial Group and the consolidation group are due to differences in the content and extent of consolidation. Within the consolidation group, insurance companies have not been consolidated but are shown in investments made by the consolidation group and the insurance companies' equity capital is not included in the equity capital of the consolidation group. The consolidation group has applied the materiality threshold specified in Article 19 of CRR in the consolidation of its companies. Table EU CC1 presents items deducted from the own funds. OP Financial Group prepares financial statements in accordance with IFRS standard.

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

Table is presented in six parts on pages 140-145.

		a	b	c
31 Dec 2024		Cooperative share	Profit share (Non-voting cooperative share)	JPY 10,000,000,000 Subordinated Floating Rate Instruments due 3 July 2025
1	Issuer	Group member cooperative banks	Group member cooperative banks	OP Corporate Bank plc
2	Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	N/A	N/A	ISIN: XS1255402288 [(EMTN Series 192)]
2a	Public or private placement	N/A	N/A	Private
3	Governing law(s) of the instrument	Finnish law, especially the Co-operatives Act and the Act on the Amalgamation of Deposit Banks, the EU Capital Requirements Regulation (575/2013 (CRR)	Finnish law, especially the Co-operatives Act and the Act on the Amalgamation of Deposit Banks, CRR	English law, except for the subordination provisions which are governed by Finnish law
3a	Contractual recognition of write down and conversion powers of resolution authorities	N/A	N/A	No
	Regulatory treatment			
4	Current treatment taking into account, where applicable, transitional CRR rules	Common Equity Tier 1 (CET1)	Common Equity Tier 1 (CET1)	Tier 2 Capital (T2)
5	Post-transitional CRR rules	Common Equity Tier 1 (CET1)	Common Equity Tier 1 (CET1)	Tier 2 Capital (T2)
6	Eligible at solo/(sub-)consolidated/ solo&(sub-)consolidated	Solo and consolidated	Solo and consolidated	Solo and consolidated
7	Instrument type (types to be specified by each jurisdiction)	CET1 as published in the EBA list	CET1 as published in the EBA list	N/A
8	Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	218	3,073	7
9	Nominal amount of instrument (in million)	EUR 222	EUR 3 255	JPY 10 000
EU-9a	Issue price	100%	100%	100%
EU-9b	Redemption price	100%	100%	100%
10	Accounting classification	Central cooperative's share, cooperative capital	Central cooperative's share, cooperative capital	Liability - carried at amortised cost
11	Original date of issuance	N/A	N/A	3/7/2015
12	Perpetual or dated	Perpetual	Perpetual	Dated
13	Original maturity date	No maturity	No maturity	3/7/2025
14	Issuer call subject to prior supervisory approval	Yes	Yes	Yes

31 Dec 2024		a Cooperative share	b Profit share (Non-voting cooperative share)	c JPY 10,000,000,000 Subordinated Floating Rate Instruments due 3 July 2025
15	Optional call date, contingent call dates and redemption amount	Cooperative banks refund shareholders their cooperative contributions upon termination of membership. However, cooperative banks have the right to refuse to refund the contributions while the bank is operating. If a cooperative bank has not refused to refund the contribution, this may take place within 12 months after the end of the financial year when membership terminated. If the refund cannot be made in full in any given year, the balance will be refunded from disposable cooperative capital based on subsequent financial statements. However, this entitlement to the refund for the balance will terminate after the fifth financial statements.	Cooperative banks refund shareholders the subscription price of their Profit shares upon termination of membership. A Profit share's subscription price is also refunded to the shareholder when the shareholder has cancelled the Profit share. However, cooperative banks have the right to refuse to refund the Profit share contributions while the bank is operating. If a cooperative bank has not refused to refund the Profit share contribution, this may take place within 12 months after the end of the financial year when membership terminated or the Profit share has been cancelled. If the refund cannot be made in full in any given year, the balance will be refunded from disposable cooperative capital based on subsequent financial statements. However, this entitlement to the refund for the balance will terminate after the fifth financial statements.	Right to early redemption on the basis of such changes in tax laws and interpretations that would result in the issuer having to pay extra. Redemption price 100%.
16	Subsequent call dates, if applicable	See item 15	See item 15	See item 15
	Coupons / dividends			
17	Fixed or floating dividend/coupon	Floating	Floating	Floating
18	Coupon rate and any related index	N/A	N/A	3-month JPY Libor + 0.735% per annum
19	Existence of a dividend stopper	No	No	No
EU-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Fully discretionary	Fully discretionary	Mandatory
EU-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Fully discretionary	Fully discretionary	Mandatory
21	Existence of step up or other incentive to redeem	N/A	N/A	No
22	Noncumulative or cumulative	Non-cumulative	Non-cumulative	Non-cumulative
23	Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible
24	If convertible, conversion trigger(s)	N/A	N/A	N/A
25	If convertible, fully or partially	N/A	N/A	N/A
26	If convertible, conversion rate	N/A	N/A	N/A
27	If convertible, mandatory or optional conversion	N/A	N/A	N/A
28	If convertible, specify instrument type convertible into	N/A	N/A	N/A
29	If convertible, specify issuer of instrument it converts into	N/A	N/A	N/A
30	Write-down features	Yes	Yes	N/A
31	If write-down, write-down trigger(s)	Accumulation of losses	Accumulation of losses	N/A
32	If write-down, full or partial	Full or partial	Full or partial	N/A
33	If write-down, permanent or temporary	Temporary	Temporary	N/A
34	If temporary write-down, description of write-up mechanism	Through increase of cooperative capital	Through increase of cooperative capital	N/A

31 Dec 2024		a Cooperative share	b Profit share (Non-voting cooperative share)	c JPY 10,000,000,000 Subordinated Floating Rate Instruments due 3 July 2025
34a	Type of subordination (only for eligible liabilities)	N/A	N/A	N/A
EU-34b	Ranking of the instrument in normal insolvency proceedings	1	1	3
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	If a cooperative bank is dissolved either through liquidation or bankruptcy, any supplementary cooperative capital is refunded before other cooperative capital or, if the funds are insufficient, that part of supplementary cooperative capital that is proportional to the supplementary cooperative capital paid.	If a cooperative bank is dissolved either through liquidation or bankruptcy, any supplementary cooperative capital is refunded before other cooperative capital or, if the funds are insufficient, that part of supplementary cooperative capital that is proportional to the supplementary cooperative capital paid.	Issuer's senior non preferred -instruments
36	Non-compliant transitioned features	No	No	Yes
37	If yes, specify non-compliant features	N/A	N/A	Instrument issued before 27 June 2019 that does not meet the eligibility criteria related to write-down and conversion powers pursuant to Article 59 BRRD or are subject to set-off or netting arrangements
37a	Link to the full term and conditions of the instrument (signposting)	https://www.op.fi/en/op-financial-group/cooperative-banks	https://www.op.fi/en/op-financial-group/cooperative-banks	https://www.op.fi/documents/20556/62165/192+EMTN+JPY/99d42d07-0105-4827-a48b-750bc6a4f90a

31 Dec 2024		d EUR 100,000,000 2.405 per cent Dated Tier 2 Instruments due 2025	e SEK 3,250,000,000 FRN Tier 2 subordinated instruments due 3 June 2030	f EUR 1,000,000,000 1.625% Tier 2 subordinated instruments due 9 June 2030
1	Issuer	OP Corporate Bank plc	OP Corporate Bank plc	OP Corporate Bank plc
2	Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	ISIN: XS1296897579 [(EMTN Series 197)]	ISIN: XS2182066543 [(EMTN Series 248)]	ISIN: XS2185867673 [(EMTN Series 250)]
2a	Public or private placement	Public	Public	Public
3	Governing law(s) of the instrument	English law, except for the subordination provisions which are governed by Finnish law	Finnish law	Finnish law
3a	Contractual recognition of write down and conversion powers of resolution authorities	No	Yes	Yes
	Regulatory treatment			
4	Current treatment taking into account, where applicable, transitional CRR rules	Tier 2 Capital (T2)	Tier 2 Capital (T2)	Tier 2 Capital (T2)
5	Post-transitional CRR rules	Tier 2 Capital (T2)	Tier 2 Capital (T2)	Tier 2 Capital (T2)
6	Eligible at solo/(sub-)consolidated/ solo&(sub-)consolidated	Solo and consolidated	Solo and consolidated	Solo and consolidated
7	Instrument type (types to be specified by each jurisdiction)	N/A	N/A	N/A
8	Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	15	308	980
9	Nominal amount of instrument (in million)	EUR 100	SEK 3 250	EUR 1 000
EU-9a	Issue price	100%	100%	100%
EU-9b	Redemption price	100%	100%	100%
10	Accounting classification	Liability - carried at amortised cost	Liability - carried at amortised cost	Liability - carried at amortised cost
11	Original date of issuance	25/9/2015	3/6/2020	9/6/2020
12	Perpetual or dated	Dated	Dated	Dated
13	Original maturity date	25/9/2025	3/6/2030	9/6/2030
14	Issuer call subject to prior supervisory approval	Yes	Yes	Yes

31 Dec 2024		d EUR 100,000,000 2.405 per cent Dated Tier 2 Instruments due 2025	e SEK 3,250,000,000 FRN Tier 2 subordinated instruments due 3 June 2030	f EUR 1,000,000,000 1.625% Tier 2 subordinated instruments due 9 June 2030
15	Optional call date, contingent call dates and redemption amount	The right of redemption at nominal value at any time due during the loan term due to a capital transaction or taxable event. Right to early redemption on the basis of such changes in tax laws and interpretations that would result in the issuer having to pay extra. Redemption price 100%.	First Call Date on 3 June 2025, and on any interest payment date thereafter.	Redeemable at the Issuer's option on the Optional Redemption Date, at the Outstanding Principal Amount with accrued interest (if any). Upon the occurrence of Capital Event or for taxation reasons, the Issuer may, subject to the prior approval of the Competent Authority and in accordance with the Applicable Banking Regulations, at its option, elect to redeem the instruments in whole, (but not in part), at par, having given notice to the Holders. Call date on 9 June 2025.
16	Subsequent call dates, if applicable	See item 15	See item 15	See item 15
	Coupons / dividends			
17	Fixed or floating dividend/coupon	Fixed	Fixed	Floating
18	Coupon rate and any related index	2.405% per annum	3-month Stibor + 2.3 %	1.625 % per annum until 9 June 2025, after the initial reset date 5-year Single Mid-Swap Rate + 2.0 %
19	Existence of a dividend stopper	No	No	No
EU-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Mandatory	Mandatory	Mandatory
EU-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Mandatory	Mandatory	Mandatory
21	Existence of step up or other incentive to redeem	No	No	No
22	Noncumulative or cumulative	Non-cumulative	Non-cumulative	Non-cumulative
23	Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible
24	If convertible, conversion trigger(s)	N/A	N/A	N/A
25	If convertible, fully or partially	N/A	N/A	N/A
26	If convertible, conversion rate	N/A	N/A	N/A
27	If convertible, mandatory or optional conversion	N/A	N/A	N/A
28	If convertible, specify instrument type convertible into	N/A	N/A	N/A
29	If convertible, specify issuer of instrument it converts into	N/A	N/A	N/A
30	Write-down features	N/A	N/A	N/A
31	If write-down, write-down trigger(s)	N/A	N/A	N/A
32	If write-down, full or partial	N/A	N/A	N/A
33	If write-down, permanent or temporary	N/A	N/A	N/A
34	If temporary write-down, description of write-up mechanism	N/A	N/A	N/A

31 Dec 2024		d EUR 100,000,000 2.405 per cent Dated Tier 2 Instruments due 2025	e SEK 3,250,000,000 FRN Tier 2 subordinated instruments due 3 June 2030	f EUR 1,000,000,000 1.625% Tier 2 subordinated instruments due 9 June 2030
34a	Type of subordination (only for eligible liabilities)	N/A	N/A	N/A
EU-34b	Ranking of the instrument in normal insolvency proceedings	3	3	3
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Issuer's senior non preferred -instruments	Issuer's senior non preferred -instruments	Issuer's senior non preferred -instruments
36	Non-compliant transitioned features	Yes	No	No
37	If yes, specify non-compliant features	Instrument issued before 27 June 2019 that does not meet the eligibility criteria related to write-down and conversion powers pursuant to Article 59 BRRD or are subject to set-off or netting arrangements	N/A	N/A
37a	Link to the full term and conditions of the instrument (signposting)	https://www.op.fi/documents/20556/62165/197+Final+Terms/57248a66-27b7-4bf1-9586-6999d13dc677	https://www.op.fi/documents/20556/62165/248+Final+Terms/2fb889d3-accd-26cd-a369-a1e2f41c71e3	https://www.op.fi/documents/20556/62165/250+Final+Terms/9df2e465-125f-14e7-35f1-c3bbded35590

MREL

EU KM2 - Key metrics - MREL and, where applicable, G-SII requirement for own funds and eligible liabilities

EUR million		a Minimum requirement for own funds and eligible liabilities (MREL) 31 Dec 2024
Own funds and eligible liabilities, ratios and components		
1	Own funds and eligible liabilities	25,534
EU-1a	Of which own funds and subordinated liabilities	20,599
2	Total risk exposure amount of the resolution group (TREA)	71,756
3	Own funds and eligible liabilities as a percentage of the TREA	35.58 %
EU-3a	Of which own funds and subordinated liabilities	28.71 %
4	Total exposure measure (TEM) of the resolution group	147,674
5	Own funds and eligible liabilities as percentage of the TEM	17.29 %
EU-5a	Of which own funds or subordinated liabilities	13.95 %
Minimum requirement for own funds and eligible liabilities (MREL)		
EU-7	MREL expressed as a percentage of the TREA	28.27 %
EU-8	Of which to be met with own funds or subordinated liabilities	18.71 %
EU-9	MREL expressed as a percentage of the TEM	7.48 %
EU-10	Of which to be met with own funds or subordinated liabilities	7.48 %

EU TLAC1 - Composition - MREL and, where applicable, G-SII Requirement for own funds and eligible liabilities

31 Dec 2024, EUR million		a Minimum requirement for own funds and eligible liabilities (MREL)
Own funds and eligible liabilities and adjustments		
1	Common Equity Tier 1 capital (CET1)	15,451
2	Additional Tier 1 capital (AT1)	
6	Tier 2 capital (T2)	1,393
11	Own funds for the purpose of Articles 92a of Regulation (EU) No 575/2013 and 45 of Directive 2014/59/EU	16,844
Own funds and eligible liabilities: Non-regulatory capital elements		
12	Eligible liabilities instruments issued directly by the resolution entity that are subordinated to excluded liabilities (not grandfathered)	3,820
EU-12a	Eligible liabilities instruments issued by other entities within the resolution group that are subordinated to excluded liabilities (not grandfathered)	
EU-12b	Eligible liabilities instruments that are subordinated to excluded liabilities issued prior to 27 June 2019 (subordinated grandfathered)	
EU-12c	Tier 2 instruments with a residual maturity of at least one year to the extent they do not qualify as Tier 2 items	
13	Eligible liabilities that are not subordinated to excluded liabilities (not grandfathered pre-cap)	4,191
EU-13a	Eligible liabilities that are not subordinated to excluded liabilities issued prior to 27 June 2019 (pre-cap)	744
14	Amount of non subordinated eligible liabilities instruments, where applicable after application of Article 72b (3) CRR	4,935
17	Eligible liabilities items before adjustments	8,755
EU-17a	Of which subordinated liabilities items	3,820
Own funds and eligible liabilities: Adjustments to non-regulatory capital elements		
18	Own funds and eligible liabilities items before adjustments	25,598
20	(Deduction of investments in other eligible liabilities instruments)	-64
22	Own funds and eligible liabilities after adjustments	25,534
EU-22a	Of which: own funds and subordinated liabilities	20,599
Risk-weighted exposure amount and leverage exposure measure of the resolution group		
23	Total risk exposure amount (TREA)	71,756
24	Total exposure measure (TEM)	147,674
Ratio of own funds and eligible liabilities		
25	Own funds and eligible liabilities as a percentage of TREA	35.58 %
EU-25a	Of which own funds and subordinated liabilities	28.71 %
26	Own funds and eligible liabilities as a percentage of TEM	17.29 %
EU-26a	Of which own funds and subordinated liabilities	13.95 %
27	CET1 (as a percentage of the TREA) available after meeting the resolution group's requirements	7.30 %

