

PILLAR 3

REPORT 2025



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PART 1: GOVERNANCE AND RISK METHODOLOGIES

1 INTRODUCTION

This year-end Pillar 3 Report presents S-Bank Group's Pillar 3 disclosures as of 31 December 2025. The S-Bank Group (hereinafter also "S-Bank") consists of S-Bank Plc and its subsidiaries, which are owned by SOK Corporation and regional cooperatives. This report provides a comprehensive overview of S-Bank's capital adequacy, risk profile, and governance framework, supporting effective risk management practices. The purpose of this report is to ensure transparency in accordance with applicable regulatory requirements.

1.1 KEY ELEMENTS OF S-BANK'S DISCLOSURE PRINCIPLES

The information disclosed in this Pillar 3 Report has been prepared in accordance with Part Eight of the Capital Requirements Regulation (EU) No 575/2013 (CRR), as amended, and in compliance with the delegated acts and guidelines issued by the European Banking Authority (EBA) for publishing Pillar 3 disclosures. S-Bank complies with its disclosure obligations by publishing the Pillar 3 Report annually in conjunction with the Board of Directors' Report and the Financial Statements. A condensed Pillar 3 report is disclosed

semi-annually alongside the Half-year Report. S-Bank is classified as an 'other listed institution' and discloses Pillar 3 information in accordance with Article 433c of the CRR.

S-Bank aims to provide open and high-quality external reporting on the risks related to its operations, both qualitatively and quantitatively. The objective is to ensure that the report complies with regulatory requirements and that stakeholders have access to the essential information they need when assessing S-Bank's risk position, risk management practices, and governance framework. To fulfil this objective, the Pillar 3 Report's disclosure principles set out the internal processes, roles and responsibilities, as well as the control mechanisms governing the report's production and quality assurance. The disclosure principles also define the bodies responsible for reviewing the report before it is finally approved by the Board of Directors.

This annually published report is divided into two parts: Part 1 presents qualitative information on S-Bank's governance, risk methodologies and risk position, while Part 2 provides quantitative risk data. The

figures presented in this report are largely based on regulatory reporting to the banking supervisors. Where there are major changes compared with the previous period, quantitative disclosures are accompanied by a qualitative information. This report has not been externally audited. However, some of the figures presented in this report are based on the Annual Report 2025 of S-Bank Plc, which has been audited by external auditor.

Most of the information that S-Bank is required to disclose under the Pillar 3 framework are disclosed in this report. Remuneration policy and practices, however, are disclosed in a separate document, which is also available on S-Bank's website. Further details on S-Bank's corporate governance statement and management systems are published on the S-Bank website and maintained on a regular basis. The disclosure information required by the CRR will also be submitted to the EBA's Pillar 3 Data Hub (P3DH) during the first half of 2026. The Pillar 3 Data Hub centralises banks' prudential disclosures and makes pillar 3 data publicly available through a single electronic access point. At the end of this report, the CRR reference table identi-

fies where the information mandated by CRR Articles 435–455 can be found, as well as items not disclosed due to immateriality, proprietary or confidential nature, or because they are not applicable to S-Bank.

All figures in this report are consolidated figures of S-Bank Group, if not otherwise stated. Amounts are shown in millions of euros (EUR), rounded to one decimal place. As a result of rounding, certain totals may not correspond exactly to the sum of their components.

For the comparison period as of 31 December 2024, capital adequacy ratios and risk-weighted exposure amounts are presented in accordance with the CRR2 regulatory framework applicable at that time.

2 RISK DECLARATION AND STATEMENT

S-Bank is a Finnish bank that provides banking and wealth management services to its customers. As a bank with more than 3 million customers, S-Bank's strategy focuses on profitable growth by providing superior ease and benefits, as well as a little more wealth to S Group's co-op members. The strategic goal is to reach one million active customers by 2027. S-Bank operates under the supervision of the Finnish Financial Supervisory Authority and the Financial Stability Authority, and complies with both EU and national regulatory requirements, including the Capital Requirements Regulation (CRR) and related EBA regulation.

S-Bank's overall risk profile and risk management arrangements

S-Bank's Board of Directors has set and approved a risk strategy that applies to all Group companies and their business and support functions. The risk strategy defines the Group's risk capacity and risk appetite, identifies the relevant risks for S-Bank and sets a target state for the Bank's risk culture. The Board of Directors defines the quantitative and qualitative limits of the S-Bank Group's risk capacity and risk appetite as part of the risk strategy. The quantitative and qualitative limits are assessed regularly and whenever required by changes in the business or the operating

environment. The risk appetite indicators are monitored and controlled as part of regular reporting.

The most significant risk types from the perspective of capital requirements are credit risk and operational risks. In line with its strategy, S-Bank positions itself as a bank for Finnish households, focuses on household lending including housing loans and other secured loans, credit cards and consumption loans. This means the bank is prepared to take a moderate credit risk in retail lending to support customer needs and business growth. The Board of Directors approves principles and strategies for credit risk management. Credit risk strategy defines the target segments for lending, growth targets and allocation limits that are based on S-Bank's risk strategy. Credit risk is managed by the business and support units within the principles and limits approved by the Board of Directors.

S-Bank is also exposed to interest rate risk in the banking book (IRRBB) and accepts a moderate level of such risk in a controlled manner and in accordance with risk management principles. Market risks are measured using sensitivity figures, allocations, stress tests and scenario analyses. The Board of Directors has set the princi-

ples for market risk management and risk limits for each market risk type, which are monitored and reported actively to the Board of Directors. S-Bank does not have a trading book, in accordance with the Capital Requirements Regulation, and hence the company is not subject to capital requirement for market risk.

Capital adequacy and liquidity management are also fundamental parts of the S-Bank's risk management process and framework, implemented through a proactive approach aligned with S-Bank's strategy, business plan and overall risk strategy. The objective of sound capital and liquidity management is to ensure that S-Bank continuously has the appropriate capital and liquidity position required to achieve its strategic business goals and risk limits. The core methods for measuring and monitoring liquidity risk at the S-Bank Group level are the adequacy of the liquidity reserve, the liquidity coverage requirement, and the net stable funding requirement, assessed through stress tests. At the end of the year, S-Bank's liquidity coverage ratio (LCR) was 318.1 per cent and the net stable funding ratio (NSFR) was 161.1 per cent, clearly exceeding the regulatory requirement of 100 per cent and internally set risk appetite minimum level.

S-Bank aims to maintain a strong capital position, with a capital adequacy ratio of at least 1.5 percentage points above the minimum level set by the authorities at any given time. At the end of 2025, the total capital ratio was 25.3 per cent, significantly exceeding the regulatory requirement of 13.52 per cent and the Pillar 2 Guidance (P2G) of 0.75 per cent of the total risk exposure amount.

For other quantitative risks, the risk appetite is low, reflecting a prudent approach aimed at ensuring stable operations.

In 2025, there were no intragroup or related-party transactions that materially affected S-Bank's risk profile.

The S-Bank Group's key risk indicators

EUR million	31 Dec 2025	31 Dec 2024
Total risk exposure amount	4 129.0	4 608.6
Credit and Counterparty Credit risk	3 476.1	3 881.9
Operational risk	643.4	716.1
Credit valuation adjustment (CVA)	9.5	10.7
Own funds, total	1 044.6	988.3
Common Equity Tier 1 (CET1) capital	956.7	894.1
Tier 2 (T2) capital	87.9	94.2
Total capital requirement (Pillar 1)	13.52%	13.52%
Capital adequacy ratio	25.3%	21.4%
Common Equity Tier 1 (CET1) ratio	23.2%	19.4%
Non-performing loan (NPL) ratio	1.8%	1.7%
Leverage ratio	7.1%	6.7%
Liquidity Coverage Ratio (LCR)	318.1%	285.4%
Net Stable Funding Ratio (NSFR)	161.1%	155.9%

Approval by the Board of Directors of both the risk statement and compliance with internal disclosure principles

The Board of Directors has approved this risk statement and confirms it provides external stakeholders a comprehensive view of S-Bank's risk management and risk profile associated with its' business strategy. Based on the same grounds, the Board of Directors declares that the risk management arrangements put in place are adequate with regards to S-Bank's risk profile and strategy. This declaration is supported by the overall risk strategy, the defined risk limits, and the ongoing risk reporting that the Board of Directors receives and reviews to assess compliance.

In addition, the Board of Directors confirms that the information disclosed in this report has been prepared in accordance with the agreed internal control processes and the principles approved by the Board of Directors, as summarised in Chapter 1.1. The Board also declares that the report complies with Part Eight of the CRR and the related EBA guidelines and regulations.

Helsinki, 27 February 2026

Signatures of the Members of the Board of Directors

Jari Annala

Chair of the Board of Directors

Jorma Vehviläinen

Vice Chair of the Board of Directors

Tom Dahlström

Member of the Board of Directors

Kati Hagros

Member of the Board of Directors

Veli-Matti Liimatainen

Member of the Board of Directors

Hillevi Mannonen

Member of the Board of Directors

Tarja Tikkanen

Member of the Board of Directors

Niklas Österlund

Member of the Board of Directors

3 S-BANK'S RISK POSITION IN 2025

Improved capital position

S-Bank's capital position strengthened during 2025. At the end of the year, total capital ratio stood at 25.3 per cent (21.4) and CET1 ratio 23.2 per cent (19.4). The strengthening of the capital adequacy ratios was primarily affected by the changes to the Capital Requirements Regulation (CRR3) that came into effect on 1 January 2025.

S-Bank's risk exposure amount (REA) decreased by EUR 479.6 million during the year 2025 and totalled to EUR 4 129.0 million (4 608.6). The implementation of CRR3 regulation reduced the risk exposure amount by EUR 568.9 million. Of this reduction, amendments related to credit risk accounted for EUR 455.3 million, mainly due to the revised methodology for calculating risk-weighted assets for exposures secured by mortgages on immovable property. The CRR3 regulatory changes decreased the REA for operational risk by EUR 116.4 million, reflecting the transition from the basic indicator approach to the new standardised approach for operational risk. Excluding the CRR3-related changes, the risk exposure amount increased by EUR 89.3 million, primarily due to growth in both credit and operational risk. Changes in the

risk related to credit valuation adjustment (CVA) were minor during the review period.

Total capital ratio was 11.0 percentage points above the regulatory requirement of 13.52 per cent and the Pillar 2 Guidance (P2G) of 0.75 per cent. S-Bank is strongly capitalised to ensure continuity of its operations even under stressed conditions.

Stable credit portfolio

The loan portfolio stood at EUR 9.4 billion (9.5) at the end of the year. Of the total loan portfolio 82.1 per cent (83.1) were loans secured by real estate, primarily to household customers and housing companies in Finland. There were no major changes in the distribution between different credit products.

The total amount of ECL provision decreased by EUR 3.1 million to EUR 49.3 million (52.3) during the financial year. The total amount of the ECL provision included provisions based on management judgement totalling EUR 3.2 million (3.8). The coverage ratio of the entire loan portfolio was 0.38 per cent (0.42) and remained within the risk appetite set by S-Bank's Board of Directors.

The amount of non-performing loans (NPL) in the balance sheet was EUR 169.5 million

(164.3), of which corporate customers amounted to EUR 0.0 million (9.0). The NPL ratio, which describes non-performing exposures in relation to loans and advances, was 1.8 per cent (1.7).

Strong liquidity and strengthened deposits

S-Bank's liquidity and funding position remained strong during the year, LCR ratio being 318.1 per cent (285.4) and NSFR ratio 161.1 per cent (155.9) at the end of the year.

In 2025, The deposit base strengthened during the year and especially deposits from household customers grew. At the end of the year total deposits were EUR 10 170.8 million (9 381.4). In December, S-Bank issued inaugural Senior Non-Preferred bond valued at EUR 150 million. S-Bank made also a tender offer and bought back in aggregate nominal amount EUR 97.9 million of its outstanding Senior Preferred MREL Eligible Notes due in 2026.

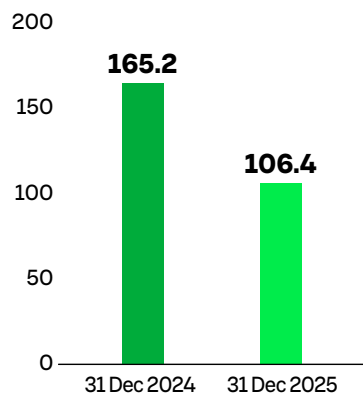
In December 2025, international credit rating agency Standard & Poor's (S&P) raised S-Bank's credit rating to A- and affirmed its short-term credit rating at A-2. S&P's outlook for S-Bank is stable.

Forthcoming changes to the capital requirements

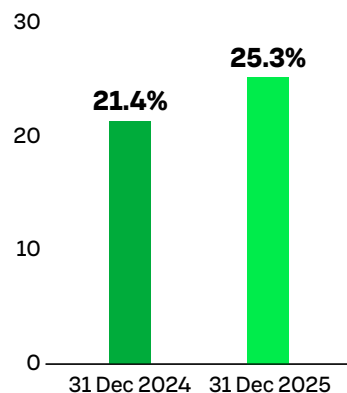
The Finnish Financial Supervisory Authority (FIN-FSA) announced on 22 October 2025 in its decision that it will lower S-Bank's discretionary Pillar 2 requirement by 0.5 percentage points as part of the regular supervisory review and evaluation process. The new requirement of 1.5 per cent will take effect on 31 March 2026 and will remain in force until 31 March 2029 at the latest. S-Bank's current discretionary Pillar 2 requirement is 2.0 per cent of the total risk exposure amount. 75 per cent of the requirement must be covered by Tier 1 (T1) capital, of which a further 75 per cent must be covered by Common Equity Tier 1 (CET1) capital.

In December 2025, the FIN-FSA announced that the Pillar 2 Guidance (P2G), derived primarily from stress test results, will remain unchanged at 0.75 per cent of the total risk exposure amount. The decision will enter into force on 31 March 2026, from which date the P2G must be fully covered by Common Equity Tier 1 (CET1) capital.

