

**KOMMUNAL
KREDIT**

**Disclosure Report as of 31/12/2025
Green Opera Finance Invest AB Group**

INFRA BANKING EXPERTS



Pursuant to Art. 431 and Art. 433 of Regulation (EU) No. 575/2013, as amended (Capital Requirements Regulation, hereinafter called CRR), credit institutions are required to publicly disclose the information specified in Title II and Title III CRR at least once a year, subject to the provisions laid down in Art. 432 CRR. Pursuant to Art. 13 of Regulation (EU) No. 575/2013, this Disclosure Report is published at the level of Green Opera Finance Invest AB (hereinafter called Green Opera).

Kommunalkredit Austria AG (hereinafter called Kommunalkredit) is part of a group of credit institutions whose ultimate parent is Green Opera Finance Invest AB (hereinafter called Green Opera), based in Sweden. Green Opera is to be classified as a financial holding company within the meaning of the CRR and has no material influence on the financial indicators and the risk structure of the group of credit institutions. Its primary activity is the management of investments held indirectly by Kommunalkredit. Kommunalkredit, being the only credit institution in the group, therefore meets the disclosure obligations on behalf of the group of credit institutions through publication of this Disclosure Report, which is posted on its website at www.kommunalkredit.at

At Kommunalkredit Austria AG, various units are involved in the process of drafting the Disclosure Report: Finance, Risk Controlling, Credit Risk, Legal & Stakeholder, People and Culture, Compliance as well as Markets work under the overall responsibility of Accounting and Regulatory Reporting.

The Executive Board of Kommunalkredit Austria AG confirms by way of a resolution that the disclosures provided in accordance with Part 8 of the CRR were prepared in line with the formal procedures and internal workflows, systems and controls.

DISCLOSURE REPORT 2025 of Green Opera Finance Invest AB Group

TABLE OF CONTENTS

Art. 435 CRR Disclosure of risk management objectives and policies	5
Art. 436 CRR Disclosure of the scope of application.....	12
Art. 437 CRR Disclosure of total capital.....	14
Art. 437a CRR Disclosure of eligible liabilities.....	14
Art. 438 CRR Disclosure of total capital requirements and risk-weighted exposure amounts.....	15
Art. 439 CRR Disclosure of exposures to counterparty credit risk.....	17
Art. 440 CRR Disclosure of countercyclical capital buffers	19
Art. 441 CRR Disclosure of indicators of global systemic importance.....	19
Art. 442 CRR Disclosure of exposures to credit risk and dilution risk	19
Art. 443 CRR Disclosure of encumbered and unencumbered assets.....	21
Art. 444 CRR Disclosure of the use of the standardized approach	21
Art. 445 CRR Disclosure of exposure to market risk	22
Art. 445a CRR Disclosure of CVA risk	22
Art. 446 CRR Disclosure of operational risk	22
Art. 447 CRR Disclosure of key metrics.....	23
Art. 448 CRR Disclosure of exposures to interest rate risk on positions not held in the trading book	23
Art. 449 CRR Disclosure of exposures to securitization positions.....	26
Art. 449a CRR Disclosure of environmental, social and governance risks (ESG risks).....	26
Art. 450 CRR Disclosure of remuneration policy.....	26
Art. 451 CRR Disclosure of the leverage ratio.....	27
Art. 451a CRR Disclosure of liquidity requirements	28
Art. 452 CRR Disclosure of the use of the IRB approach to credit risk.....	29
Art. 453 CRR Disclosure of the use of credit risk mitigation techniques.....	29
Art. 454 CRR Disclosure of the use of advanced measurement approaches to operational risks.....	31
Art. 455 CRR Use of internal market risk models	31
ANNEX.....	31

Art. 435 CRR Disclosure of risk management objectives and policies

Art. 435 (1) (e) and (f) CRR

Risk declaration by the Executive Board on the adequacy of the risk management arrangements of the institution and on its risk profile

Complete risk identification is ensured through comprehensive risk assessment performed by the Group on an annual basis.

The risk management system and the risk management process of the bank correspond to the materiality of risks and the complexity of the business model; they meet the general prudential risk management requirements, including the provisions of the Austrian Banking Act (BWG), the Austrian Regulation on Credit Institution Risk Management (KI-RMVO), CRR and CRD.

For the purpose of limiting risks in accordance with the risk-bearing capacity of the bank, an appropriate limit system has been implemented, which covers and continuously monitors all counterparty-related limits in terms of volume, as well as risk-type-related and portfolio-related limits. At the highest level of aggregation, the risk appetite is defined and appropriately limited as a function of the bank's risk-bearing capacity.

The Group's risk management procedures and processes were subject to a regular annual comprehensive review. The adequacy of all components of the risk management process was reviewed, including in particular

- complete coverage of all risks relevant to the business model,
- formulation of adequate strategies for the management of the main types of risk,
- adequacy of methods employed to measure and limit risks,
- adequacy of hedging targets within the framework of the perspectives taken in analyzing the risk-bearing capacity (regulatory / normative perspective, going-concern perspective, liquidation perspective),
- adequacy of reporting frequency and content for identified risks,
- adequacy of the risk organization and the management bodies.

The review process was coordinated and supported by Risk Controlling. The Executive Board and all units of the bank concerned were included in the process. The results were approved by way of Executive Board resolutions. Moreover, a report of the review was submitted to the Supervisory Board.

For the purpose of securing and monitoring capital adequacy, the main types of risk are covered through risk-bearing-capacity analyses, quantified and compared with the bank's aggregate risk cover on a monthly basis. The main types of risks include, in particular, liquidity risk, credit default risk, market risk, operational risk and syndication risk. Risk tolerance is determined by the hedging targets defined for the different perspectives of risk-bearing capacity and subjected to monthly reviews (establishment of risk status).

From the liquidation perspective, risk tolerance is defined in terms of risk appetite as a percentage of the aggregate risk cover. The utilization of the risk limit and the amount of the actual capital buffer, compared to the minimum capital buffer, are determined and reviewed every month at a confidence level of 99.95%.

From the going-concern perspective, risk tolerance is defined in terms of the hedging target of a minimum tier-1 ratio of 10% and a minimum total capital ratio of 13%. The capital buffer required to reach the hedging target is determined and reviewed every month at a confidence level of 95%.

Values as of 31.12.2025 in EUR Mio.	Liquidation perspective	Going-concern perspective Tier 1	Going-concern perspective TC
Aggregate risk cover	794.7	321.4	326.6
Economic exposure	559.1	111.9	111.9
Capital buffer	235.5	209.5	214.7
Capital buffer in %	29.6	65.2	65.7

The robustness of the business model and the adequacy of total capital are verified regularly through stress tests. The requirement to report to the Supervisory Board was met through submission of comprehensive risk reports.

The Executive Board declares that the risk-bearing capacity of the bank was adequate at all times in the 2025 financial year and that it was not/is not aware of any risks jeopardizing the risk-bearing capacity of the bank.

Kommunalkredit is the only credit institution in the group of credit institutions. The other companies in the group exercise a holding function and/or are of minor importance in economic and risk terms.

Kommunalkredit operates on the basis of a clear business model focused on the core business areas of public finance as well as infrastructure and energy financing. The risk strategy is derived from this business model and defines the essential requirements to be fulfilled by Risk Management. Hence, the risk strategy provides the basis for the institution's uniform way of dealing with risks and ensuring a sufficient risk-bearing capacity of the bank at all times.

Art. 435 (1) (b) and (c) CRR

Organizational structure of risk management and monitoring as well as scope and type of risk reporting and measuring systems

In accordance with the division of tasks within the bank, overall responsibility for the ICAAP process lies with the Executive Board. The risk management policies and risk strategy are derived from the Group's business strategy. The Executive Board also decides on risk management procedures to be applied and regularly informs the Supervisory Board and/or its committees on the Group's risk position.

As part of the Group's organizational structure for risk management, the tasks, competences and responsibilities within the framework of the risk management process are clearly defined and set out. Risk-taking organizational units (front office) are therefore clearly separated from organizational units in charge of the monitoring and communication of risks (back office) at all levels below the Executive Board. The risk management function, which is independent of the front office, is exercised by the Chief Risk Officer (CRO) at Executive Board level. The CRO receives technical and operational support from the Risk Controlling (RCON), Credit Risk (CR) and Compliance (CO) divisions in particular. Thus, the organizational structure fully meets the regulatory requirement of separation between front office and back office functions.

Risks are monitored and managed by the Risk Management Committee (RMC), the Asset Liability Committee (ALCO) and the Credit Committee (CC). Operational risk topics are reported within the monthly Risk Management Committee (RMC), while Internal Control System (ICS) topics are covered via the quarterly Compliance Office report (CO).

The Risk Management Committee (RMC) constitutes the central element of the comprehensive risk management process, providing information to the Executive Board on the overall risk position of the bank on a monthly basis. In organizational terms, Risk Controlling is in charge of this committee. The RMC is responsible for the establishment of guidelines for the implementation of the risk strategy and is in charge of limit setting (except country and counterparty limits) and limit monitoring by type of risk.

The Asset Liability Committee (ALCO) supports the operational management of market and liquidity risks. In organizational terms, Markets is in charge of this committee. Within the framework of its meetings, the market situation is evaluated, the limits monitored by the RMC are verified again, and interest rate and liquidity risk management measures are discussed.

The Credit Committee (CC) approves individual transactions and new business (unless a resolution of the Supervisory Board is provided for in accordance with the authorization process); it also reviews the portfolios and single names from the portfolio. In organizational terms, Credit Risk is in charge of this committee.

Valuation sessions held at regular intervals focus on valuation issues and spread assessments of portfolio positions and new business, especially in relation to project financing.

Credit Risk handles the analysis and assessment of single-name risks, casting of a second vote on credit approval and/or review, assigns ratings, monitors limits of industry and country risks, monitors and manages exposures with increased risk profile (in particular exposures on the monitoring and watch list) and performs qualitative portfolio analyses.

Compliance is responsible for anti-money laundering, including financial sanctions, capital market and regulatory compliance, as well as data protection, anti-financial crime (anti-fraud and anti-corruption), conflicts of interest, complaint management and process compliance (internal control system).

The strategies, methods, reporting rules and organizational responsibilities for the management of risks are documented in writing in the ICAAP manual, the risk strategies and in risk management manuals for each type of risk and in organizational guidelines, which can be downloaded via the Intranet in their current versions at any time by all employees concerned.

The objective of overall bank management is to optimize the use of capital resources in terms of risk and return within the framework of the bank's risk appetite and risk-bearing capacity.

In addition to the limits applied in the calculation of the bank's risk-bearing capacity, risk-type-specific limits have been defined for credit risk, market risk and liquidity risk, which are derived from the risk strategies in the course of their operationalization. All limits are approved by the Executive Board and monitored within the framework of the units in charge of risk and the processes defined.

In the course of the 2025 financial year, there was no change in management positions in internal control, risk management, compliance, and internal audit.

The "Code of Conduct" defines general principles of good conduct and is binding for all Board members, employees and other persons working for the Group. The Group promotes a risk culture marked by a proactive approach to mitigate risk in day-to-day business and open dialogue on risk-related issues at all levels. All employees have the possibility of voicing concerns anonymously within the framework of a whistleblowing program, which enables the management to derive the necessary consequences while, at the same time, upholding the rights of the individual. Through its risk management, the Group aims to sustainably optimize its financial and income position. The limitation of risks at the Group is commensurate with the bank's earning strength and its equity

base. To this end, every effort is being made to further develop employees' expertise and the systems in place in accordance with the requirements of the business model and together with the core business of the bank. All decisions relating to the banking business are guided by the Group's risk policy approach, as specified through rules of conduct (the risk policy principles) governing the handling of risks. These rules of conduct, as set out by the Executive Board, complement the other individual guidelines and standard operating procedures.

Art. 435 (1) (a) CRR

Risk management strategies and procedures

Pillar 2 risk management (ICAAP – Internal Capital Adequacy Assessment Process and ILAAP – Internal Liquidity Adequacy Assessment Process) is conducted at group level (credit institution group level; for information on the scope of consolidation, see Art. 436 (b) CRR). The aggregate risk covers are derived from the Group's total capital and/or the Group's equity.

Besides Kommunalkredit Austria AG (Kommunalkredit) as the only credit institution in the group of credit institutions, Kommunalkredit TLI Immobilien GmbH & Co KG is another entity in the group with a material equity position. The higher-level units Kommunalkredit KBI Immobilien GmbH, Kommunalkredit 4OG Immobilien GmbH & Co KG and Kommunalkredit KBI Immobilien GmbH & Co KG serve the sole purpose of participation in Kommunalkredit TLI Immobilien GmbH & Co KG and therefore do not constitute an additional economic risk. The other credit institution group members Green Opera Finance Invest AB, Green Opera Finance BidCo AB and Satere Beteiligungsverwaltungs GmbH are not engaged in any business activities, apart from their participation in KA their risk position therefore is of no relevance in Pillar 2.

In addition to the units in the group of credit institutions, the following investees are taken into consideration:

- Kommunalkredit Public Consulting GmbH
- Florestan KA GmbH
- Florestan KA Hydrogen GmbH (indirect investee)
- PeakSun Holding GmbH (indirect investee)
- Fidelio KA Beteiligung GmbH
- Fidelio KA Infrastructure Opportunities Fund SICAF-RAIF SCA
- Kommunalnet E-Government Solutions GmbH

The risk drivers of the business model are identified and evaluated through annual assessments, from which a risk map is derived. The risk map serves to establish a uniform understanding of the concept of risk, to identify and assess risk drivers of the business model, review the system for completeness and identify potential gaps in risk control, which are to be closed in the interest of continuous further development of risk management.

For the main types of risk (above all credit default risk, liquidity risk and market risk), the economic capital required to cover the risk is calculated according to recognized internal bank management procedures. In addition, a risk buffer is included to cover risks that are not or not sufficiently quantifiable (above all reputational risk, legal risks and other risks).