EU TLAC3 - Creditor ranking - resolution entity

31 Dec 2024, EUR million		Insolvency ranking 1 (most junior)	3	8	9	11 (most senior)	Sum of 1 to n
1	Description of insolvency rank	CET1	T2	Senior non-preferred liabilities	Claims without priority or guarantee	Eligible deposit of private persons and SMEs	
5	Own funds and liabilities potentially eligible for meeting MREL	15,451	1,393	3,820	4,935		25,598
6	of which residual maturity ≥ 1 year < 2 years			977	634		1,611
7	of which residual maturity ≥ 2 year < 5 years			2,543	3,829		6,371
8	of which residual maturity ≥ 5 years < 10 years		1,303	300	387		1,990
9	of which residual maturity ≥ 10 years, but excluding perpetual securities				85		85
10	of which perpetual securities	15,451					15,451

Scope of application

EU LI1 - Differences between accounting and regulatory scopes of consolidation and mapping of financial statement categories with regulatory risk categories

		a	b	c	d	e	f	g
				Carrying values of items				
	31 Dec 2024, EUR million	Carrying values as reported in published financial statements	Carrying values under scope of prudential consolidation	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							
1	Cash and balances at central banks	18,110	18,110	18,110				
2	Receivables from credit institutions	808	763	763				
3	Receivables from customers	98,629	98,715	98,715				
4	Derivative contracts	2,497	2,490		2,490		1,363	
5	Investment assets	23,537	16,452	15,765		271	415	
6	Assets covering unit-linked contracts	14,172						
7	Reinsurance contract assets	102						
8	Intangible assets	1,022	368	49				320
9	Property, plant and equipment	392	386	386				
10	Other assets	1,780	1,277	1,031				197
11	of which pension assets	249	246					197
12	Income tax receivables	42	22	22				
13	Deferred tax assets	77	65	65				
14	**Total assets**	**161,168**	**138,648**	**134,906**	**2,490**	**271**	**1,778**	**517**

	Breakdown by liability classes according to the balance sheet in the published financial statements				
1	Liabilities to credit institutions	91	92		92
2	Liabilities to customers	80,455	81,048		81,048
3	Derivative contracts	2,324	2,329		2,329
4	of which DVA	-30	-30		-30
5	Insurance contract liabilities	11,796			
6	Liabilities from investment agreements	9,140			
7	Debt securities issued to the public and debentures	33,198	33,198		33,198
8	Provisions and other liabilities	3,526	3,246	45	3,201
9	of which loss allowance, off balance sheet items	45	45	45	
10	Income tax liabilities	55	40		40
11	Deferred tax liabilities	1,027	753		753
12	Subordinated liabilities	1,444	1,444		1,444
13	**Total liabilities**	**143,058**	**122,150**	**45**	**122,105**
	Equity capital				
1	Share of OP Financial Group's owners				
2	Cooperative capital				
3	Cooperative share	222	222		222
4	Profit share	3,255	3,255		3,255
5	Fair value reserve	-249	-251		-251
6	of which cash flow hedge reserve	-140	-140		-140
7	Other reserves	2,172	2,123		2,123
8	Retained earnings	12,569	11,149		11,149
9	Profit for previous financial years	10,848	9,709		9,709
10	Actuarial gains and losses	-254	-241		-241
11	Profit for the financial year	1,975	1,681		1,681
12	Non-controlling interests	141			
13	**Total Equity capital**	**18,110**	**16,498**		**15,702**

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

		a	b	c	d	e
			Items subject to			
31 Dec 2024, EUR million		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)	138,131	134,906	271	2,490	1,778
2	Liabilities carrying value amount under the scope of prudential consolidation (as per template LI1)	45	45			
3	**Total net amount under the scope of prudential consolidation**	**138,086**	**134,861**	**271**	**2,490**	**1,778**
4	Off-balance-sheet amounts	27,368	27,368			
5	Differences in valuations	-3	-3			
6	Differences due to different netting rules, other than those already included in row 2	-303			-303	
7	Differences due to consideration of provisions	83	83			
8	Differences due to the use of credit risk mitigation techniques (CRMs)	-462	-462			
9	Differences due to credit conversion factors	-20,310	-20,310			
10	Differences due to Securitisation with risk transfer					
11	Other differences	638	638			
12	**Exposure amounts considered for regulatory purposes**	**145,096**	**142,174**	**271**	**2,186**	**1,778**

EU LIA - Explanations of differences between accounting and regulatory exposure amounts

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

The differences between the balance sheets of OP Financial Group and the consolidation group are due to differences in the content and extent of consolidation. Within the consolidation group, insurance companies have not been consolidated but are shown in investments made by the consolidation group and the insurance companies' equity capital is not included in the equity capital of the consolidation group. The consolidation group has applied the materiality threshold specified in Article 19 of CRR in the consolidation of its companies. Template EU CC1 - Composition of regulatory own funds presents items deducted from the capital base. OP Financial Group prepares financial statements in accordance with IFRS standard.

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

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

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

31 Dec 2024

a	b	c	d	e	f	g	x	h
		Method of prudential consolidation						
Name of the entity	Method of accounting consolidation	Full consolidation	Proportional consolidation	Equity method	Neither consolidated nor deducted	Deducted	Supervisor's permission not to consolidate	Description of the entity
OP Cooperative	Full consolidation	x						Entity assisting in financial intermediation
OP Corporate Bank plc	Full consolidation	x						Banking
OP Mortgage Bank plc	Full consolidation	x						Banking
OP Retail Customers plc	Full consolidation	x						Banking
Alajärven osuuspankki	Full consolidation	x						Banking
Ala-Satakunnan osuuspankki	Full consolidation	x						Banking
Alavieskan osuuspankki	Full consolidation	x						Banking
Andelsbanken för Åland	Full consolidation	x						Banking
Andelsbanken Raseborg	Full consolidation	x						Banking
Botnia andelsbank	Full consolidation	x						Banking
Etelä-Pirkanmaan osuuspankki	Full consolidation	x						Banking
Etelä-Pohjanmaan osuuspankki	Full consolidation	x						Banking
Euran osuuspankki	Full consolidation	x						Banking
Haapamäen Seudun osuuspankki	Full consolidation	x						Banking
Hailuodon osuuspankki	Full consolidation	x						Banking
Hämeen osuuspankki	Full consolidation	x						Banking
Janakkalan osuuspankki	Full consolidation	x						Banking
Jokilaaksojen osuuspankki	Full consolidation	x						Banking
Jokiläänin osuuspankki	Full consolidation	x						Banking
Joki-Pohjanmaan osuuspankki	Full consolidation	x						Banking
Jämsän Seudun osuuspankki	Full consolidation	x						Banking
Järvi-Hämeen osuuspankki	Full consolidation	x						Banking
Kaakkois-Suomen osuuspankki	Full consolidation	x						Banking
Kainuun osuuspankki	Full consolidation	x						Banking
Kangasalan Seudun osuuspankki	Full consolidation	x						Banking
Kangasniemen osuuspankki	Full consolidation	x						Banking
Kemin Seudun osuuspankki	Full consolidation	x						Banking
Kerimäen osuuspankki	Full consolidation	x						Banking
Keski-Pohjanmaan osuuspankki	Full consolidation	x						Banking
Keski-Suomen osuuspankki	Full consolidation	x						Banking
Koillismaan osuuspankki	Full consolidation	x						Banking
Koitin-Pertunmaan osuuspankki	Full consolidation	x						Banking

Korpilahden osuuspankki	Full consolidation	x	Banking
Kuhmon osuuspankki	Full consolidation	x	Banking
Kuortaneen osuuspankki	Full consolidation	x	Banking
Laihian osuuspankki	Full consolidation	x	Banking
Lapin osuuspankki	Full consolidation	x	Banking
Lehtimäen osuuspankki	Full consolidation	x	Banking
Lemin osuuspankki	Full consolidation	x	Banking
Limingan osuuspankki	Full consolidation	x	Banking
Liperin osuuspankki	Full consolidation	x	Banking
Lounaismaan osuuspankki	Full consolidation	x	Banking
Lounaisrannikon osuuspankki	Full consolidation	x	Banking
Lounais-Suomen osuuspankki	Full consolidation	x	Banking
Luumäen osuuspankki	Full consolidation	x	Banking
Länsi-Kymen osuuspankki	Full consolidation	x	Banking
Länsi-Suomen osuuspankki	Full consolidation	x	Banking
Maaningan osuuspankki	Full consolidation	x	Banking
Mouhijärven osuuspankki	Full consolidation	x	Banking
Multian osuuspankki	Full consolidation	x	Banking
Nagu Andelsbank	Full consolidation	x	Banking
Nakkila-Luvian osuuspankki	Full consolidation	x	Banking
Niinijokivarren osuuspankki	Full consolidation	x	Banking
osuuspankki Harjuseutu	Full consolidation	x	Banking
osuuspankki Vakka-Auranmaa	Full consolidation	x	Banking
Outokummun osuuspankki	Full consolidation	x	Banking
Paltamon osuuspankki	Full consolidation	x	Banking
Petäjäveden osuuspankki	Full consolidation	x	Banking
Pohjois-Hämeen osuuspankki	Full consolidation	x	Banking
Pohjois-Karjalan osuuspankki	Full consolidation	x	Banking
Pohjois-Savon osuuspankki	Full consolidation	x	Banking
Pohjolan osuuspankki	Full consolidation	x	Banking
Polvijärven osuuspankki	Full consolidation	x	Banking
Posion osuuspankki	Full consolidation	x	Banking
Pulkkilan osuuspankki	Full consolidation	x	Banking
Punkalaitumen osuuspankki	Full consolidation	x	Banking
Raahentienoon osuuspankki	Full consolidation	x	Banking
Rantasalmen osuuspankki	Full consolidation	x	Banking
Rautalammin osuuspankki	Full consolidation	x	Banking
Riistaveden osuuspankki	Full consolidation	x	Banking
Rymättylän osuuspankki	Full consolidation	x	Banking
Sallan osuuspankki	Full consolidation	x	Banking
Satapirkan osuuspankki	Full consolidation	x	Banking

Savitaipaleen osuuspankki	Full consolidation	x				Banking
Siikajoen osuuspankki	Full consolidation	x				Banking
Siikalatvan osuuspankki	Full consolidation	x				Banking
Suomenselän osuuspankki	Full consolidation	x				Banking
Suur-Savon osuuspankki	Full consolidation	x				Banking
Sydänmaan osuuspankki	Full consolidation	x				Banking
Tampereen Seudun osuuspankki	Full consolidation	x				Banking
Tervolan osuuspankki	Full consolidation	x				Banking
Tervon osuuspankki	Full consolidation	x				Banking
Turun Seudun osuuspankki	Full consolidation	x				Banking
Tuusniemen osuuspankki	Full consolidation	x				Banking
Tyrnävän osuuspankki	Full consolidation	x				Banking
Utajärven osuuspankki	Full consolidation	x				Banking
Uudenmaan osuuspankki	Full consolidation	x				Banking
Vaara-Karjalan osuuspankki	Full consolidation	x				Banking
Vasa Andelsbank	Full consolidation	x				Banking
Vehmersalmen osuuspankki	Full consolidation	x				Banking
Vimpelin osuuspankki	Full consolidation	x				Banking
Ylitornion osuuspankki	Full consolidation	x				Banking
Ylä-Kainuun osuuspankki	Full consolidation	x				Banking
Yläneen osuuspankki	Full consolidation	x				Banking
Ylä-Pirkanmaan osuuspankki	Full consolidation	x				Banking
Ylä-Savon osuuspankki	Full consolidation	x				Banking
Ylä-Uudenmaan osuuspankki	Full consolidation	x				Banking
OP Custody Ltd	Full consolidation	x				Asset management
OP Fund Management Company Ltd	Full consolidation	x				Fund management company
OP Asset Management Ltd	Full consolidation	x				Asset management
OP Property Management Ltd	Full consolidation	x				Real-estate investment operations
OP Life Assurance Company Ltd	Full consolidation			x	x	Insurance business
Pohjola Insurance Ltd	Full consolidation			x	x	Non-life insurance
Access Capital Private Debt Fund II Ky	Equity method			x	x	Mutual fund business
Asunto Oy Oulun Kalevankulma	IFRS11			x		Property company (CRR art. 4 (2))
Asunto Oy Raitinlinna	IFRS11			x		Property company (CRR art. 4 (2))
Canelco Capital Oy	Fair value		x			Financial services unclassified elsewhere
Certior Credit Investments I Ky	Equity method			x	x	Mutual fund business
Certior Credit Opportunities Fund Ky	Equity method			x	x	Mutual fund business
European Real Estate Senior Debt 1	Full consolidation			x	x	Financial services unclassified elsewhere
European Real Estate Senior Debt 2	Full consolidation			x	x	Financial services unclassified elsewhere
European Real Estate Senior Debt 3	Full consolidation			x	x	Financial services unclassified elsewhere
European Real Estate Senior Debt 6	Full consolidation			x	x	Financial services unclassified elsewhere
Finanssi-Kontio Oy	Equity method		x			IT hardware and software consulting