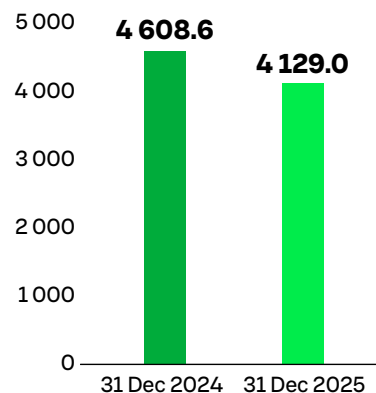
Operating profit (EUR million)



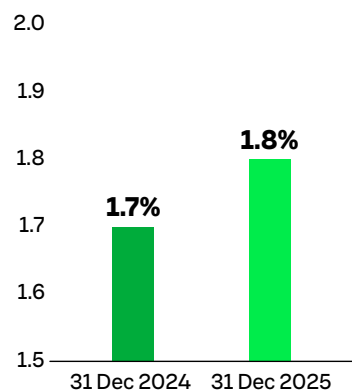
Total capital ratio (%)



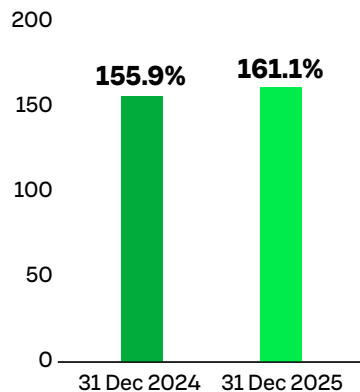
Total REA (EUR million)



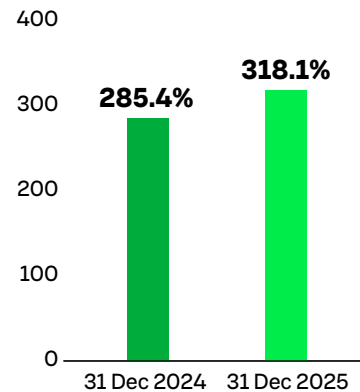
NPL ratio (%)



NSFR (%)



LCR (%)



4 DESCRIPTION OF THE S-BANK GROUP

4.1 CORPORATE STRUCTURE AND CONSOLIDATION

S-Bank provides banking and wealth management services to its customers. The S-Bank Group comprises S-Bank Plc and its subsidiaries, owned by SOK Corporation and regional cooperatives.

S-Bank Plc is the parent company of the S-Bank Group. S-Bank is a deposit bank that engages in credit institution operations pursuant to the Finnish Act on Credit Institutions (610/2014). The bank engages in the operations and related activities referred to in Chapter 5, section 1, of the above-mentioned Act. The Bank engages also in mortgage banking activities pursuant to Finnish Act on Mortgage Credit Banks and Covered Bonds (11.3.2022/151). In addition, the Bank is offering investment services pursuant to Chapter 1, section 15, of the Act on Investment Services (747/2012). As the parent company, S-Bank performs such tasks of the Group companies that must be carried out in a centralised manner, such as the Group's administration, guidance and supervision.

S-Bank Fund Management Ltd is a wholly owned subsidiary of S-Bank Plc, which acts as a fund management company and authorised alternative investment fund manager for S-Pankki funds. S-Bank Fund

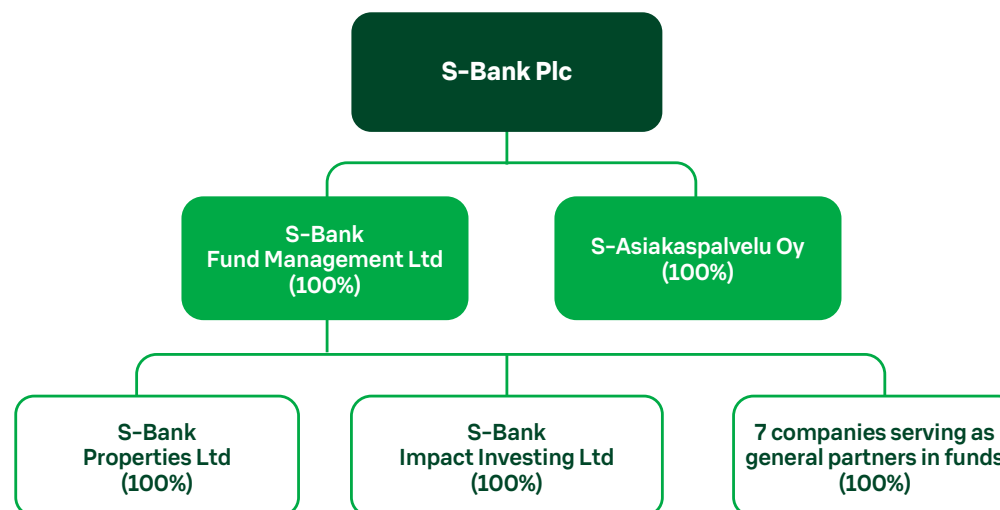
Management Ltd is responsible for the portfolio management of alternative funds which invest to real estate, private equity and other alternative investments. Portfolio management of equity, interest and asset management funds is outsourced to S-Bank Plc.

S-Asiakaspalvelu Oy is a wholly owned subsidiary of S-Bank Plc. It provides customer service and data processing-related and other services relevant to a credit institution's core operations, in its capacity as a service company as provided for by the Act on Credit Institutions (610/2014).

S-Bank Properties Ltd specialises in property management and offers its services to investors, property owners and tenants. In addition to property portfolio management, property management services and property development, the company focuses on the implementation and management of joint venture projects. S-Bank Fund Management Ltd owns 100 per cent of S-Bank Properties Ltd's share capital.

S-Bank Impact Investing Ltd is a wholly owned subsidiary of S-Bank Fund Management Ltd. The company is responsible for the planning and coordination of the operations of projects financed by impact investing funds.

Corporate structure of S-Bank Group

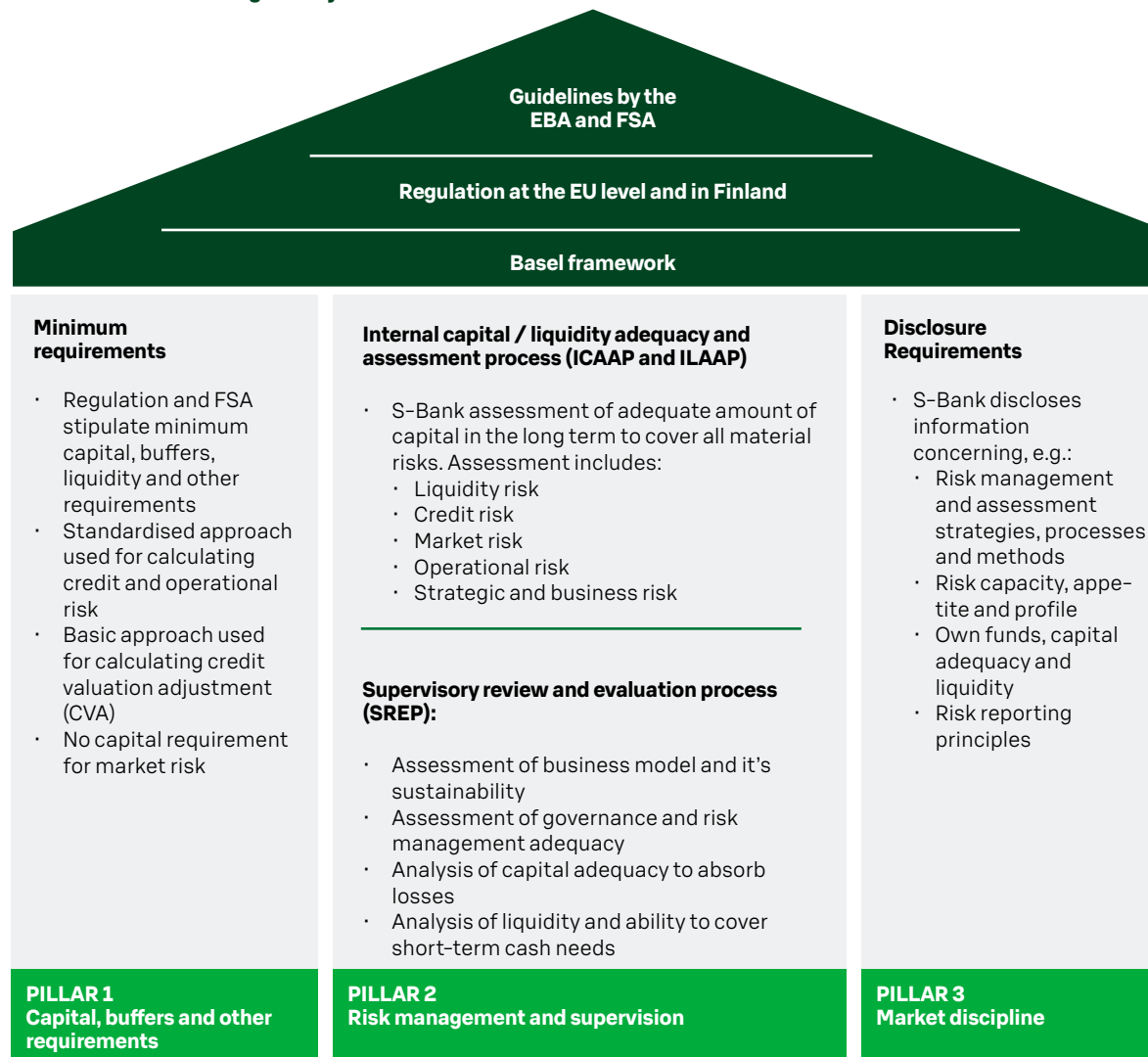


FIM Real Estate Ltd, FIM Infrastructure Mezzanine Debt Fund GP Oy, FIM Infrastructure Mezzanine Debt Fund III GP Oy, FIM Private Debt Fund I GP Oy, FIM SIB Oy, S-Pankki Vaikuttavuus IGPOy and S-Pankki Social Finance I GP Oy serve as general partners in funds managed by S-Bank Fund Management Ltd. These companies have no other business activities and are fully owned by S-Bank Fund Management Ltd.

5 GOVERNANCE OF RISK

The regulatory framework for banks comprises of three Pillars: (1) minimum requirements addressing risk, (2) risk management and supervisory review and (3) market discipline. The framework is implemented at the EU level through directives, regulations, standards, guidelines, and national legislation. It is further specified by regulations and guidelines issued by various authorities, such as the European Banking Authority (EBA) and the local Financial Supervisory Authority. S-Bank is under supervision of the Finnish Financial Supervisory Authority and the Financial Stability Authority.

Basel international regulatory framework



5.1 INSTITUTION RISK MANAGEMENT APPROACH (EU OVA)

The institution's risk management approach at a general level is described in this chapter. The following chapters of this report provide more detailed descriptions of the risk management practices for each type of risk.

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

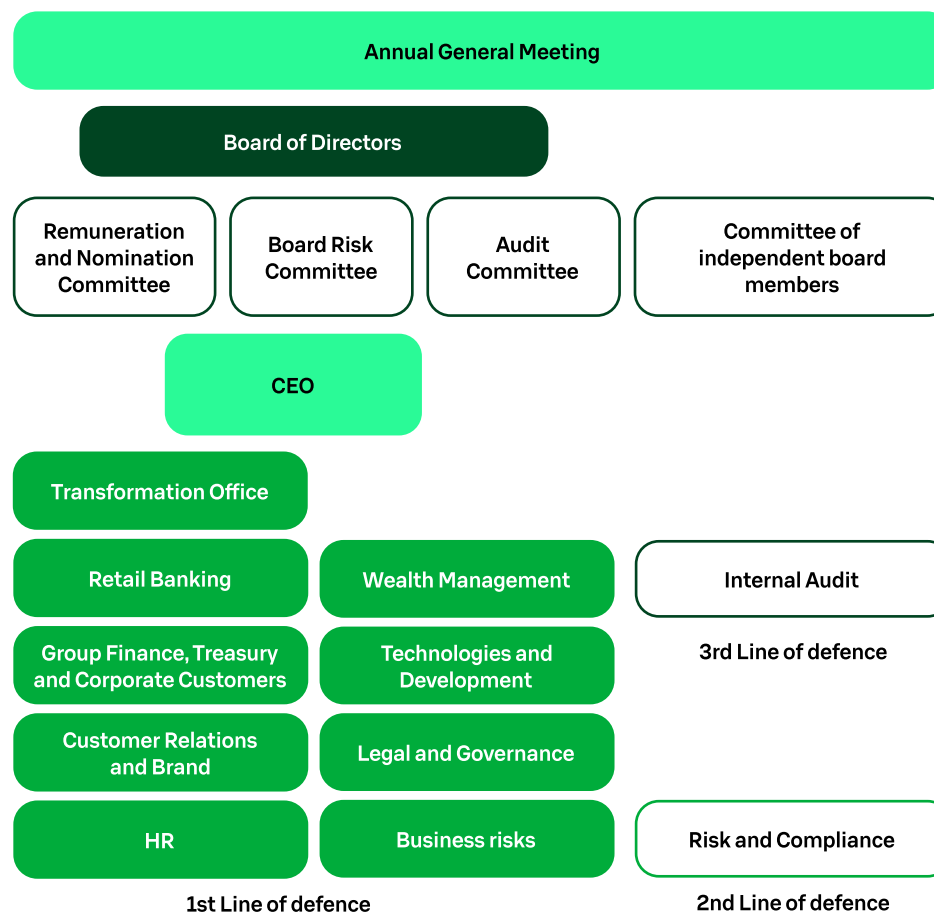
The risk declaration and statement approved by the Board of Directors is disclosed in chapter 2.

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

S-Bank's risk management is built on three lines of defence. The first line of defence consists of units responsible for the Group-level business operations and supporting functions, and which conduct business operations in accordance with S-Bank's strategy and business plan. The first line of defence is responsible for risk-taking, identification of risks and daily risk management.

The second line of defence, Risk and Compliance, consists of the Group-level functions that are independent of business

S-Bank Group's administrative structure



operations. The second line of defence is responsible for maintaining the risk management framework, acting as an independent control function, and monitoring the implementation of risk management and adequacy internal control.

Internal Audit is the third line of defence and is independent of the functions being audited. The purpose of the function is to audit and evaluate the effectiveness of the risk management and internal control measures carried out by the Group. Consequently, Internal Audit also reviews the activities of the Risk and Compliance functions.

Board of Directors

The parent company's Board of Directors bears overall responsibility for risk management in the S-Bank Group, ensuring that the Group's operations are organised appropriately and reliably. The Board is responsible for the strategic management of the entire bank group, setting strategic goals and risk strategy, approving principles for risk management and monitoring their implementation.

The Board ensures that Bank continuously has adequate amount of capital to cover all material risks arising from its business operations and changes in the operating

environment and that the risk-bearing capacity is sufficient. The Board monitors the development of capital, its allocation and risk limits, and decides on the recapitalising and financing arrangements and their implementation.