Within the framework of the risk strategy for the main types of risk, the Executive Board specifies the principles for adequate management and limitation of risks. The economic risk is limited for the bank as a whole as a function of the risk-bearing capacity (ICAAP – Internal Capital Adequacy Assessment Process and ILAAP – Internal Liquidity Adequacy Assessment Process) and the risk appetite of the bank. Monthly reviews are performed to monitor the degree of utilization of and compliance with the risk level as well as the risk appetite of the bank. Counterparty limits for treasury counterparties as well as the operational risk limits for the open FX position are monitored on a daily basis. The Group does not engage in any trading activities.

According to the regulatory definition, the Group has no trading book. Trading activities aimed at generating profits from short-term price differences and from taking risk positions in the trading book are not part of the Group's business and risk strategy, and are forbidden in accordance with the Group's guidelines and related organizational measures. The only transactions made are intermediary trading activities within the framework of customer services, which do not entail any risk positions to be backed by own funds.

Alongside standard risk measurements, stress tests are performed regularly at aggregate bank level. Risk Controlling is responsible for the performance of stress tests. The results are adopted by way of Executive Board decisions and reported to the Supervisory Board as part of regular risk reporting.

The Group performs various types of stress tests. Macroeconomic stress tests are focused on the robustness of the business model and compliance with regulatory and/or internal indicators and minimum values. Stress tests based on deterministic scenarios are performed to calculate the bank's risk-bearing capacity and its internal capital adequacy. Additionally, the Group's stress-testing framework also provides for reverse stress tests for credit risk, liquidity risk and interest rate risk as the main types of risk as well as stress tests with interdependencies between different risk types. Reverse stress tests are intended to show the extent to which parameters and risks can be stressed until regulatory or internal minimum requirements can no longer be met.

Art. 435 (1) (d) CRR

Risk management policies

Essential principles of risk management

Within the framework of the risk strategy for the main types of risk, the Executive Board specifies the principles for the adequate management and limitation of risks. The economic risk is limited and monitored for the bank as a whole as a function of the risk-bearing capacity (ICAAP – Internal Capital Adequacy Assessment Process and ILAAP – Internal Liquidity Adequacy Assessment Process) and the risk appetite of the bank.

Moreover, the following essential principles apply to the Group's risk management:

- The Group does not take any risks as an end in itself, but only for the creation of sustainable added value.
- The Group pursues a policy of risk limitation in accordance with earnings strength and its equity base.
- The Group promotes a risk culture marked by proactive handling of risks at all levels.
- The Group only takes risks for which it has or has access to the necessary expertise.
- The introduction of new products or markets always requires an adequate analysis of business-specific risks.
- All measurable risks are subject to the Group's limit framework through the overall limit of risk-bearing capacity calculation. Compliance with limits is to be continuously monitored and breaches, if any, are to be escalated.
- The results of risk measurement are subject to regular stress tests and taken into account when determining the risk-bearing capacity of the credit institution.
- Outsourcing of critical or essential functions is only permitted subject to the applicable internal outsourcing framework and the principle of proportionality.

This Risk Strategy comprises the sub-strategies for credit, liquidity, market, operational, and syndication risk, and is reviewed regularly and adapted to current developments and changes.

Within the framework of the credit risk strategy, the following principles apply:

- Credit risks are consciously taken within the framework of the risk appetite and the risk-bearing capacity defined in the ICAAP.
- Every transaction through which the bank assumes risks should generate a contribution margin commensurate with its risk profile in the context of the overall business relationship with the customer.
- Financing can only be extended if the risks correspond to the specified targets and risk limits .
- The borrower must have sufficient creditworthiness and debt servicing capacity for the financing to be extended.
- Undesired default credit risk concentrations must be avoided, taking the risk-bearing capacity of the bank as a whole into account.
- Credit risk monitoring and management techniques shall mitigate the risks so that they do not develop to a level that could threaten the continued operation of the bank. In this context, the Review Process for Credit Risks Policy and Early Warning and Workout Policy are especially relevant.
- KA strives to maintain a balance between exposures carried on the balance sheet and those placed on the market. Thus, a prudent syndication strategy plays a central role in the origination of new financing arrangements in the Infrastructure & Energy business segment (portfolio management via syndication), especially in the case of larger exposures.

Within the framework of the liquidity risk strategy, the following principles apply:

- Identified liquidity risks are subject to regular and timely operational management and monitoring within the defined limits
- The risk-adequate management frequency and involvement of the Executive Board and the responsible management bodies must be in line with governance requirements
- Climate and environmental risks must be included in the management of liquidity risk.
- Limitation of the liquidity risk through an appropriate internal limit system in line with the risk-bearing capacity
- Strict monitoring and compliance with the regulatory requirements for limiting liquidity risk (Liquidity Coverage Ratio (LCR) and Net Stable Funding Ratio (NSFR)) in combination with a forecast calculation
- Unquantified risks must be adequately taken into account by a risk buffer as part of the risk-bearing capacity calculation
- Furthermore, liquidity risk must be appropriately reflected in pricing
- ILAAP (Internal Liquidity Adequacy Assessment Process) is an integral component of the ICAAP (Internal Capital Adequacy Assessment Process) which encompasses all institution-specific risks and thus also covers liquidity risk in all its forms

Within the framework of the market risk strategy, the following principles apply:

- Identified market risks are subject to regular and timely operational management and monitoring within the defined limits.
- Assurance of a risk-adequate management frequency and involvement of the Executive Board and the responsible management bodies in line with governance requirements.
- Significant ESG risks that may have an impact on market risks must be included in the management of market risks.
- Limitation of market risks through an appropriate internal limit system in line with the risk-bearing capacity.
- Bilateral Credit Value Adjustment Risk (BCVA-Risk) is formally assigned to risk type 'own credit risk'. Due to its dependence on market risks, BCVA risk is integrated into the market risk strategy

In the context of market risk management, hedging and risk mitigation measures are applied in line with the market risk strategy, including micro-hedges (depending on certain characteristics like holding intent, holding period, specifics of the product) and, as appropriate, portfolio-level hedging decisions for the overall (macro) position, subject to internal, accounting and regulatory constraints. The effectiveness of the hedging relationship is assessed by Accounting and Risk Controlling through retrospective effectiveness tests including checks against the hedging table and consistency with the documented hedging strategy.

Within the framework of the operational risk strategy, the following principles apply:

- Cyclical and continuous process covering risk identification, assessment, control, monitoring, and reporting to ensure the ongoing management of operational risks.
- Comprehensive risk identification and assessment using standardized tools, in particular Risk & Control Self-Assessments (RCSA) as a forward-looking instrument and an operational event database for the analysis of loss events.
- Integration into the Internal Control System (ICS), ensuring that identified operational risks are embedded in business processes with clear ownership by process owners and appropriate controls.
- Clearly defined governance and responsibilities, with overall accountability vested in the Executive Board and clearly allocated roles across risk management functions, coordination bodies, and business units.
- Regular and ad-hoc risk monitoring and reporting, including periodic reporting to senior management committees and immediate escalation of significant events with potential reputational or regulatory impact.
- Compliance with regulatory requirements, ensuring consistent documentation, traceability of operational risk events, and timely reporting to supervisory authorities.
- Promotion of risk awareness and a preventive risk culture, involving all employees in the identification and mitigation of operational risks and supporting loss prevention and process efficiency.
- Integration into the ICAAP framework, ensuring that operational risk is considered as part of the overall risk profile and the institution's risk-bearing capacity assessment.

Within the framework of the syndication risk strategy, the following principles apply:

- Assets are continuously valued based on market values.
- Under IFRS, changes in market value and their volatility affect capital or the IFRS P&L depending on asset classification; related effects are monitored as part of credit spread risk and interest rate risk.
- Under UGB, syndication-related risks materialize either as a one-off effect upon sale or are recognized over time via net interest income in the case of sub-participations. The development of potential economic hidden losses and reserves is continuously monitored within the going-concern risk-bearing capacity calculation under credit spread risk and interest rate risk.
- There is no obligation to execute syndications automatically at the planned date, particularly in stressed market conditions; decisions are taken in line with applicable IFRS 9 business model and classification requirements. Syndication decisions are based on market value developments, a cost-benefit assessment between syndication and holding the exposure, and compliance with existing limits.

Art. 435 (2) (a) CRR

Directorships held by members of the management body

Name	Function at Kommunalkredit Austria AG	Management and supervisory functions (as of 31/12/2025)	
		Number of management functions	Number of supervisory functions
Hans Larsson	Chairman of the Supervisory Board	-	2
Paal Weberg	Deputy Chairman of the Supervisory Board	-	4
Herman Korsgaard	Member of the Supervisory Board	-	3
Andreas Haindl	Member of the Supervisory Board	1	1
Henrik Matsen	Member of the Supervisory Board	1	2
Kurt Svoboda	Member of the Supervisory Board	1	2
Anne Jaeger	Member of the Supervisory Board since February 27, 2025	-	2
Claudia Slauer	Member of the Supervisory Board	-	1
Oliver Fincke	Member of the Supervisory Board	-	1
Gerald Unterrainer	Member of the Supervisory Board	-	1
Jacques Ripoll	Chairman of the Executive Board since September 1, 2025	1	2
Sebastian Firlinger	Member of the Executive Board	1	-
Nima Motazed	Member of the Executive Board	1	-
John Weiland	Member of the Executive Board	1	-

Art. 435 (2) (b) CRR

Strategy for the selection of members of the management body

Kommunalkredit Austria AG was classified as a credit institution of significant relevance upon approval of the annual financial statements for the 2024 financial year on February 27, 2025, in accordance with § 5 (4) Austrian Banking Act. Accordingly, by resolution of the Supervisory Board on February 27, 2025, a Nomination Committee was established. The new Nomination Committee was merged with the existing Remuneration Committee (Remuneration and Nomination Committee).

The statutory tasks provided for by § 29 of the Austrian Banking Act are performed by the Remuneration and Nomination Committee of the Supervisory Board. The principles and processes for selecting members of the management body and the strategic succession planning to ensure the relevant knowledge and skills required for this are defined by the Remuneration and Nomination Committee – considering the Fit & Proper Policy of Kommunalkredit Austria AG.

The business strategy, Kommunalkredit Austria AG's Fit & Proper policy and, job profiles for Executive Board's and the Supervisory Board's members established by the Nomination Committee constitute the basis for the selection, for strategic succession planning, and for the suitability assessment of the members of the management bodies.

The **qualifications and competencies** required of persons selected as candidates for **Executive Board positions** are as follows:

International banking experience; strategic and operational management experience in a market-oriented business unit of comparable size and complexity with accountability for its results; profound understanding of banking processes; aptitude for tasks assigned within the Executive Board; restructuring and portfolio management competencies; fulfilment of all regulatory fit & proper requirements; entrepreneurial personality; high level of social skills; strong implementation record; confident and self-assured manner; negotiation skills; communication skills; ability to share responsibility for the overall strategy with other members of the Executive Board; relevant experience; ability to lead and motivate staff.

The **qualifications and competencies** required of persons selected as candidates for **Supervisory Board positions** are as follows:

Practice-related knowledge that enables the questioning of Executive Board decisions; experience on supervisory boards (preferred); diversity in respect of the other Supervisory Board members; understanding of the business activities of the bank; high awareness of the responsibility; integrity; willingness to contribute; independence; personality; fulfilment of regulatory fit & proper requirements; practical experience with remuneration policy pursuant to § 39 (3) of the Austrian Banking Act (if required); requirements to be met by a financial expert pursuant to § 63a of the Austrian Banking Act (if required).

The qualifications and competencies required of potential candidates for Executive Board and Supervisory Board positions are based on the bank's internal "Fit & Proper Policy" adopted to ensure compliance with and implementation of legal requirements. The Fit & Proper Policy specifies the quality requirements to be met by the Group's Executive Board and Supervisory Board members and defines criteria for the selection and aptitude assessment of members of the management and supervisory bodies (both individually and collectively) and/or for the identification and assessment of holders of key functions and their aptitude. A special Fit & Proper Office ensures compliance with and fulfilment of these requirements. In accordance with the Fit & Proper Circular 3/2023 of the Financial Markets Supervisory Authority (FMA), regular Fit & Proper training is provided for Executive Board and Supervisory Board members and holders of key functions.

Art. 435 (2) (c) CRR

Diversity strategy with regard to the selection of members of the management body

The measures, processes and programs regarding diversity are laid down in the binding diversity policy of Kommunalkredit Austria AG.

The overall proportion of females in the management body (Supervisory Board and Executive Board) is 14.3%.

The obligation to set a quota for the underrepresented gender (Art. 88 (2) (b) 2013/36/EU) on its management body became applicable for Kommunalkredit with the classification as a credit institution of significant relevance upon approval of the annual financial statements for the 2024 financial year on February 27, 2025. Accordingly, a target quota of 25% was set for the management body by the Remuneration and Nomination Committee. The quota is defined as a common objective for the Supervisory Board and the Executive Board and is to be achieved by December 2030 at the latest.

The following measures which are part of Kommunalkredit's diversity policy are defined for the achievement of the target quota.

Recruitment: Both internal and external recruitment processes are structured to address candidates of all genders and ensure a high representation of female applicants. Gender-neutral and inclusive job descriptions are created to attract a wide range of applicants and external talent acquisition partners are directed to prioritize on the recruitment of the under-represented gender to foster a diverse and inclusive candidate pool.

Talent development and succession planning: Measures for identifying and developing managers for senior and middle management are integrated into the bank's diversity policy to promote a diverse pool of talents and potential candidates for future leadership roles.

Diversity Training: To raise awareness for the topic within the company, regular diversity trainings for all managers of senior and middle management positions are scheduled.

Board Appointments: The Nomination Committee ensures that male and female candidates are considered in a balanced manner when identifying and recommending individuals for vacant positions on the Executive Board. The Nomination Committee also supports the Supervisory Board in submitting proposals to the Shareholders' Meeting for suitable candidates for vacancies in the Supervisory Board. The Shareholders' Meeting shall be informed of the target ratio and asked to take this into account when electing new members of the Supervisory Board.

The defined measures are being evaluated continuously and adjusted or intensified as required.

Art. 435 (2) (d) CRR

Information regarding the establishment of a separate Risk Committee

Kommunalkredit Austria AG was classified as a credit institution of significant relevance upon approval of the annual financial statements for the 2024 financial year on February 27, 2025, in accordance with § 5 (4) Austrian Banking Act. Accordingly, by resolution of the Supervisory Board on February 27, 2025, a Risk Committee was established. In the 2025 financial year, the Risk Committee had three meetings.