Joukahainen Oy	Equity method		x	x	Asset management
Jyväskylän Kassatalo Oy	IFRS11		x		Property company (CRR art. 4 (2))
Kauppakeskus REDI GP Oy	Fair value		x	x	Financial services unclassified elsewhere
Kiint. Oy STC Viinikkala	IFRS11		x	x	Property company
Kiinteistö Oy Espoon Kutojantie 12	IFRS11		x	x	Property company
Kiinteistö Oy Fenix Terra	IFRS11		x	x	Property company
Kiinteistö Oy Hämeenkivi	IFRS11		x		Property company (CRR art. 4 (2))
Kiinteistö Oy Joensuun Koskikatu 9	IFRS11		x		Property company (CRR art. 4 (2))
Kiinteistö Oy Juvankartanon Matka-asema	IFRS11		x	x	Property company
Kiinteistö Oy Järvenpään Tempo 1	IFRS11		x	x	Property company
Kiinteistö Oy Keravan Kauppakaari 1	IFRS11		x	x	Property company
Kiinteistö Oy Kokkolan Tehtaankatu 12	IFRS11		x	x	Property company
Kiinteistö Oy Kouvolan Karhut	IFRS11		x	x	Property company
Kiinteistö Oy Kuopion Teknia	IFRS11		x	x	Property company
Kiinteistö Oy Lappeenrannan Mariankulma	IFRS11		x		Property company (CRR art. 4 (2))
Kiinteistö Oy Mikkelin Porrassalmenkatu 29	IFRS11		x	x	Property company
Kiinteistö Oy Nurmijärven Kirkonkylän Ilvesvuori	IFRS11		x	x	Property company
Kiinteistö Oy Perhekeskus Viisikko	IFRS11		x	x	Property company
Kiinteistö Oy Piispankalliontie 3	IFRS11		x		Property company (CRR art. 4 (2))
Kiinteistö Oy Riihimäen Mattilanpuisto	IFRS11		x	x	Property company
Kiinteistö Oy Säästöraha	IFRS11		x	x	Property company
Kiinteistö Oy Tammelanpuistokatu 21	IFRS11		x	x	Property company
Kiinteistö Oy Tampereen Hämeenkatu 12	IFRS11		x		Property company (CRR art. 4 (2))
Kiinteistö Oy Vammalan Torikeskus	IFRS11		x		Property company (CRR art. 4 (2))
Kiinteistö Oy Vantaan Honkanummentie 12	IFRS11		x	x	Property company
Kiinteistö Oy Vantaan Kisällintie 13	IFRS11		x	x	Property company
Kiinteistö Oy Vantaan Puutarhatie 18	IFRS11		x	x	Property company
Kiinteistökonsultointi Proexcatum Oy	Full consolidation		x	x	Property company
Kodin Isännöinti Oy	Full consolidation		x	x	Real estate management
KSK Parking I Ky	Fair value		x	x	Property company
KSK REDI Ky	Fair value		x	x	Property company
Kuusiniementie 13 AOy	IFRS11		x		Property company (CRR art. 4 (2))
Lounaismaan Isännöinti Oy	Full consolidation		x	x	Real estate management
Länsi-Suomen Pääomarahasto Oy	Fair value	x			Financial services unclassified elsewhere
North Wall European Opportunities Fund I LP	Fair value		x	x	Mutual fund business
OP Finnfund Global Impact I GP Oy	Full consolidation		x		Mutual fund business (CRR art. 19 (1) a))
OP-Alternative Credit -erikoissijoitusrahasto	Fair value		x	x	Mutual fund business
OP-Alternative Credit II -erikoissijoitusrahasto	Fair value		x	x	Mutual fund business
OP-Kestävä Yrityslaina	Fair value		x	x	Mutual fund business
REDI Parkki GP Oy	Fair value		x	x	Financial services unclassified elsewhere
OP Koti Etelä-Pirkanmaa Oy LKV	Full consolidation		x	x	Real estate agent services

OP Koti Etelä-Pohjanmaa Oy LKV	Full consolidation			x	x	Real estate agent services
OP Koti Häme Oy LKV	Full consolidation			x	x	Real estate agent services
OP Koti Itä-Suomi Oy LKV	Full consolidation			x	x	Real estate agent services
Op Koti Jämsä Oy LKV	Full consolidation			x	x	Real estate agent services
OP Koti Järvi-Häme Oy LKV	Full consolidation			x	x	Real estate agent services
OP Koti Järviseutu - Suomenselkä Oy LKV	Full consolidation			x	x	Real estate agent services
OP Koti Kaakkois-Suomi Oy LKV	Full consolidation			x	x	Real estate agent services
OP Koti Keski-Suomi Oy LKV	Full consolidation			x	x	Real estate agent services
OP Koti Lounaismaa Oy	Full consolidation			x	x	Real estate agent services
OP Koti Lounaisrannikko Oy LKV	Full consolidation			x	x	Real estate agent services
OP Koti Lounais-Suomi Oy LKV	Full consolidation			x	x	Real estate agent services
OP Koti Länsi-Suomi Oy LKV	Full consolidation			x	x	Real estate agent services
OP Koti Nakkila-Luvia Oy LKV	Full consolidation			x	x	Real estate agent services
OP Koti Orivesi Oy LKV	Full consolidation			x	x	Real estate agent services
OP Koti Pirkanmaa Oy LKV	Full consolidation			x	x	Real estate agent services
OP Koti Pohjoinen Oy LKV	Full consolidation			x	x	Real estate agent services
OP Koti Pohjois-Häme Oy LKV	Full consolidation			x	x	Real estate agent services
OP Koti Sastamala Oy LKV	Full consolidation			x	x	Real estate agent services
OP Koti Satapirkka Oy LKV	Full consolidation			x	x	Real estate agent services
OP Koti Turun Seutu Oy LKV	Full consolidation			x	x	Real estate agent services
OP Koti Uusimaa Oy LKV	Full consolidation			x	x	Real estate agent services
OP Koti Ylä-Uusimaa Oy LKV	Full consolidation			x	x	Real estate agent services
OP cooperative banks' property companies	IFRS11			x		Property company (CRR art. 4 (2))
OP Rent Oy	Full consolidation			x		Real-estate investment operations (CRR art. 19 (1) a))
OP Suomi Infra GP Oy	Full consolidation			x		Mutual fund business (CRR art. 19 (1) a))
OP Toimitilakiinteistö GP Oy	Full consolidation			x		Real-estate investment operations (CRR art. 19 (1) a))
OP Tonttirahasto GP Oy	Full consolidation			x		Real-estate investment operations (CRR art. 19 (1) a))
OP Turun Seudun Kiinteistöt Oy	Full consolidation			x		Real-estate investment operations
Otso Infrastruktuuri I Ky	Full consolidation			x	x	Asset management
Paja Finanssipalvelut Oy	Equity method		x			Activities serving financing
Perniön Op-Tilikeskus Oy	Full consolidation			x	x	Accounting and Financial Reporting Service
Pivo Wallet Oy	Full consolidation	x				Activities serving financing
Real Estate Debt And Secondaries GP Oy	Full consolidation			x		Real-estate investment operations (CRR art. 19 (1) a))
Real Estate Fund Finland III GP Oy	Full consolidation			x		Real-estate investment operations (CRR art. 19 (1) a))
Real Estate Fund Finland III Ky	Full consolidation			x	x	Property investment
Real Estate Fund of Funds Finland Oy	Full consolidation			x		Real-estate investment operations (CRR art. 19 (1) a))
Real Estate Fund of Funds II Ky	Full consolidation			x	x	Property investment
Real Estate Fund of Funds V Gp Oy	Full consolidation			x		Financial services unclassified elsewhere (CRR art. 19 (1) a))
Real Estate Fund of Funds V Ky	Equity method			x	x	Financial services unclassified elsewhere
Selected Private Equity Investment II Ky	Fair value			x	x	Mutual fund business
Siirto Brand Oy	Not consolidated			x		Activities serving financing and investment (CRR art. 19 (1) a))

Tampereen Areenahotelli Ky	Equity method		x	x	Ownership and possession of real estate
Tampereen Monitoimiareena Ky	Equity method		x	x	Ownership and possession of real estate
Tampereen Tornit Ky	Equity method		x	x	Ownership and possession of real estate
Tikkurilan Kauppatalo Oy	IFRS11		x	x	Property company
Tilivakka Oy	Full consolidation		x	x	Accounting and Financial Reporting Service
Tribedo Oy	Equity method	x			Labour hire
Vuosselinmaa Oy	Full consolidation		x	x	Property company

According to the definition of the consolidation group, insurance companies have not been consolidated into capital adequacy but are treated as investments. There are no investments that are deducted from own funds.

Property companies are not treated as participations but they are treated as investments in real estate property.

EU LIB - Other qualitative information on the scope of application

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

N/A

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

N/A

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

N/A

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

N/A

EU PV1 - Prudent valuation adjustment (PVA)

		a	b	c	d	e	EU e1	EU e2	f	g	h
		Risk category					Category level AVA - Valuation uncertainty				
Category level AVA, 31 Dec 2024, EUR million		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	0	3	0	15				9		9
3	Close-out cost	0	5	1					3		3
4	Concentrated positions										
5	Early termination										
6	Model risk	0	1	0	0		4		3		3
7	Operational risk	0	0	0	1				1		1
10	Future administrative costs										
11	Fallback approach								6		6
12	**Total Additional Valuation Adjustments (AVAs)**								**22**		**22**

Prudent valuation adjustments are calculated as a net value of trading and banking book. No material change compared to year-end 2023.

		a	b	c	d	e	EU e1	EU e2	f	g	h
		Risk category					Category level AVA - Valuation uncertainty				
Category level AVA, 31 Dec 2023, EUR million		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	0	4	0	16				10		10
3	Close-out cost	1	7	1					4		4
4	Concentrated positions										
5	Early termination										
6	Model risk	0	0	0	0		4		3		3
7	Operational risk	0	1	0	1				1		1
10	Future administrative costs										
11	Fallback approach								15		15
12	**Total Additional Valuation Adjustments (AVAs)**								**34**		**34**

Encumbered and unencumbered assets

EU AE1 - Encumbered and unencumbered assets

		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
31 Dec 2024, EUR million		010	030	040	050	060	080	090	100
010	Assets of the reporting institution	20,494	495			116,426	29,863		
030	Equity instruments					68			
040	Debt securities	494	494	495	495	13,104	12,033	13,111	12,044
050	of which: covered bonds	163	163	164	164	6,747	6,675	6,752	6,680
060	of which: securitisations					336	336	336	336
070	of which: issued by general governments	145	145	145	145	3,539	2,895	3,540	2,896
080	of which: issued by financial corporations	188	188	189	189	8,932	7,593	8,942	7,610
090	of which: issued by non-financial corporations	158	158	158	158	644	77	521	77
120	Other assets	19,999	1			103,062	17,776		

The tables below provide information on asset encumbrance and liabilities related to encumbered assets. The figures are presented as the quarterly median for 2024.

EU AE2 - Collateral received and own debt securities issued

		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
31 Dec 2024, EUR million		010	030	040	050
130	Collateral received by the disclosing institution			1,139	
140	Loans on demand				
150	Equity instruments			932	
160	Debt securities			202	
170	of which: covered bonds				
180	of which: securitisations				
190	of which: issued by general governments			2	
200	of which: issued by financial corporations			7	
210	of which: issued by non-financial corporations			193	
220	Loans and advances other than loans on demand				
230	Other collateral received				
240	Own debt securities issued other than own covered bonds or securitisations				
241	Own covered bonds and securitisation issued and not yet pledged				
250	TOTAL COLLATERAL RECEIVED AND OWN DEBT SECURITIES ISSUED	20,494	495		

Encumbered assets and collateral received accounted for 14.8 % of the assets of the amalgamation of the Group's member cooperative bank.

EU AE3 Sources of encumbrance

31 Dec 2024, EUR million		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**	**17,186**	**19,983**
011	Covered bonds	14,858	17,767
012	Other secured debt	2,328	2,216

EU AE4 - Accompanying narrative information

a) General narrative information on asset encumbrance

Collateral management and asset encumbrance

In this context, collateral securities mean OP Financial Group's assets used as collateral to fulfil liquidity needs, either in normal or stress conditions. Group Treasury monitors collateral on a centralised basis, and is responsible for its use and transfer.

Home loans serving as collateral for covered bonds issued by OP Mortgage Bank constitute the largest source of asset encumbrance in the balance sheet. Central bank operations and the derivatives business are the other main sources of asset encumbrance. From the perspective of preparing for liquidity needs, the central cooperative consolidated restricts asset encumbrance through the quantitative limits specified in its Risk Policy.

To increase liquidity potential, it is necessary to identify the eligibility of the balance sheet receivables as collateral and create readiness to use receivables as collateral.

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.

An asset is considered encumbered if it has been pledged or given as collateral or they secure transactions recognised in the balance sheet (e.g. to secure debt). Other assets that are not freely available within the Group are also classified as encumbered. Encumbered assets mainly relate to collateral pertaining to OP Corporate Bank plc's derivatives, loans with collateral of central bank refinancing and collateral with respect to covered bonds issued by OP Mortgage Bank. Of the collateral related to covered bonds, EUR 2,904 (1,819) million is overcollateralised. EUR 6,090 (7,701) million of unencumbered assets is not eligible as collateral (e.g. intangible assets, and property, plant and equipment, tax assets and other assets).

Renumeration policy

EU REM1 - Remuneration awarded for the financial year

31 Dec 2024, EUR million			a MB Supervisory function	b MB Management function	c Other senior management	d Other identified staff
1	Fixed remuneration	**Number of identified staff**	10	10	243	195
2	Fixed remuneration	**Total fixed remuneration**	1	4	35	21
3	Fixed remuneration	Of which: cash-based	1	4	35	21
EU-4a	Fixed remuneration	Of which: shares or equivalent ownership interests				
5	Fixed remuneration	Of which: share-linked instruments or equivalent non-cash instruments				
EU-5x	Fixed remuneration	Of which: other instruments				
7	Fixed remuneration	Of which: other forms				
9	Variable remuneration	**Number of identified staff**		10	226	172
10	Variable remuneration	**Total variable remuneration**		3	14	6
11	Variable remuneration	Of which: cash-based		1	9	4
12	Variable remuneration	Of which: deferred		1	2	1
EU-13a	Variable remuneration	Of which: shares or equivalent ownership interests				
EU-14a	Variable remuneration	Of which: deferred				
EU-13b	Variable remuneration	Of which: share-linked instruments or equivalent non-cash instruments		1	5	1
EU-14b	Variable remuneration	Of which: deferred		1	2	0
EU-14x	Variable remuneration	Of which: other instruments			0	1
EU-14y	Variable remuneration	Of which: deferred			0	0
15	Variable remuneration	Of which: other forms				
16	Variable remuneration	Of which: deferred				
17	**Total remuneration (2 + 10)**		1	7	49	27

OP Cooperative’s board of directors and OP Financial Group company’s board of directors have confirmed the performance bonus for the earnings period 2023 in March 2024, taking into account the Board's qualitative assessment of risk-taking and risk management, external regulation and compliance with internal guidelines, and the awards have been paid in 2023. In terms of performance-based bonus, the amounts shown in the tables thus represent the bonus from 2023 earnings period

	31 Dec 2023, EUR million		a MB Supervisory function	b MB Management function	c Other senior management	d Other identified staff
1	Fixed remuneration	**Number of identified staff**	10	9	236	198
2		**Total fixed remuneration**	1	3	33	18
3		Of which: cash-based	1	3	33	18
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				
7		Of which: other forms				
9	Variable remuneration	**Number of identified staff**		9	216	181
10		**Total variable remuneration**		2	10	6
11		Of which: cash-based		0	6	4
12		Of which: deferred		1	1	1
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		1	3	1
EU-14b		Of which: deferred		1	1	0
EU-14x		Of which: other instruments			0	1
EU-14y		Of which: deferred			0	1
15		Of which: other forms				
16		Of which: deferred				
17	Total remuneration (2 + 10)		1	6	42	24

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

	31 Dec 2024, EUR million	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		1		
2	Guaranteed variable remuneration awards -Total amount		0		
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				
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			4	3
7	Severance payments awarded during the financial year - Total amount			1	0
8	Of which paid during the financial year			0	0
9	Of which deferred			0	0
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			0	0