Furthermore, the Board of Directors monitors the scope, effectiveness and soundness of risk management and ensures the adequacy of the independent internal control functions. The Board of Directors oversees that the Internal Audit function regularly assesses the effectiveness and quality of risk management, the internal control framework, as well as the integrity and expediency of the independent internal control functions.

The Board of Directors is assisted in its work by the Board Risk Committee, Audit Committee, Remuneration and Nomination Committee, as well as Committee of Independent Board Members. The Board Risk Committee assists the Board of Directors in matters concerning S-Bank's risk strategy and risk-taking. The Committee also oversees and assesses issues related to the ICLAAP process. Furthermore, it works in co-operation with the other Board Committees to ensure that S-Bank's remuneration principles are consistent with

sound and efficient risk management and do not entail excessive risk-taking. The Committee of Independent Board Members convenes, when necessary, to prepare a decision for the Board in situations where at least half of the Board members have a conflict of interest in the matter.

CEO and Group Management Team

S-Bank's CEO, assisted by the Group Management Team, is responsible for managing the operations and governance of the Group, implementing risk management practices, promoting good risk culture and organising internal control in accordance with the principles set by the Board. CEO, with assistance of the Group Management Team, is responsible for assuring, that risk capacity and risk appetite are considered in the S-Bank's strategy process, operational planning, and risk management. In addition, CEO is responsible for achieving the set goals and for monitoring and managing the risks that may threaten these goals.

The CEO has established committees that make and prepare decisions falling within the responsibilities of the operative management. The key committees responsible for preparing and making risk-related decisions are Management Risk

Committee, Asset and Liability Committee, and the Credit Committee.

Risk management committees

The task of the Management Risk Committee is to ensure, that Group Management Team, The Board, and its committees has sufficient and relevant overall picture of the Group's risk position. The Management Risk Committee ensures that the Group's operations comply with internal guidelines and external regulations. The Management Risk Committee prepares and recommends for approval by the Board the key risk management strategies, policies, and risk appetite limits. In addition, risk reports and other documents requiring independence are presented to the Committee for information prior being considered by the Board. The CEO acts as a chairman in Management Risk Committee and it is a first line of defence body, which convenes on a monthly basis. Under the Committee, there are preparatory and decision-making bodies focusing on specific risk categories.

Asset and Liability Committee's task is to ensure capital adequacy, liquidity and to forecast, monitor and manage capital adequacy and balance sheet. Asset and Liability Committee is a first line of defence body.

The task of the Credit Committee is to make customer-specific credit decisions. Under the Credit Committee, there are separate credit committees for corporate and household customers, which make credit decisions within their authority and monitor the development of credit risks. Credit Committee is a first line of defence body.

The Group's units

Within the first line of defence, S-Bank has the Group's units responsible for the Group-level business operations and support functions complemented by the Business Risks Unit, which provides coordination and additional support in risk management. In addition, the Group has Risk and Compliance unit as part of the second line of defence and the Internal Audit unit in the third line of defence. The Group's units are presented in the diagram S-Bank Group's administrative structure.

The directors of S-Bank's business and support functions take primary responsibility for the risks in their respective areas and for ensuring that their units operate in accordance with S-Bank's guidelines, policies and set limits. Hence, they are responsible for identifying and assessing the risks associated with their operations, and for managing and monitoring them

and for carrying out internal controls. The directors of the Group's units are responsible for ensuring that the unit's operations and risk management are clearly and sufficiently described.

Independent control functions

Independent control functions consist of Compliance, Risk Control, Operational Risk Control and Internal Audit.

Compliance is tasked to monitor compliance with regulations, internal guidelines, and ethical principles. Compliance maintains and develops principles and procedures to ensure compliance to regulations. Compliance performs its control function according to the risk-based annual plan approved by the Board and regularly reports its findings and recommendations to the Board and executive management.

Risk Control is tasked with comprehensively monitoring and assessing S-Bank's risk-taking level and the implementation of risk management for financial risks. The Risk Control monitors the execution of the overall risk strategy and the total risk exposure, ensuring that the risks taken by S-Bank are proportionate to its risk capacity and risk appetite. The Risk Control maintains and develops methods for

measuring, assessing, and reporting risks, and supports the business functions in identifying and managing risks.

Operational Risk Control's task is to comprehensively monitor and assess the coverage, adequacy, and effectiveness of operational risk management. Operational Risk Control maintains and develops the operational risk framework and the principles of procedures for managing operational risks.

The **Internal Audit** function's task is to assess the adequacy, efficiency, effectiveness of internal control and risk management within the Group. These are done in accordance with the audit plan approved by the Board. When conducting audits according to plan, the Internal Audit bases the auditing criteria on external regulations, internal guidelines, and the set objectives. Internal Audit also evaluates Risk Control, Operational Risk Control, and the Compliance function.

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

The declaration of the risk management arrangements by the Board of Directors is disclosed in chapter 2.

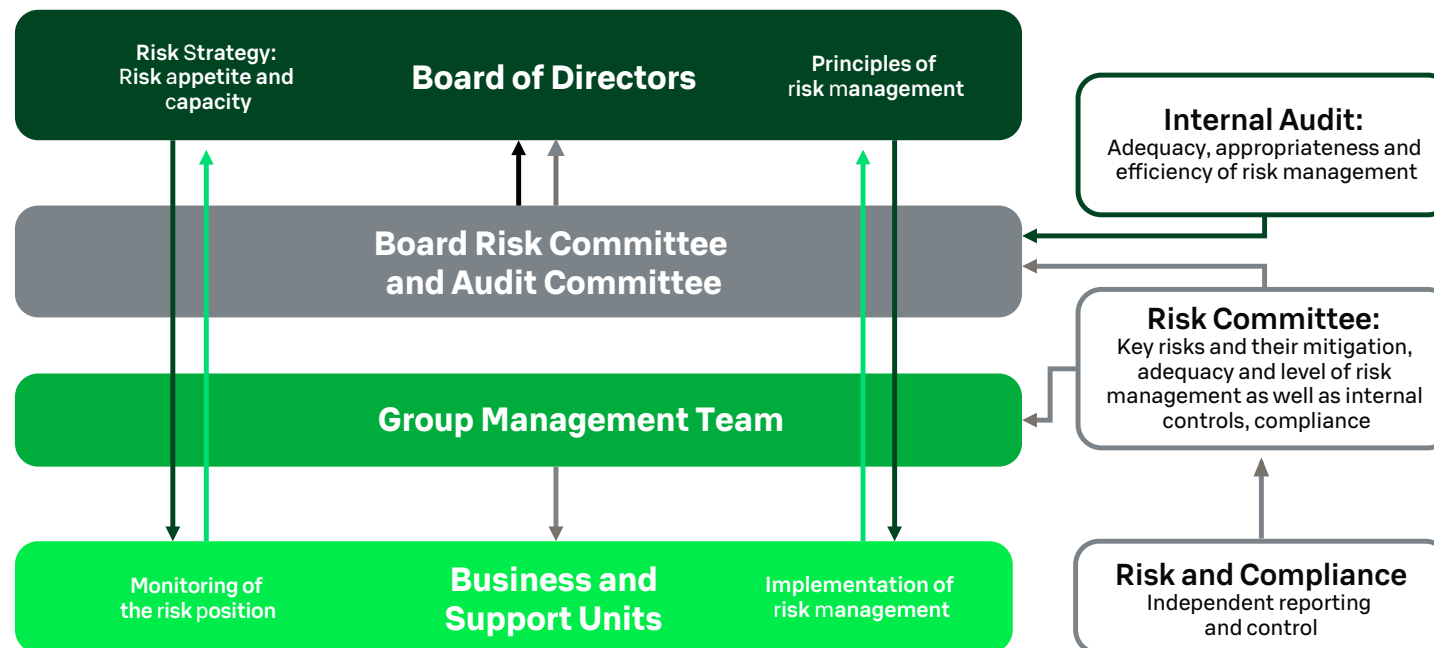
(d) Disclosure on the scope and nature of risk disclosure and/or measurement systems.

S-Bank continuously monitors risks as part of work duties. It is the responsibility of each employee to follow the execution of risk management within their area of responsibility and to report any deviations and deficiencies in risk management in accordance with agreed procedures.

Risks are measured, monitored, controlled, and reported to ensure that the Board of Directors and the executive management have adequate and essential information regarding risks and their management. The risk position, risk management principles and any changes to these are reported to the Board on a regular basis to enable it to assess the level of risk-taking and the measures implemented to manage the overall risk level.

S-Bank’s internal reporting process includes regular analyses of the achievement of the goals set by the Board, in addition to financial and risk reporting. Regular reporting is supplemented as needed with separate deep dive analyses and other reports. Risk-taking in relation to the risk appetite and risk capacity is monitored regularly and assessed, for example, when updating the Internal Capital Adequacy Assessment Process (ICAAP) and Internal Liquidity

The overall risk reporting in S-Bank



Adequacy Assessment Process (ILAAP) and recovery plan, and when updating strategy or when deciding on significant business projects or investments for S-Bank.

The independent control function, Risk and Compliance, is responsible for producing reports on the key risks and the level of risk management for S-Bank’s executive

management and the Board of Directors. In addition to regular reports, the aforementioned bodies are provided with a separate report and analysis if any major changes or deviations occur that may influence S-Bank’s risk position or capital adequacy.

The Internal Audit function evaluates the processes concerning risks and capital

management in accordance with its auditing plan. Internal Audit regularly reports on audit results, key audit observations, any operational improvement recommendations and compliance with the audit plan to the Audit Committee and the Board, as well as to other relevant bodies in the organisation.

Independent risk reporting



(e) Disclosure of information on the main features of risk disclosure and measurement systems.

Within the Pillar 3 report, S-Bank provides disclosures on its risk management assessment methods and processes, description of risk appetite framework, and the required quantitative data on risks, own funds, and key figures. Additional Information on governance arrangements such as corporate governance statement and remuneration are available on S-Bank's website.

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

and

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

S-Bank's Board of Directors has set a risk strategy that applies to all Group companies and their business and support functions. The risk strategy defines the Group's risk capacity and risk appetite, identifies the relevant risks for S-Bank and sets a target state for the Bank's risk culture. The risk strategy is supplemented by risk type-specific principles and strategies. Additionally, the business and support functions maintain more detailed guidelines and descriptions to implement risk management in their own operations.

Comprehensive risk management is a continuous process integrated into S-Bank's strategy, decision making, processes, internal control framework, development and reporting. Risk management refers to the procedures used to identify, assess, measure, and monitor risks related to operations. It also encompasses the maintenance and development of risk management methods, so that the occurrence of risks or the consequences resulting from them are kept at an acceptable level.

Risk management supports compliance with S-Bank's values and strategy, and sound banking, lending, and securities market practices.

To support the achievement of the set goals, risk management is carried out throughout the organisation by following measures:

- Risks related to S-Bank's operations are identified, measured, monitored, assessed, and reported.
- Risk management methods are defined, and they are effective, meaningful, and adequate considering risk appetite.
- Risk management is integrated as part of management system, decision making and procedures.

The Board of Directors defines the quantitative and qualitative limits of the S-Bank

Group's risk capacity and risk appetite as part of the risk strategy. The quantitative and qualitative limits are assessed regularly and whenever required by changes in the business or the operating environment. The risk appetite indicators are monitored and controlled as part of regular reporting.

Risk capacity determines the maximum levels for risk-taking, business growth and the Group's negative profitability, that can be carried in the short and long term, while considering available own funds and regulatory requirements and limitations.

Risk appetite reflects the types and levels of approved risks that S-Bank is willing to take in its business operations while pursuing its targets. Risk appetite set's the desired risk profile for the bank. S-Bank's risk appetite is designed to support the achievement of strategic objectives, taking into account all material risks to which the bank is exposed in executing its strategy.

The subsequent chapters in this report provide an in-depth analysis of risk management for each distinct category of risk, as well as capital management.

Summary of S-Bank's risk appetite framework 31 Dec 2025

ESG-risk	Capital risk	<ul style="list-style-type: none"> · Capital ratio · Economic capital · Leverage ratio · Profitability
	Credit risk	<ul style="list-style-type: none"> · Expected and final credit losses · Indicators for asset quality · Concentration risk · Distribution of credit portfolio by segment and product
	Market risk	<ul style="list-style-type: none"> · Interest rate risk in economic value and net interest income · Spread risk · Other market risks
	Liquidity risk	<ul style="list-style-type: none"> · Indicators for short- and medium-term liquidity · Adequacy of stable funding · Asset encumbrance · Structure and concentration of funding
	Compliance risk	<ul style="list-style-type: none"> · Financial crime indicators · Conduct risk indicators · Regulatory compliance indicators
	Operational risk	<ul style="list-style-type: none"> · Realised operational risks · Fraud indicators · Other operational risk indicators

6 GOVERNANCE ARRANGEMENTS (EU OVB)

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

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

According to S-Bank's Articles of Association, the Board of Directors shall consist of six (6) to ten (10) members. The members of the Board are elected by the General Meeting for a term of one year. A Board member is required to have sufficient and diverse expertise and experience of S-Bank's business operations as well as of the risks related to S-Bank and its activities. A Board member must also have the personal capabilities necessary to successfully carry out the duties and have sufficient time to devote to Board work.

The selection of a new Board member is prepared by the Board's Remuneration and Nomination Committee. When identifying potential candidates, the Committee may engage an external consultant if necessary. An assessment of reliability and suitability is carried out for the candidate selected by the Committee. In addition, the nomination is reviewed by the Finnish Financial Supervisory Authority, as required by regulation. The Committee presents its selected candidate to the Board. The General

Meeting of S-Bank decides on the election of a Board member based on the Board's proposal. The Board elects a Chair and a Vice Chair from among its members.

On 31 December 2025, the Board of Directors consisted of the following members:

Jari Annala, Chair of the Board
M.Sc. (Econ.)

Executive Vice President SOK, CEO of SOK Liiketoiminta Oy

Previous experience:

- Executive Vice President, CFO, Suomen Osuuskauppojen Keskuskunta (2007-2018)
- Group Treasurer, Suomen Osuuskauppojen Keskuskunta (1997-2007)

Other directorships:

- Chair of the Board, Sokotel Oy
- Chair of the Board, SOK Retail Int. Oy
- Chair of the Board, FSTP Real Estate Oy
- Member of the Board, Suomen Luotto-Osuuskunta
- Chair of the Supervisory Board, AS Sokotel
- Chair of the Supervisory Board, AS Prisma Peremarket

Jorma Vehviläinen, Vice Chair of the Board
M.Sc. (Econ.)