Art. 435 (2) (e) CRR

Information flow on risk to the management body

See Art. 435 (1) (b) and (c) CRR – Organizational structure of risk management and monitoring as well as scope and type of risk reporting and measuring systems.

Art. 436 CRR Disclosure of the scope of application

Art. 436 (a) CRR

Name of the institution to which the requirements of this Regulation apply

- Name of the group of credit institutions: Kommunalkredit Austria
- Name of the credit institution: Kommunalkredit Austria AG (Kommunalkredit)

Art. 436 (b) CRR

Information on the scope of consolidation and entities therein

Green Opera Finance Invest AB (Green Opera), which indirectly holds 97.69% of Kommunalkredit, is the ultimate parent of the group of credit institutions. Kommunalkredit, as the only subsidiary credit institution among the entities of the Group, has been designated as being responsible for ensuring that the regulatory requirements of Parts 2 to 4 (Total Capital, Total Capital Requirements, Large Exposures), Part 6 (Liquidity) and Part 7 (Leverage) CRR are met on a consolidated basis. Pursuant to Art. 13 CRR, the disclosure requirements of Part 8 also have to be met on the basis of the consolidated position by Kommunalkredit as a credit institution. Kommunalkredit also meets the definition of an ultimate credit institution pursuant to § 30 (5) of the Austrian Banking Act, which is responsible for compliance with the provisions of the Austrian Banking Act applicable to groups of credit institutions.

In addition to Green Opera Finance Invest AB and Kommunalkredit, the regulatory group of credit institutions also includes Green Opera Finance Bidco AB, Satere Beteiligungsverwaltungs GmbH, Kommunalkredit KBI Immobilien GmbH, Kommunalkredit 4OG Immobilien GmbH & Co KG, Kommunalkredit KBI Immobilien GmbH & Co KG and Kommunalkredit TLI Immobilien GmbH & Co KG as providers of additional services. As regards Kommunalkredit's not fully consolidated participations, the portfolio – alongside Kommunalkredit Public Consulting GmbH (KPC, accounted for "at equity" according to the equivalence method), a specialized provider of management services for support programs and consultancy services for international organizations and financial institutions – mainly comprises strategic participations supporting the infrastructure project business.

Green Opera prepares its consolidated financial statements on the basis of local accounting rules as laid down in the Austrian Company Code (UGB); therefore, the capital ratios of the group of credit institutions are calculated in accordance with the provisions of the Austrian GAAP and CRR.

There are no differences in the scope of consolidation for accounting purposes and for regulatory purposes.

For numerical information please refer to the dedicated document in tabular form (EU LI3 – Outline of the differences in the scopes of consolidation (entity by entity)).

Art. 436 (c) CRR

Breakdown of assets and liabilities of the consolidated financial statements

Within the Group, there are no differences between the carrying values reported in published financial statements and the carrying values under the scope of regulatory consolidation.

For numerical information please refer to the dedicated document in tabular form (EU LI1 – Differences between accounting and regulatory scopes of consolidation and mapping of financial statement categories with regulatory risk categories).

Art. 436 (d) CRR

Main sources of differences between carrying values and exposure amounts

Within the Group, there are no differences between the carrying values reported in published financial statements and the carrying values under the scope of regulatory consolidation.

For numerical information please refer to the dedicated document in tabular form (EU LI2 – Main sources of differences between regulatory exposure amounts and carrying values in financial statements)

Art. 436 (e) CRR

Exposure amounts subject to prudent value adjustment

The Group currently does not hold any trading book positions and does not apply the core approach of prudent valuation according to Chapter III of Commission Delegated Regulation (EU) 2016/101.

Art. 436 (f)

Material impediments to the transfer of total capital or repayment of liabilities among the parent and its subsidiaries

There are no material impediments to the transfer of total capital or the repayment of liabilities in the meaning of the above provision within the Group.

Art. 436 (g) CRR

Disclosures on total capital of subsidiaries not included in the consolidation

Within the Group, there are no total capital effects from subsidiaries not included in the consolidation.

Art. 436 (h) CRR

Derogation from the application of prudential requirements on an individual basis

The Group does not elect to apply a derogation from the application of prudential requirements on an individual basis.

Art. 437 CRR Disclosure of total capital

Art. 437 (1) (a) and (d)

Reconciliation of the items of regulatory own funds and the statement of financial position, and disclosure of the nature and amounts of the components listed under (d) (i) to (iii)

As there are no differences compared with the scope of consolidation under company law, the consolidated statement of financial position for the regulatory scope of consolidation corresponds to the statutory consolidation

For numerical information please refer to the dedicated document in tabular form (EU CC1 – Composition of regulatory own funds and EU CC2 – Reconciliation of regulatory own funds to balance sheet in the audited financial statements).

Art. 437 (b) and (c) CRR

Description of the main features of the capital instruments issued by the institution and their full terms and conditions

The main features of common equity tier 1 and tier 2 capital instruments are shown in the Annex (Main features of regulatory own funds instruments and eligible liabilities instruments). The full terms and conditions of these instruments are published on the Kommunalkredit website under “Investor Relations / Bond Investors”.

Art. 437 (e) CRR

Description of all restrictions applied to the calculation of total capital and instruments, prudential filters and deductions to which those restrictions apply

All components of total capital meet the requirements of CRR and are not subject to any restrictions.

Art. 437 (f) CRR

Basis on which the capital ratios are calculated

The capital ratios of the Group are calculated on the basis determined by CRR.

Art. 437a CRR Disclosure of eligible liabilities

As the Group is not subject to the provisions of Art. 92a or 92b CRR, separate disclosure pursuant to Art. 437a CRR is not required.

Art. 438 CRR Disclosure of total capital requirements and risk-weighted exposure amounts

Art. 438 (a), (b) and (c) CRR

Securing minimum capital adequacy and results of internal capital assessment ICAAP approaches to the assessment of the capital position

ICAAP (internal capital adequacy assessment process) is a core element of Pillar 2 of the Basel Accord and comprises all procedures and measures applied by a bank to secure the appropriate identification, measurement and limitation of risks, a level of capitalization in line with the risk profile of the business model, and the use and continuous further development of suitable risk management systems.

For the purpose of quantitative assessment, the Group uses the method of risk-bearing-capacity analysis. Economic risks are compared with risk coverage potential. Depending on the hedging target pursued, two economic perspectives are applied:

- Liquidation perspective (economic control loop in accordance with the principle of creditor protection)

Hedging target: The main focus is on the protection of creditors and securing a level of capitalization to ensure that, in the event of liquidation of the company, all lenders can be satisfied with a defined probability (“creditor protection”).

The economic capital requirement (internal risk measurement) is compared with the bank’s economic capital/aggregate risk cover. In this approach, both the economic capital requirement and aggregate risk cover are determined on a present-value basis (“full fair value” perspective) and therefore not subject to accounting rules on recognition and measurement. A confidence level of 99.95% is applied in determining the economic risk.

Risk status: As of 31 December 2025, the economic risks correspond to 70.4% of the aggregate risk cover. Thus, the risk buffer amounts to 29.6%.

- Going-concern perspective (going-concern control level in accordance with the going-concern principle)

Hedging target: If the risks materialize, the survival of the bank as a going concern without additional equity is to be secured with a certain degree of probability. The Group’s defined level of hedging from risk under the going-concern perspective currently is a minimum tier-1 ratio of 10% and a minimum total capital ratio of 13%.

All risks affecting profit or loss must be covered by the budgeted annual result, realizable reserves and “free capital”. Free capital is the capital portion exceeding the internally defined hedging target expressed as a minimum tier-1 ratio and a minimum total capital ratio. Early warning levels have been set for the respective hedging targets. A confidence level of 95% is applied in determining the economic risk.

Risk status: As of 31 December 2025, the economic risks correspond to 34.8% of the aggregate risk cover (tier-1) and 34.3% of the aggregate risk cover (total capital). Thus, the risk buffer amounts to 65.2% (tier-1) and 65.7% (total capital).

To cover other, non-quantifiable risks, an adequate risk buffer is provided for. Alongside these economic control loops, compliance with regulatory/normative minimum requirements and hedging targets is ensured within the framework of medium-term planning and current capital budgeting. Moreover, stress tests are performed regularly to test the robustness of the business model and to ensure capital adequacy (see Art. 435 (1) (a) CRR Risk management strategies and processes).

The regulatory provisions regarding the SREP capital requirements (see Art. 447) are an integral part of the hedging targets and therefore have a direct impact on the risk appetite, the risk buffers and the Group’s risk management.

Upon demand from the relevant competent authority, the result of the institution’s internal capital adequacy assessment process is provided.

Art. 438 (d) CRR

Total risk-weighted exposure amounts and total own funds requirements

All components of total risk-weighted assets were calculated according to the requirements of CRR.

For numerical information please refer to the dedicated document in tabular form (EU OV1 – Overview of risk-weighted exposure amounts).

Art. 438 (e) CRR

Exposure amounts from special lending transactions using the IRB credit risk approach

The Group currently does not use the IRB credit risk approach.

For numerical information please refer to the dedicated document in tabular form (EU CR10 Specialized lending and equity exposures).

Art. 438 (f) CRR

Exposure amounts of own funds instruments held by insurance companies

Within the Group, there are no exposure amounts of own funds instruments concerning insurance companies.

Art. 438 (g) CRR

Supplementary total capital requirements and the capital adequacy ratio of a financial conglomerate

Given that the Group does not constitute a financial conglomerate, no supplementary total capital requirements result from this.

Art. 438 (h) CRR

Variations in risk-weighted exposure amounts resulting from the use of internal models

The Group currently does not use internal models for the calculation of risk-weighted exposure amounts to measure its total capital requirements.

Art. 439 CRR Disclosure of exposures to counterparty credit risk

Art. 439 (a) CRR

Calculation of internal capital and upper limits for exposures to counterparty credit risk

The exposure to the counterparty credit risk in derivative transactions, taken into account in credit risk, is defined as the residual risk from the current replacement cost (positive market value), taking into account CSAs and netting agreements plus an “add on” for potential market value changes during the so-called “residual period of risk” between the counterparty default and the close-out/replacement of the derivative transaction. Following the entry into force of CRR II, the method applied in determining the counterparty credit risk in derivative transactions was changed from the mark-to-market method to the standardized approach (SA-CCR).

Securities transactions are cleared primarily on the basis of “delivery against payment” via Euroclear or Clearstream, thereby ensuring the simultaneous exchange of securities and cash and significantly reducing counterparty credit risk.

Counterparty credit risk exposures are limited in economic terms through volume-based counterparty and credit concentration limits, on the one hand, and by determining the credit VaR in calculating the risk-bearing capacity, on the other. For centrally cleared OTC derivatives, exposures to central counterparties (CCPs) are reflected in internal limit monitoring. Sufficient credit line with the central counterparty must be available for cleared trades. The internal exposure for centrally cleared OTC derivatives is determined as $\max(0; \text{difference between market value and variation margin})$ plus initial margin and additional collateral amount.

Art. 439 (b) CRR

Requirements for collateralization and the establishment of credit reserves

Legally binding Netting Agreements for derivatives exist with all active counterparties of Kommunalkredit (close-out netting) in the form of credit support agreements or collateral annexes to Master Agreements providing for daily collateral margining in compliance with bilateral collateralization requirements under the European Markets Infrastructure Regulation (EMIR). Derivative contracts in the cover pool are excluded from this. However, also here Master Agreements and Netting Agreements with standard market conditions exist for these (one-way collateralization by the counterparty, rating trigger).

Counterparty default risk positions are limited through volume-based counterparty and credit concentration limits on the one hand and through the economic credit risk in the credit VaR calculation of the risk-bearing capacity calculation on the other. The exposure of the counterparty default risk of derivatives, which is taken into account in credit risk, is defined as the residual risk of the current replacement cost, considering CSAs and netting agreements, plus an “add-on” for potential changes in the market value during the “residual period of risk” between the default of the counterparty and the closing out / replacement of the derivative transaction.

In the internal exposure calculation, personal collateral (guarantees and sureties) is transferred to the collateral provider, while financial collateral (netting agreements and cash collateral) is reflected at the collateral taker and reduces the exposure shown. The use and recognition of collateral as credit risk mitigation techniques is governed by the internal policy “Verwaltung und Bewertung von Sicherheiten”. Exposures for which single loan loss provisions (SLLP) have been recognized are not included in internal credit risk quantification, as both expected and unexpected losses are already covered by the SLLP.

Art. 439 (c) CRR

Rules with respect to wrong-way risk exposures

No such exposure exists with respect to General Wrong-Way risk, and Specific Wrong-Way risk as defined in Article 291 CRR, and there are no plans to take on such exposures.

Art. 439 (d) CRR

Disclosure of the required collateral amount in the event of a downgrade of the institution’s credit rating

As of the reporting date, there are no collateral agreements in place that would result in additional collateral requirements in the event of a downgrade of the institution’s own credit rating. Accordingly, the amount of collateral that would have to be provided pursuant to Article 439(d) CRR is nil.

Art. 439 (e) CRR

Amount of collateral received and posted by type of collateral

For numerical information please refer to the dedicated document in tabular form (EU CCR5 – Composition of collateral for CCR exposure amounts).

Art. 439 (f) and (g)

Exposure values for derivative transactions and securities financing transactions before and after the effect of credit risk mitigation

For numerical information please refer to the dedicated document in tabular form (EU CCR1 – Analysis of CCR exposure amounts by approach).

Art. 439 (h)

Exposure values after credit risk mitigation effects and the associated risk positions for credit valuation adjustment capital charge

With the enactment of CRR III, the disclosure framework for credit valuation risk (CVA) was redesigned. The EU-CCR2 template is no longer part of the current framework. According to Article 439(h) of the CRR, the disclosure requirements are now met by the templates specified in Article 445a of CRR III, namely EU-CVA1 (quantitative) and EU-A (qualitative).

Art. 439 (i) CRR

Disclosure of exposure values to central counterparties

For numerical information please refer to the dedicated document in tabular form (EU CCR8 – Exposures to central counterparties (CCPs)).