	31 Dec 2023, EUR million	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				
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			1	
5	Severance payments awarded in previous periods, that have been paid out during the financial year - Total amount			0	
	Severance payments awarded during the financial year				
6	Severance payments awarded during the financial year - Number of identified staff			6	3
7	Severance payments awarded during the financial year - Total amount			1	0
8	Of which paid during the financial year			1	0
9	Of which deferred			0	0
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			0	0

EU REM3 - Deferred remuneration

	31 Dec 2024, EUR million	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	1	0	1				0	
9	Shares or equivalent ownership interests								
10	Share-linked instruments or equivalent non-cash instruments	2	0	1				0	
11	Other instruments								
12	Other forms								
13	Other senior management								
14	Cash-based	2	1	2				1	
15	Shares or equivalent ownership interests								
16	Share-linked instruments or equivalent non-cash instruments	3	1	3				1	
17	Other instruments	0	0	0				0	
18	Other forms								
19	Other identified staff								
20	Cash-based	1	0	1				0	
21	Shares or equivalent ownership interests								
22	Share-linked instruments or equivalent non-cash instruments	1	0	1				0	
23	Other instruments	1	0	1				0	
24	Other forms								
25	Total amount	12	3	9				3	

*i.e.changes of value of deferred remuneration due to the changes of prices of instruments

	31 Dec 2023, EUR million	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	1	0	1				0	
9	Shares or equivalent ownership interests								
10	Share-linked instruments or equivalent non-cash instruments	1	0	1				0	
11	Other instruments	0	0	0				0	
12	Other forms								
13	Other senior management								
14	Cash-based	2	1	1				1	
15	Shares or equivalent ownership interests								
16	Share-linked instruments or equivalent non-cash instruments	2	0	2				0	
17	Other instruments	0	0	0				0	
18	Other forms								
19	Other identified staff								
20	Cash-based	1	0	1				0	
21	Shares or equivalent ownership interests								
22	Share-linked instruments or equivalent non-cash instruments	0	0	0				0	
23	Other instruments	0	0	0				0	
24	Other forms								
25	Total amount	7	1	6				1	

*i.e.changes of value of deferred remuneration due to the changes of prices of instruments

EU REM4 - Remuneration of 1 million EUR or more per year

	31 Dec 2024, EUR	a Identified staff that are high earners as set out in Article 450(i) CRR
1	1 000 000 to below 1 500 000	
2	1 500 000 to below 2 000 000	1
3	2 000 000 to below 2 500 000	
4	2 500 000 to below 3 000 000	
5	3 000 000 to below 3 500 000	
6	3 500 000 to below 4 000 000	
7	4 000 000 to below 4 500 000	
8	4 500 000 to below 5 000 000	
9	5 000 000 to below 6 000 000	
10	6 000 000 to below 7 000 000	
11	7 000 000 to below 8 000 000	

	31 Dec 2023, EUR	a Identified staff that are high earners as set out in Article 450(i) CRR
1	1 000 000 to below 1 500 000	1
2	1 500 000 to below 2 000 000	
3	2 000 000 to below 2 500 000	
4	2 500 000 to below 3 000 000	
5	3 000 000 to below 3 500 000	
6	3 500 000 to below 4 000 000	
7	4 000 000 to below 4 500 000	
8	4 500 000 to below 5 000 000	
9	5 000 000 to below 6 000 000	
10	6 000 000 to below 7 000 000	
11	7 000 000 to below 8 000 000	

EU REM5 - Information on remuneration 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 2024, EUR million	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**										458
2	Of which: members of the MB	10	10	20							
3	Of which: other senior management				0	0	0	0	0	0	
4	Of which: other identified staff				0	0	0	0	0	0	
5	**Total remuneration of identified staff**	1	7	8	0	53	14	5	0	4	
6	Of which: variable remuneration		3	3	0	14	4	1	0	1	
7	Of which: fixed remuneration	1	4	5	0	39	10	4	0	3	

		a	b	c	d	e	f	g	h	i	j
		Management body remuneration			Business areas						
	31 Dec 2023, EUR million	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**										453
2	Of which: members of the MB	10	9	19							
3	Of which: other senior management				1	201	8	11	1	14	
4	Of which: other identified staff				1	83	99	13	0	2	
5	**Total remuneration of identified staff**	1	6	6	0	46	14	4	0	3	
6	Of which: variable remuneration		2	2	0	10	4	1	0	1	
7	Of which: fixed remuneration	1	3	4	0	35	10	3	0	2	

EU REMA - Remuneration policy

a) Information relating to the bodies that oversee remuneration

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

OP Cooperative's Board of Directors and its Remuneration Committee controls and supervises remuneration in OP Financial Group. Each OP Financial Group company ensures that its remuneration practices comply with legislation, regulation and group-wide remuneration guidelines. OP Cooperative ensures the legal compliance of Remuneration Guidelines concerning the entire OP Financial Group.

In 2024, OP Cooperative's board had 11 members (Jaakko Pehkonen, Jarna Heinonen, Matti Kiuru, Katja Kuosa-Kaartti, Kati Levoranta, Pekka Loikkanen, Tero Ojanperä, Riitta Palomäki, Timo Ritakallio, Petri Sahlström, Olli Tarkkanen) and the board held 16 meetings.

The Remuneration Committee of OP Cooperative's Board of Directors assists the Board of Directors in decisions related to the management and control of remuneration schemes and prepares OP Financial Group's Remuneration Guidelines. Remuneration Committee provides a framework for, controls and supervises the development of overall remuneration applied to employees within the entire OP Financial Group.

Remuneration Committee's composition and meetings in 2024

Kati Levoranta, Chair
Jaakko Pehkonen, Vice Chair
Tero Ojanperä

In 2024, the Remuneration Committee had 6 meetings.

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

No external consultants were used in designing new incentive schemes in 2024.

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

OP Financial Group's group-wide remuneration principles and remuneration policy apply to all entities of OP Financial Group.

A description of the staff or categories of staff whose professional activities have a material impact on institutions' risk profile

Identified staff are those in tasks with a material impact on the company's risk exposure in accordance with the definitions of regulatory guidelines for credit institutions, investment firms and custody firms, fund management entities (UCITS, AIFMs) and insurance companies. An employee is an identified staff member if they have spent at least 3 months in duties categorised as a risk position (risk-taker / MRT). Categories of staff whose professional activities have a material impact on institutions' risk profile (MRTs) have been categorized as stated below:

Credit institutions:

1) President and Group Chief Executive Officer, Executive Management Team and member of a central cooperative consolidated governing body

2) Managing Director of OP cooperative bank and central cooperative consolidated company, Member of business's management team in central cooperative, Member of internal supervisory functions' management team in central cooperative, Member of OP cooperative banks' management team (customer business worth over 2 billion euros), Internal control officers of OP cooperative banks, Persons in tasks impacting on credit institution's risk profile on basis of separately completed internal review

3) Persons whose annual total remuneration is at least 500,000 euros and those whose total remuneration does not differ significantly from the average remuneration of the person referred to in point 1 above. Persons in companies with over 1,000 employees, whose total salary places them in the top 0.3% group of earners.

Asset management and custody firms, fund management entities (UCITS, AIFMs):

1) Senior management and member of a central cooperative consolidated governing body
2) Persons appointed separately, based on a review by each business line, whose professional activities have a material impact on the credit institution's risk profile
3) Persons working in internal control functions
4) Persons whose total salary is at the same level as those of the persons specified in sections 1 and 2, unless it can be shown that their professional activities do not have an impact on the credit institution's risk profile.

Insurance companies:

1) Persons genuinely in charge of company's operations – governing, management or supervisory body members
2) Other member of senior management in charge of company's activities
3) Key function holders
4) Persons appointed separately, based on a review by each business line, whose professional activities have a material impact on the company's risk profile.

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

An overview of the key features and objectives of remuneration policy, and information about the decision-making process used for determining the remuneration policy and the role of the relevant stakeholders

Remuneration in OP Financial Group is based on the five principles shown below. The principles are permanent targets that control all remuneration in OP Financial Group.

1. Remuneration attracts, encourages and motivates

Encouraging and motivating skilled and capable employees is central to OP Financial Group's and its customers' continuous and long-term success. The principle is to reward for excellent performance, which is reflected in the development of fixed pay and in the variable remuneration amount.

2. Remuneration is in line with OP Financial Group's core values, mission and strategy, and it contributes to their implementation

Remuneration schemes reward employees for the right things on a timely basis and contribute to the achievement of targets relevant to OP Financial Group. The performance appraisal criteria that form the basis of remuneration and the variable remuneration metrics are in line with OP Financial Group's core values, mission, and targets. One key aspect is the equality of remuneration between age groups and gender, based on job grades. Remuneration forms a whole that includes fixed and variable remuneration and benefits provided by the employer.

3. Rewarding for excellent performance

The performance review considers both quantitative metrics and qualitative factors. This means that the performance review is not only based on achieving set targets, but also on whether the person has acted in accordance with OP Financial Group's core values and corporate culture, valid regulation, internal guidelines, and risk management principles.

4. Remuneration is competitive as a whole

The competitiveness of remuneration is evaluated in terms of total remuneration. This includes the pay in cash, benefits and variable remuneration.

5. Remuneration schemes comply with regulation, takes account of responsibility issues and sustainability risks, and do not encourage excessive risk-taking

Remuneration in OP Financial Group complies with regulation valid at each given time, encourages responsibility and it meets official requirements. Remuneration does not encourage unnecessary risk-taking or actions that are against the client's best interests.

In addition to the terms and conditions of remuneration schemes (group-wide remuneration policy), regulatory compliance is ensured through the cooperation of businesses, Compliance, Risk Management and Internal Audit. The Risk Management function is involved in the preparation of the remuneration principles, remuneration policy and remuneration schemes, and in the determination of supervisory practices related to remuneration processes. Compliance and Internal Audit, for its part, annually assess the remuneration scheme. Remuneration regulatory compliance takes account of, for example, the following matters:

- Determination of the remuneration schemes, monitoring of the actuals and acceptance and payment of bonuses must be performed independent of the person.
- Bonuses earned by a person in charge of control duties may not depend on the financial performance of the business unit they control.
- A remuneration scheme may not encourage those covered by the scheme to act against the client's best interests.
- Targets set for the scheme must be in harmony with the Risk Appetite Framework and promote the risk-based approach.
- The remuneration scheme must be consistent with considering sustainability risks.

Remuneration may not in any respects lead to a situation that could jeopardise the general reliability of remuneration schemes or the entire company's reputation.

The Remuneration Guidelines are annually considered by OP Cooperative's Board of Directors on the basis of a proposal by the Remuneration Committee of the Board of Directors. OP Cooperative's Board of Directors presents OP Financial Group's remuneration principles (topics 1-5 as set above) to OP Cooperative's Supervisory Council for approval. The Responsibility and Remuneration Unit of OP Cooperative's Supervisory Council assists the Supervisory Council in its consideration of OP Financial Group's remuneration principles.

Financial remuneration includes the following components:

- Pay
- Employee benefits
- Variable remuneration
- Supplementary pension (only for some employee groups)

In 2024, variable remuneration comprises a performance-based bonus, spot bonus, retention bonus, guaranteed variable remuneration and the personnel fund. Variable remuneration equals a maximum of 100% of a person's fixed annual earnings.

Information on the criteria used for performance measurement and ex ante and ex post risk adjustment

Basic pay is determined by job grade, personal competencies, experience and performance. Various employee groups have their own job grades in accordance with each group's collective agreement. In addition, OP Financial Group has its own Group-level OP job grading system in place.

Variable remuneration is based on an assessment of how the person/team, business unit or company has performed. Remuneration schemes are built in such a way that they do not encourage a person to act against OP Financial Group's Code of Business Ethics or its principles related to sustainability risks, and that such remuneration does not lead to actions against the customer's best interests (Managing conflicts of interest and anti-corruption).

Individual's annual target setting must include both quantitative and qualitative targets. Inclusion of both quantitative and qualitative targets enables holistic performance assessment of individuals and teams from multiple perspectives; incentivises high-quality, efficient work in line with OP Financial Group's strategy; strengthens the risk management culture in daily work; and promotes high-quality employee development.

A qualitative review is part of remuneration procedures (ex ante risk adjustment), where the individual's performance and compliance with guidelines and regulation is assessed during and after the performance period, prior of payment of variable remuneration. Such a review must also consider sustainability risks concerning those persons and roles for which such consideration is intrinsic to the duties involved. The review and thus ex ante risk adjustment process is part of performance appraisal. The performance-based bonus, spot bonus and retention bonus can be adjusted on the basis of the severity and number of offences using a factor of 0–1.

Variable remuneration schemes include malus and clawback clauses. If it is noted that an an individual has received variable remuneration in violation of the performance-based bonus scheme, the board of directors of a company belonging to OP Cooperative or the Group has the right to on the non-payment of all or part of the variable remuneration, or on the clawback of paid variable remuneration, if the bonus payout is in violation of regulations or OP Financial Group's internal guidelines.

Whether the management body or the remuneration committee where established reviewed the institution's remuneration policy during the past year, and if so, an overview of any changes that were made, the reasons for those changes and their impact on remuneration

In 2024, the Remuneration Guidelines were considered by OP Cooperative's Board of Directors in October and December 2024 in the conjunction of the annual decision-making process based on a proposal by the Remuneration Committee of the Board of Directors.

Updates were made in the conjunction of the annual decision-making process for ensuring the correct implementation of the already existing principles, alignment with OP Financial Group's strategy, updates in OP Financial group's business lines and to strengthen the policy's applicability with the regulations taking into account regulatory requirements applying for OP Financial Group's entities and groups of personnel in its' operating field.

In April 2024 the Remuneration Guidelines were considered by OP Cooperative's Board of Directors based on a proposal by the Remuneration Committee of the Board of Directors due to updates on domestic Finnish practices and its' impact on the possibility to transfer performance-based bonus to personnel fund.

Information of how the institution ensures that staff in internal control functions are remunerated independently of the businesses they oversee

Variable remuneration paid to employees in internal control functions must not compromise their objectivity and independence. Remuneration of persons in such roles may not be based on the earnings of the organisations they supervise with a qualitative based emphasis.

OP Cooperative's Board of Directors decides the remuneration of leading personnel for control functions, including metrics on scorecards for performance-based bonus as well as evaluating the outcome of such scorecards.

Policies and criteria applied for the award of guaranteed variable remuneration and severance payments.
Guaranteed variable remuneration may only be used when recruiting a new employee from a company outside OP Financial Group. Guaranteed payable remuneration is paid only for compelling reasons and provided that the bonus only applies to the person's first year of employment. Its payment does not affect the employee's right to be covered by other remuneration schemes in the company. In 2024, the total amount of variable remuneration (including guaranteed variable remuneration) must not exceed 12 months of the employee's salary (fixed remuneration).

The application and size of the severance pay is determined in the executive contract and is not used to reward failure or abuse. Severance pay is based on the principle of compensating lost earnings if the employer ends the employment relationship. It is not counted as a component of variable remuneration.

c) Description of the ways in which current and future risks are taken into account in the remuneration processes. Disclosures shall include an overview of the key risks, their measurement and how these measures affect remuneration.