Executive Vice President, CFO, SOK Finance and Administration

Previous experience:

- Executive Vice President / CEO, Suomen Osuuskauppojen Keskuskunta / SOK Liiketoiminta Oy (2014-2018)
- Executive Vice President, Suomen Osuuskauppojen Keskuskunta (2013-2014)
- CEO and Chairman of the Board, Osuuskauppa Maakunta (2011-2013)
- CEO, Inex Partners Oy (2007-2011)
- CFO, Inex Partners Oy (2005-2007)
- Finance & Treasury Manager, Suomen Osuuskauppojen Keskuskunta (1997-2005)

Other directorships:

- Chair of the Board, Gigawatti Oy
- Chair of the Board, S-Voima Oy
- Chair of the Board, Reila Palvelut Oy
- Chair of the Board, S-Business Oy
- Chair of the Board, S-ryhmän logistiikkakeskukset Oy
- Member of the Board, FSTP Real Estate Oy
- Member of the Board, North European Oil Trade Oy

- Member of the Supervisory Board, Keskinäinen työeläkevakuutusyhtiö Varma

Tom Dahlström, Member of the Board
Ph.D. (Doc.Soc.Sc.) (Econ.)

Management Consultant

Previous experience:

- Principal, Good Ventures Oy (2023-2024)
- Management Consultant, Entrepreneur (2018-2022)
- Chief Strategy Officer, OP Ryhmä (2014-2018)
- Chief Strategy Officer, OP-Pohjola (2010-2014)
- Director, Strategy OP-Pohjola (2008-2010)
- Director, Strategy and Competitive Intelligence, OP-Pohjola (2007-2008)

Other directorships:

- Alderman, National Defence Course 202

Kati Hagros, Member of the Board
M.Sc. (Engineering), M.Soc.Sc.

Chief Digital Officer at Aalto University

Previous experience:

- Senior Vice President, Development, Chief Information Officer (CIO), KONE (2010–2016)
- Vice President, IT, Nokia (2007–2010)
- Vice President, Quality, Nokia (2004–2007)
- Director, Strategy, Process and Quality, Nokia Mobile Phone Asia–Pacific (2001–2004)
- Head of Customer Relationship Management, Nokia (1999–2001)

Other directorships:

- Member of the Board, Eezy Oyj
- Member of the Board, RAN Group / Rantalainen Oy

Veli-Matti Liimatainen, Member of the Board

M.Sc. (Econ.)

Managing Director of Helsinki Cooperative Society Elanto, Managing Director of HOK-Elanto Liiketoiminta Oy

Previous experience:

- Deputy CEO, Helsingin Osuuskauppa Elanto (2012–2017)

- Chief Operating Officer, Retail Division, HOK-Elanto Liiketoiminta Oy, Deputy CEO of Helsingin Osuuskauppa Elanto (2009–2011)
- Chief Operating Officer, Grocery Business, HOK-Elanto Liiketoiminta Oy, Deputy CEO of Helsingin Osuuskauppa Elanto (2007–2009)
- Chief Operating Officer, Grocery Business, HOK-Elanto Liiketoiminta Oy (2005–2007)
- Chain Director, HOK-Elanto Liiketoiminta Oy (2004–2005)
- Chain Director, HOK Liiketoiminta Oy (2003)
- Chain Director, HOK Liiketoiminta Oy (1997–2002)
- Group Manager, HOK Liiketoiminta Oy (1996–1997)

Other directorships:

- Chair of the Board, Helsingin Osuuskauppa Elanto
- Vice Chair of the Board, HOK-Elanto Liiketoiminta Oy
- Member of the Board, Suomen Osuuskauppojen Keskuskunta
- Member of the Board, S-ryhmän Logistiikkakeskukset Oy
- Member of the Board, S-Voima Oy
- Member of the Board, Gigawatti Oy

- Member of the Supervisory Board, LähiTapiola Pääkaupunkiseutu Keskinäinen Vakuutusyhtiö
- Member of the Supervisory Board, Keskinäinen Eläkevakuutusyhtiö Ilmarinen
- Member of the Delegation, Finland Chamber of Commerce
- Member of the Delegation, Helsinki Region Chamber of Commerce

Hillevi Mannonen, Member of the Board

M.Sc. (Math.), SHV (actuary approved by the Ministry of Social Affairs and Health), Certified Board Member

Board professional, H Mannonen Consulting, sole proprietorship

Previous experience:

- Chief Actuary and CRO, Ilmarinen Mutual Pension Insurance Company (2010–2019)
- Chief Actuary, Ilmarinen Mutual Pension Insurance Company (1998–2010)
- Senior Actuarial Adviser, Ilmarinen Mutual Pension Insurance Company (1997–1998)
- Senior Insurance Adviser, Ministry of Social Affairs and Health (1991–1997)

- Actuary, Assistant Manager, Finnish Centre for Pensions (1981–1991)

Other directorships:

- Chair, AAE's (Actuarial Association of Europe) Actuarial Standards Subcommittee

Tarja Tikkanen, Member of the Board

LL.M., Trained on the bench, Certified Board Member, TMA trained, Board professional

Partner, Boardman Oy

Previous experience:

- CEO, Kuopion Seudun Hengityssäätö (2016–2020)
- Secretary General, Kuopion Seudun Hengityssäätö (2013–2016)
- Regional Director, Finnvera Oyj (2009–2013)
- Director of Human Resources, Lujatalo Oyj (2007–2009)
- Director, Minna Canth Instituutti, Kuopion Yliopisto (2000–2007)
- Bank Manager, Nordea Pankki Oy (1999–2000)
- Deputy General Manager, Ltd. Merita Nordbanken Luxembourg (1996–1999)

- Director of Corporate Services Unit, Merita Pankki Oy (1995-1996)

Other directorships:

- Chair of the Board, CEO, ProAudentia Oy
- Chair of the Board, Lasten ja Nuorten Säätiö

Niklas Österlund, Member of the Board

M.Sc. (Econ.)

Managing Director of Turku Cooperative Society

Previous experience:

- Director of business operations, Corporate Customers, OP Turun Seutu (2022-2023)
- Sales Director, OP Turun Seutu (2019-2022)
- Director, Customer Relations, OP Turun Seutu (2015-2019)
- General Manager, FC TPS Turku Oy (2015)
- General Manager, HC TPS Turku Oy (2012-2015)
- Branch Manager, Turun Seudun Osuuspankki (2010-2012)

Other directorships:

- Chair of the Board, Turun Kauppaopettussäätiö (Turku Foundation of Business Education)
- Member of the Board, Turku Chamber of Commerce
- Member of the Board, Varsinais-Suomen Maakuntasäätiö

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

The Board of Directors of S-Bank has approved the Principles on Board Diversity and Gender Balance. According to these principles, the Board of S-Bank must collectively have sufficient and diverse expertise and experience relating to the operations of a credit institution and the risks associated with its activities. When assessing the suitability of an individual member, the suitability of the Board as a whole is taken into account. In considering the diversity of the Board's composition, appropriate attention must be paid to age, gender and geographical distribution as well as professional background. Since S-Bank provides services only in Finland, the geographical distribution of Board

members is less important than the other mentioned diversity factors. The objective is that the minimum representation of the underrepresented gender on the Board is one third. This objective has been achieved in the current Board of S-Bank, where three of the eight members are women.

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

The Board has established a Board Risk Committee whose members, including the Chair and Vice Chair, are appointed by the Board of Directors from among its own members. At least half of the Committee members must be independent of S-Bank's owners.

In 2025, the Board Risk Committee consisted of four (4) members, two of whom were independent of the S-Bank's owners. The Committee held nine (9) meetings during the year 2025.

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

Information flow on risk to the management body is described in Chapter 5.1 Institution risk management approach (EU OVA).

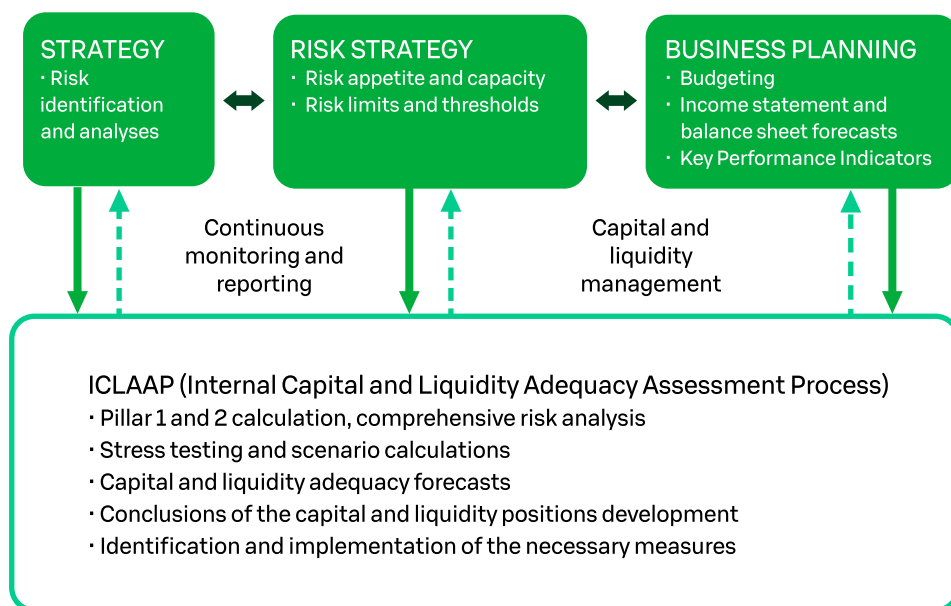
7 CAPITAL AND LIQUIDITY MANAGEMENT PRINCIPLES

Capital adequacy and liquidity management are fundamental parts of the risk management process. The objective of sound capital and liquidity management is to ensure that S-Bank consistently maintains a sufficient capital and liquidity position required to achieve its strategic business objectives. Furthermore, the aim is to

ensure that S-Bank continuously has adequate capital and liquidity buffers to safeguard against unexpected events. Capital and liquidity management is based on a proactive approach taking into account S-Bank's strategy, business plan and overall risk strategy.

Capital and liquidity management framework and tools are also part of the regularly updated recovery plan, which aims to ensure the continuity of S-Bank's core businesses, to mitigate adverse macroeconomic impacts and to protect public funds. The recovery plan sets several quantitative and qualitative indicators, that are used for monitoring S-Bank's capital, liquidity, funding, and profitability along with asset quality. The thresholds of recovery indicators are ultimately used to decide whether to employ or refrain from taking the set recovery options in use. The recovery planning is aligned with plausible scenarios used in ICAAP and ILAAP stress tests.

Capital adequacy and liquidity management framework



7.1 INTERNAL CAPITAL ADEQUACY AND LIQUIDITY ADEQUACY ASSESSMENT PROCESS

The results of the regularly performed ICAAP (Internal Capital Adequacy Assessment Process) and ILAAP (Internal Liquidity Adequacy Assessment Process) are combined into a comprehensive ICLAAP report which S-Bank prepares at least annually and as often as necessary. The process begins with strategic analysis and comprehensive identification of risks associated with S-Bank’s business. S-Bank utilises a variety of stress scenarios to estimate how potential adverse developments could impact capital adequacy, profitability, and liquidity at the Group level as well as at an individual subsidiary level over a certain time frame. Factors taken into consideration include various development patterns in the business, macroeconomic and competitive environment. The process also includes forecasts of capital requirements, available capital as well as the impact of changes in regulation. Moreover, the scenarios include potential changes in S-Bank’s business volumes and in the behaviour of its customers.

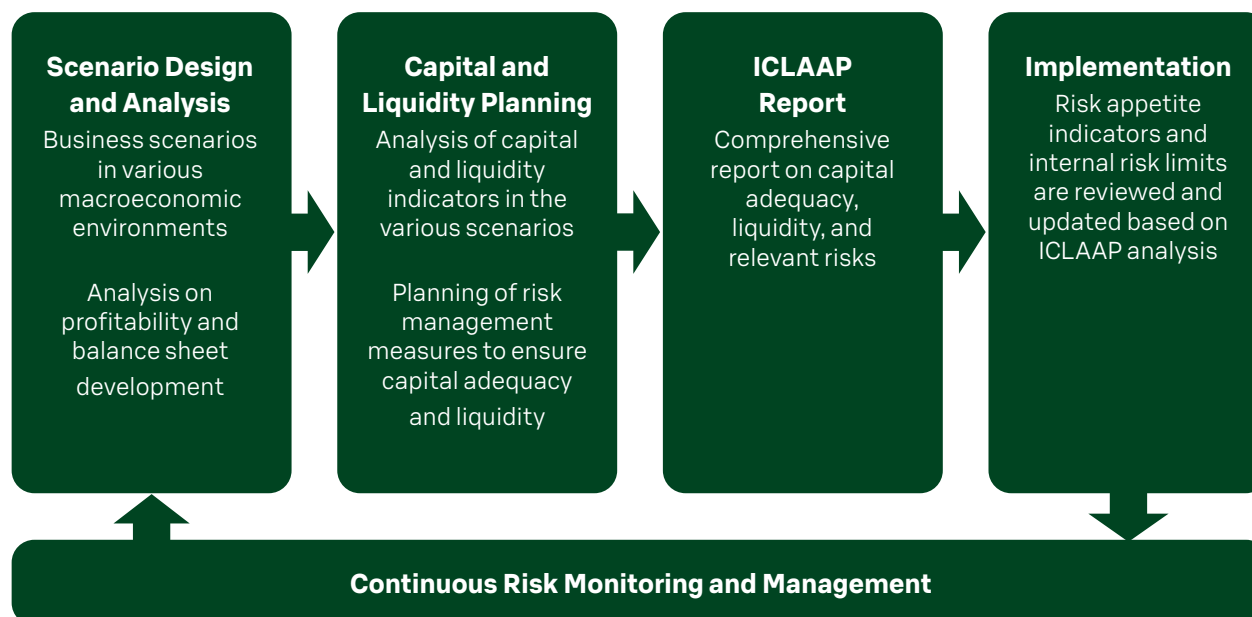
ICAAP provides a comprehensive overview of S-Bank’s capital and risk positions in various stress scenarios. Based on the results of the stress scenarios, needed recovery options are identified and described, to ensure adequate level of own funds and capital adequacy position. Liquidity stress tests are conducted as a part of the ILAAP, which provides a compre-

hensive overview of the S-Bank’s liquidity risk position in various stressed business and macroeconomic scenarios.