Art. 439 (j) CRR

Nominal amounts and fair value of credit derivative transactions

The Group currently does not engage in credit derivative transactions.

Art. 439 (k) CRR

Estimate of alpha

The Group currently does not use its own estimates for the alpha factor.

For numerical information please refer to the dedicated document in tabular form (EU CCR1 – Analysis of CCR exposure amounts by approach).

Art. 439 (l) CRR

Exposure values after credit risk mitigation according to the standardized credit risk approach

For numerical information please refer to the dedicated document in tabular form (EU CCR3 – Standardized approach: CCR exposures by regulatory exposure class and risk weight).

Art. 439 (m)

Size of derivative transactions taken into account in a simplified method for the measurement of the counterparty credit risk

The Group does not use simplified measurement methods for the presentation of derivative transactions.

For numerical information please refer to the dedicated document in tabular form (EU CCR1 – Analysis of CCR exposure amounts by approach).

Art. 440 CRR Disclosure of countercyclical capital buffers

As of 31 December 2025, the Group has to hold an institution-specific countercyclical capital buffer of 0.9529%.

For numerical information please refer to the dedicated document in tabular form (EU CCyB1 – Geographical distribution of credit exposures relevant for the calculation of the countercyclical capital buffer and EU CCyB2 – Amount of institution-specific countercyclical capital buffer).

Art. 441 CRR Disclosure of indicators of global systemic importance

The Group has not been classified as an institution of global systemic importance pursuant to Art. 131 CRD.

Art. 442 CRR Disclosure of exposures to credit risk and dilution risk

Art. 442 (a) and (b) CRR

Approaches and methods relating to specific and general credit risk adjustments; definitions for accounting purposes of “past due” and “impaired”

To identify defaults, the Group applies the definition of default of an obligor pursuant to Art. 178 CRR. This includes receivables that are more than 90 days “past due” (overdue receivables) as well as the criterion “unlikeliness to pay”. A receivable is deemed to be 90 days past due if the overdue receivable exceeds 1.0% of the outstanding loans and advances and is at least EUR 500.00. As part of the “unlikeliness-to-pay” review, receivables pursuant to Art. 178 CRR are also subject to a qualitative review to determine whether it is unlikely that the debtor can meet its obligations in full. The Group’s definition of “impaired” applies to exposures classified as risk stage 3 (workout with default or enforcement measures).

Within the Group, a multi-stage risk control process is in place through which all exposures/counterparties are classified according to six risk categories.

- Risk category 1a: Standard risk category
Standard risk category for all exposures under regular management that are not subject to a higher risk category.
- Risk category 1b: Monitoring list
Exposures under regular management but which are under observation and are included on the monitoring list because they exhibit temporary anomalies and are being monitored for various reasons. However, there is no elevated risk in the sense of a significant deterioration of the probability of default.
- Risk category 2a: Watchlist/Intensive management
Includes those exposures that are classified as Watchlist partners due to material or credit-related anomalies and elevated risk. They are therefore subject to close monitoring and intensive management. Depending on severity of the anomalies, these exposures may be classified in IFRS stage 2 (lifetime expected credit loss), but do not indicate any need for individual impairment.
- Risk category 2b: Workout / No default
Exposures in risk category 2b are already classified as potential distressed loans. Regardless of any payment delays, risk category 2b includes those exposures that must be classified as “risk positions with a significant need for restructuring”, but that are not in default. These positions must be recorded in IFRS stage 2.
- Risk category 3: Work out / default, enforcement
Restructuring cases in default or for which a specific loan loss provision has been recognized must be classified in risk category 3a, provided no enforcement measures are initiated. In case of enforcement measures (acceleration, enforcement of collateral through judicial or non-judicial measures), the receivable is reclassified to risk category 3b.

From risk category 1b and below, there is close monitoring and monthly reporting in the Credit Committee. Specific loan loss provisions must be booked where it is expected that a receivable – including interest – cannot be collected in full or at all. The need to book a specific loan loss provision is also reviewed if the regulatory default definitions are met (90 days past due and/or unlikeliness-to-pay).

Statistically expected credit losses are taken into account on the basis of a risk provisioning model with statistically determined empirical values. The risk provisioning is calculated either as the expected 12-month credit loss (stage 1) or the expected credit loss over the residual maturity, if the risk of default has increased significantly since the first-time recognition of the financial asset (stage 2). Within the Group, the need for specific loan loss provisions (stage 3) is evaluated for individual transactions for borrowers that are in default according to the regulatory criteria.

The Group reports a non-performing-loan (NPL) ratio of 7.0% or a net ratio of 6.4%, taking into account the ECA cover. Overall, an exposure with a volume of EUR 375.0 million is in default, for which specific loan loss provisions of EUR 68.2 million have been booked.

Exposure per risk stage	31/12/2025
in EUR 1,000	
1b	404,715.3
2a	120,385.7
2b	84,251.9
3	374,968.7

Credit Risk continuously updates the list of counterparties with increased credit risk and submits monthly reports to the Credit Committee, which then decides the measures to be taken.

Art. 442 (c) CRR

Information on the amount and quality of exposures for loans, debt securities and off-balance-sheet exposures

For numerical information please refer to the dedicated document in tabular form (EU CR1 – Performing and non-performing exposures and related provisions, EU CQ1 – Credit quality of forborne exposures, EU CQ4 – Quality of non-performing exposures by geographic area, EU CQ5 – Credit quality of loans and advances to non-financial corporations by industry and EU CQ7 - Collateral obtained by taking possession and execution processes).

Art. 442 (d) CRR

Aging analysis of past due exposures

There were no receivables above the regulatory threshold that had been overdue for more than 30 days, with the exception of the receivables in default, for which single loan loss provisions had been booked.

For numerical information please refer to the dedicated document in tabular form (EU CQ3 – Credit quality of performing and non-performing exposures by past due days).

Art. 442 (e) CRR

Quality of non-performing exposures by geographical area

For numerical information please refer to the dedicated document in tabular form (EU CQ4 – Quality of non-performing exposures by geographic area and EU CQ5 – Credit quality of loans and advances to non-financial corporations by industry).

Art. 442 (f) CRR

The Group reports a non-performing-loan (NPL) ratio of 7.0% or a net ratio of 6.4%, taking into account ECA cover. Overall, an exposure with a volume of EUR 375.0 million is in default, for which specific loan loss provisions of EUR 68.2 million have been booked.

For numerical information please refer to the dedicated document in tabular form ((EU CR1 – Performing and non-performing exposures and related provisions and EU CR2 - Changes in the stock of non-performing loans and advances).

Art. 442 (g) CRR

Breakdown of loans and debt securities by residual maturity

For numerical information please refer to the dedicated document in tabular form (EU CR1-A – Residual maturity of exposures).

Overview of foreign-currency loans according to FMA minimum standards (Austrian and foreign borrowers)

Exposure to foreign-currency loans	31/12/2025
in EUR 1,000	
Outstanding volume of foreign-currency loans	503,231.4
Total loan portfolio (excl. governments and banks)	5,704,127.3
Percentage of foreign-currency loans in total loan portfolio (excl. governments and banks)	8.82%

Material currencies and their share in foreign-currency volume	31/12/2025
in EUR 1,000	
Total volume	503,231.4
of which EURO	500,353.2
of which CHF	2,878.2

The foreign currency loans shown above (according to FMA minimum standards) are loans where the contract currency differs from the legal currency of the country in the absence of any material income in the contract currency or hedging instruments that fully hedge the foreign-exchange risk (excl. governments and banks).

99% of the foreign currency exposures concern euro-denominated financing for debtors in non-euro countries (e.g. in the CEE region). They exclusively concern corporate clients or project financing transactions in which the foreign currency risk, as a rule, is mitigated by structural elements or corresponding buffers in the financing structures and redemption profiles.

All foreign currency exposures show a proper debt service, and all internally defined foreign currency limits were met.

The Group's portfolio includes neither loans with repayment vehicles nor loans to private individuals.

Art. 443 CRR Disclosure of encumbered and unencumbered assets

Amount of encumbrance

The main sources of encumbrance continue to be covered bonds by a public sector cover pool.

As of 31 December 2025, the asset encumbrance ratio was 26.4%.

For numerical as well as further information please refer to the dedicated document in tabular form (EU AE1- Encumbered and unencumbered assets, EU AE2 - Collateral received and own debt securities issued, EU AE3 - Sources of encumbrance and EU AE4- Accompanying narrative information and EU AE4 – Accompanying narrative information)

Art. 444 CRR Disclosure of the use of the standardized approach

Art. 444 (a) CRR

Names of the nominated External Credit Assessment Institutions (ECAIs)

The Group uses external ratings by Standard & Poor's and Fitch for the entire portfolio. Exclusively for the Covered Bond portfolio, the Group additionally uses ratings by Moody's since 1 January 2025.

Art. 444 (b) CRR

Exposure classes for which an ECAI is used

The rating agencies Standard & Poor's and Fitch are used consistently for all exposure classes. In addition, Moody's ratings are exclusively used for the Groups Covered Bond portfolio.

Art. 444 (c) CRR

Description of the process used to transfer the issuer and issue credit ratings onto items not included in the trading book

The provisions of Art. 138 and 139 CRR are applied in determining the credit ratings and transferring issuer ratings to individual issues.

Art. 444 (d) CRR

Mapping of the external rating of each nominated ECAI with each credit quality step as set out in Chapter 2 of Title II of Part 3

The Group uses the standard mapping published by EBA for mapping the external ratings of the nominated ECAIs with the credit quality steps as set out in Chapter 2 of Title II of Part 3.

Art. 444 (e) CRR

Exposure values before and after credit mitigation, associated with each credit quality step as set out in Chapter 2 of Title II of Part 3

For numerical information please refer to the dedicated document in tabular form (EU CR4 – Standardized approach – Credit risk exposure and credit risk mitigation effect, EU CR5 – Standardized approach and EU CCR3 – Standardized approach: CCR exposures by regulatory exposure class and risk weight).

Art. 445 CRR Disclosure of exposure to market risk

As of December 31, 2025, the Group had an open foreign exchange position of EUR 27.9 million.

For numerical information please refer to the dedicated document in tabular form (Template EU MR1 - Market risk under the standardized approach).

Art. 445a CRR Disclosure of CVA risk

In the calculation of CVA risk according to pillar 2, all derivatives that are not covered by a collateral agreement with daily cash collateralization are taken into account. The development of changes in CVA / DVA, including an analysis of the main drivers, is monitored on a monthly basis by Risk Controlling. In addition, the CVA risk is calculated monthly as a VaR metric and reported in the Risk Management Committee.

The Group identifies CVA risk for all derivative transactions within the scope of Article 382 of the CRR.

CVA risk is measured in accordance with the Basic Approach pursuant to Article 384(2) CRR (reduced BA-CVA), using exposures and inputs derived from standard valuation systems and counterparty credit risk metrics.

The Group does not meet all of the conditions set out in Article 273a(2) CRR and therefore is not eligible to calculate the own funds requirement for CVA risk using the simplified approach in Article 385 CRR. Accordingly, own funds requirements under Article 385 are not applicable.

For numerical information please refer to the dedicated document in tabular form (Template EU CVA 1 – Credit valuation adjustment risk under the Reduced Basic Approach (R-BA)).

Art. 446 CRR Disclosure of operational risk

The Group uses the standardized approach to calculate the minimum total capital requirement for operational risk. With respect to the amount of the minimum total capital requirement as of 31 December 2025, reference is made to the disclosure under Art. 312.

In accordance with Article 446(2)(a) and (b) CRR, institutions are required to disclose historical operational risk loss data only where annual operational risk losses are calculated in accordance with Article 316 CRR. As the Group does not calculate annual operational risk losses pursuant to Article 316 CRR, the disclosure requirements set out in Article 446(2) CRR are not applicable. Consequently, template EU OR1 (2) is not disclosed.

For numerical information please refer to the dedicated document in tabular form (EU OR3- Operational risk own funds requirements and risk exposure amounts and EU ORA- Qualitative information on operational risk).

Art. 447 CRR Disclosure of key metrics

For numerical information please refer to the dedicated document in tabular form (EU KM1 – Key metrics).

Art. 448 CRR Disclosure of exposures to interest rate risk on positions not held in the trading book

Art. 448 (a) and (b) CRR

For numerical information please refer to the dedicated document in tabular form (EU IRRBB1 – Interest rate risks of non-trading book activities).

Art. 448 (c) CRR

Nature of interest rate risk and key assumptions, and information on variations in earnings, economic value or other relevant measures used by the management for upward and downward rate shocks

For the measurement, management and limitation of interest rate risks on positions not included in the trading book, the Group distinguishes between the period-oriented repricing risk/net interest income risk and the NPV-oriented interest rate risk/interest rate risk of the economic value of equity.

To quantify net interest income risk, the effect of a one-time change in the yield curve on the net interest income of the next 12 months is determined on the basis of a gap analysis (expiry of interest commitment periods) with daily maturity bands over a 12-month period. In scenarios with a rising yield curve, active gaps have a positive effect on net interest income from the time of the next interest adjustment, while passive gaps have a negative impact on net interest income from the time of the next interest adjustment, and vice versa in scenarios with a falling yield curve. Ultimately, the accumulated effect across all maturity bands over a 12-month period shows the effect on net interest income per scenario. The focus of this analysis is on the risks of different interest rate adjustment frequencies and/or points in time of interest rate adjustments of floating interest transactions. Moreover, the effect on net interest income from the multi-year perspective of medium-term planning is determined on the basis of scenarios.

The focus is on the structural interest rate risk of fixed versus floating interest rates and shows the extent of maturity transformation on a calendar-year basis through the net interest income sensitivity.

To quantify the economic value of equity and its sensitivity to interest rate changes, cash flows of all interest-bearing transactions are determined and discounted on a daily basis. Depending on the respective portfolio, swap curves without valuation premiums (for the non-trading-book portfolio) and swap curves with valuation premiums (P&L portfolios) are used for discounting.

For the purpose of efficient interest rate risk and net interest income management, the Group uses an analysis and simulation tool (interest rate gap structure by currency, interest VaR, sensitivity analyses, simulation of specific trades), which enables the forecast and targeted management of the bank's aggregate interest rate risk on positions not included in the trading book, the interest rate sensitivity of the IFRS portfolio and net interest income for the period.