Remuneration guidelines are reviewed and decided annually by the OP Cooperative's Board of Directors. The Remuneration Committee of the Board of Directors considers statements from internal control functions when performance-based bonuses are awarded within OP Financial Group. Statements from control functions are also considered when remuneration guidelines are decided for the upcoming fiscal year. Account is taken of sustainability risks when setting targets for the performance-based bonus or performing a qualitative review, if taking account of such risks is a fundamental part of the employee's duties.

In relation to variable remuneration, the risk policy and qualitative components are taken into account in advance in target-setting, and afterwards in the performance review and bonus payment. In addition to reviewing financial risks, the performance reviews also cover sustainability risk and reputational risk, and actions that conform to OP Financial Group's core values and corporate culture.

Bonus payouts must be justifiable based on the company's financial success, compliance with internal guidelines and external regulations, and operation in accordance with the Risk Appetite Statement and Risk Appetite Framework. When assessing fulfilment of the payout criteria, in addition to observations by the company's board, account must be taken of observations made by the Risk Management, Compliance and Internal Audit functions. Observations made by control functions consider solvency, evaluation on whether remuneration has been earned with excessive risk-taking or with actions contrary to the interests of customers or client and whether any breach of regulations or the law would impact the payment of performance-based remuneration.

Before confirming the payment of deferred bonuses, the company's board of directors assesses the bonus payment criteria in accordance with OP Financial Group's remuneration policy's terms for cancellation of earned bonuses and clawback of paid bonuses. Before the payment of a deferred bonus, the person's work performance or performance is reassessed and, if required, the bonus is revised to correspond to any new risks identified and materialised after the bonus was granted.

d) The ratios between fixed and variable remuneration set in accordance with point (g) of Article 94(1) CRD.

The total amount of OP Financial Group's variable remuneration is calculated based on the amount awarded to each person. In 2024, variable remuneration equals a maximum of 100% of a person's fixed annual earnings. Fixed annual earnings comprise earned income paid by the employer, minus any bonuses and severance pay included in variable remuneration.

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

An overview of main performance criteria and metrics for institution, business lines and individuals
An overview of how amounts of individual variable remuneration are linked to institution-wide and individual performance
Information on the criteria used to determine the balance between different types of instruments awarded including shares, equivalent ownership interest, options and other instruments.
Information of the measures the institution will implement to adjust variable remuneration in the event that performance metrics are weak, including the institution's criteria for determining "weak" performance metrics.
The performance appraisal criteria that form the basis of remuneration and the variable remuneration metrics are in line with OP Financial Group's core values, mission and targets. The key objective of these criteria is to support OP Financial Group's strategy, financial targets, development of personnel and value to OP Financial Group's customers.

Performance-based bonus

Variable remuneration is based on an assessment of how the person/team, business unit, company or the Group has performed. On an employee's level, the performance is reviewed based on individual scorecard including targets / metrics derived from OP Financial Group's strategic and annual targets, and the annual plans of business segments and centres of excellence. These annual plans are used to adjust implementation of the strategy during the calendar year and must take account of the principles for variable remuneration.

Minimum, target and maximum performance levels are defined for all metrics. Performance exceeding the minimum level entitles to remuneration (bonus at the minimum level is 10% of the target bonus). Performance at the target level enables distributing the target bonus (bonus 100% of the target bonus). Performance exceeding the target level enables bonus above the target bonus (if performance is at or above the maximum level, bonus is 200% i.e., maximum bonus)

Final amount of performance-based bonus for individual is based on an evaluation of individual's performance (meeting targets), employing entity's financial performance and possible earnings factor (based on the company's key financial or strategy figures, or a combination of the two) and outcome of individual's qualitative review during the earning period. Maximum amount of performance-based bonus is based on employee's job grade. Earnings factor set by the employing entity may increase the maximum amount of individual's job-grade-based bonus, yet the total amount of individual's variable remuneration may not exceed 100% of employee's fixed remuneration per annum.

On a company level, bonus payouts must be justifiable based on the company's financial success, compliance with internal guidelines and external regulations, and operation in accordance with the Risk Appetite Statement and Risk Appetite Framework.

In 2024, OP Cooperative's board of directors decides on any reduction of bonuses earned if the financial statements for the performance year show that

- OP Financial Group's LCR is 100 – 110% or
- OP Financial Group's CET1 ratio is the CET1 MDA – CET1 MDA +2%.

Earned bonus will not be paid if the financial statements for the performance year show that

- OP Financial Group's Liquidity Coverage Ratio (LCR) is less than 100% or
- OP Financial Group's CET1 ratio is less than CET1 MDA.

In addition, earned bonus will not be paid if

- the OP cooperative bank in question made a loss
- the earnings before tax of a central cooperative company, were negative

The aforementioned financial criteria apply to performance-based bonus, retention bonus and guaranteed variable remuneration.

Before confirming the payment of deferred bonuses, the company's board of directors assesses the bonus payment criteria in accordance with OP Financial Group's remuneration policy's terms for cancellation of earned bonuses and clawback of paid bonuses.

The amount of deferred bonuses will be decreased by 1/3, if

- OP Financial Group's return on equity (ROE) is under -5.0% or
- OP Financial Group's non-performing exposure (NPE) ratio is over 5.0% in the financial statements preceding the year of the deferred bonus's payment.

If both the aforementioned ROE and NPE thresholds are breached, the bonus will be decreased by 2/3.

Deferred bonuses will not be paid if OP Financial Group's CET1 ratio is less than the CET1 MDA in the financial statements preceding the year of the deferred bonus's payment.

Personnel fund

The personnel fund has Group-level targets, which are common to all employees. OP Cooperative's Board of Directors annually decides on the targets. The profit-based bonus accounts for a maximum of 3% of the total salaries of the personnel fund members. The personnel fund profit-based bonus is taken into account in the total amount of the variable remuneration for the payout year. In 2024 the targets for personnel fund contribution by the employer were linked to OP Financial Group's cost/income ratio and net growth of cross-product metric eligible customers.

Criteria used to determine the balance between different types of instruments

In case of deferral and dividing the variable remuneration into instrument portions, half of variable remuneration is paid in non-monetary form (instruments), which is subject to the retention period of 12 months. OP Cooperative's board of directors decides on the instruments used for the payment of non-monetary bonus.

Instruments applied in OP Financial Group's variable remuneration are synthetic reference instruments:

a) Instrument tied to Profit Shares and an instrument determined using a factor based on OP Financial Group's CET1 ratio, return on equity, and non-performing exposures

- Profit Shares are an investment, as referred to in the Co-operatives Act (421/2013 plus amendments), in an OP cooperative bank's equity capital, with no preference in the case of insolvency proceedings
- The factor determining the reference instrument's value (based on CET1, ROE and NPE factors) is calculated on the basis of the financial statements preceding the payment year. Each factor is has a value between 0-1,2
- In addition to quantitative measures, the board of directors evaluates the conditions for the payment of deferred bonuses in accordance with the remuneration policy's terms for payment of deferred bonuses. The evaluation takes into account whether there have been qualitative violations/risks in OP Financial Group that are not reflected in the quantitative measures described above and which should be taken into account in the amount of the reward before the payment of each deferred reward installment

or

b) reference instrument tied to the performance of the OP-Private Strategy 50 A (growth) Fund (OP-Private Strategy 50 Fund)

In relation to reference instrument tied to the performance of OP-Private Strategy 50 Fund, the reference instrument's performance is annually determined by the average value of prices for the first three weeks of March prior payout.

Variable remuneration is paid as cash award or award linked to the above-mentioned synthetic instruments (points a) and b)). Statutory deferral periods are applied in the payout process of variable remuneration of the identified staff.

f) Description of the ways in which the institution seeks to adjust remuneration to take account of longterm performance

An overview of the institution's policy on deferral, payout in instrument, retention periods and vesting of variable remuneration including where it is different among staff or categories of staff
Information of the institution' criteria for ex post adjustments (malus during deferral and clawback after vesting, if permitted by national law).
Where applicable, shareholding requirements that may be imposed on identified staff.

If statutory limits for deferral and dividing the variable remuneration into instrument portions are met, half of variable remuneration is paid in non-monetary form (instruments), which is subject to the retention period of 12 months. A retention period means a period following the deferral period stipulated in the remuneration scheme, during which the person does not yet have control over a bonus awarded to them in non-monetary form. The retention period is 12 months. In accordance with the deferral procedure, a retention period applies to all non-monetary bonuses.

If the variable remuneration of an Executive Management Team member exceeds €50,000 for the performance year, or forms at least a third of total annual earnings, half of the bonus payment will be monetary and half consist of an instrument. A total of 60% of the bonus's monetary portion is paid in the year following the performance year and 40% is paid in five equal instalments during the five years following the first payment year, with at least one year between each payment. A total of 40% of the portion paid in instruments is paid in the second year following the performance year and 60% is paid in five equal instalments during the five years following the first payment year, with at least one year between each payment.

If an identified staff member's (excluding Executive Management Team members) variable remuneration for the performance year exceeds €50,000 or accounts for at least a third (at least a quarter in the case of OP Real Estate Asset Management Ltd, OP Fund Management Company Ltd, OP Custody Ltd and OP Asset Management Ltd) of total annual earnings, they will be paid 60% of the monetary portion in the year following the performance year, and 40% will be paid in four equal instalments during the following four years, with at least one year between each payment. A total of 60% of the portion paid in instruments is paid in the second year following the performance year and 40% is paid in five equal instalments during the five years following the first payment year, with at least one year between each payment.

If an Executive Management Team member or identified staff member's variable remuneration for the performance year is exceptionally large, in other words is equivalent to at least 8 months' salary and equals at least €200,000, 40% of the monetary portion will be paid in the year after the performance year and 60% in four equal instalments over the course of the next four years (five instalments over the course of five years for members of OP Cooperative's Executive Management Team), with at least one year between each payment. A total of 40% of the portion paid in instruments is paid in the second year following the performance year and 60% is paid in five equal instalments during the five years following the first payment year, with at least one year between each payment.

Before confirming the payment of deferred bonuses, the company's board of directors assesses the bonus payment criteria in accordance with OP Financial Group's remuneration policy's terms for cancellation of earned bonuses and clawback of paid bonuses.

The board of directors of a company belonging to OP Cooperative or the Group has the right to decide on the non-payment of all or part of an earned bonus, or the clawback of a paid bonus, in the following situations:

- Paying a bonus would be against the regulations in force or OP Financial Group's internal guidelines.
- Notable non-compliances with internal and external guidelines have emerged in OP Financial Group or a Group company, regarding risks defined as significant, after the performance period. Significant risks include credit risks, counterparty risks, structural interest rate risks on the balance sheet, other market risks, non-life insurance risks, life insurance risks, liquidity risks, operational risks (including e.g. risks related to information security, data protection and cybersecurity), compliance risks, model risks, concentration risks, risks associated with future business and reputational risks.
- There is a need to adjust the financial statements of OP Financial Group, or of a Group company, which has an effect on the bonus amount.
- A sanction has been imposed on OP Financial Group, or a Group company, for a breach of regulations or the law.
- Manipulation of performance metrics under the scheme and of the related targets.
- A person has acted in violation of laws or OP Financial Group's Code of Business Ethics, or otherwise unethically or fraudulently.
- A person has earned or been paid bonuses in breach of the performance-based bonus scheme's terms and conditions.
- Risks posed to the company or the Group by the employee's activities are only learned of after the bonus has been determined or paid.

OP Cooperative's board of directors is responsible for decisions related to OP Financial Group, whereas OP Cooperative's board of directors or that of the Group company in question is responsible for decisions affecting a company, business unit or employee.

When making its decision, the board of directors must take account of any observations by Risk Management, Compliance and Internal Audit.

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

Information on the specific performance indicators used to determine the variable components of remuneration and the criteria used to determine the balance between different types of instruments awarded, including shares, equivalent ownership interests, share-linked instruments, equivalent non cash-instruments, options and other instruments

Details on parameters for variable remuneration and information on components of variable remuneration have been given above in sections e) and f). OP Financial Group applies only cash or awards linked to synthetic instruments in its' variable remuneration.

Variable remuneration comprises a performance-based bonus, spot bonus, retention bonus, guaranteed variable remuneration and the personnel fund.

The performance-based bonus scheme is used to control and promote the achievement of OP Financial Group's long-term strategic targets and related annual target metrics, and to reward employees for reaching and exceeding the targets. Details on performance-based bonus have been provided in section e).

Units, teams, or equivalent, delimited groups may use spot bonuses as a form of spontaneous reward (on an individual level maximum amount of 3 000 € p.a.). Spot bonuses may be paid out as a reward for an innovation providing the employer with financial benefits or for exceptionally good performance. Use of spot bonuses must always be justified and their granting and grounds shall be overt. Spot bonuses are paid, provided that the company shows a cumulative profit from the year start, and the person has acted in accordance with internal guidelines and external regulations and that such remuneration does not lead to actions against the customer's best interests.

Retention bonuses can be used in OP Financial Group to promote key employee retention in order to ensure that restructurings, wind-downs, corporate acquisitions, changes in control and major projects are successfully completed. The retention bonus must be based on metrics other than those used for the performance-based bonus. It must not be used to compensate for a weak balanced scorecard result or if the company's financial situation does not allow payment of a performance-based bonus.

Guaranteed variable remuneration (such as a sign-on bonus) may only be used when recruiting a new employee from a company outside OP Financial Group. Guaranteed variable remuneration is paid only for compelling reasons and provided that the bonus only applies to the person's first year of employment. Its payment does not affect the employee's right to be covered by other remuneration schemes in the company.

The personnel fund profit-based bonus supports the implementation of OP Financial Group's strategy, long-term profitability and employee motivation to achieve Group-level targets. The personnel fund has Group-level targets, which are common to all employees. OP Cooperative's Board of Directors annually decides on the targets. The profit-based bonus accounts for a maximum of 3% of the total salaries of the personnel fund members.

The total amount of variable remuneration must not exceed 100% of the fixed annual earnings. In case of performance-based bonus, retention bonus and guaranteed variable remuneration it is required that conditions for bonus payment as described under section e) are met (financial criteria for possible reduction or non-payment of awards). Qualitative review as described under section b) is mandatory for performance-based bonus, spot bonus, retention bonus and guaranteed variable remuneration.

The Board of Directors of OP Cooperative and OP cooperative banks' boards of directors annually determine employee benefits on a company-specific basis. Benefits applied in 2024 in OP Cooperative included:

- Discounts from OP Financial Group's products and services
- Comprehensive Health Insurance
- Exercise and culture benefits
- Company car benefit (only for selected groups of employees)
- Phone benefit

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

N/A

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

For the purposes of this point, institutions that benefit from such a derogation shall indicate whether this is on the basis of point (a) and/or point (b) of Article 94(3) CRD. They shall also indicate for which of the remuneration principles they apply the derogation(s), the number of staff members that benefit from the derogation(s) and their total remuneration, split into fixed and variable remuneration

OP Financial Group applies in its' variable remuneration deferral and payment as instruments as indicated in section f). OP Financial Group has benefited from the exception established in Article 94, Section 3 b), of Directive 2013/36/EU. In 2024 pay outs, the deferral of variable remuneration and payment as instrument have not been applied to 214 MRTs, whose total remuneration in 2024 has been EUR 27.93 M€ (fixed remuneration EUR 22.85 M€, variable remuneration EUR 5.08 M€).