The purpose of liquidity stress testing is to ensure the adequacy of S-Bank’s liquid assets to cover unexpected liquidity outflows and ensure that the liquidity coverage ratio (LCR) and the net stable

funding ratio (NSFR) maintain within the set risk appetite. S-Bank is prepared to withstand unexpectedly large cash outflows and recover its liquidity buffer under stressed conditions. The results of stress tests are used for managing liquidity, capital, profitability, and asset and liability management as well as in setting the levels of risk appetite.

ICLAAP process



7.2 ICAAP INFORMATION (EU OVC)

(a) Approach to assessing the adequacy of the internal capital

The calculation of economic capital is a part of S-Bank's comprehensive risk management process. Economic capital is used to assess the adequate amount of risk-based capital required to cover potential losses arising from business operations and the external operating environment. In addition, it supports the evaluation of capital adequacy over the long term under both baseline and stressed scenarios as part of the ICLAAP process. The results of economic capital calculations can also be utilised for capital allocation and setting risk limits.

S-Bank's economic capital must cover risks from both a normative and an economic perspective. The normative perspective ensures that capital adequacy continuously meets both the regulatory and supervisory capital requirements. The economic perspective, conversely, focuses on identifying and measuring not only Pillar 1 risks but also other material risks to which S-Bank is exposed when executing its strategy and which may lead to financial losses and a reduction in internal capital.

From an economic perspective and beyond Pillar 1 risks, at least interest rate risk in the banking book, business risk, concentration risk, and other risks that could significantly affect capital adequacy over the next 12 months should be incorporated into the assessment. The need to update economic capital calculation methods is assessed at least annually and more frequently if necessary.

Internal models as well as Pillar 1 calculation methods are used to determine the required amount of economic capital. The calculation considers at least the following key aspects:

- All material risks to which the bank is exposed in its operations.
- Risk measurements already covered by Pillar 1 are reviewed and, where necessary, supplemented with economic capital adjustments using internal models.
- For risks not covered under Pillar 1, economic capital requirements are calculated using internal models and methodologies.
- Macroprudential requirements set by regulation to cover crisis scenarios and structural risks and vulnerabilities in the

financial system, ensuring the normative perspective is covered.

- Risk add-ons determined based on stress tests included in the ICLAAP calculation process, ensuring sufficient capital even under adverse macroeconomic environment.

S-Bank measures market risks, interest rate risk in the banking book, business and strategic risk, concentration risk, credit risk, and operational risk using internal models. The economic capital requirement is covered by internal capital. At S-Bank, the definition of internal capital is the same as own funds calculated in accordance with the Capital Requirements Regulation. S-Bank continuously monitors that its own funds are sufficient to cover the minimum amount of economic capital, taking into account current and future activities as well as obligations arising from regulation.

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

Not applicable to S-Bank.

7.3 CAPITAL REQUIREMENTS

S-Bank's total capital requirement was 13.52 per cent (13.52). The capital requirement consists of the minimum capital requirement, the capital conservation buffer, the countercyclical capital buffer, the systemic risk buffer, and the discretionary, institution-specific Pillar 2 requirement. There were no material changes in the total capital requirement during the year.

The discretionary Pillar 2 requirement imposed on S-Bank was 2.0 per cent of the total risk exposure amount at the end of the review period. The requirement will decrease to 1.5 per cent of the total risk exposure amount as of 31 March 2026 and will remain in force until 31 March 2029 at the latest. The Pillar 2 capital requirement complements the minimum capital requirement laid down in the Capital Requirements Regulation. 75 per cent of

the requirement must be covered by Tier 1 (T1) capital, of which a further 75 per cent must be covered by Common Equity Tier 1 (CET1) capital.

The Pillar 2 Guidance (P2G) imposed by FIN-FSA on S-Bank is 0.75 per cent of the total risk exposure amount. The P2G entered into force on 31 March 2024. The FIN-FSA confirmed in its decision issued in December 2025 that the P2G based on

stress test results will remain unchanged at 0.75 per cent of the total risk exposure amount. The decision is valid until further notice as of 31 March 2026, and the P2G must be fully covered by Common Equity Tier 1 (CET1) capital.

S-Bank's total capital requirement on 31 December 2025 (Pillar 1)

Capital	Minimum capital requirement		Capital conservation buffer		Countercyclical capital buffer		Systemic risk buffer		Pillar 2 (SREP) additional capital requirement		Total capital requirement	
	%	EUR million	%	EUR million	%	EUR million	%	EUR million	%	EUR million	%	EUR million
CET1	4.5%	185.8	2.5%	103.2	0.02%	1.0	1.0%	41.3	1.13%	46.5	9.15%	377.8
AT1	1.5%	61.9							0.38%	15.5	1.88%	77.4
T2	2.0%	82.6							0.50%	20.6	2.50%	103.2
Total	8.0%	330.3	2.5%	103.2	0.02%	1.0	1.0%	41.3	2.00%	82.6	13.52%	558.4

8 CREDIT RISK

8.1 MANAGEMENT OF CREDIT RISK (EU CRA)

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

S-Bank business activities focus on household lending including housing loans, credit cards and consumption loans. S-Bank's corporate portfolio concentrates on secured lending to housing companies. In line with its risk strategy, S-Bank is prepared to take a moderate level of credit risk in retail lending, while its risk appetite for other credit risks remains low. The maintenance of the credit risk profile is supported by careful credit risk management and monitoring.

The risk declaration and statement approved by the Board of Directors is disclosed in Chapter 2. S-Bank's credit risk profile is also described in Chapter 3, which outlines S-Bank's risk position in 2025, together with the information disclosed in the year-end Pillar 3 templates in Part 2 of this report.

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

The Board of Directors approves principles and strategies for credit risk management, which are in line with good banking and lending practices and regulation. Credit risk strategy defines the target segments for lending, growth targets and allocation limits that are based on S-Bank's risk strategy and action plan which are derived from the strategy of S-Bank.

The principles for credit risk management describes the principles of credit portfolio management, credit origination process, collateral management for household and corporate customers and monitoring and control of credit risk. Credit risks arising from the investing activities are described and limited in the annual investment plan. Credit risk is managed by the business and support units within the principles and limits approved by the Board of Directors.

The origination of credit is based on a process that includes customer identification, credit analysis, an assessment of the use of funds along with collateral. Credit proposals and decisions are prepared, executed, and documented appropriately. The credit decision process is centralised and partly automatised based on risk scoring models and other credit granting criteria. Credit decision process is managed according to credit risk strategy, which sets limits for credit portfolio allocation, risk concentrations and asset quality indicators.

Risk concentrations may arise from a concentration of S-Bank's exposure in certain customers, industries, geographical areas or against certain types of collateral. Concentration risks are managed through the set limits and are monitored regularly as part of the management risk reporting. Moreover, concentration risks are assessed through stress testing in the context of the capital plan (ICAAP) and are incorporated into the calculation of the economic capital requirement (Pillar 2).

Individual large credit institutions and corporate customers are the principal

source of customer-related concentration risk. Customer-related concentration risk is managed by assessing the connections between corporate customers, setting limits on the exposures of customer entities, and monitoring the changes in these exposures, including the concentrations in loans granted to related parties.

Majority of S-Bank's exposures are not classified by industry, as they consist mainly of household customers credits, which reduces industry concentration risk. Corporate lending is targeted mainly at financing of housing companies, in which the credit risk is divided among the shareholders of the housing company.

From a geographical perspective, the majority of S-Bank's exposures are in Finland, followed by the rest of the Nordic countries. The geographical concentration risk is not considered relevant. Exposures outside Finland are primarily Treasury investments. The credit risk strategy guides portfolio allocation between products and regions. Especially, mortgage credit granting is directed to the largest cities and their commuting areas.

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

The Management Risk Committee is responsible for setting up credit granting targets, processes, methods, and risk limits in accordance with the risk appetite set by the Board. The Credit Committee makes significant credit decisions and implements credit decision framework within the organisation.

Banking business units are responsible for credit risk management together with credit risk management unit. The business and support functions regularly monitor the fulfilment of the set objectives, the materialisation of risk levels, the distribution of the credit portfolio across different credit categories, the regional distribution of credit, risk concentrations, collateral values, realised margins, the performance of credit

rating models, the consistency of the credit management processes, and non-performing loans and expected credit losses.

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

Risk Control, Compliance, and Operational Risk Control, that form the Group-level control functions, monitor, and ensure that the business and support units operate in accordance with the principles and limits set in the risk policies, principles, and strategies. Risk and Compliance reports regularly on S-Bank's credit risk profile and the sufficiency of risk management procedures. The relationships between credit risk management, Risk and Compliance, and the Internal audit are described in Chapter 5 Governance of risk.

8.2 CREDIT RISK QUALITY OF EXPOSURES (EU CRB)

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

S-Bank applies harmonized definition for the concepts of defaulted exposures, non-performing exposures and IFRS 9 -credit impaired exposures. Defaulted exposures are comprised of exposures with material payment past due more than 90 consecutive days, non-performing forbearance, or other indication of unlikely repayment. Defaulted exposure has a probation period of at least 3 months after removal of all default criteria.

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

Past due exposures are comprised of exposures with payments past due without considering materiality thresholds. The material payment is defined through both absolute and relative thresholds. Absolute threshold for material payment, coming from the regulation, is minimum 100 euros for retail exposures or 500 euros for corporate exposures and relative threshold is minimum 1 per cent of the gross carrying amount.

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

General credit risk adjustments are provisions for credit risk losses, for a group of exposures for which the institution has no evidence that a loss has occurred. If exposures are to be included in general credit risk adjustments, the amounts must be freely and fully available to cover loan losses. S-Bank did not have general credit risk adjustments and credit risk adjustments are specific.

Internal risk models are used for the measurement of credit risk in terms of expected credit losses (ECL) as per IFRS 9 standard requirements. S-Bank uses the probability of default (PD), loss given default (LGD) and credit conversion factor (CCF) models for measuring credit risks. The CCF parameter is used to determine the amount of future liability, i.e. exposure at default (EAD). Detailed descriptions concerning the measurement of credit risks, expected credit losses and development of the impairment model are disclosed in S-Bank's financial statements (Group's note 1 and Group's note 2).

A receivable or a part of it is recognised as a credit loss when it is unlikely that its amount will be recovered. On the basis of S-Bank's specifications and depending on the product, credit loss is recorded as follows: Credit losses on unsecured credit are typically recorded 4 to 7 months after the receivable has matured. Credit losses on secured receivables are recorded at the earliest when the collateral has been realised and allocated to the receivable. In this case, the remaining receivable may not be recorded as a credit loss if a payment schedule has been created for it.

After the recognition of a credit loss, the credit in question will no longer be included in the calculation of expected credit loss and thus will no longer be impaired. Even if a receivable is accepted and recorded as a credit loss, collection will nevertheless continue in the form of post-collection. Collection of the receivable will continue until there are sufficient grounds for discontinuing it. If payment is made on a receivable recognised as credit loss, it is recognised as a recovered credit loss in the income statement. The impairments for the reporting period are presented in the notes to the financial statements.

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

Forbearance measures are concessions to credit agreements (e.g. repayment holidays), which are intended to help customers cope with temporary payment difficulties. Forbearance measures must comply with material regulatory requirements, including

the assessment of the customer's financial situation and a risk-based assessment of the application.

Forbearance measures always aim to return the exposure to a situation of sustainable repayment. Forbearance is classified as performing when default criteria are not met. In this case, the contract is classified under stage 2 in impairment measurement for a cure period of at least two years.

A performing forborne exposure becomes non-performing if any of default criteria are met. A non-performing forborne exposure is subject to a minimum of a 12-month probation period and is classified under stage 3 in impairment measurement. The contract will be transferred to the probation of a performing forborne exposure for at least two years when the probation of the non-performing forborne exposure ends. A forbearance will become non-performing as a result of a second forbearance or a payment delay of more than 30 days during the probation period.

8.3 CREDIT RISK MITIGATION (EU CRC)

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

S-Bank has ISDA (International Swaps and Derivatives Association) and CSA (Credit Support Annex) netting agreements with its derivative counterparties. S-Bank recognises credit risk mitigation effect of derivatives netting in its capital adequacy calculation.

Description of policies related to guarantees and other credit risk mitigants for counterparty credit risk is disclosed in Chapter 9.1 Management of counterparty credit risk (EU CCRA).

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

The Management Risk Committee decides the eligible collateral categories and their valuation principles. The methods specified in the credit granting guidelines and credit risk management principles are used to ensure that the collateral and guarantees

are acceptable, binding, comprehensive and realisable. The guiding principle is that credit may only be granted to customers with an adequate repayment ability, regardless of the value of possible collateral. Depending on its type, collateral is measured at market value or fair value. A haircut is applied to the value of collateral in credit processes, and the amount of this haircut is subject to approval of independent valuer.

Immovable property collateral values are monitored and revalued regularly during the lifecycle of the credit. Collateral revaluation process combines advanced statistical modelling and expertise of independent valuers. Collateral valuations are monitored frequently and significant declines in collateral value are updated accordingly. Certain pre-defined groups of collaterals are regularly revalued by an independent appraiser. The revaluation process is explicitly documented, and collateral monitoring process provides transparency of the collateral base.

S-Bank does not take possession of collateral pledged to it. If the payment difficulties related to a non-performing receivable are not resolved, S-Bank cooperates with the customer to sell the security to cover the remaining debt.

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

S-Bank uses collateral and other credit risk mitigation arrangements in credit risk management. Credit risk mitigation arrangements, in addition to collaterals, include mainly customary types of guarantees, such as government guarantees, institutional guarantees and personal guarantee commitments.

Immovable property collateral and unfunded credit protection (such as government guarantees for student and housing loans and S-Asuntotakaas guarantees provided by an external service provider for household customers' housing loans) are the principal credit risk mitigation factors used in capital adequacy calculation in accordance with capital requirements regulation. S-Bank also uses other collateral and guarantees to reduce its credit risk, but these are not taken into account in the capital adequacy calculation.

Expected credit loss calculations take into account the effect of guarantees and collateral and the uncertainties and costs associated with its liquidation through the parameters indicating the loss given default (LGD) based on historical results.

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

Main types of guarantors are sovereign guarantors, such as Finnish government, and external insurance companies with high quality credit ratings. By using guarantees, the customer risk is transferred from the counterparty to the guarantor in the capital adequacy calculation. S-Bank does not use credit derivatives as credit protection.

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

Real estate collateral is S-Bank's most significant type of collateral from the perspective of concentration risks. As a significant part of the real estate collateral portfolio comprises housing, the price trends of housing affect S-Bank's risk position. Regional concentration risk within Finland is mitigated by diversification of the credit portfolio across large number of individual loans and collaterals due to broad customer base. Collateral information is maintained to identify and manage possible collateral risk concentrations.