The Group's portfolio mainly comprises positions with clearly defined interest rate and capital commitments. Retail deposits (repayable on demand) include positions without clearly defined interest rate and capital commitments. As a matter of principle, the interest rate commitment of these on-demand deposits is modelled in accordance with the pricing strategy. Generally, non-linear risks are completely hedged. If non-linear risks are not hedged, they are quantified in a scenario analysis. The Group uses the fully-integrated SAP strategic enterprise management IT system as well as Numerix software for risk quantification.

For interest rate risk management by the RMC, gap structures, broken down by currency, are analyzed and the price sensitivity of the overall position as well as the impact of interest rate changes on the net interest income of the period (repricing risk) are quantified for different scenarios. The repricing risk is measured for the Group's main currencies (EUR, USD, CHF, JPY, GBP).

For risk management purposes, the Group differentiates between the following sub-portfolios:

- less-than-twelve-months interest-rate position (short-term ALM)
- more-than-twelve-months interest-rate position (long-term ALM)
- equity investment portfolio ("equity book")
- IFRS fair value position
- IFRS OCI value position

Annual net interest income effect from the Group's repricing risk as of 31 December 2025 in EUR million in the event of a parallel rise of +100bp in short-term interest rates:

EUR	USD	CHF	JPY	GBP	Other	Total
-0.7	0	-0.7	0	0.6	0	-0.8

NPV risk of interest rate changes in the Group's non-trading book as of 31 December 2025 in EUR million in the event of a +30bp parallel shift in the yield curve:

EUR	USD	CHF	JPY	GBP	Other	Total	VaR Total
1.6	0	0.1	0	-0.1	-0.1	1.5	9.7

Art. 448 (d)

As regards the importance of the exposure amounts to be disclosed according to points (a) and (b) of this paragraph, see Table EU IRRBBA under Art. 448 (e) to (g). Variations since the last reporting date resulted from the usual variations inherent in asset- and liability-side business, changes in the interest rate landscape.

Art. 448 (e) to (g) CRR

The essential qualitative information on internal risk management methods is listed in this table (EU IRRBBA – Qualitative information on interest rate risks of non-trading book transactions):

Nr.	Qualitative information – free format	Legal basis
(a)	The net interest income risk is determined for the non-trading book portfolio, limited through the risk-bearing-capacity calculation and reviewed monthly. The NPV interest rate risk for the non-trading book is determined by means of an internal value-at-risk model, limited through the risk-bearing-capacity calculation and reviewed monthly. Additionally, NPV interest rate risks for P&L portfolios are calculated and reviewed monthly.	Article 448.1 (e), first paragraph
(b)	In line with Kommunalkredit's interest rate risk strategy, the primary risk-policy goal is to hedge the net interest income by closing fixed-interest gaps.	Article 448.1 (f)
(c)	The IRRBB measures (net interest income sensitivities and present-value sensitivities) are determined quarterly according to EBA/GL/2022/14 and reported within the framework of the Risk Management Committee.	Article 448.1 (e) (i) and (v); Article 448.2
(d)	The scenarios used for the economic risk of interest rate changes in the liquidation perspective are derived from historical time series with a confidence level of 99.95%. The historical interest rate changes are calculated from a rolling one-year window over a 20 year period for a representative tenor of the banking book. For the net interest income risk scenarios, historical interest rate changes over a 5 year period are used and parallel shifts derived therefrom.	Article 448.1 (e) (iii); Article 448.2
(e)	Cash flow modelling does not differ from risk quantification according to Table IRRBB1. For the derivation of the internal scenarios, see line (d) of this table.	Article 448.1 (e) (ii); Article 448.2
(f)	As described in line (b) of this table, interest rate risks are to be hedged as far as possible. This can be achieved either through appropriate management of new business or through the use of interest rate swaps as hedging instruments. Under local GAAP (UGB), hedge accounting is performed in accordance with the provisions of AFRAC 15. Units of accounts are created as part of micro-hedges. The hedging of interest risk on an overall bank level is done under the provisions of macro-hedging. Under IFRS in respect of micro-hedge accounting the provisions of IFRS 9 are applied. Fair value hedges for a portfolio against interest rate risks are accounted for in accordance with IAS 39 (IAS 39.89A)	Article 448.1 (e) (iv); Article 448.2
(g)	A deadline for interest rate adjustments (fixed-interest period assumptions) is set for non-maturity deposits on the basis of Kommunalkredit's pricing strategy.	Article 448.1 (c); Article 448.2
(h)	The indicators shown in Table EU IRRBB1 are an integral part of Kommunalkredit's risk management policy. Variations over time result from the nature of the business and are to be mitigated according to the interest rate risk strategy as far as possible.	Article 448.1 (d)
(i)	n.a.	
(1) (2)	The deadline for interest rate adjustments (fixed-interest period assumptions) for non-maturity deposits is between 1 month and 3 months.	Article 448.1(g)

Art. 449 CRR Disclosure of exposures to securitization positions

The Group has not issued any securitization positions and does not hold any securitization positions as of 31 December 2025. For this reason, no further disclosures are made under Art. 449 CRR.

Art. 449a CRR Disclosure of environmental, social and governance risks (ESG risks)

The Group does not yet fall within the scope of Art. 449a – for this reason, disclosures do not apply in this report.

Art. 450 CRR Disclosure of remuneration policy

Art. 450 (a)

Information concerning the decision-making process used for determining the remuneration policy

The Remuneration Committee set up by the Supervisory Board of the Group regularly reviews the remuneration policy and its execution and reports to the Supervisory Board. The remuneration policy was adopted by the Supervisory Board upon the Remuneration Committee's recommendation. The review of the remuneration policy for the 2025 financial year was performed on 25 February 2026 and approved by the Supervisory Board. As of 31 December 2025, the members of the Remuneration Committee are Hans Larsson (Chairman), Paal Weberg (Deputy Chairman) and Anne Jaeger (remuneration expert) as capital representatives, as well as Gerald Unterrainer as staff representative.

Art. 450 (b) to (f)

Information on the link between pay and performance, the most important design characteristics of the remuneration system, the ratios between fixed and variable remuneration, and the performance criteria on which variable components of remuneration are based as well as their main parameters.

The performance criteria determining the amount of variable remuneration include business and risk parameters as well as the degree of individual target attainment.

Through its linkage to the achievement of the budgeted profit for the year as well as compliance with the regulatory minimum total capital requirements, the net income of the institution influences the level of the individual performance bonus. Through the introduction of lower and upper limits (caps) on net income, a flexible policy governing the variable remuneration components is ensured. If the yellow threshold of the indicators specified in the Federal Act on the Recovery and Resolution of Banks (CET 1 ratio) is not reached, no bonus will be paid out for the respective year.

The individual performance bonus depends on the achievement of agreed qualitative and quantitative targets.

These targets are agreed upon on the basis of specified criteria (risk adjustment, long-term nature and sustainability, main tasks and day-to-day business, organizational unit), the attainment of which is evaluated. The system allows considerable variations, depending on individual target attainment. If target achievement is below 70%, no performance bonus is paid out. Performance above 105% qualifies as extraordinary, which requires the respective assessment to be complemented via additional specification and justification. Moreover, as a matter of principle, a deferral system is applied. This system is implemented exclusively for identified staff. Variable remuneration exceeding EUR 50,000 or accounting for more than one-third of total compensation is subject to a 40% deferral. For bonus amounts above EUR 175,000, a deferral rate of 60% is applied. The deferral period has been set at five years and applied equally to both Identified Staff and the members of the Executive Board.

Given the Group's ownership structure, there are no capital instruments available for the purpose of variable remuneration. The variable remuneration components are therefore paid out through payroll.

Art. 450 (1) (g) to (i) CRR

Quantitative information on remuneration, broken down by business area

The total amounts of (fixed and variable) remuneration for senior management and for employees whose actions have a material impact on the risk profile of the institution (identified staff) for the 2025 financial year, broken down by business area, are shown in the following table:

Total amounts of remuneration in 2025 – Identified staff excl. the Executive Board:

in EUR	Front Office	Back Office	Total
Total amount of remuneration	2,133,000	3,108,000	5,241,000
Number of beneficiaries	7	17	24

For numerical information please refer to the dedicated document in tabular form (EU REM1: Remuneration awarded for the financial year, EU REM2: Special payments to staff whose professional activities have a material impact on the institution's risk profile (identified staff), EU REM3: Deferred remuneration, EU REM4: Remuneration of EUR 1 million or more per year and EU REM5 - Information on remuneration of staff whose professional activities have a material impact on institutions' risk profile (identified staff)).

Art. 451 CRR Disclosure of the leverage ratio

Art. 451 (1) (a) and (b)

Disclosure of the leverage ratio and how the institution applies Art. 499 (2)

The choice allowed to institutions by Art. 499 (2) is not applicable to the Group, as the transitional provisions of CRR do not apply to the capital instruments of the Group.

For numerical information please refer to the dedicated document in tabular form (EU LR1 – Summary reconciliation of accounting assets and leverage ratio exposures, EU LR2 – Leverage ratio common disclosure and EU LR3 – Split-up of on-balance-sheet exposures (excluding derivatives, securities financing transactions/SFTs and exempted exposures)).

Art. 451 (1) (c) CRR

A derogation pursuant to Art. 451 (1) (c) is not applied by the Group.

Art. 451 (1) (d) CRR

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

Besides considering the regulatory perspective in the calculation of risk-carrying capacity as of the reporting date, the Group prepares a dynamic capital plan, including regulatory equity ratios, for the budgeting period on a quarterly basis and/or according to requirements. Portfolio run-off, new business, and known or expected special effects are taken into account.

In addition to the common equity tier 1 ratio, the tier 1 ratio, the total capital ratio and the large lending limit, the leverage ratio is also taken into account.

Art. 451 (1) (e)

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 represents the relationship between Tier 1 capital and the leverage exposure pursuant to Article 429 CRR, more specifically the Delegated Regulation (EU) 2015/62 with regard to leverage ratio (Delegated Act) of 10 October 2014, which was published in the Official Journal of the European Union on 17 January 2015. Essentially, the leverage exposure represents the sum of unweighted on-balance sheet and off-balance sheet positions considering valuation and risk adjustments as defined in the Delegated Act.

The leverage ratio of the Group at consolidated level amounted to 10.06%, comfortably above the 3.0% minimum requirement.

Art. 451a CRR Disclosure of liquidity requirements

Liquidity planning is agreed upon with the Executive Board within the framework of the annual budgeting process (including the total funding framework for transactions subject to approval by the Supervisory Board) and submitted to the Audit Committee and Supervisory Board for approval. In accordance with the Rules of Procedure, the Executive Board submits a quarterly liquidity report to the Supervisory Board, which contains information on the liquidity situation and outstanding short- and long-term funding instruments, their terms and conditions, and the funding structure.

Within the framework of the monthly ALCOs, deviations of the funding structure from the planned structure are analyzed together with the Executive Board, operational liquidity measures are agreed upon, and liquidity management decisions are taken. The underlying data (cash flows from portfolio business, new business/syndication planning and funding plans) are updated on a weekly basis. The monthly RMCs are in charge of monitoring limits and early warning indicators, and of measuring and monitoring structural liquidity risks. On this basis, requirements and decisions on future liquidity planning are derived. The decisions taken by both Committees are supported by a comprehensive reporting framework.

The Group pursues a diversified funding strategy, which is also reflected in its liquidity risk strategy, including strategic guidelines for liquidity risk management and mitigation. Funding comprises customer deposits and capital market funding. Additionally, the maturity structure is managed in a targeted manner in order to mitigate concentration risks.

Operational management is performed by Markets within the framework of the budgetary requirements and risk limits.

With regard to timing, the Group distinguishes between structural and operational liquidity, which corresponds to the distinction between medium- and long-term liquidity on the one hand, and short-term liquidity on the other. The threshold between structural and operational liquidity is twelve months.

Alongside the regulatory indicators (LCR, NSFR), various scenarios (cases), limits and monitoring thresholds have been defined for management and risk strategy implementation purposes. Besides the budgetary requirements, internal measures/perspectives as well as regulatory indicators constitute the framework for liquidity management. Moreover, regular stress analyses are performed by determining the time-to-wall on a weekly and monthly basis, supported by early warning indicators. In addition, the accumulated net financing level in the institution-specific scenario (Bad Case) and a market wide stress scenario (Market Stress Case) is determined on a monthly basis.

The emergency liquidity plan implemented at the Group enables the bank to overcome liquidity bottlenecks and/or short- and longer-term disruptions in the funding markets. In particular, it comprises measures aimed at securing liquidity and ensuring the flow of information to senior management and external stakeholders. This emergency plan sets out individual responsibilities and the composition of the crisis management body, as well as internal and external communication routes. It defines management activities in the event of a crisis and supplements the measures already in place to limit and manage the liquidity risk.

Within the framework of a liquidity adequacy statement, which is approved annually by the Executive Board, the core content and targets of the ILAAP, an analysis of the ILAAP framework, and the results derived, and findings obtained are described.

Liquidity coverage ratio/LCR

The Group's LCR by far exceeded the regulatory minimum requirement of 100% on all relevant disclosure dates. The high LCR primarily results from the Group's comfortable liquidity buffer. Inflows and outflows are relatively low, both compared to the liquidity buffer and in absolute numbers. Over time, minor absolute fluctuations in inflows and outflows therefore necessarily result in increased fluctuations in the LCR. The main drivers are outflows, due to changes in committed disbursements and the liquidity buffer, due to changes in the account balance with central banks.

The LCR is reported in EUR. Currency mismatches are managed, in particular, via FX swaps. Derivative exposures to financial counterparties are collateralized in cash through daily collateral margins. The liquidity buffer consists of cash and balances with central banks and a liquidity reserve of high-quality liquid assets (HQLA). Besides the strategic liquidity buffer, a strong emphasis is placed on a diversified funding structure. Alongside capital market issues, a solid deposit structure provides a broadly diversified source of funding.