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

Quantitative information on the remuneration of OP Cooperative's board of directors is included in form REM1. President and Group CEO of OP Financial Group is considered as executive member of collective management body (1/11 members) and his remuneration details are included into MB Management function section of form REM1. President and Group CEO of OP Financial Group does not receive remuneration for board member duties (board member remuneration).

Total remuneration of non-executive collective management body members paid in 2024 amounted to EUR 1 016 145. Non-executive members of OP Cooperative's board receive fixed remuneration for their duties (board member remuneration) and variable remuneration is not provided for board member duties. Total remuneration of executive member of collective management body paid in 2024 amounted to EUR 1 465 384, from which variable remuneration was EUR 541 683 and fixed remuneration was EUR 923 700.

Two board members (2/11 members) are considered as MRTs as Other Senior Management on form REM1 due to their role in OP cooperative banks, hence their remuneration details for other than board member duties are included into the mentioned section.

Additional details on remuneration of OP Cooperative's board can be found from OP Financial Group's Remuneration Report for Governing Bodies 2024 (op.fi – OP Financial Group – To the media – OP Financial Group's publications).

Requirements

Compliance with regulatory disclosure requirements

CRR Article	Reference
Article 431	
Disclosure requirements and policies	
1. Institutions shall publicly disclose the information referred to in Titles II and III in accordance with the provisions laid down in this Title, subject to the exceptions referred to in Article 432.	www.op.fi - OP Financial Group - To the media - OP Financial Group's publications: OP Amalgamation Pillar 3 report
2. Institutions that have been granted permission by the competent authorities under Part Three for the instruments and methodologies referred to in Title III of this Part shall publicly disclose the information laid down therein.	Table: Risk Exposure Amount
3. The management body or senior management shall adopt formal policies to comply with the disclosure requirements laid down in this Part and put in place and maintain internal processes, systems and controls to verify that the institutions' disclosures are appropriate and in compliance with the requirements laid down in this Part. At least one member of the management body or senior management shall attest in writing that the relevant institution has made the disclosures required under this Part in accordance with the formal policies and internal processes, systems and controls. The written attestation and the key elements of the institution's formal policies to comply with the disclosure requirements shall be included in institutions' disclosures.	Disclosure principles of capital adequacy information approved by OP Financial Group's management
Information to be disclosed in accordance with this Part shall be subject to the same level of internal verification as that applicable to the management report included in the institution's financial report.	Table: Signatures
Institutions shall also have policies in place to verify that their disclosures convey their risk profile comprehensively to market participants. Where institutions find that the disclosures required under this Part do not convey the risk profile comprehensively to market participants, they shall publicly disclose information in addition to the information required to be disclosed under this Part. Nonetheless, institutions shall only be required to disclose information that is material and not proprietary or confidential as referred to in Article 432.	Disclosure principles of capital adequacy information approved by OP Financial Group's management
4. All quantitative disclosures shall be accompanied by a qualitative narrative and any other supplementary information that may be necessary in order for the users of that information to understand the quantitative disclosures, noting in particular any significant change in any given disclosure compared to the information contained in the previous disclosures.	Disclosure principles of capital adequacy information approved by OP Financial Group's management
5. Institutions shall, if requested, explain their rating decisions to SMEs and other corporate applicants for loans, providing an explanation in writing when asked. The administrative costs of that explanation shall be proportionate to the size of the loan.	To be delivered on request
Article 432	
Non-material, proprietary or confidential information	
1. With the exception of the disclosures laid down in point (c) of Article 435(2) and in Articles 437 and 450, institutions may omit one or more of the disclosures listed in Titles II and III where the information provided by those disclosures is not regarded as material.	Refer to table: Immaterial items not disclosed
2. Institutions may also omit one or more items of information referred to in Titles II and III where those items include information that is regarded as proprietary or confidential in accordance with this paragraph, except for the disclosures laid down in Articles 437 and 450.	Refer to table: Immaterial items not disclosed
Article 433	
Frequency and scope of disclosures	
Institutions shall publish the disclosures required under Titles II and III in the manner set out in Articles 433a, 433b and 433c.	Information is disclosed on the date of publication of the financial statements. Information disclosed quarterly and half-yearly is presented in connection with interim reports. The frequency of disclosure will be assessed according to the disclosure principles of capital adequacy information.

Annual disclosures shall be published on the same date as the date on which institutions publish their financial statements or as soon as possible thereafter.	Information is disclosed on the date of publication of the financial statements.
Semi-annual and quarterly disclosures shall be published on the same date as the date on which the institutions publish their financial reports for the corresponding period where applicable or as soon as possible thereafter.	Information disclosed quarterly and half-yearly is presented in connection with interim reports. The frequency of disclosure will be assessed according to the disclosure principles of capital adequacy information.
Article 433a	
Disclosures by large institutions	
1. Large institutions shall disclose the information outlined below with the following frequency:	
(a) all the information required under this Part on an annual basis;	Information is disclosed on the date of publication of the financial statements.
(b) on a semi-annual basis the information referred to in:	Information disclosed quarterly and half-yearly is presented in connection with interim reports.
(i)point (a) of Article 437;	
(ii)point (e) of Article 438;	
(iii)points (e) to (l) of Article 439;	
(iv)Article 440;	
(v)points (c), (e), (f) and (g) of Article 442;	
(vi)point (e) of Article 444;	
(vii)Article 445;	
(viii)point (a) and (b) of Article 448(1);	
(ix)point (j) to (l) of Article 449;	
(x)points (a) and (b) of Article 451(1);	
(xi)Article 451a(3);	
(xii)point (g) of Article 452;	
(xiii)points (f) to (j) of Article 453;	
(xiv)points (d), (e) and (g) of Article 455;	
(c) on a quarterly basis the information referred to in:	
(i)points (d) and (h) of Article 438;	
(ii)the key metrics referred to in Article 447;	
(iii)Article 451a(2).	
2. By way of derogation from paragraph 1, large institutions other than G-SIIs that are non-listed institutions shall disclose the information outlined below with the following frequency:	N/A
(a) all the information required under this Part on an annual basis;	N/A
(b) the key metrics referred to in Article 447 on a semi-annual basis.	N/A
3. Large institutions that are subject to Article 92a or 92b shall disclose the information required under Article 437a on a semi-annual basis, except for the key metrics referred to in point (h) of Article 447, which are to be disclosed on a quarterly basis.	N/A
Article 433b	
Disclosures by small and non-complex institutions	N/A
Article 433c	
Disclosures by other institutions	N/A
Article 434	
Means of disclosures	

1. Institutions shall disclose all the information required under Titles II and III in electronic format and in a single medium or location. The single medium or location shall be a standalone document that provides a readily accessible source of prudential information for users of that information or a distinctive section included in or appended to the institutions' financial statements or financial reports containing the required disclosures and being easily identifiable to those users.	www.op.fi - OP Financial Group - To the media - OP Financial Group's publications: OP Amalgamation Pillar 3 report
2. Institutions shall make available on their website or, in the absence of a website, in any other appropriate location an archive of the information required to be disclosed in accordance with this Part. That archive shall be kept accessible for a period of time that shall be no less than the storage period set by national law for information included in the institutions' financial reports.	www.op.fi - OP Financial Group - To the media - OP Financial Group's publications: OP Amalgamation Pillar 3 report
Article 434a	
Uniform disclosure formats	www.op.fi - OP Financial Group - To the media - OP Financial Group's publications: OP Amalgamation Pillar 3 report
Article 435	
Disclosure of risk management objectives and policies	
1. Institutions shall disclose their risk management objectives and policies for each separate category of risk, including the risks referred to in this Title. Those disclosures shall include:	
(a) the strategies and processes to manage those categories of risks;	Tables: EU OVA, EU OVB, EU CRA, EU CCRA, EU MRA, EU LIQA and EU ORA
(b) the structure and organisation of the relevant risk management function including information on the basis of its authority, its powers and accountability in accordance with the institution's incorporation and governing documents;	Tables: EU OVA, EU OVB, EU CRA, EU CCRA, EU MRA, EU LIQA and EU ORA
(c) the scope and nature of risk reporting and measurement systems;	Tables: EU OVA, EU OVB, EU CRA, EU CCRA, EU MRA, EU LIQA and EU ORA
(d) the policies for hedging and mitigating risk, and the strategies and processes for monitoring the continuing effectiveness of hedges and mitigants;	Tables: EU OVA, EU OVB, EU CRA, EU CCRA, EU MRA, EU LIQA, EU ORA and EU CRC
(e) a declaration approved by the management body on the adequacy of the risk management arrangements of the relevant institution providing assurance that the risk management systems put in place are adequate with regard to the institution's profile and strategy;	Tables: EU OVA including Declaration and Statement and EU OVB
(f) a concise risk statement approved by the management body succinctly describing the relevant institution's overall risk profile associated with the business strategy; that statement shall include:	Table: EU OVA and Declaration and Statement
(i) key ratios and figures providing external stakeholders a comprehensive view of the institution's management of risk, including how the risk profile of the institution interacts with the risk tolerance set by the management body;key ratios and figures providing external stakeholders a comprehensive view of the institution's management of risk, including how the risk profile of the institution interacts with the risk tolerance set by the management body;	Table: EU OVA and Declaration and Statement
(ii) information on intragroup transactions and transactions with related parties that may have a material impact of the risk profile of the consolidated group information on intragroup transactions and transactions with related parties that may have a material impact of the risk profile of the consolidated group.	Table: EU OVA and Declaration and Statement
2. Institutions shall disclose the following information regarding governance arrangements:	
(a) the number of directorships held by members of the management body;	Table: EU OVB
(b) the recruitment policy for the selection of members of the management body and their actual knowledge, skills and expertise;	Table: EU OVB
(c) the policy on diversity with regard to selection of members of the management body, its objectives and any relevant targets set out in that policy, and the extent to which those objectives and targets have been achieved;	Table: EU OVB
(d) whether or not the institution has set up a separate risk committee and the number of times the risk committee has met;	Table: EU OVB
(e) the description of the information flow on risk to the management body.	Table: EU OVB
Article 436	
Disclosure of the scope of application	
Institutions shall disclose the following information regarding the scope of application of this Regulation as follows:	
(a) the name of the institution to which this Regulation applies;	OP Amalgamation, OP Osuuskunta LEI code 7437003B5WFBOIEFY714

(b) a reconciliation between the consolidated financial statements prepared in accordance with the applicable accounting framework and the consolidated financial statements prepared in accordance with the requirements on regulatory consolidation pursuant to Sections 2 and 3 of Title II of Part One; that reconciliation shall outline the differences between the accounting and regulatory scopes of consolidation and the legal entities included within the regulatory scope of consolidation where it differs from the accounting scope of consolidation; the outline of the legal entities included within the regulatory scope of consolidation shall describe the method of regulatory consolidation where it is different from the accounting consolidation method, whether those entities are fully or proportionally consolidated and whether the holdings in those legal entities are deducted from own funds;	Tables: EU LI1, EU LI2, EU LIA and EU LI3
(c) a breakdown of assets and liabilities of the consolidated financial statements prepared in accordance with the requirements on regulatory consolidation pursuant to Sections 2 and 3 of Title II of Part One, broken down by type of risks as referred to under this Part;	Tables: EU LI1 and EU LI2
(d) a reconciliation identifying the main sources of differences between the carrying value amounts in the financial statements under the regulatory scope of consolidation as defined in Sections 2 and 3 of Title II of Part One, and the exposure amount used for regulatory purposes; that reconciliation shall be supplemented by qualitative information on those main sources of differences;	Tables: EU LI1, EU LI2 and EU LIA
(e) for exposures from the trading book and the non-trading book that are adjusted in accordance with Article 34 and Article 105, a breakdown of the amounts of the constituent elements of an institution's prudent valuation adjustment, by type of risks, and the total of constituent elements separately for the trading book and non-trading book positions;	Table: EU PV1
(f) 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 and its subsidiaries;	Table: EU LIB
(g) the aggregate amount by which the actual own funds are less than required in all subsidiaries that are not included in the consolidation, and the name or names of those subsidiaries;	Table: EU LIB
(h) where applicable, the circumstances under which use is made of the derogation referred to in Article 7 or the individual consolidation method laid down in Article 9.	Table: EU LIB
Article 437	
Disclosure of own funds	
Institutions shall disclose the following information regarding their own funds:	
(a) a full reconciliation of Common Equity Tier 1 items, Additional Tier 1 items, Tier 2 items and the filters and deductions applied to own funds of the institution pursuant to Articles 32 to 36, 56, 66 and 79 with the balance sheet in the audited financial statements of the institution;	Tables: Own Funds, EU CC1 and EU CC2
(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;	Table: EU CCA
(c) the full terms and conditions of all Common Equity Tier 1, Additional Tier 1 and Tier 2 instruments;	Table: EU CCA
(d) a separate disclosure of the nature and amounts of the following:	Tables: Own Funds, EU CC1 and EU CC2
(i)each prudential filter applied pursuant to Articles 32 to 35;	Tables: Own Funds, EU CC1 and EU CC2
(ii)items deducted pursuant to Articles 36, 56 and 66;	Tables: Own Funds, EU CC1 and EU CC2
(iii)items not deducted pursuant to Articles 47, 48, 56, 66 and 79;	Tables: Own Funds, EU CC1 and EU CC2
(e) a description of all restrictions applied to the calculation of own funds in accordance with this Regulation and the instruments, prudential filters and deductions to which those restrictions apply;	Tables: Own Funds, EU CC1 and EU CC2
(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.	N/A
Article 437a	
Disclosure of own funds and eligible liabilities	
Institutions that are subject to Article 92a or 92b shall disclose the following information regarding their own funds and eligible liabilities:	N/A
(a) the composition of their own funds and eligible liabilities, their maturity and their main features;	N/A
(b) the ranking of eligible liabilities in the creditor hierarchy;	N/A