Possible changes in immovable property collateral values are also considered as a part of stress scenarios.

Distribution of Loan-to-Value (LTV) ratio describes remaining amount of household mortgage loans as a percentage relative to the value of the real estate collateral at the time of loan origination. Mortgage insurance for housing loans is included in the calculation. The loan-to-value ratio is regularly monitored based on the original and current value of the collateral.

8.4 USE OF THE STANDARDISED APPROACH (EU CRD)

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

For calculating risk-weighted exposure amounts for certain exposure classes, S-Bank uses ratings disclosed by External Credit Assessment Institutions (ECAI's) such as Standard & Poor's, Moody's Investors Service and Fitch Ratings. There were no changes in the ECAI used during the year.

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

The ECAIs are used to determine applicable risk weights for exposure classes: central governments or central banks, regional governments or local authorities, multilateral development banks, international organisations, institutions, corporates, covered bonds and collective investments undertakings.

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

For the calculation of risk-weighted exposure amounts, the credit quality step derived from the external credit rating is used. In cases where a counterparty or exposure has two external credit ratings, the lower rating is applied. If there are three external credit ratings, the median rating is used. When available, the security-specific credit rating of the issue programme is employed; otherwise, the issuer's general credit rating is used.

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

The nominated ECAI's are mapped to the corresponding credit quality step, as defined, and published by the EBA for determining the applicable risk weight for the issuer or for the issue.

9 COUNTERPARTY CREDIT RISK

9.1 MANAGEMENT OF COUNTERPARTY CREDIT RISK (EU CCRA)

Counterparty credit risk (CCR) originates from S-Bank's derivative positions. Derivatives are used to hedge the interest rate risk in the banking book. S-Bank uses derivatives primarily for hedging purposes (more information in Chapter 11.1 Management of market risk).

During the second quarter of the year 2025, S-Bank changed its method for calculating the counterparty credit risk (CCR) from the original exposure method to a simplified standardised approach for counterparty credit risk. The change in the calculation method was due to an increase in the S-Bank's derivative position.

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

The same methodologies used for the Pillar 1 regulatory capital requirement are applied when allocating internal capital to CCR. Internal capital for CCR is calculated using the simplified standardised approach. S Bank has netting agreements with all its

derivative counterparties and incorporates the effects of netting into its counterparty credit risk calculations.

Counterparty credit risk is managed by setting counterparty-specific credit limits, which are approved by the Credit Committee in line with the risk appetite set by the Board of Directors. CCR exposures, along with any other exposures towards the counterparty, are included within the internal credit limits. The central counterparty is not subject to CVA risk calculation under the regulatory framework, nor it is included within the internal credit limits.

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

S-Bank uses ISDA (International Swaps and Derivatives Association) and CSA (Credit Support Annex) agreements with its derivative counterparties. These agreements reduce counterparty risk and are used to mitigate the regulatory counterparty credit risk. The agreements specify the general terms and conditions to derivatives and collaterals between the counterparties. S-Bank uses clearing broker to access central counterparty.

The ISDA/CSA agreement creates a single legal obligation, in which all positive and negative market values under an agreement can be netted at the counterparty level. Counterparty exposures and adequacy of required collateral are monitored and measured on a daily basis.

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

Wrong-way risk is defined as the risk that occurs when exposure to a counterparty is adversely correlated with the credit quality of that counterparty. S-Bank has not identified any wrong-way risk associated with its derivative exposures, as they consist solely of interest rate derivatives.

(d) Any other risk management objectives and relevant policies related to CCR.

S-Bank has not set any additional objectives or policies relating to CCR.

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

S-Bank has no agreements under which a downgrade of its credit rating would trigger additional collateral requirements.

10 CREDIT VALUATION ADJUSTMENT RISK (CVA)

10.1 MANAGEMENT OF CREDIT VALUATION ADJUSTMENT RISK (EU CVAA)

(a) A description of the institution's processes to manage credit valuation adjustment risk, including:

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

Credit Valuation Adjustment risk (CVA) is the risk of loss arising from the deterioration in the creditworthiness of a counterparty, which affects the market value of derivative positions. CVA risk is calculated based on S-Bank's derivative position, which consists solely of interest rate derivatives as of 31 December 2025.

The same methodology that is used for Pillar 1 regulatory capital requirement is also applied when allocating internal capital to credit valuation adjustment risk (CVA).

Consistent with counterparty credit risk management practices, CVA risk is controlled by setting specific credit limits for counterparties. These limits are approved by the Credit Committee within the risk appetite set by the Board. CVA and any other exposures towards the counterparty are included within the internal credit limits. However, the central counterparty is exempt from CVA risk calculation under the regulatory framework, as well as the internal credit limit policies.

All derivative contracts are executed with financial counterparties under ISDA Master Agreements and Credit Support Annexes (CSA), as described in Chapter 9, Counterparty Credit Risk. A substantial share of these transactions is also cleared through a qualifying central counterparty (QCCP), thereby reducing CVA risk, as such exposures are exempt from CVA risk calculation.

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

As of 31 December 2025, the size of S-Bank's on- and off-balance-sheet derivative positions amounted to EUR 63.8 million, representing approximately 0.5 per cent of total assets. Based on the year-end position, S-Bank meets the conditions set out in Article 273a(2) of the CRR. However, S-Bank has decided to apply the Basic Approach for the calculation of CVA risk.

S-Bank calculates the exposure value for counterparty credit risk using the simplified standardised approach for counterparty credit risk. The conditions for using this method are set out in Article 273a(1). Consequently, the methodology applied for CVA risk calculation does not incorporate any thresholds lower than those applied in the calculation of CCR.

11 MARKET RISK

11.1 MANAGEMENT OF MARKET RISK (EU MRA)

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

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

and

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

In general, market risk refers to the impact of changes in securities prices, market interest rates, exchange rates or the market value fluctuation of balance sheet items on the bank's profit and balance sheet. The market risk of S-Bank's banking business mainly consists of the interest rate risk in the banking book (IRRBB) and the spread risk of debt securities. Further details on IRRBB risk and its management can be found in Chapter 13 of Part 2. S-Bank's banking business includes only minor amount of direct equity, foreign exchange and real estate risks.

Market risks are measured using internal risk models as part of the Pillar 2 economic capital. The amount of items allocated to the small trading book, in accordance with the Capital Requirements Regulation, has been very low due to internally set limits, and therefore S-Bank is not subject to the Pillar 1 capital requirement for market risk. Interest rate, spread, equity, foreign exchange, and real estate risks, as well as the diversification benefits, are taken into account in the internal capital and liquidity adequacy assessment process (ICLAAP).

The aim of S-Bank's market risk management is to manage unexpected changes in the bank's profits and capital adequacy as

a result of fluctuations in market prices and to maintain the return on equity within the scope of the risk appetite. S-Bank accepts a moderate level of interest rate risk in the banking book, while maintaining a low risk appetite for other market risks. The Board of Directors has set the principles for market risk management and risk limits for each market risk type, which are monitored and reported actively to the Board of Directors. Monitoring and prediction of the external business environment are particularly emphasised in market risk management. Market risk concentrations are managed by means of limits that are set at the Group and business unit levels and are determined as market risk-sensitivities or maximum amounts in monetary terms. The Treasury unit is tasked with the day-to-day management of the Group's market risks within the scope of its authorisations. Treasury's strategic goals are set in S-Bank's risk strategy and risk appetite, then integrated into Treasury's annual investment plan and hedging strategy of the interest rate risk. S-Bank uses derivatives to hedge the interest rate risk in the banking book. All hedging derivative instruments at the end of the year were interest rate swaps, and hedge accounting was applied for the eligible positions.

(c) Scope and nature of risk reporting and measurement systems.

S-Bank's Treasury unit monitors the market risk on a daily basis and the Asset and Liability Management Committee is responsible for the operational measurement, monitoring and reporting of market risks in accordance with the procedures agreed within the organisation. Risk Control, as part of the second line of defence, also monitors market risk exposures on a daily basis. In addition, the Risk Control function supervises the management of S-Bank's market risks and the effectiveness and use of the applied market risk models. The most important entities related to market risks, the effectiveness of risk management and the impact of risks on capital adequacy are reported to S-Bank's management, the Management Risk Committee, the Board Risk Committee, and the Board of Directors. Market risk position and the impact of market risk on economic capital are reported within organisation in accordance with Chapter 7.

12 LIQUIDITY RISK

12.1 LIQUIDITY RISK MANAGEMENT (EU LIQA)

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

The liquidity and funding risk management in S-Bank is based on S-Bank's overall risk strategy, which defines and sets key limits for the risk appetite. S-Bank's liquidity risk appetite is set to low level, which is used to align key limits indicating conservatism and ensure stable operations. Liquidity risk appetite is enforced by liquidity risk management principles, funding plan, liquidity contingency plan and investment plan approved by the Board of Directors.

S-Bank's funding is primarily based on the deposit portfolio and thus the main sources of funding are the current and savings accounts of its household customers. As of 31 December 2025, total deposits portfolio amounted to EUR 10 170.8 million, of which EUR 9 389.7 were household customer deposits. S-Bank has a bond programme, under which the bank can issue senior preferred notes, senior non-preferred notes, covered bonds and additional tier 1 capital notes. As of December 2025, S-Bank has issued covered bonds for nominal value of EUR 1 000 million, senior preferred MREL eligible bonds for nominal value of EUR 452

million and senior non-preferred bonds for nominal value of EUR 150 million under the bond programme. Other sources of funding include wholesale market deposits from companies and other credit institutions, as well as certificates of deposits. Funding needs and guidelines for long term funding are defined in funding plan.

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

Liquidity risk management principles define the roles, responsibilities, management, mitigation, monitoring and reporting of liquidity risk. S-Bank's liquidity and funding risk management has been delegated to the Treasury unit, which is responsible for the operational execution of the risk appetite pursuant to S-Bank's overall risk strategy, taking into consideration S-Bank's business model, risk limit structure, and funding and investment plans. The roles and responsibilities in the governance of risk management for Board of Directors, Board Risk Committee, CEO and Group Management Team, Management Risk Committee, Asset and Liability Committee and Risk Control function have been described in Chapter 5.

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

The parent company of the S-Bank Group, S-Bank Plc, is responsible for the liquidity management within the group. It accepts deposits, obtains market-based external funding, and prepares contingency funding sources. In the event of a crisis, S-Bank Plc will provide liquidity to other companies within the group.

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

S-Bank reports and measures its liquidity and funding using the LCR and NSFR ratios, MREL requirements and asset encumbrance ratio defined by the authorities and internal indicators. Internal liquidity indicators include short-term liquidity buffer, survival horizon and the maturity structure of long-term market funding. S-Bank has also set an internal limit for the amount of covered bonds out of the total funding and out of the balance sheet total. The limit framework is used to ensure that the liquidity position always meets the internal target levels and the minimum regulatory requirements. Intraday liquidity position is managed using cash flow forecasts and liquidity risk is reported daily for the LCR, short-term liquidity buffer and survival horizon. Monthly liquidity reporting

includes the NSFR, MREL requirements, asset encumbrance ratio and other internal indicators. The key aspects of the liquidity risks are reported by the Treasury and Risk Control to S-Bank's management, the Management Risk Committee, the Board Risk Committee and the Board of Directors.

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

Liquidity position is managed with active risk management and continuous monitoring. Treasury function's main objective in investing activities is to ensure that the liquidity position is continuously above the minimum regulatory requirements and the internal limits. Minimum requirement for liquidity management includes meeting the regulatory liquidity coverage requirement (LCR), net stable funding requirement (NSFR), the MREL requirements and the central bank's minimum reserve obligation requirements considering the internal risk limit structure. In addition, liquidity management includes collateral management, i.e. ensuring that S-Bank has an adequate number of eligible liquid securities at its disposal to cover the collateral required by various business operations.

S-Bank has pre-positioned central bank eligible debt securities for central bank

facilities and monetary policy operations, that can be used as additional liquidity sources. In addition, S-Bank has a certificate of deposits program for short term funding needs and a EUR 3.0 billion bond programme, under which the bank can issue senior preferred notes, senior non-preferred notes, covered bonds and additional tier1 capital notes to the whole-sale market.

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

Liquidity contingency plan establishes a structure for preserving an adequate liquidity position in a stressed market environment. The plan defines the policies and operating models used to ensure the adequacy of the liquidity buffers in exceptional conditions considering systemic and idiosyncratic scenarios.

(g) An explanation of how stress testing is used

S-Bank`s internal liquidity modelling is an integral part of the annual internal capital and liquidity adequacy assessment process (ICLAAP). In this process, different stresses and scenario analyses are used to prepare forecasts of changes in S-Bank`s liquidity position in various scenarios affecting the balance sheet and the external operating environment, and of the

impact of these changes on the liquidity indicators. The results of stress tests are used for liquidity risk management as well as in setting the levels of risk appetite. The internal capital and liquidity adequacy assessment process (ICLAAP) is described in more detail in Chapter 7.

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

For a declaration approved by the Board of Directors on the adequacy of liquidity risk management arrangements, please refer to Chapter 2.

(i) A concise liquidity risk statement approved by the management body succinctly describing the institution`s overall liquidity risk profile associated with the business strategy.

For a concise liquidity risk statement approved by the Board of Directors succinctly describing the institution`s overall liquidity risk profile associated with the business strategy, please refer to Chapter 2.

13 OPERATIONAL RISK

13.1 MANAGEMENT OF OPERATIONAL RISK (EU ORA)

(a) Disclosure of the risk management objectives and policies

Operational risk refers to the possibility of losses arising from unclear or inadequate processes, deficient systems, actions by the personnel, or external factors. The consequences of realised operational risks may appear as financial loss or additional costs, or as a deterioration of S-Bank's reputation, esteem and trustworthiness. At S-Bank, operational risks include risks related to employee practices and occupational safety, internal and external misconduct, security, business continuity, execution of transactions and processes, technology, outsourcing and procurement, information security, statutory reporting and data management, as well as model risk.

In 2025, S-Bank's operational risk events were impacted by external fraud, system disruptions, deviations related to order execution and processes, as well as regulatory sanctions stemming from a system vulnerability identified in 2022. The realized operational risk losses in 2025 amounted to EUR 11.1 million (1.8). Of this amount, EUR 9.5 million resulted from penalty fees imposed by authorities due to the 2022

system vulnerability. S-Bank filed an appeal related to this matter with the Helsinki Administrative Court in October 2025.