Net stable funding ratio/NSFR

The NSFR and its changes over time are largely influenced by the liquidity buffer, funding mix and degree of maturity transformation of liquidity. Changes in the NSFR during the disclosure period resulted from the usual variations inherent in asset- and liability-side business.

For numerical information please refer to the dedicated document in tabular form (EU LIQ1: Quantitative information on LCR and EU LIQ2 – Net stable funding ratio.)

Art. 452 CRR Disclosure of the use of the IRB approach to credit risk

No information is provided, as the Group does not use the IRB approach.

Art. 453 CRR Disclosure of the use of credit risk mitigation techniques

Art. 453 (a) CRR

Policies and processes for the use of on- and off-balance-sheet netting

The Group uses netting in derivative - transactions; on-balance-sheet netting is not used.

Legally binding master agreements exist with all counterparties for derivatives (in particular ISDA Master Agreements, German Master Agreements for Financial Derivatives Transactions), according to which netting of the receivables and liabilities of all single transactions under a master agreement is performed in the event of default (close-out netting). The Group ensures the enforceability and legal validity of contractual netting arrangements pursuant to Art. 297 (1) CRR for derivatives through legal opinions produced on behalf of the Group and/or international organizations (in particular the International Swaps and Derivatives Association (ISDA), the International Capital Market Association (ICMA)), and bodies representing the interests of banks (Association of Austrian Banks and Bankers, Federal Association of German Banks) for the respective jurisdiction of the counterparty.

For derivative transactions, the Group usually concludes credit support agreements and/or collateral annexes to the respective master agreements with its counterparties. These agreements provide for regular collateral margining, typically on a daily basis, in line with the bilateral collateralization obligation pursuant to EMIR. As of 31 December 2025, all derivatives were allocated to the non-trading book. The Group ensures that collateral received can be effectively realized in the event of counterparty's insolvency and that its continued enforceability and usability are legally secured. This is supported by jurisdiction-specific legal opinions obtained for the relevant counterparty jurisdiction.

Pursuant to Art. 111 (2) CRR, the calculation of the exposure value for derivatives is performed in accordance with the rules of Chapter 6 of Title II of Part 3 CRR (Art. 271 et seqq. CRR). The reduced potential future recovery value, i.e. the exposure value after netting, is calculated pursuant to Art. 298 (1) (c) CRR for all contracts covered by netting arrangements. The effect of such netting arrangements is also shown in the quantitative disclosure pursuant to Art. 439 CRR.

Art. 453 (b) CRR

Policies and processes for collateral valuation and management

For the purposes of credit risk mitigation, the Group exclusively takes into account personal collateral (guarantees), cash deposits with the Group and netting framework arrangements. Cash deposits are measured at their nominal value, with currency or maturity mismatches taken into account through a corresponding discount. In the case of personal collateral, collateral providers are subject to the same credit approval and rating process as the primary obligor, i.e. the credit standing and/or creditworthiness is assessed on a case-by-case basis and monitored during the entire loan tenor, so that risk-mitigating measures can be initiated, if necessary.

Art. 453 (c) CRR

Main types of collateral taken

The Group exclusively takes financial collateral (cash) and personal forms of collateral (mainly different forms of guarantees) for credit risk mitigation. In the Group, other forms of collateral (real estate, movables, receivables, etc.) are not counted as eligible collateral in accordance with prudential rules.

Art. 453 (d) CRR

Main types of guarantors and credit derivative counterparties

Most of the personal forms of collateral available to the Group are guarantees of central governments (mainly ECA cover) and regional governments. The Group does not currently have any credit derivatives in use as collateral.

Disclosure of guarantors by rating and exposure class						
In EUR 1,000						
Regulatory rating	Central governments and central banks	Regional governments	Public sector entities	MDB	Corporates	Total
No rating	0.00	0.00	0.00	14.166,67	0.00	14.166,67
1	294.989,00	350.148,82	5.555,38	199.208,05	167.254,88	1.017.156,14
2	134.959,81	0.00	0.00	0.00	0.00	134.959,81
3	20.000,00	0.00	0.00	0.00	0.00	20.000,00
4	0.00	0.00	0.00	0.00	0.00	0,00
5	0.00	0.00	0.00	0.00	0.00	0,00
6	0.00	0.00	0.00	0.00	0.00	0,00
Total	449.948,81	350.148,82	5.555,38	213.374,72	167.254,88	1.186.282,62

Art. 453 (e) CRR

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

In the ongoing monitoring and reporting of credit exposures and within the framework of the regular annual reviews, the Group always takes into account the guarantor with its entire exposure/guaranteed volume. This ensures transparency of potential concentrations at the level of the guarantors.

Disclosure according to Part 8 CRR 59

Within the Group's public finance portfolio, there is a certain credit risk concentration with individual Austrian federal states and, within the framework of export financing transactions, with several European countries (Germany, France) acting as guarantors. In the Group's international and corporate/project finance business, with few exceptions, higher customer exposures are usually of a short-term nature and frequently comprise newly granted financing for which the syndication process has not yet been completed or which is diversified across several individual borrowers within a customer group that are largely independent of one another. As of 31 December 2025, the internally defined buffer of 15% in regard to the regulatory large exposure limit was not utilized.

In addition to analyzing concentrations on counterparty level, there are several credit risk concentration limits in place, which are either linked to equity capitalization or credit portfolio amounts, that monitor and limit top risk driver, sectors and geographic distributions

Art. 453 (f)

As required by Art. 453 (f) CRR, the following table provides an overview of the total exposure covered by credit risk mitigation techniques.

No material changes occurred during the disclosure period.

For numerical information please refer to the dedicated document in tabular form (EU CR3 – Overview of credit risk mitigation techniques: Disclosure of the use of credit risk mitigation techniques).

Art. 453 (g) to (i) CRR

For numerical information please refer to the dedicated document in tabular form (Template EU CR4 – standardized approach – Credit risk exposure and CRM effects).

Art. 454 CRR Disclosure of the use of advanced measurement approaches to operational risks

No information provided, as the advanced measurement approach is not used to calculate the minimum total capital requirement for operational risks.

Art. 455 CRR Use of internal market risk models

No information is provided, as internal models are not used to calculate the minimum total capital requirement for market risks.

ANNEX

Art. 437 (1) (b) CRR – EU CCA Main features of regulatory own funds instruments and eligible liabilities instruments

		a
		Qualitative or quantitative information - Free format
1	Issuer	Green Opera Finance Invest AB
2	Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	Share capital (Reg. Nummer: 559411-2012)
2a	Public or private placement	Private
3	Governing law(s) of the instrument	Swedish law
3a	Contractual recognition of write down and conversion powers of resolution authorities	N/A
<i>Regulatory treatment</i>		
4	Current treatment taking into account, where applicable, transitional CRR rules	CET 1 capital
5	Post-transitional CRR rules	CET 1 capital
6	Eligible at solo/(sub-)consolidated/ solo&(sub-)consolidated	Eligible at consolidated level
7	Instrument type (types to be specified by each jurisdiction)	Share capital
8	Amount recognized in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	25000 SEK
9	Nominal amount of instrument	25000 SEK
EU-9a	Issue price	N/A
EU-9b	Redemption price	N/A
10	Accounting classification	Liability – amortized cost
11	Original date of issuance	12/12/2022
12	Perpetual or dated	Perpetual
13	Original maturity date	No maturity
14	Issuer call subject to prior supervisory approval	No
15	Optional call date, contingent call dates and redemption amount	N/A
16	Subsequent call dates, if applicable	N/A
<i>Coupons / dividends</i>		
17	Fixed or floating dividend/coupon	Floating
18	Coupon rate and any related index	N/A
19	Existence of a dividend stopper	Yes
EU-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Fully discretionary
EU-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Fully discretionary
21	Existence of step up or other incentive to redeem	No
22	Noncumulative or cumulative	Non-cumulative
23	Convertible or non-convertible	Non-cumulative
24	If convertible, conversion trigger(s)	
25	If convertible, fully or partially	
26	If convertible, conversion rate	
27	If convertible, mandatory or optional conversion	
28	If convertible, specify instrument type convertible into	
29	If convertible, specify issuer of instrument it converts into	
30	Write-down features	No
31	If write-down, write-down trigger(s)	
32	If write-down, full or partial	
33	If write-down, permanent or temporary	
34	If temporary write-down, description of write-up mechanism	
34a	Type of subordination (only for eligible liabilities)	By Law
EU-34b	Ranking of the instrument in normal insolvency proceedings	CET 1 capital
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	AT 1 capital
36	Non-compliant transitioned features	No
37	If yes, specify non-compliant features	
37a	Link to the full term and conditions of the instrument (signposting)	N/A

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

		a
		Qualitative or quantitative information - Free format
1	Issuer	Satere Beteiligungsverwaltungs GmbH
2	Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	Variable collective instrument 1 & 2
2a	Public or private placement	Private
3	Governing law(s) of the instrument	Austrian law
3a	Contractual recognition of write down and conversion powers of resolution authorities	N/A
<i>Regulatory treatment</i>		
4	Current treatment taking into account, where applicable, transitional CRR rules	CET 1 capital
5	Post-transitional CRR rules	CET 1 capital
6	Eligible at solo/(sub-)consolidated/ solo&(sub-)consolidated	Eligible at solo and consolidated level
7	Instrument type (types to be specified by each jurisdiction)	Share capital
8	Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	35,000 EUR
9	Nominal amount of instrument	35,000 EUR
EU-9a	Issue price	N/A
EU-9b	Redemption price	N/A
10	Accounting classification	Liability – amortized cost
11	Original date of issuance	20/1/2015
12	Perpetual or dated	Perpetual
13	Original maturity date	No maturity
14	Issuer call subject to prior supervisory approval	No
15	Optional call date, contingent call dates and redemption amount	N/A
16	Subsequent call dates, if applicable	N/A
<i>Coupons / dividends</i>		
17	Fixed or floating dividend/coupon	Floating
18	Coupon rate and any related index	N/A
19	Existence of a dividend stopper	Yes
EU-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	
EU-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Fully discretionary
21	Existence of step up or other incentive to redeem	Fully discretionary
22	Noncumulative or cumulative	No
23	Convertible or non-convertible	Non-cumulative
24	If convertible, conversion trigger(s)	Non-cumulative
25	If convertible, fully or partially	
26	If convertible, conversion rate	
27	If convertible, mandatory or optional conversion	
28	If convertible, specify instrument type convertible into	
29	If convertible, specify issuer of instrument it converts into	
30	Write-down features	
31	If write-down, write-down trigger(s)	No
32	If write-down, full or partial	
33	If write-down, permanent or temporary	
34	If temporary write-down, description of write-up mechanism	
34a	Type of subordination (only for eligible liabilities)	
EU-34b	Ranking of the instrument in normal insolvency proceedings	By law
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	CET 1 capital
36	Non-compliant transitioned features	AT 1 capital
37	If yes, specify non-compliant features	No
37a	Link to the full term and conditions of the instrument (signposting)	N/A

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

		a
Qualitative or quantitative information - Free format		
1	Issuer	Kommunikredit Austria
2	Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	Modifiable global certificate 1 & 2
2a	Public or private placement	Private
3	Governing law(s) of the instrument	Austrian law
3a	Contractual recognition of write down and conversion powers of resolution authorities	N/A
<i>Regulatory treatment</i>		
4	Current treatment taking into account, where applicable, transitional CRR rules	CET 1 capital
5	Post-transitional CRR rules	CET 1 capital
6	Eligible at solo/(sub-)consolidated/ solo&(sub-)consolidated	Eligible at solo and consolidated level
7	Instrument type (types to be specified by each jurisdiction)	Share capital
8	Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	177,017,121 EUR
9	Nominal amount of instrument	177,017,121 EUR
EU-9a	Issue price	N/A
EU-9b	Redemption price	N/A
10	Accounting classification	Liability – amortized cost
11	Original date of issuance	26/9/2015
12	Perpetual or dated	Perpetual
13	Original maturity date	No maturity
14	Issuer call subject to prior supervisory approval	No
15	Optional call date, contingent call dates and redemption amount	N/A
16	Subsequent call dates, if applicable	N/A
<i>Coupons / dividends</i>		
17	Fixed or floating dividend/coupon	Floating
18	Coupon rate and any related index	N/A
19	Existence of a dividend stopper	Yes
EU-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Fully discretionary
EU-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Fully discretionary
21	Existence of step up or other incentive to redeem	No
22	Noncumulative or cumulative	Non-cumulative
23	Convertible or non-convertible	Non-cumulative
24	If convertible, conversion trigger(s)	
25	If convertible, fully or partially	
26	If convertible, conversion rate	
27	If convertible, mandatory or optional conversion	
28	If convertible, specify instrument type convertible into	
29	If convertible, specify issuer of instrument it converts into	
30	Write-down features	No
31	If write-down, write-down trigger(s)	
32	If write-down, full or partial	
33	If write-down, permanent or temporary	
34	If temporary write-down, description of write-up mechanism	
34a	Type of subordination (only for eligible liabilities)	By law
EU-34b	Ranking of the instrument in normal insolvency proceedings	CET 1 capital
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	AT 1 capital
36	Non-compliant transitioned features	No
37	If yes, specify non-compliant features	
37a	Link to the full term and conditions of the instrument (signposting)	N/A