(c) the total amount of each issuance of eligible liabilities instruments referred to in Article 72b and the amount of those issuances that is included in eligible liabilities items within the limits specified in Article 72b(3) and (4);	N/A
(d) the total amount of excluded liabilities referred to in Article 72a(2).	N/A
Article 438	
Disclosure of own funds requirements and risk-weighted exposure amounts	
Institutions shall disclose the following information regarding their compliance with Article 92 of this Regulation and with the requirements laid down in Article 73 and in point (a) of Article 104(1) of Directive 2013/36/EU:	
(a) a summary of their approach to assessing the adequacy of their internal capital to support current and future activities;	Table: EU OVC
(b) the amount of the additional own funds requirements based on the supervisory review process as referred to in point (a) of Article 104(1) of Directive 2013/36/EU and its composition in terms of Common Equity Tier 1, additional Tier 1 and Tier 2 instruments;	Table: EU KM1
(c) upon demand from the relevant competent authority, the result of the institution's internal capital adequacy assessment process;	N/A, Table: EU OVC
(d) the total risk-weighted exposure amount and the corresponding total own funds requirement determined in accordance with Article 92, to be broken down by the different risk categories 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;	Tables: Risk Exposure Amount and EU OV1
(e) the on- and off-balance-sheet exposures, the risk-weighted exposure amounts and associated expected losses for each category of specialised lending referred to in Table 1 of Article 153(5) and the on- and off-balance-sheet exposures and risk-weighted exposure amounts for the categories of equity exposures set out in Article 155(2);	N/A
(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 that the institutions do not deduct from their own funds in accordance with Article 49 when calculating their capital requirements on an individual, sub-consolidated and consolidated basis;	Tables: EU INS1 and EU INS2
(g) the supplementary own funds requirement and the capital adequacy ratio of the financial conglomerate calculated in accordance with Article 6 of Directive 2002/87/EC and Annex I to that Directive where method 1 or 2 set out in that Annex is applied;	Table: EU INS2
(h) the variations in the risk-weighted exposure amounts of the current disclosure period compared to the immediately preceding disclosure period that result from the use of internal models, including an outline of the key drivers explaining those variations.	N/A
Article 439	
Disclosure of exposures to counterparty credit risk	
Institutions shall disclose the following information regarding their exposure to counterparty credit risk as referred to in Chapter 6 of Title II of Part Three:	
(a) a description of the methodology used to assign internal capital and credit limits for counterparty credit exposures, including the methods to assign those limits to exposures to central counterparties;	Table: EU CCRA
(b) a description of policies related to guarantees and other credit risk mitigants, such as the policies for securing collateral and establishing credit reserves;	Table: EU CCRA
(c) a description of policies with respect to General Wrong-Way risk and Specific Wrong-Way risk as defined in Article 291;	Table: EU CCRA
(d) the amount of collateral the institution would have to provide if its credit rating was downgraded;	Table: EU CCRA
(e) the amount of segregated and unsegregated collateral received and posted per type of collateral, further broken down between collateral used for derivatives and securities financing transactions;	Table: EU CCR5
(f) for derivative transactions, the exposure values before and after the effect of the credit risk mitigation as determined under the methods set out in Sections 3 to 6 of Chapter 6 of Title II of Part Three, whichever method is applicable, and the associated risk exposure amounts broken down by applicable method;	Table: EU CCR1

(g) for securities financing transactions, the exposure values before and after the effect of the credit risk mitigation as determined under the methods set out in Chapters 4 and 6 of Title II of Part Three, whichever method is used, and the associated risk exposure amounts broken down by applicable method;	Table: EU CCR1
(h) the exposure values after credit risk mitigation effects and the associated risk exposures for credit valuation adjustment capital charge, separately for each method as set out in Title VI of Part Three;	Table: EU CCR2
(i) the exposure value to central counterparties and the associated risk exposures within the scope of Section 9 of Chapter 6 of Title II of Part Three, separately for qualifying and non-qualifying central counterparties, and broken down by types of exposures;	Table: EU CCR8
(j) the notional amounts and fair value of credit derivative transactions; credit derivative transactions shall be broken down by product type; within each product type, credit derivative transactions shall be broken down further by credit protection bought and credit protection sold;	Table: EU CCR6
(k) the estimate of alpha where the institution has received the permission of the competent authorities to use its own estimate of alpha in accordance with Article 284(9);	N/A
(l) separately, the disclosures included in point (e) of Article 444 and point (g) of Article 452;	Table: 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 their on- and off-balance-sheet derivative business as calculated in accordance with Article 273a(1) or (2), as applicable.	N/A
Where the central bank of a Member State provides liquidity assistance in the form of collateral swap transactions, the competent authority may exempt institutions from the requirements in points (d) and (e) of the first subparagraph where that competent authority considers that the disclosure of the information referred to therein could reveal that emergency liquidity assistance has been provided. For those purposes, the competent authority shall set out appropriate thresholds and objective criteria.	N/A
Article 440	
Disclosure of countercyclical capital buffers	
Institutions shall disclose the following information in relation to their compliance with the requirement for a countercyclical capital buffer as referred to in Chapter 4 of Title VII of Directive 2013/36/EU:	Tables: EU CCyB1 and EU CCyB2
(a) the geographical distribution of the exposure amounts and risk-weighted exposure amounts of its credit exposures used as a basis for the calculation of their countercyclical capital buffer;	Tables: EU CCyB1 and EU CCyB2
(b) the amount of their institution-specific countercyclical capital buffer.	Tables: EU CCyB1 and EU CCyB2
Article 441	
Disclosure of indicators of global systemic importance	
G-SIIs shall disclose, on an annual basis, the values of the indicators used for determining their score in accordance with the identification methodology referred to in Article 131 of Directive 2013/36/EU.	N/A
Article 442	
Disclosure of exposures to credit risk and dilution risk	
Institutions shall disclose the following information regarding their exposures to credit risk and dilution risk:	
(a) the scope and definitions that they use for accounting purposes of 'past due' and 'impaired' and the differences, if any, between the definitions of 'past due' and 'default' for accounting and regulatory purposes;	Table: EU CRB
(b) a description of the approaches and methods adopted for determining specific and general credit risk adjustments;	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, including their related accumulated impairment, provisions and negative fair value changes due to credit risk and amounts of collateral and financial guarantees received;	Tables: EU CR1, EU CQ1, EU CQ4, EU CQ5 and EU CQ7
(d) an ageing analysis of accounting past due exposures;	Table: EU CQ3
(e) the gross carrying amounts of both defaulted and non-defaulted exposures, the accumulated specific and general credit risk adjustments, the accumulated write-offs taken against those exposures and the net carrying amounts and their distribution by geographical area and industry type and for loans, debt securities and off-balance-sheet exposures;	Tables: EU CR1, EU CQ1, EU CQ4, EU CQ5 and EU CQ7

(f) any changes in the gross amount of defaulted on- and off-balance-sheet exposures, including, as a minimum, information on the opening and closing balances of those exposures, the gross amount of any of those exposures reverted to non-defaulted status or subject to a write-off;	Table: EU CR2
(g) the breakdown of loans and debt securities by residual maturity.	Table: EU CR1-A
Article 443	
Disclosure of encumbered and unencumbered assets	
Institutions shall disclose information concerning their encumbered and unencumbered assets. For those purposes, institutions shall use the carrying amount per exposure class broken down by asset quality and the total amount of the carrying amount that is encumbered and unencumbered. Disclosure of information on encumbered and unencumbered assets shall not reveal emergency liquidity assistance provided by central banks.	Tables: EU AE1, EU AE2, EU AE3 and EU AE4
Article 444	
Disclosure of the use of the Standardised Approach	
Institutions calculating their risk-weighted exposure amounts in accordance with Chapter 2 of Title II of Part Three shall disclose the following information for each of the exposure classes set out in Article 112:	
(a) the names of the nominated ECAIs and ECAs and the reasons for any changes in those nominations over the disclosure period;	Table: EU CRD
(b) the exposure classes for which each ECAI or ECA is used;	Table: EU CRD
(c) a description of the process used to transfer the issuer and issue credit ratings onto items not included in the trading book;	Table: 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 Chapter 2 of Title II of Part Three, taking into account that it is not necessary to disclose that information where the institutions comply with the standard association published by EBA;	N/A
(e) the exposure values and the exposure values after credit risk mitigation associated with each credit quality step as set out in Chapter 2 of Title II of Part Three, by exposure class, as well as the exposure values deducted from own funds.	Table: EU CR4
Article 445	
Disclosure of exposure to market risk	
Institutions calculating their own funds requirements in accordance with points (b) and (c) of Article 92(3) shall disclose those requirements separately for each risk referred to in those points. In addition, own funds requirements for the specific interest rate risk of securitisation positions shall be disclosed separately.	Table: EU MR1
Article 446	
Disclosure of operational risk management	
Institutions shall disclose the following information about their operational risk management:	
(a) the approaches for the assessment of own funds requirements for operation risk that the institution qualifies for;	Tables: EU OR1 and EU ORA
(b) where the institution makes use of it, a description of the methodology set out in Article 312(2), which shall include a discussion of the relevant internal and external factors being considered in the institution's advanced measurement approach;	N/A
(c) in the case of partial use, the scope and coverage of the different methodologies used.	N/A
Article 447	
Disclosure of key metrics	
Institutions shall disclose the following key metrics in a tabular format:	
(a) the composition of their own funds and their own funds requirements as calculated in accordance with Article 92;	Tables: Own funds, EU OV1 and EU KM1
(b) the total risk exposure amount as calculated in accordance with Article 92(3);	Tables: Risk Exposure Amount, EU OV1 and EU KM1
(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;	Tables: EU KM1 and EU CC1

(d) their combined buffer requirement which the institutions are required to hold in accordance with Chapter 4 of Title VII of Directive 2013/36/EU;	Tables: EU KM1 and EU CC1
(e) their leverage ratio and the total exposure measure as calculated in accordance with Article 429;	Tables EU KM1, EU LR1, EU LR2 and EU LR3
(f) the following information in relation to their liquidity coverage ratio as calculated in accordance with the delegated act referred to in Article 460(1):	Tables: EU KM1 and EU LIQ1
(i)the average or averages, as applicable, of their liquidity coverage ratio based on end-of-the-month observations over the preceding 12 months for each quarter of the relevant disclosure period;	Tables: EU KM1 and EU LIQ1
(ii)the average or averages, as applicable, of total liquid assets, after applying the relevant haircuts, included in the liquidity buffer pursuant to the delegated act referred to in Article 460(1), based on end-of-the-month observations over the preceding 12 months for each quarter of the relevant disclosure period;	Tables: EU KM1 and EU LIQ1
(iii)the averages of their liquidity outflows, inflows and net liquidity outflows as calculated pursuant to the delegated act referred to in Article 460(1), based on end-of-the-month observations over the preceding 12 months for each quarter of the relevant disclosure period;	Tables: EU KM1 and EU LIQ1
(g) the following information in relation to their net stable funding requirement as calculated in accordance with Title IV of Part Six:	Tables: EU KM1 and EU LIQ2
(i)the net stable funding ratio at the end of each quarter of the relevant disclosure period;	Tables: EU KM1 and EU LIQ2
(ii)the available stable funding at the end of each quarter of the relevant disclosure period;	Tables: EU KM1 and EU LIQ2
(iii)the required stable funding at the end of each quarter of the relevant disclosure period;	Tables: EU KM1 and EU LIQ2
(h) their own funds and eligible liabilities ratios and their components, numerator and denominator, as calculated in accordance with Articles 92a and 92b and broken down at the level of each resolution group, where applicable.	N/A
Article 448	
Disclosure of exposures to interest rate risk on positions not held in the trading book	
1. As from 28 June 2021, institutions shall disclose the following quantitative and qualitative information on the risks arising from potential changes in interest rates that affect both the economic value of equity and the net interest income of their non-trading book activities referred to in Article 84 and Article 98(5) of Directive 2013/36/EU:	Tables: EU IRRBB1 and EU IRRBBA
(a) the changes in the economic value of equity calculated under the six supervisory shock scenarios referred to in Article 98(5) of Directive 2013/36/EU for the current and previous disclosure periods;	Table: EU IRRBB1
(b) the changes in the net interest income calculated under the two supervisory shock scenarios referred to in Article 98(5) of Directive 2013/36/EU for the current and previous disclosure periods;	Table: EU IRRBB1
(c) a description of key modelling and parametric assumptions, other than those referred to in points (b) and (c) of Article 98(5a) of Directive 2013/36/EU used to calculate changes in the economic value of equity and in the net interest income required under points (a) and (b) of this paragraph;	Tables: EU IRRBB1 and EU IRRBBA
(d) an explanation of the significance of the risk measures disclosed under points (a) and (b) of this paragraph and of any significant variations of those risk measures since the previous disclosure reference date;	Tables: EU IRRBB1 and EU IRRBBA
(e) the description of how institutions define, measure, mitigate and control the interest rate risk of their non-trading book activities for the purposes of the competent authorities' review in accordance with Article 84 of Directive 2013/36/EU, including:	Table: EU IRRBBA
(i)a description of the specific risk measures that the institutions use to evaluate changes in their economic value of equity and in their net interest income;	Table: EU IRRBBA
(ii)a description of the key modelling and parametric assumptions used in the institutions' internal measurement systems that would differ from the common modelling and parametric assumptions referred to in Article 98(5a) of Directive 2013/36/EU for the purpose of calculating changes to the economic value of equity and to the net interest income, including the rationale for those differences;	Table: EU IRRBBA
(iii)a description of the interest rate shock scenarios that institutions use to estimate the interest rate risk;	Table: EU IRRBBA
(iv)the recognition of the effect of hedges against those interest rate risks, including internal hedges that meet the requirements laid down in Article 106(3);	Table: EU IRRBBA
(v)an outline of how often the evaluation of the interest rate risk occurs;	Table: EU IRRBBA

(f) the description of the overall risk management and mitigation strategies for those risks;	Table: EU IRRBBA
(g) average and longest repricing maturity assigned to non-maturity deposits.	Table: EU IRRBBA
2. By way of derogation from paragraph 1 of this Article, the requirements set out in points (c) and (e)(i) to (e)(iv) of paragraph 1 of this Article shall not apply to institutions that use the standardised methodology or the simplified standardised methodology referred to in Article 84(1) of Directive 2013/36/EU.	Table: EU IRRBBA
Article 449	
Disclosure of exposures to securitisation positions	
Institutions calculating risk-weighted exposure amounts in accordance with Chapter 5 of Title II of Part Three or own funds requirements in accordance with Article 337 or 338 shall disclose the following information separately for their trading book and non-trading book activities:	Tables: EU SEC1, EU SEC4 and EU SECA
(a) a description of their securitisation and re-securitisation activities, including their risk management and investment objectives in connection with those activities, their role in securitisation and re-securitisation transactions, whether they use the simple, transparent and standardised securitisation (STS) as defined in point (10) of Article 242, and the extent to which they use securitisation transactions to transfer the credit risk of the securitised exposures to third parties with, where applicable, a separate description of their synthetic securitisation risk transfer policy;	Table: EU SECA
(b) the type of risks they are exposed to in their securitisation and re-securitisation activities by level of seniority of the relevant securitisation positions providing a distinction between STS and non-STS positions and:	Table: EU SECA
(i)the risk retained in own-originated transactions;	Table: EU SECA
(ii)the risk incurred in relation to transactions originated by third parties;	Table: EU SECA
(c) their approaches for calculating the risk-weighted exposure amounts that they apply to their securitisation activities, including the types of securitisation positions to which each approach applies and with a distinction between STS and non-STS positions;	Tables: EU SEC1, EU SEC4 and EU SECA
(d) a list of SSPEs falling into any of the following categories, with a description of their types of exposures to those SSPEs, including derivative contracts:	N/A
(i)SSPEs which acquire exposures originated by the institutions;	N/A
(ii)SSPEs sponsored by the institutions;	N/A
(iii)SSPEs and other legal entities for which the institutions provide securitisation-related services, such as advisory, asset servicing or management services;	N/A
(iv)SSPEs included in the institutions' regulatory scope of consolidation;	N/A
(e) a list of any legal entities in relation to which the institutions have disclosed that they have provided support in accordance with Chapter 5 of Title II of Part Three;	N/A
(f) a list of legal entities affiliated with the institutions and that invest in securitisations originated by the institutions or in securitisation positions issued by SSPEs sponsored by the institutions;	N/A
(g) a summary of their accounting policies for securitisation activity, including where relevant a distinction between securitisation and re-securitisation positions;	Table: EU SECA
(h) the names of the ECAIs used for securitisations and the types of exposure for which each agency is used;	Table: EU SECA
(i) where applicable, a description of the Internal Assessment Approach as set out in Chapter 5 of Title II of Part Three, including the structure of the internal assessment process and the relation between internal assessment and external ratings of the relevant ECAI disclosed in accordance with point (h), the control mechanisms for the internal assessment process including discussion of independence, accountability, and internal assessment process review, the exposure types to which the internal assessment process is applied and the stress factors used for determining credit enhancement levels;	N/A
(j) separately for the trading book and the non-trading book, the carrying amount of securitisation exposures, including information on whether institutions have transferred significant credit risk in accordance with Articles 244 and 245, for which institutions act as originator, sponsor or investor, separately for traditional and synthetic securitisations, and for STS and non-STS transactions and broken down by type of securitisation exposures;	Table: EU SEC1
(k) for the non-trading book activities, the following information:	Tables: EU SEC1 and EU SEC4