The objective of S-Bank's operational risk management is to avoid financial losses and negative reputational impact by identifying operational risks in business activities and the controls required to mitigate them. Another goal is to ensure business continuity by preparing for potential disruptions, identifying possible threats in advance, and limiting their impact or shortening their duration.

Operational risk management supports the implementation of S-Bank's values, strategy, and objectives, as well as compliance with good banking and lending practices and good securities market practices. Risk management covers all material operational risks related to S-Bank's activities.

To support the achievement of S-Bank's objectives, risk management is conducted throughout the organisation using the following measures:

- Identifying, measuring, monitoring and reporting all of S-Bank's material operational risks and their effects on the risk capacity and risk appetite.

- Determining methods for risk management and ensuring that they are effective, appropriate, cost-efficient and adequate, while taking account of S-Bank's risk appetite and internal control measures.
- Properly protect S-Bank's information and ICT assets (ICT = information and communication technology) from risks, damage, and unauthorized access and use, thereby striving to maintain a high level of availability, authenticity, integrity, and confidentiality of information assets.
- Utilize effective means to detect disruptions, abnormal activities, and deficiencies as quickly as possible and respond to disruptions, abnormal activities, and deficiencies promptly, efficiently, and comprehensively.
- Prepare for serious disruptions and deviations through impact analyses and continuity plans and test them regularly to ensure operational capability.
- Ensure sufficient competence of management and staff, risk management resources (personnel, financial, and technical resources), application of best practices, and continuous increase in risk awareness.
- Integrating risk management into S-Bank's management system, decision-making and operating methods.

The purpose of S-Bank's compliance risk management is to ensure regulatory compliance and strengthen commitment to ethical business practices and responsible governance, building stakeholder trust and mitigating risks. Compliance risk refers to a risk that arises from non-compliance of regulatory requirements, internal guidelines or ethical principles. Compliance risks include conduct risks, risks related to non-compliance of regulatory requirements, specific juridical risks and risks in relation to anti-money laundering, terrorist financing and sanctions. Compliance risks are classified as qualitative risks together with above-mentioned operational risks. The consequences of realised compliance risks often overlap with actual operational risks.

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

Operational risk management follows the three lines of defence principle described earlier in Chapter 5.1.

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

Operational risk is measured using indicators defined by the Board, executive management, and the Risk Committee, aligned with S-Bank's risk appetite. Operational risks are identified comprehensively, proactively and systematically. Identified risks are assessed based on the likelihood of occurrence and the consequences of realization. The result of the assessment provides an estimate of the significance of each risk. Controls are defined and implemented for identified risks, and their adequacy and effectiveness are evaluated.

S-Bank calculates the minimum own funds requirement for operational risk based on the business indicator component (BIC), as specified in the Capital Requirements Regulation (CRR). As S-Bank's business indicator (BI) remained below the EUR 750 million threshold, the bank is not required to calculate annual operational risk losses under Article 316 of the CRR.

Operational risk capital charge is also assessed through stress testing in the context of the capital planning (ICAAP process) and is incorporated into the calculation of the economic capital requirement (Pillar 2), as described in Chapter 7.

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

Operational risk reporting follows the general and business-independent risk reporting models described earlier. Operational risks are measured, monitored, supervised, and reported so that S-Bank's Board and executive management have sufficient and relevant information on operational risks and their management. The risk position, principles of operational risk management, and changes to these are reported regularly to the Board so it can assess the level of risk-taking and actions taken to manage risk levels.

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

S-Bank's operational risk management consists of identifying and assessing risks, managing risks, anticipating and preparing for risks, protecting and preventing, responding to disruptions or deviations when they occur, limiting damage, and monitoring and supervising. At all stages, efforts are made to identify areas for improvement in risk management.

Operational risks are identified, assessed, and managed through various procedures. New products and services are approved

through a formal approval process before they are implemented or offered to the customers. A similar procedure is used to approve new counterparties and contractual partners before S-Bank starts cooperating with them. Continuity plans are prepared in case there are major disturbances in operations. Realised operational risks are managed through incident management procedures. S-Bank prepares for potential operational risks by arranging insurance against damage caused by misuse or criminal activity and damage to property, for example.

Risk identification and assessment is a continuous, iterative process that is part of daily business processes and activities. Risks, control effectiveness, and progress of development actions are actively monitored, and risks and various risk assessments with development actions are updated based on risk whenever changes occur in operations or the operating environment, but at least annually.

Risk realisation or its consequences are kept at an acceptable level. Control measures are defined for risks based on risk and their effectiveness, appropriateness, cost-efficiency, and adequacy are ensured, considering S-Bank's risk appetite and internal control measures.

Development actions are defined for risks when the significance of the risk and/or poor quality of controls require reducing the risk's significance and/or improving risk management. Development actions are prioritised and integrated into operational and development plans.

PART 2: YEAR-END PILLAR 3 TEMPLATES

1 KEY PRUDENTIAL METRICS AND RISK-WEIGHTED ASSETS (RWA)

1.1 EU OV1 – OVERVIEW OF TOTAL RISK EXPOSURES AMOUNTS

S-Bank’s risk exposure amount (REA) decreased by EUR 479.6 million during the review period and totalled to EUR 4 129.0 million (4 608.6). The implementation of CRR3 regulation reduced risk exposure amount by EUR 568.9 million, mainly due to the revised calculation of risk-weighted assets for exposures secured by mortgages on immovable property and the adoption of a new standardised approach for operational risk. During the review period, risk-weighted assets for credit risk increased by EUR 49.5 million, driven by the growth in investments and the decline in the market values of residential real estate collateral. S-Bank’s loan portfolio decreased during the same period. Operational risk increased by EUR 43.7 million, mainly driven by the strong growth in the net interest income over the past three years. The REA for credit valuation adjustment (CVA) was EUR 9.5 million, of which EUR 8.8 million was calculated using the reduced basic approach. In addition, the simplified treatment for derivative positions in collective investment undertakings (CIUs) contributed to EUR 0.8 million.

S-Bank uses the standardised approach for calculating credit and operational risk. During the second quarter of the year 2025, S-Bank changed its method for calculating the counterparty credit risk (CCR) from the original exposure method to a simplified standardised approach for counterparty credit risk. The change in the calculation method was due to an increase in the S-Bank’s derivative position.

The balance on row 25 is included in the balance on row 1.

EUR million		Total risk exposure amounts (TREA)		Total own funds requirements
		a	b	c
		31 Dec 2025	31 Dec 2024	31 Dec 2025
1	Credit risk (excluding CCR)	3 473.8	3 878.9	277.9
2	Of which the standardised approach	3 473.8	3 878.9	277.9
3	Of which the Foundation IRB (F-IRB) approach			
4	Of which slotting approach			
EU 4a	Of which equities under the simple risk weighted approach			
5	Of which the Advanced IRB (A-IRB) approach			
6	Counterparty credit risk – CCR	2.3	3.0	0.2
7	Of which the standardised approach			
8	Of which internal model method (IMM)			
EU 8a	Of which exposures to a CCP	0.1	0.2	0.0
9	Of which other CCR	2.2	2.8	0.2
10	Credit valuation adjustments risk – CVA risk	9.5	10.7	0.8
EU 10a	Of which the standardised approach (SA)			
EU 10b	Of which the basic approach (F-BA and R-BA)	8.8		0.7
EU 10c	Of which the simplified approach			
11	Not applicable			
12	Not applicable			

EUR million		Total risk exposure amounts (TREA)		Total own funds requirements
		a	b	c
		31 Dec 2025	31 Dec 2024	31 Dec 2025
13	Not applicable			
14	Not applicable			
15	Settlement risk			
16	Securitisation exposures in the non-trading book (after the cap)			
17	Of which SEC-IRBA approach			
18	Of which SEC-ERBA (including IAA)			
19	Of which SEC-SA approach			
EU 19a	Of which 1250% / deduction			
20	Position, foreign exchange and commodities risks (Market risk)			
21	Of which the Alternative standardised approach (A-SA)			
EU 21a	Of which the Simplified standardised approach (S-SA)			
22	Of which Alternative Internal Model Approach (A-IMA)			
EU 22a	Large exposures			
23	Reclassifications between the trading and non-trading books			
24	Operational risk	643.4	716.1	51.5
EU 24a	Exposures to crypto-assets			
25	Amounts below the thresholds for deduction (subject to 250% risk weight)	6.9	9.7	0.6
26	Output floor applied (%)			
27	Floor adjustment (before application of transitional cap)			
28	Floor adjustment (after application of transitional cap)			
29	Total	4 129.0	4 608.6	330.3

1.2 EU KM1 – KEY METRICS TEMPLATE

S-Bank's capital adequacy and liquidity coverage ratio strengthened during 2025. S-Bank's capital position was well above the regulatory requirement of 13.52 per cent as well as the internal minimum target level, which is set 150 basis points above the sum of the regulatory requirement and the Pillar 2 Guidance (P2G). The P2G imposed by the Finnish Financial Supervisory Authority (FIN-FSA) is 0.75 per cent of the total risk exposure amount. S-Bank's total capital adequacy ratio was 25.3 per cent (21.4) and the Tier 1 (T1) ratio was 23.2 (19.4) as of 31 December 2025. S-Bank has no Additional Tier 1 (AT1) instruments, and therefore its CET1 and T1 ratios are identical.

CET1 capital increased by EUR 62.6 million and total own funds increased by EUR 56.3 million during 2025. The development of CET1 capital was mainly affected by the profit performance due to net interest income. Total REA decreased by EUR 479.6 million, mainly due to the implementation of CRR3 regulation. Excluding the CRR3-related changes, the risk exposure amount increased by EUR 89.3 million during the year, primarily due to growth in both credit and operational risk.

S-Bank's leverage ratio (LR) of 7.1 per cent (6.7) was strong and exceeded the minimum regulatory requirement of 3 per cent and the internal minimum target level.

The liquidity position remained strong during the year. The 12-month moving average of the liquidity coverage ratio was 279.3 per cent, while the net stable funding ratio stood at 161.1 per cent. Please note that the liquidity coverage ratio is presented as a moving average over 12 months.

EUR million		a	c	e
		31 Dec 2025	30 Jun 2025	31 Dec 2024
Available own funds (amounts)				
1	Common Equity Tier 1 (CET1) capital	956.7	928.0	894.1
2	Tier 1 capital	956.7	928.0	894.1
3	Total capital	1 044.6	1 021.3	988.3
Risk-weighted exposure amounts				
4	Total risk exposure amount	4 129.0	4 036.6	4 608.6
4a	Total risk exposure pre-floor	4 129.0	4 036.6	
Capital ratios (as a percentage of risk-weighted exposure amount)				
5	Common Equity Tier 1 ratio (%)	23.17%	22.99%	19.40%
5a	Not applicable			
5b	Common Equity Tier 1 ratio considering unfloored TREA (%)	23.17%	22.99%	
6	Tier 1 ratio (%)	23.17%	22.99%	19.40%
6a	Not applicable			
6b	Tier 1 ratio considering unfloored TREA (%)	23.17%	22.99%	
7	Total capital ratio (%)	25.30%	25.30%	21.44%
7a	Not applicable			
7b	Total capital ratio considering unfloored TREA (%)	25.30%	25.30%	

EUR million		a	c	e
		31 Dec 2025	30 Jun 2025	31 Dec 2024
Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)				
EU 7d	Additional own funds requirements to address risks other than the risk of excessive leverage (%)	2.00%	2.00%	2.00%
EU 7e	of which: to be made up of CET1 capital (percentage points)	1.13%	1.13%	1.13%
EU 7f	of which: to be made up of Tier 1 capital (percentage points)	1.50%	1.50%	1.50%
EU 7g	Total SREP own funds requirements (%)	10.00%	10.00%	10.00%
Combined buffer and overall capital requirement (as a percentage of risk-weighted exposure amount)				
8	Capital conservation buffer (%)	2.50%	2.50%	2.50%
EU 8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)			
9	Institution specific countercyclical capital buffer (%)	0.02%	0.02%	0.02%
EU 9a	Systemic risk buffer (%)	1.00%	1.00%	1.00%
10	Global Systemically Important Institution buffer (%)			
EU 10a	Other Systemically Important Institution buffer (%)			
11	Combined buffer requirement (%)	3.52%	3.52%	3.52%
EU 11a	Overall capital requirements (%)	13.52%	13.52%	13.52%
12	CET1 available after meeting the total SREP own funds requirements (%)	15.30%	15.30%	11.44%
Leverage ratio				
13	Total exposure measure	13 439.4	13 172.2	13 392.1
14	Leverage ratio (%)	7.12%	7.05%	6.68%
Additional own funds requirements to address the risk of excessive leverage (as a percentage of total exposure measure)				
EU 14a	Additional own funds requirements to address the risk of excessive leverage (%)			
EU 14b	of which: to be made up of CET1 capital (percentage points)			
EU 14c	Total SREP leverage ratio requirements (%)	3.00%	3.00%	3.00%
Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)				
EU 14d	Leverage ratio buffer requirement (%)			
EU 14e	Overall leverage ratio requirement (%)	3.00%	3.00%	3.00%
Liquidity Coverage Ratio				
15	Total high-quality liquid assets (HQLA) (Weighted value -average)	3 006.0	3 206.4	3 148.3
EU 16a	Cash outflows - Total weighted value	1178.2	1 254.3	1 119.1
EU 16b	Cash inflows - Total weighted value	91.5	83.1	72.8
16	Total net cash outflows (adjusted value)	1 086.7	1 171.2	1 043.1
17	Liquidity coverage ratio (%)	279.33%	292.50%	322.96%
Net Stable Funding Ratio				
18	Total available stable funding	11 845.6	11 606.9	11 088.3
19	Total required stable funding	7 353.1	7 282.9	7 111.2
20	NSFR ratio (%)	161.10%	159.37%	155.93%

2 SCOPE OF APPLICATION

2.1 EU LI1 - DIFFERENCES BETWEEN THE ACCOUNTING SCOPE AND THE SCOPE OF PRUDENTIAL CONSOLIDATION AND MAPPING OF FINANCIAL STATEMENT CATEGORIES WITH REGULATORY RISK CATEGORIES

S-Bank uses the same carrying values for financial statements and for prudential consolidation. For prudential purposes only credit risk and counterparty credit risk (CCR) frameworks are applicable to S-Bank. Items classified to the trading book are below the thresholds for market risk framework and are thus treated under the credit risk framework.