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

		a
		Qualitative or quantitative information - Free format
1	Issuer	Kommunalkredit Austria
2	Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)	AT0000A2PDN1
2a	Public or private placement	Private
3	Governing law(s) of the instrument	Austrian law
3a	Contractual recognition of write down and conversion powers of resolution authorities	CET 1 capital
	<i>Regulatory treatment</i>	
4	Current treatment taking into account, where applicable, transitional CRR rules	AT 1 capital
5	Post-transitional CRR rules	AT 1 capital
6	Eligible at solo/(sub-)consolidated/ solo&(sub-)consolidated	Eligible at solo and consolidated level
7	Instrument type (types to be specified by each jurisdiction)	AT 1 bond
8	Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	6,000,000 EUR at solo level (reduced at consolidated level due to deduction of minorities)
9	Nominal amount of instrument	6,000,000 EUR
EU-9a	Issue price	100 EUR
EU-9b	Redemption price	Upon call at current nominal amount minus write-downs
10	Accounting classification	Liability – amortized cost
11	Original date of issuance	15/2/2021
12	Perpetual or dated	Perpetual
13	Original maturity date	N/A
14	Issuer call subject to prior supervisory approval	Yes
15	Optional call date, contingent call dates and redemption amount	15/5/2026
16	Subsequent call dates, if applicable	Daily from 15/05/2026 to 15/11/2026, semi-annually from 15/11/2026
	<i>Coupons / dividends</i>	
17	Fixed or floating dividend/coupon	Fixed
18	Coupon rate and any related index	6.875% p.a. until 15/11/2026, subsequently resets to fixed at 5-year mid-swap plus 7.215% every 5 years
19	Existence of a dividend stopper	No
EU-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	
EU-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	
21	Existence of step up or other incentive to redeem	
22	Noncumulative or cumulative	
23	Convertible or non-convertible	Non-convertible
24	If convertible, conversion trigger(s)	
25	If convertible, fully or partially	
26	If convertible, conversion rate	
27	If convertible, mandatory or optional conversion	
28	If convertible, specify instrument type convertible into	
29	If convertible, specify issuer of instrument it converts into	
30	Write-down features	Yes
31	If write-down, write-down trigger(s)	CET 1 ratio under 5.125%
32	If write-down, full or partial	Full or partial
33	If write-down, permanent or temporary	Temporary
34	If temporary write-down, description of write-up mechanism	Full or partial, discretionary for issuer. Prerequisites: surplus for the year report-ed by issuer and for the regulatory group, no insolvency, no write-down trigger
34a	Type of subordination (only for eligible liabilities)	By law
EU-34b	Ranking of the instrument in normal insolvency proceedings	AT 1 capital
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	T 2 capital
36	Non-compliant transitioned features	No
37	If yes, specify non-compliant features	
37a	Link to the full term and conditions of the instrument (signposting)	https://www.kommunalkredit.at/fileadmin/user_upload/Processed/Investor-Relations/Bond-Investoren/Na-chrangige-Instrumente/Kommunalkred-it-Terms-and-Conditions-ADIP85-AT-0000A2PDN1.pdf

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

		a
		Qualitative or quantitative information - Free format
1	Issuer	Kommunalkredit Austria
2	Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)	AT0000A2QU74
2a	Public or private placement	Private
3	Governing law(s) of the instrument	Austrian law
3a	Contractual recognition of write down and conversion powers of resolution authorities	N/A
<i>Regulatory treatment</i>		
4	Current treatment taking into account, where applicable, transitional CRR rules	AT 1 capital
5	Post-transitional CRR rules	AT 1 capital
6	Eligible at solo/(sub-)consolidated/ solo&(sub-)consolidated	Eligible at solo and consolidated level
7	Instrument type (types to be specified by each jurisdiction)	AT 1 bond
8	Amount recognized in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	56,800,000 EUR at solo level (reduced at consolidated level due to deduction of minorities)
9	Nominal amount of instrument	56,800,000 EUR
EU-9a	Issue price	100 EUR
EU-9b	Redemption price	Upon call at current nominal amount minus write-downs
10	Accounting classification	Liability – amortized cost
11	Original date of issuance	27/4/2021
12	Perpetual or dated	Perpetual
13	Original maturity date	N/A
14	Issuer call subject to prior supervisory approval	Yes
15	Optional call date, contingent call dates and redemption amount	15/5/2026
16	Subsequent call dates, if applicable	Daily from 15/05/2026 to 15/11/2026, semi-annually from 15/11/2026
<i>Coupons / dividends</i>		
17	Fixed or floating dividend/coupon	Fixed
18	Coupon rate and any related index	6.50% p.a. until 15/11/2026, subsequently resets to fixed at 5-year mid-swap plus 6.762% every 5 years
19	Existence of a dividend stopper	No
EU-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	
EU-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	
21	Existence of step up or other incentive to redeem	
22	Noncumulative or cumulative	
23	Convertible or non-convertible	Non-convertible
24	If convertible, conversion trigger(s)	
25	If convertible, fully or partially	
26	If convertible, conversion rate	
27	If convertible, mandatory or optional conversion	
28	If convertible, specify instrument type convertible into	
29	If convertible, specify issuer of instrument it converts into	
30	Write-down features	Yes
31	If write-down, write-down trigger(s)	CET 1 ratio under 5.125 %
32	If write-down, full or partial	Full or partial
33	If write-down, permanent or temporary	Temporary
34	If temporary write-down, description of write-up mechanism	Full or partial, discretionary for issuer. Prerequisites: surplus for the year report-ed by issuer and for the regulatory group, no insolvency, no write-down trigger
34a	Type of subordination (only for eligible liabilities)	By law
EU-34b	Ranking of the instrument in normal insolvency proceedings	AT 1 capital
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	T 2 capital
36	Non-compliant transitioned features	No
37	If yes, specify non-compliant features	
37a	Link to the full term and conditions of the instrument (signposting)	https://www.kommunalkredit.at/fileadmin/user_upload/Processed/Relations/Bond-Investoren/Nachrangige-Instrumente/Kommu-nalkredit-Terms-and-Conditions-AD-IP86-AT0000A2QU74.pdf

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

		a
		Qualitative or quantitative information - Free format
1	Issuer	Kommunalkredit Austria
2	Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	SSD 45
2a	Public or private placement	Private
3	Governing law(s) of the instrument	German law, subordination in accordance with Austrian law
3a	Contractual recognition of write down and conversion powers of resolution authorities	N/A
<i>Regulatory treatment</i>		
4	Current treatment taking into account, where applicable, transitional CRR rules	T 2 capital
5	Post-transitional CRR rules	T 2 capital
6	Eligible at solo/(sub-)consolidated/ solo&(sub-)consolidated	Eligible at solo and consolidated level
7	Instrument type (types to be specified by each jurisdiction)	Subordinated liabilities
8	Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	10,000,000 EUR at solo level (reduced at consolidated level due to deduction of minorities)
9	Nominal amount of instrument	10,000,000 EUR
EU-9a	Issue price	100 EUR
EU-9b	Redemption price	100 EUR
10	Accounting classification	Liability – amortized cost
11	Original date of issuance	7/2/2007
12	Perpetual or dated	Dated
13	Original maturity date	9/2/2037
14	Issuer call subject to prior supervisory approval	Yes
15	Optional call date, contingent call dates and redemption amount	9/2/2017
16	Subsequent call dates, if applicable	Annually from 09/02/2017
<i>Coupons / dividends</i>		
17	Fixed or floating dividend/coupon	Fixed
18	Coupon rate and any related index	5.08 % p. a.
19	Existence of a dividend stopper	N/A
EU-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	N/A
EU-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	N/A
21	Existence of step up or other incentive to redeem	No
22	Noncumulative or cumulative	N/A
23	Convertible or non-convertible	Non-convertible
24	If convertible, conversion trigger(s)	
25	If convertible, fully or partially	
26	If convertible, conversion rate	
27	If convertible, mandatory or optional conversion	
28	If convertible, specify instrument type convertible into	
29	If convertible, specify issuer of instrument it converts into	
30	Write-down features	No
31	If write-down, write-down trigger(s)	
32	If write-down, full or partial	
33	If write-down, permanent or temporary	
34	If temporary write-down, description of write-up mechanism	
34a	Type of subordination (only for eligible liabilities)	By law
EU-34b	Ranking of the instrument in normal insolvency proceedings	T 2 capital
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Non-subordinated instruments
36	Non-compliant transitioned features	No
37	If yes, specify non-compliant features	
37a	Link to the full term and conditions of the instrument (signposting)	https://www.kommunalkredit.at/fileadmin/user_upload/Processed/Investor-Relations/Bond-Investoren/Na-chrangige-Instrumente/Kommunalkred-it-Bedingungen-SSD45.pdf

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

		a
		Qualitative or quantitative information - Free format
1	Issuer	Kommunalkredit Austria
2	Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	SSD 46
2a	Public or private placement	Private
3	Governing law(s) of the instrument	German law, subordination in accordance with Austrian law
3a	Contractual recognition of write down and conversion powers of resolution authorities	N/A
<i>Regulatory treatment</i>		
4	Current treatment taking into account, where applicable, transitional CRR rules	T 2 capital
5	Post-transitional CRR rules	T 2 capital
6	Eligible at solo/(sub-)consolidated/ solo&(sub-)consolidated	Eligible at solo and consolidated level
7	Instrument type (types to be specified by each jurisdiction)	Subordinated liabilities
8	Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	10,200,000 EUR at solo level (reduced at consolidated level due to deduction of minorities)
9	Nominal amount of instrument	10,200,000 EUR
EU-9a	Issue price	100 EUR
EU-9b	Redemption price	100 EUR
10	Accounting classification	Liability – amortized cost
11	Original date of issuance	7/2/2007
12	Perpetual or dated	Dated
13	Original maturity date	9/2/2037
14	Issuer call subject to prior supervisory approval	Yes
15	Optional call date, contingent call dates and redemption amount	9/2/2017
16	Subsequent call dates, if applicable	Annually from 09/02/2017
<i>Coupons / dividends</i>		
17	Fixed or floating dividend/coupon	Fixed
18	Coupon rate and any related index	5.08 % p. a.
19	Existence of a dividend stopper	N/A
EU-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	N/A
EU-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	N/A
21	Existence of step up or other incentive to redeem	No
22	Noncumulative or cumulative	N/A
23	Convertible or non-convertible	Non-convertible
24	If convertible, conversion trigger(s)	
25	If convertible, fully or partially	
26	If convertible, conversion rate	
27	If convertible, mandatory or optional conversion	
28	If convertible, specify instrument type convertible into	
29	If convertible, specify issuer of instrument it converts into	
30	Write-down features	No
31	If write-down, write-down trigger(s)	
32	If write-down, full or partial	
33	If write-down, permanent or temporary	
34	If temporary write-down, description of write-up mechanism	
34a	Type of subordination (only for eligible liabilities)	By law
EU-34b	Ranking of the instrument in normal insolvency proceedings	T 2 capital
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Non-subordinated instruments
36	Non-compliant transitioned features	No
37	If yes, specify non-compliant features	
37a	Link to the full term and conditions of the instrument (signposting)	https://www.kommunalkredit.at/fileadmin/user_upload/Processed/Investor-Relations/Bond-Investoren/Na-chrangige-Instrumente/Kommunalkred-it-Bedingungen-SSD46.pdf

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

		a
		Qualitative or quantitative information - Free format
1	Issuer	Kommunalkredit Austria
2	Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	SSD 47
2a	Public or private placement	Private
3	Governing law(s) of the instrument	German law, subordination in accordance with Austrian law
3a	Contractual recognition of write down and conversion powers of resolution authorities	N/A
<i>Regulatory treatment</i>		
4	Current treatment taking into account, where applicable, transitional CRR rules	T 2 capital
5	Post-transitional CRR rules	T 2 capital
6	Eligible at solo/(sub-)consolidated/ solo&(sub-)consolidated	Eligible at solo and consolidated level
7	Instrument type (types to be specified by each jurisdiction)	Subordinated liabilities
8	Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	800,000 EUR at solo level (reduced at consolidated level due to deduction of minorities)
9	Nominal amount of instrument	800,000 EUR
EU-9a	Issue price	100 EUR
EU-9b	Redemption price	100 EUR
10	Accounting classification	Liability – amortized cost
11	Original date of issuance	7/2/2007
12	Perpetual or dated	Dated
13	Original maturity date	9/2/2037
14	Issuer call subject to prior supervisory approval	Yes
15	Optional call date, contingent call dates and redemption amount	9/2/2017
16	Subsequent call dates, if applicable	Annually from 09/02/2017
<i>Coupons / dividends</i>		
17	Fixed or floating dividend/coupon	Fixed
18	Coupon rate and any related index	5.08 % p. a.
19	Existence of a dividend stopper	N/A
EU-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	N/A
EU-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	N/A
21	Existence of step up or other incentive to redeem	No
22	Noncumulative or cumulative	N/A
23	Convertible or non-convertible	Non-convertible
24	If convertible, conversion trigger(s)	
25	If convertible, fully or partially	
26	If convertible, conversion rate	
27	If convertible, mandatory or optional conversion	
28	If convertible, specify instrument type convertible into	
29	If convertible, specify issuer of instrument it converts into	
30	Write-down features	No
31	If write-down, write-down trigger(s)	
32	If write-down, full or partial	
33	If write-down, permanent or temporary	
34	If temporary write-down, description of write-up mechanism	
34a	Type of subordination (only for eligible liabilities)	By law
EU-34b	Ranking of the instrument in normal insolvency proceedings	T 2 capital
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Non-subordinated instruments
36	Non-compliant transitioned features	No
37	If yes, specify non-compliant features	
37a	Link to the full term and conditions of the instrument (signposting)	https://www.kommunalkredit.at/fileadmin/user_upload/Processed/Investor-Relations/Bond-Investoren/Na-chrangige-Instrumente/Kommunalkred-it-Bedingungen-SSD47.pdf