(i)the aggregate amount of securitisation positions where institutions act as originator or sponsor and the associated risk-weighted assets and capital requirements by regulatory approaches, including exposures deducted from own funds or risk weighted at 1 250 %, broken down between traditional and synthetic securitisations and between securitisation and re-securitisation exposures, separately for STS and non-STS positions, and further broken down into a meaningful number of risk-weight or capital requirement bands and by approach used to calculate the capital requirements;	N/A
(ii)the aggregate amount of securitisation positions where institutions act as investor and the associated risk-weighted assets and capital requirements by regulatory approaches, including exposures deducted from own funds or risk weighted at 1 250 %, broken down between traditional and synthetic securitisations, securitisation and re-securitisation positions, and STS and non-STS positions, and further broken down into a meaningful number of risk weight or capital requirement bands and by approach used to calculate the capital requirements;	Tables: EU SEC1 and EU SEC4
(l) for exposures securitised by the institution, the amount of exposures in default and the amount of the specific credit risk adjustments made by the institution during the current period, both broken down by exposure type.	N/A
Article 449a	
Disclosure of environmental, social and governance risks (ESG risks)	
From 28 June 2022, large institutions which have issued securities that are admitted to trading on a regulated market of any Member State, as defined in point (21) of Article 4(1) of Directive 2014/65/EU, shall disclose information on ESG risks, including physical risks and transition risks, as defined in the report referred to in Article 98(8) of Directive 2013/36/EU.	ESG disclosures: Templates 1-8, template 10 and tables 1-3
The information referred to in the first paragraph shall be disclosed on an annual basis for the first year and biannually thereafter.	ESG disclosures: Templates 1-8, template 10 and tables 1-3
Article 450	
Disclosure of remuneration policy	
1. Institutions shall disclose the following information regarding their remuneration policy and practices for those categories of staff whose professional activities have a material impact on the risk profile of the institutions:	Tables: EU REM1, EU REM2, EU REM3, EU REM4, EU REM5 and EU REMA
(a) information concerning the decision-making process used for determining the remuneration policy, as well as the number of meetings held by the main body overseeing remuneration during the financial year, including, where applicable, information about the composition and the mandate of a remuneration committee, the external consultant whose services have been used for the determination of the remuneration policy and the role of the relevant stakeholders;	Table: EU REMA
(b) information about the link between pay of the staff and their performance;	Table: EU REMA
(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;	Table: EU REMA
(d) the ratios between fixed and variable remuneration set in accordance with point (g) of Article 94(1) of Directive 2013/36/EU;	Table: EU REMA
(e) information on the performance criteria on which the entitlement to shares, options or variable components of remuneration is based;	Table: EU REMA
(f) the main parameters and rationale for any variable component scheme and any other non-cash benefits;	Table: EU REMA
(g) aggregate quantitative information on remuneration, broken down by business area;	Table: EU REM5
(h) aggregate quantitative information on remuneration, broken down by senior management and members of staff whose professional activities have a material impact on the risk profile of the institutions, indicating the following:	Tables: EU REM1, EU REM2 and EU REM3
(i)the amounts of remuneration awarded for the financial year, split into fixed remuneration including a description of the fixed components, and variable remuneration, and the number of beneficiaries;	Table: EU REM1
(ii)the amounts and forms of awarded variable remuneration, split into cash, shares, share-linked instruments and other types separately for the part paid upfront and the deferred part;	Table: EU REM1
(iii)the amounts of deferred remuneration awarded for previous performance periods, split into the amount due to vest in the financial year and the amount due to vest in subsequent years;	Table: EU REM3

(iv)the amount of deferred remuneration due to vest in the financial year that is paid out during the financial year, and that is reduced through performance adjustments;	Table: EU REM3
(v)the guaranteed variable remuneration awards during the financial year, and the number of beneficiaries of those awards;	Table: EU REM2
(vi)the severance payments awarded in previous periods, that have been paid out during the financial year;	Table: EU REM2
(vii)the amounts of severance payments awarded during the financial year, split into paid upfront and deferred, the number of beneficiaries of those payments and highest payment that has been awarded to a single person;	Table: EU REM2
(i) the number of individuals that have been remunerated EUR 1 million or more per financial year, with the remuneration between EUR 1 million and EUR 5 million broken down into pay bands of EUR 500 000 and with the remuneration of EUR 5 million and above broken down into pay bands of EUR 1 million;	Table: EU REM4
(j) upon demand from the relevant Member State or competent authority, the total remuneration for each member of the management body or senior management;	N/A
(k) information on whether the institution benefits from a derogation laid down in Article 94(3) of Directive 2013/36/EU.	Table: EU REMA
For the purposes of point (k) of the first subparagraph of this paragraph, institutions that benefit from such a derogation shall indicate whether they benefit from that derogation on the basis of point (a) or (b) of Article 94(3) of Directive 2013/36/EU. They shall also indicate for which of the remuneration principles they apply the derogation(s), the number of staff members that benefit from the derogation(s) and their total remuneration, split into fixed and variable remuneration.	Tables: EU REM1, EU REM2, EU REM3, EU REM4, EU REM5 and EU REMA
2. For large institutions, 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.	Table: EU REMA
Article 451	
Disclosure of the leverage ratio	
1. Institutions that are subject to Part Seven shall disclose the following information regarding their leverage ratio as calculated in accordance with Article 429 and their management of the risk of excessive leverage:	Tables: EU LR1, EU LR2, EU LRA, EU LR3
(a) the leverage ratio and how the institutions apply Article 499(2);	Tables: EU LR1, EU LR2, EU LRA, EU LR3
(b) a breakdown of the total exposure measure referred to in Article 429(4), as well as a reconciliation of the total exposure measure with the relevant information disclosed in published financial statements;	Tables: EU LR1, EU LR2, EU LR3
(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);	Table: EU LR2
(d) a description of the processes used to manage the risk of excessive leverage;	Table: EU LRA
(e) a description of the factors that had an impact on the leverage ratio during the period to which the disclosed leverage ratio refers.	Table: EU LRA
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).	Table: EU LR2
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).	Table: EU LR2
Article 451a	
Disclosure of liquidity requirements	
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.	Tables: EU LIQ1, EU LIQB, EU LIQ2 and EU LIQA
2. Institutions shall disclose the following information in relation to their liquidity coverage ratio as calculated in accordance with the delegated act referred to in Article 460(1):	Tables: EU LIQ1 and EU LIQB
(a) the average or averages, as applicable, of their liquidity coverage ratio based on end-of-the-month observations over the preceding 12 months for each quarter of the relevant disclosure period;	Tables: EU LIQ1 and EU LIQB

(b) the average or averages, as applicable, of total liquid assets, after applying the relevant haircuts, included in the liquidity buffer pursuant to the delegated act referred to in Article 460(1), based on end-of-the-month observations over the preceding 12 months for each quarter of the relevant disclosure period, and a description of the composition of that liquidity buffer;	Tables: EU LIQ1 and EU LIQB
(c) the averages of their liquidity outflows, inflows and net liquidity outflows as calculated in accordance with the delegated act referred to in Article 460(1), based on end-of-the-month observations over the preceding 12 months for each quarter of the relevant disclosure period and the description of their composition.	Tables: EU LIQ1 and EU LIQB
3. Institutions shall disclose the following information in relation to their net stable funding ratio as calculated in accordance with Title IV of Part Six:	Table: EU LIQ2
(a) quarter-end figures of their net stable funding ratio calculated in accordance with Chapter 2 of Title IV of Part Six for each quarter of the relevant disclosure period;	Table: EU LIQ2
(b) an overview of the amount of available stable funding calculated in accordance with Chapter 3 of Title IV of Part Six;	Table: EU LIQ2
(c) an overview of the amount of required stable funding calculated in accordance with Chapter 4 of Title IV of Part Six.	Table: EU LIQ2
4. Institutions shall disclose the arrangements, systems, processes and strategies put in place to identify, measure, manage and monitor their liquidity risk in accordance with Article 86 of Directive 2013/36/EU.	Tables: EU LIQA and EU LIQB
Article 452	
Disclosure of the use of the IRB Approach to credit risk	
Institutions calculating the risk-weighted exposure amounts under the IRB Approach to credit risk shall disclose the following information:	N/A
(a) the competent authority's permission of the approach or approved transition;	N/A
(b) for each exposure class referred to in Article 147, the percentage of the total exposure value of each exposure class subject to the Standardised Approach laid down in Chapter 2 of Title II of Part Three or to the IRB Approach laid down in Chapter 3 of Title II of Part Three, as well as the part of each exposure class subject to a roll-out plan; where institutions have received permission to use own LGDs and conversion factors for the calculation of risk-weighted exposure amounts, they shall disclose separately the percentage of the total exposure value of each exposure class subject to that permission;	N/A
(c) the control mechanisms for rating systems at the different stages of model development, controls and changes, which shall include information on:	N/A
(i)the relationship between the risk management function and the internal audit function;	N/A
(ii)the rating system review;	N/A
(iii)the procedure to ensure the independence of the function in charge of reviewing the models from the functions responsible for the development of the models;	N/A
(iv)the procedure to ensure the accountability of the functions in charge of developing and reviewing the models;	N/A
(d) the role of the functions involved in the development, approval and subsequent changes of the credit risk models;	N/A
(e) the scope and main content of the reporting related to credit risk models;	N/A
(f) a description of the internal ratings process by exposure class, including the number of key models used with respect to each portfolio and a brief discussion of the main differences between the models within the same portfolio, covering:	N/A
(i)the definitions, methods and data for estimation and validation of PD, which shall include information on how PDs are estimated for low default portfolios, whether there are regulatory floors and the drivers for differences observed between PD and actual default rates at least for the last three periods;	N/A
(ii)where applicable, the definitions, methods and data for estimation and validation of LGD, such as methods to calculate downturn LGD, how LGDs are estimated for low default portfolio and the time lapse between the default event and the closure of the exposure;	N/A
(iii)where applicable, the definitions, methods and data for estimation and validation of conversion factors, including assumptions employed in the derivation of those variables;	N/A

(g) as applicable, the following information in relation to each exposure class referred to in Article 147:	N/A
(i)their gross on-balance-sheet exposure;	N/A
(ii)their off-balance-sheet exposure values prior to the relevant conversion factor;	N/A
(iii)their exposure after applying the relevant conversion factor and credit risk mitigation;	N/A
(iv)any model, parameter or input relevant for the understanding of the risk weighting and the resulting risk exposure amounts disclosed across a sufficient number of obligor grades (including default) to allow for a meaningful differentiation of credit risk;	N/A
(v)separately for those exposure classes in relation to which institutions have received permission to use own LGDs and conversion factors for the calculation of risk-weighted exposure amounts, and for exposures for which the institutions do not use such estimates, the values referred to in points (i) to (iv) subject to that permission;	N/A
(h) institutions' estimates of PDs against the actual default rate for each exposure class over a longer period, with separate disclosure of the PD range, the external rating equivalent, the weighted average and arithmetic average PD, the number of obligors at the end of the previous year and of the year under review, the number of defaulted obligors, including the new defaulted obligors, and the annual average historical default rate.	N/A
For the purposes of point (b) of this Article, institutions shall use the exposure value as defined in Article 166.	N/A
Article 453	
Disclosure of the use of credit risk mitigation techniques	
Institutions using credit risk mitigation techniques shall disclose the following information:	Table: EU CRC
(a) the core features of the policies and processes for on- and off-balance-sheet netting and an indication of the extent to which institutions make use of balance sheet netting;	Table: EU CRC
(b) the core features of the policies and processes for eligible collateral evaluation and management;	Table: EU CRC
(c) a description of the main types of collateral taken by the institution to mitigate credit risk;	Table: EU CRC
(d) for guarantees and credit derivatives used as credit protection, the main types of guarantor and credit derivative counterparty and their creditworthiness used for the purpose of reducing capital requirements, excluding those used as part of synthetic securitisation structures;	Table: EU CRC
(e) information about market or credit risk concentrations within the credit risk mitigation taken;	Table: EU CRC
(f) for institutions calculating risk-weighted exposure amounts under the Standardised Approach or the IRB Approach, the total exposure value not covered by any eligible credit protection and the total exposure value covered by eligible credit protection after applying volatility adjustments; the disclosure set out in this point shall be made separately for loans and debt securities and including a breakdown of defaulted exposures;	Table: EU CR3
(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;	Table: 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;	Table: 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;	Table: 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; where institutions have received permission to use own LGDs and conversion factors for the calculation of risk-weighted exposure amounts, they shall make the disclosure set out in this point separately for the exposure classes subject to that permission.	N/A
Article 454	
Disclosure of the use of the Advanced Measurement Approaches to operational risk	N/A
Article 455	
Use of internal market risk models	N/A

Immaterial items not disclosed

Disclosure requirement	
Template 5 – Banking book – Climate change physical risk: Exposures subject to physical risk	Real estate activities' sensitivity to impact from climate change physical events has not been assessed.
Template 3 – Banking book – Climate change transition risk: Alignment metrics	Counterparties operating in the Cement, Chemicals and Fossil fuel combustion industries do not have business that can be measured and reported using IEA metrics suitable for scenarios.
	In the Aviation and Automotive industries, there too few relevant companies per industry. Industries in which there are too few operating enterprises are not reported in the table.
Blank templates and zero lines are not presented.	

Signatures

The Board of Directors confirms that OP Amalgamation's Pillar 3 report has been disclosed in compliance with Part 8 of the CRR and the related EBA guidelines and the disclosures have been prepared applying the principles of capital adequacy disclosure adopted by OP Cooperative's Board of Directors in 2024. The principles define methods used to verify the accuracy of information to be disclosed and the assessment of the materiality of the information.

Helsinki, 3 March 2025

Jaakko Pehkonen
Chair of the Board of Directors

Timo Ritakallio
President and Group Chief Executive Officer

Jarna Heinonen

Matti Kiuru

Katja Kuosa-Kaartti

Kati Levoranta

Pekka Loikkanen

Tero Ojanperä

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Jaana Reimasto-Heiskanen

Petri Sahlström