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

		a
		Qualitative or quantitative information - Free format
1	Issuer	Kommunalkredit Austria
2	Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	SSD 50
2a	Public or private placement	Private
3	Governing law(s) of the instrument	German law, subordination in accordance with Austrian law
3a	Contractual recognition of write down and conversion powers of resolution authorities	N/A
<i>Regulatory treatment</i>		
4	Current treatment taking into account, where applicable, transitional CRR rules	T 2 capital
5	Post-transitional CRR rules	T 2 capital
6	Eligible at solo/(sub-)consolidated/ solo&(sub-)consolidated	Eligible at solo and consolidated level
7	Instrument type (types to be specified by each jurisdiction)	Subordinated liabilities
8	Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	10,000,000 EUR at solo level (reduced at consolidated level due to deduction of minorities)
9	Nominal amount of instrument	10,000,000 EUR
EU-9a	Issue price	100 EUR
EU-9b	Redemption price	100 EUR
10	Accounting classification	Liability – amortized cost
11	Original date of issuance	7/3/2007
12	Perpetual or dated	Dated
13	Original maturity date	7/3/2047
14	Issuer call subject to prior supervisory approval	Yes
15	Optional call date, contingent call dates and redemption amount	7/3/2017
16	Subsequent call dates, if applicable	Annually from 07/03/2017
<i>Coupons / dividends</i>		
17	Fixed or floating dividend/coupon	Fixed
18	Coupon rate and any related index	5.0175 % p. a.
19	Existence of a dividend stopper	N/A
EU-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	N/A
EU-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	N/A
21	Existence of step up or other incentive to redeem	No
22	Noncumulative or cumulative	N/A
23	Convertible or non-convertible	Non-convertible
24	If convertible, conversion trigger(s)	
25	If convertible, fully or partially	
26	If convertible, conversion rate	
27	If convertible, mandatory or optional conversion	
28	If convertible, specify instrument type convertible into	
29	If convertible, specify issuer of instrument it converts into	
30	Write-down features	No
31	If write-down, write-down trigger(s)	
32	If write-down, full or partial	
33	If write-down, permanent or temporary	
34	If temporary write-down, description of write-up mechanism	
34a	Type of subordination (only for eligible liabilities)	By law
EU-34b	Ranking of the instrument in normal insolvency proceedings	T 2 capital
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Non-subordinated instruments
36	Non-compliant transitioned features	No
37	If yes, specify non-compliant features	
37a	Link to the full term and conditions of the instrument (signposting)	https://www.kommunalkredit.at/fileadmin/user_upload/Processed/Investor-Relations/Bond-Investoren/Na-chrangige-Instrumente/Kommunalkred-it-Bedingungen-SSD50.pdf

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

		a
		Qualitative or quantitative information - Free format
1	Issuer	Kommunalkredit Austria
2	Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	SSD 51
2a	Public or private placement	Private
3	Governing law(s) of the instrument	German law, subordination in accordance with Austrian law
3a	Contractual recognition of write down and conversion powers of resolution authorities	N/A
<i>Regulatory treatment</i>		
4	Current treatment taking into account, where applicable, transitional CRR rules	T 2 capital
5	Post-transitional CRR rules	T 2 capital
6	Eligible at solo/(sub-)consolidated/ solo&(sub-)consolidated	Eligible at solo and consolidated level
7	Instrument type (types to be specified by each jurisdiction)	Subordinated liabilities
8	Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	9,000,000 EUR at solo level (reduced at consolidated level due to deduction of minorities)
9	Nominal amount of instrument	9,000,000 EUR
EU-9a	Issue price	100 EUR
EU-9b	Redemption price	100 EUR
10	Accounting classification	Liability – amortized cost
11	Original date of issuance	7/3/2007
12	Perpetual or dated	Dated
13	Original maturity date	7/3/2047
14	Issuer call subject to prior supervisory approval	Yes
15	Optional call date, contingent call dates and redemption amount	7/3/2017
16	Subsequent call dates, if applicable	Annually from 07/03/2017
<i>Coupons / dividends</i>		
17	Fixed or floating dividend/coupon	Fixed
18	Coupon rate and any related index	5.0175 % p. a.
19	Existence of a dividend stopper	N/A
EU-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	N/A
EU-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	N/A
21	Existence of step up or other incentive to redeem	No
22	Noncumulative or cumulative	N/A
23	Convertible or non-convertible	Non-convertible
24	If convertible, conversion trigger(s)	
25	If convertible, fully or partially	
26	If convertible, conversion rate	
27	If convertible, mandatory or optional conversion	
28	If convertible, specify instrument type convertible into	
29	If convertible, specify issuer of instrument it converts into	
30	Write-down features	No
31	If write-down, write-down trigger(s)	
32	If write-down, full or partial	
33	If write-down, permanent or temporary	
34	If temporary write-down, description of write-up mechanism	
34a	Type of subordination (only for eligible liabilities)	By law
EU-34b	Ranking of the instrument in normal insolvency proceedings	T 2 capital
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Non-subordinated instruments
36	Non-compliant transitioned features	No
37	If yes, specify non-compliant features	
37a	Link to the full term and conditions of the instrument (signposting)	https://www.kommunalkredit.at/fileadmin/user_upload/Processed/Investor-Relations/Bond-Investoren/Na-chrangige-Instrumente/Kommunalkred-it-Bedingungen-SSD51.pdf

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

		a
		Qualitative or quantitative information - Free format
1	Issuer	Kommunalkredit Austria
2	Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	AT0000A3MQS7
2a	Public or private placement	Public
3	Governing law(s) of the instrument	Austrian law
3a	Contractual recognition of write down and conversion powers of resolution authorities	
<i>Regulatory treatment</i>		
4	Current treatment taking into account, where applicable, transitional CRR rules	T 2 capital
5	Post-transitional CRR rules	T 2 capital
6	Eligible at solo/(sub-)consolidated/ solo&(sub-)consolidated	Eligible at solo and consolidated level
7	Instrument type (types to be specified by each jurisdiction)	Tier 2 bond
8	Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	150,000,000 EUR at solo level (reduced at consolidated level due to deduction of minorities)
9	Nominal amount of instrument	150,000,000 EUR
EU-9a	Issue price	99.459 EUR
EU-9b	Redemption price	100 EUR
10	Accounting classification	Liability – amortized cost
11	Original date of issuance	24/06/2025
12	Perpetual or dated	Dated
13	Original maturity date	24/09/2035
14	Issuer call subject to prior supervisory approval	Yes
15	Optional call date, contingent call dates and redemption amount	24/06/2030
16	Subsequent call dates, if applicable	Daily from 24/06/2030 to 24/09/2030
<i>Coupons / dividends</i>		
17	Fixed or floating dividend/coupon	Fixed
18	Coupon rate and any related index	5.500% p.a. until 24/09/2030, resets to fixed at 5-year mid-swap + 335bps till maturity
19	Existence of a dividend stopper	No
EU-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	
EU-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	
21	Existence of step up or other incentive to redeem	
22	Noncumulative or cumulative	
23	Convertible or non-convertible	Non-convertible
24	If convertible, conversion trigger(s)	
25	If convertible, fully or partially	
26	If convertible, conversion rate	
27	If convertible, mandatory or optional conversion	
28	If convertible, specify instrument type convertible into	
29	If convertible, specify issuer of instrument it converts into	
30	Write-down features	No
31	If write-down, write-down trigger(s)	
32	If write-down, full or partial	
33	If write-down, permanent or temporary	
34	If temporary write-down, description of write-up mechanism	
34a	Type of subordination (only for eligible liabilities)	By law
EU-34b	Ranking of the instrument in normal insolvency proceedings	T 2 capital
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Non-subordinated instruments
36	Non-compliant transitioned features	No
37	If yes, specify non-compliant features	
37a	Link to the full term and conditions of the instrument (signposting)	https://www.kommunalkredit.at/fileadmin/user_upload/Processed/Investor-Relations/Bond-Investoren/Nachrangige-Instrumente/Kommunalkredit-Bedingungen-ADIP-87.pdf

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

Quantitative Disclosure

All of the templates listed below are available in quantitative or qualitative format in a separate Excel file.

Template	Title
EU CC1	Composition of regulatory own funds
EU CC2	Reconciliation of regulatory own funds to balance sheet in the audited financial statements
EU OV1	Overview of risk weighted exposure amounts
EU KM1	Key metrics template
EU LI1	Differences between the accounting scope and the scope of prudential consolidation and mapping of financial statement categories with regulatory risk categories
EU LI2	Main sources of differences between regulatory exposure amounts and carrying values in financial statements
EU LI3	Outline of the differences in the scopes of consolidation (entity by entity)
EU CCyB1	Template EU CCyB1 - Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer
EU CCyB2	Template EU CCyB2 - Amount of institution-specific countercyclical capital buffer
EU CCR1	Analysis of CCR exposure by approach
EU CCR3	Standardized approach – CCR exposures by regulatory exposure class and risk weights
EU CCR5	Composition of collateral for CCR exposures
EU CCR8	Exposures to CCPs
EU CR1	Performing and non-performing exposures and related provisions
EU CR1-A	Maturity of exposures
EU CR2	Changes in the stock of non-performing loans and advances
EU CR3	CRM techniques overview: Disclosure of the use of credit risk mitigation techniques
EU CR4	Standardized approach -Credit risk exposure and CRM effects
EU CR5	Standardized approach
EU CR10	Specialized lending and equity exposures
EU CQ1	Credit quality of forborne exposures
EU CQ3	Credit quality of performing and non-performing exposures by past due days
EU CQ4	Quality of non-performing exposures by geography
EU CQ5	Credit quality of loans and advances by industry
EU CQ7	Collateral obtained by taking possession and execution processes
EU OR2	Business Indicator, components and subcomponents
EU OR3	Operational risk own funds requirements and risk exposure amounts
EU ORA	Qualitative information on operational risk
EU MR1	Market risk under the standardized approach
EU CVA 1	Credit valuation adjustment risk under the Reduced Basic Approach (R-BA)
EU LR1	Summary reconciliation of accounting assets and leverage ratio exposures
EU LR2	Leverage ratio common disclosure
EU LR3	Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)
EU LIQ1	Quantitative information of LCR
EU LIQ2	Net Stable Funding Ratio
EU AE1	Encumbered and unencumbered assets
EU AE2	Collateral received and own debt securities issued
EU AE3	Sources of encumbrance
EU AE4	Accompanying narrative information
EU IRRBB1	Interest rate risks of non-trading book activities
EU REM1	Remuneration awarded for the financial year
EU REM2	Special payments to staff whose professional activities have a material impact on institutions' risk profile (identified staff)
EU REM3	Deferred remuneration
EU REM4	Remuneration of 1 million EUR or more per year
EU REM5	Information on remuneration of staff whose professional activities have a material impact on institutions' risk profile (identified staff)

Since the following templates are not bound by any specific format, we have disclosed this content purely on a qualitative basis.

Template	Title
EU CCA	Main features of regulatory own funds instruments and eligible liabilities instruments
EU OVC	ICAAP Information
EU OVA	Institution risk management approach
EU OVB	Disclosure on governance arrangements
EU LIA	Explanations of differences between accounting and regulatory exposure amounts
EU LIB	Other qualitative information on the scope of application
EU CCRA	Qualitative disclosure related to CRR
EU CRA	General qualitative information about credit risk
EU CRB	Additional disclosure related to the credit quality of assets
EU CRC	Qualitative disclosure requirements related to CRM techniques
EU CRD	Qualitative disclosure requirements related to standardized approach
EU MRA	Qualitative disclosure requirements related to market risk
EU CVAA	Qualitative disclosure requirements related to credit valuation adjustment risk
EU LRA	Disclosure of LR qualitative information
EU LIQA	Liquidity risk management
EU LIQB	On qualitative information on LCR, which complements template EU LIQ1
EU IRRBBA	Qualitative information on interest rate risks of non-trading book activities
EU REMA	Remuneration policy

Due to the business model of the Green Opera Finance Invest AB Group, none of these templates need to be reported.

Template	Title
EU INS1	Insurance participations
EU INS2	Financial conglomerates information on own funds and capital adequacy ratio
EU CMS1	Comparison of modelled and standardized risk weighted exposure amounts at risk level
EU CMS2	Comparison of modelled and standardized risk weighted exposure amounts for credit risk at asset class level
EU CCR4	IRB approach – CCR exposures by exposure class and PD scale
EU CR2a	Changes in the stock of non-performing loans and advances and related net accumulated recoveries
EU CCR6	Credit derivatives exposures
EU CCR7	RWEA flow statements of CCR exposures under the IMM
EU CR6	IRB approach – Credit risk exposures by exposure class and PD range
EU CR6-A	Scope of the use of IRB and SA approaches
EU CR7	IRB approach – Effect on the RWEAs of credit derivatives used as CRM techniques
EU CR7-A	IRB approach – Disclosure of the extent of the use of CRM techniques
EU CR8	RWEA flow statements of credit risk exposures under the IRB approach
EU CR9	IRB approach – Back-testing of PD per exposure class (fixed PD scale)
EU CR9.1	Back-testing of PD per exposure class (only for PD estimates according to Article 180(1)(f))
EU CRE	Qualitative disclosure requirements related to IRB approach
EU SEC1	Securitization exposures in the non-trading book
EU SEC2	Securitization exposures in the trading book
EU SEC3	Securitization exposures in the non-trading book and associated regulatory capital requirements - institution acting as originator or as sponsor
EU SEC4	Securitization exposures in the non-trading book and associated regulatory capital requirements - institution acting as investor
EU SEC5	Exposures securitized by the institution - Exposures in default and specific credit risk adjustments
EU SECA	Qualitative disclosure requirements related to securitization exposures
EU CQ2	Quality of forbearance
EU CQ6	Collateral valuation - loans and advances
EU CQ8	Collateral obtained by taking possession and execution processes – vintage breakdown
EU OR1 (2)	Operational risk losses
EU MR2-A	Market risk under the internal Model Approach (IMA)
EU MR2-B	RWA flow statements of market risk exposures under the IMA
EU MR3	IMA values for trading portfolios
EU MR 4	Comparison of VaR estimates with gains/losses
EU MR1 (2)	Market risk under the alternative standardized approach (ASA)
EU MR2	Market risk under the alternative internal model approach (AIMA)
EU MR 3 (2)	Market risk under the simplified standardized approach (SSA)
EU MRB	Qualitative disclosure requirements for institutions using the alternative internal model approach (AIMA)
EU CVA2	Credit valuation adjustment risk under the Full Basic Approach (F-BA)
EU CVA3	Credit valuation adjustment risk under the Standardized Approach (SA)
EU CVA4	RWEA flow statements of credit valuation adjustment risk under the Standardized Approach (SA)
EU CVAB	Qualitative disclosure requirements related to CVA risk for institutions using the Standardized Approach
EU PV1	Prudent valuation adjustments (PVA)
EU CAE1	Exposures to crypto-assets
EU SB1	Aggregate exposure to shadow banking entities
EU KM2	Key metrics - MREL and, where applicable, G-SII Requirement for own funds and eligible liabilities
EU TLAC1	Composition - MREL and, where applicable, the G-SII Requirement for own funds and eligible liabilities
EU iLAC	Internal loss absorbing capacity: internal MREL and, where applicable, requirement for own funds and eligible liabilities for non-EU G-SIIs
EU TLAC2a	Creditor ranking - Entity that is not a resolution entity
EU TLAC3a	Creditor ranking - resolution entity