31 Dec 2025		a & b	c	d	e	f	g
		Carrying values as reported in published financial statements & Carrying values under scope of prudential consolidation	Carrying values of items				
EUR million	Subject to the credit risk framework		Subject to the CCR framework	Subject to the securitisation framework	Subject to the market risk framework		
Breakdown by asset classes according to the balance sheet in the published financial statements							
1	Cash and cash equivalents	2 535.3	2 535.3				
2	Debt securities eligible for refinancing with central banks	854.2	854.2				
3	Receivables from credit institutions	27.9	27.9				
4	Receivables from customers	9 407.6	9 407.6				
5	Debt securities	191.3	191.3				
6	Derivatives	29.5		29.5			
7	Shares and interests	16.3	16.3				
8	Holdings in associated companies	0.0	0.0				
9	Intangible assets	62.5					62.5
10	Tangible assets	10.1	10.1				
11	Tax assets	3.0	3.0				
12	Prepayments and accrued income	96.8	64.2	32.6			
13	Other assets	5.2	5.2				
14	Total assets	13 239.8	13 115.1	62.1			62.5
Breakdown by liability classes according to the balance sheet in the published financial statements							
1	Liabilities to credit institutions	57.2					57.2
2	Liabilities to customers	10 241.5					10 241.5
3	Issued bonds	1 616.5					1 616.5
4	Subordinated debts	90.0					90.0
5	Derivatives	4.5		4.5			
6	Provisions	0.2					0.2
7	Tax liabilities	8.2					8.2
8	Accrued expenses	100.1		1.0			99.1
9	Other liabilities	80.1					80.1
10	Total liabilities	12 198.2		5.5			12 192.7

31 Dec 2024		a & b	c	d	e	f	g
		Carrying values as reported in published financial statements & Carrying values under scope of prudential consolidation	Carrying values of items				
EUR million	Subject to the credit risk framework		Subject to the CCR framework	Subject to the securitisation framework	Subject to the market risk framework		
Breakdown by asset classes according to the balance sheet in the published financial statements							
1	Cash and cash equivalents	2 906.4	2 906.4				
2	Debt securities eligible for refinancing with central banks	564.8	564.8				
3	Receivables from credit institutions	21.6	21.6				
4	Receivables from customers	9 466.8	9 466.8				
5	Debt securities	58.0	58.0				
6	Derivatives	49.0		49.0			
7	Shares and interests	19.3	19.3				
8	Holdings in associated companies	0.0	0.0				
9	Intangible assets	62.4					62.4
10	Tangible assets	14.0	14.0				
11	Tax assets	4.0	4.0				
12	Prepayments and accrued income	78.1	57.5	20.6			
13	Other assets	5.4	5.4				
14	Total assets	13 249.6	13 117.7	69.6			62.4
Breakdown by liability classes according to the balance sheet in the published financial statements							
1	Liabilities to credit institutions	655.7					655.7
2	Liabilities to customers	9 460.4					9 460.4
3	Issued bonds	1 712.5					1 712.5
4	Subordinated debts	95.7					95.7
5	Derivatives	1.7		1.7			
6	Provisions	0.2					0.2
7	Tax liabilities	11.3					11.3
8	Accrued expenses	246.7		2.5			244.2
9	Other liabilities	87.8					87.8
10	Total liabilities	12 272.0		4.2			12 267.8

2.2 EU LI2 - MAIN SOURCES OF DIFFERENCES BETWEEN REGULATORY EXPOSURE AMOUNTS AND CARRYING VALUES IN FINANCIAL STATEMENTS

The origins of differences between carrying values under the scope of prudential consolidation and amounts considered for regulatory purposes are described in more detail in table EU LIA.

		a	b	c	d	e
		Total	Items subject to			Market risk framework
EUR million			Credit risk framework	Securitisation framework	CCR framework	
31 Dec 2025						
1	Assets carrying value amount under the scope of prudential consolidation (as per template LI1)	13 177.3	13 115.1		62.1	
2	Liabilities carrying value amount under the scope of prudential consolidation (as per template LI1)	5.5			5.5	
3	Total net amount under the scope of prudential consolidation	13 171.8	13 115.1		56.7	
4	Off-balance-sheet amounts	2 649.9	2 649.9			
5	Differences in valuations	-1.1	-1.1			
6	Differences due to different netting rules, other than those already included in row 2					
7	Differences due to consideration of provisions					
8	Differences due to the use of credit risk mitigation techniques (CRMs)					
9	Differences due to credit conversion factors	-2 589.5	-2 589.5			
10	Differences due to Securitisation with risk transfer					
11	Other differences	-41.7	-1.2		-40.5	
12	Exposure amounts considered for regulatory purposes	13 189.4	13 173.2		16.2	

		a	b	c	d	e
		Total	Items subject to			Market risk framework
EUR million			Credit risk framework	Securitisation framework	CCR framework	
31 Dec 2024						
1	Assets carrying value amount under the scope of prudential consolidation (as per template LI1)	13 187.3	13 117.7		69.6	
2	Liabilities carrying value amount under the scope of prudential consolidation (as per template LI1)	4.2			4.2	
3	Total net amount under the scope of prudential consolidation	13 183.1	13 117.7		65.4	
4	Off-balance-sheet amounts	2 342.3	2 342.3			
5	Differences in valuations	-0.7	-0.7			
6	Differences due to different netting rules, other than those already included in row 2					
7	Differences due to consideration of provisions					
8	Differences due to the use of credit risk mitigation techniques (CRMs)					
9	Differences due to credit conversion factors	-2 313.7	-2 313.7			
10	Differences due to Securitisation with risk transfer					
11	Other differences	-40.0	-0.4		-39.6	
12	Exposure amounts considered for regulatory purposes	13 170.9	13 145.1		25.8	

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

S-Bank uses the same method of consolidation for accounting and for prudential consolidation. All subsidiaries are included in the consolidation. There are no impediments to the prompt transfer of own funds or to the repayment of liabilities within the group.

31 Dec 2025

a Name of the entity	b Method of accounting consolidation	c Method of prudential consolidation				g Deducted	h Method of accounting consolidation
		d Full consolidation	e Proportional consolidation	f Equity method	Neither consolidated nor deducted		
S-Bank Plc	Full consolidation	X					Credit institution
S-Bank Fund Management Ltd	Full consolidation	X					Asset management
S-Asiakaspalvelu Oy	Full consolidation	X					Service entity
S-Bank Properties Ltd	Full consolidation	X					Real estate activities
S-Bank Impact Investing Ltd	Full consolidation	X					Asset management
FIM Real Estate Ltd	Full consolidation	X					Asset management
FIM Infrastructure Mezzanine Debt Fund GP Oy	Full consolidation	X					Asset management
FIM Infrastructure Mezzanine Debt Fund III GP Oy	Full consolidation	X					Asset management
FIM Private Debt Fund I GP Oy	Full consolidation	X					Asset management
FIM SIB Oy	Full consolidation	X					Asset management
S-Pankki Vaikuttavuus I GP Oy	Full consolidation	X					Asset management
S-Pankki Social Finance I GP Oy	Full consolidation	X					Asset management
S-Crosskey Ltd	Equity method			X			IT-service entity

2.4 EU LIA - EXPLANATIONS OF DIFFERENCES BETWEEN ACCOUNTING AND REGULATORY EXPOSURE AMOUNTS

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

S-Bank uses the same carrying values for both financial statements and for prudential consolidation. Consequently, there are no differences between columns (a) and (b), and the two columns have therefore been combined into a single column in template EU LI1.

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

The differences between regulatory exposure amounts and carrying values in the financial statements are mainly due to off-balance sheet items and the difference in treatment of derivatives between the IFRS

framework and regulatory framework. The difference in treatment of derivatives is presented in row 11 of template EU LI2 and it is subject to CCR framework and arises from applying simplified standardised approach for derivatives. Off-balance sheet items are reported in row 4 of template EU LI2 which are not included in the balance sheet carrying amounts in IFRS framework. Prudent valua-

tion adjustments (PVA) amounted to EUR1.1 million (0.7) and it is shown in row 5 of template EU LI2. There were no material changes compared to year-end 2024.

2.5 EU PV1 - PRUDENT VALUATION ADJUSTMENTS (PVA)

S-Bank uses the simplified approach to calculate the prudent valuation adjustment (PVA).

		a	b	c	d	e	EU e1	EU e2	f	g	h
		Risk category					Category level AVA - Valuation uncertainty		Total category level post-diversification	Of which: Total core approach in the trading book	Of which: Total core approach in the banking book
EUR million	Category level AVA	Equity	Interest Rates	Foreign exchange	Credit	Commodities	Unearned credit spreads AVA	Investment and funding costs AVA			
1	Market price uncertainty										
2	Not applicable										
3	Close-out cost										
4	Concentrated positions										
5	Early termination										
6	Model risk										
7	Operational risk										
8	Not applicable										
9	Not applicable										
10	Future administrative costs										
11	Not applicable										
12	Total Additional Valuation Adjustments (AVAs)								1.1		

		a	b	c	d	e	EU e1	EU e2	f	g	h
		Risk category					Category level AVA - Valuation uncertainty		Total category level post-diversification	Of which: Total core approach in the trading book	Of which: Total core approach in the banking book
EUR million	Category level AVA	Equity	Interest Rates	Foreign exchange	Credit	Commodities	Unearned credit spreads AVA	Investment and funding costs AVA			
1	Market price uncertainty										
2	Not applicable										
3	Close-out cost										
4	Concentrated positions										
5	Early termination										
6	Model risk										
7	Operational risk										
8	Not applicable										
9	Not applicable										
10	Future administrative costs										
11	Not applicable										
12	Total Additional Valuation Adjustments (AVAs)								0.7		

3 OWN FUNDS

3.1 EU CC1 - COMPOSITION OF REGULATORY OWN FUNDS

At the end of the year, total own funds stood at EUR 1 044.6 million (988.3) and CET1 capital at EUR 956.7 million (894.1). Tier 2 capital stood at EUR 87.9 million (94.2). Own funds were positively affected especially by profit performance due to net interest income. The recovery in the fair value reserve strengthened own funds, even though the fair value reserve had a negative impact on own funds. The amount of foreseeable dividend for 2025 has been deducted from retained earnings, in line with S-Bank's dividend policy and Commission Delegated Regulation (EU) No 241/2014. S-Bank's Tier 2 capital consists of four debentures. The debentures with a residual maturity of less than five years are being gradually reduced from Tier 2 capital, as required by Capital Requirements Regulation.

The regulatory adjustments made to own funds consist of the deduction of intangible assets from CET1 capital, as well as value adjustments made due to the requirements for prudent valuation. Other regulatory adjustments include a deduction for non-performing exposures. The capital ratios are determined on the basis laid down in the CRR.

EUR million		a	b	Amount on disclosure date 31 Dec 2024
		Amount on disclosure date 31 Dec 2025	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation	
Common Equity Tier 1 (CET1) capital: instruments and reserves				
1	Capital instruments and the related share premium accounts	82.9	c	82.9
	of which: Share capital	82.9	c	82.9
2	Retained earnings	393.2	f	281.2
3	Accumulated other comprehensive income (and other reserves)	482.3	d, e	481.4
EU-3a	Funds for general banking risk			
4	Amount of qualifying items referred to in Article 484 (3) CRR and the related share premium accounts subject to phase out from CET1			
5	Minority interests (amount allowed in consolidated CET1)			
EU-5a	Independently reviewed interim profits net of any foreseeable charge or dividend	63.0	g	112.1
6	Common Equity Tier 1 (CET1) capital before regulatory adjustments	1 021.5		957.5
Common Equity Tier 1 (CET1) capital: regulatory adjustments				
7	Additional value adjustments (negative amount)	-1.1	h	-0.7
8	Intangible assets (net of related tax liability) (negative amount)	-62.5	a	-62.4
9	Not applicable			
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)			
11	Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value			
12	Negative amounts resulting from the calculation of expected loss amounts			

EUR million		a	b	Amount on disclosure date 31 Dec 2024
		Amount on disclosure date 31 Dec 2025	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation	
13	Any increase in equity that results from securitised assets (negative amount)			
14	Gains or losses on liabilities valued at fair value resulting from changes in own credit standing			
15	Defined-benefit pension fund assets (negative amount)			
16	Direct, indirect and synthetic holdings by an institution of own CET1 instruments (negative amount)			
17	Direct, indirect and synthetic holdings of the CET1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)			
18	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)			
19	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)			
20	Not applicable			
EU-20a	Exposure amount of the following items which qualify for a RW of 1250%, where the institution opts for the deduction alternative			
EU-20b	of which: qualifying holdings outside the financial sector (negative amount)			
EU-20c	of which: securitisation positions (negative amount)			
EU-20d	of which: free deliveries (negative amount)			
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)			
22	Amount exceeding the 17.65% threshold (negative amount)			
23	of which: direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities			
24	Not applicable			
25	of which: deferred tax assets arising from temporary differences			
EU-25a	Losses for the current financial year (negative amount)			
EU-25b	Foreseeable tax charges relating to CET1 items except where the institution suitably adjusts the amount of CET1 items insofar as such tax charges reduce the amount up to which those items may be used to cover risks or losses (negative amount)			
26	Not applicable			
27	Qualifying AT1 deductions that exceed the AT1 items of the institution (negative amount)			
27a	Other regulatory adjustments	-1.2		-0.4
28	Total regulatory adjustments to Common Equity Tier 1 (CET1)	-64.8		-63.4
29	Common Equity Tier 1 (CET1) capital	956.7		894.1
Additional Tier 1 (AT1) capital: instruments				
30	Capital instruments and the related share premium accounts			
31	of which: classified as equity under applicable accounting standards			

		a	b	
		Amount on disclosure date	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation	Amount on disclosure date
EUR million		31 Dec 2025		31 Dec 2024
32	of which: classified as liabilities under applicable accounting standards			
33	Amount of qualifying items referred to in Article 484 (4) CRR and the related share premium accounts subject to phase out from AT1			
EU-33a	Amount of qualifying items referred to in Article 494a(1) CRR subject to phase out from AT1			
EU-33b	Amount of qualifying items referred to in Article 494b(1) CRR subject to phase out from AT1			
34	Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties			
35	of which: instruments issued by subsidiaries subject to phase out			
36	Additional Tier 1 (AT1) capital before regulatory adjustments			
Additional Tier 1 (AT1) capital: regulatory adjustments				
37	Direct, indirect and synthetic holdings by an institution of own AT1 instruments (negative amount)			
38	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)			
39	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)			
40	Direct, indirect and synthetic holdings by the institution of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)			
41	Not applicable			
42	Qualifying T2 deductions that exceed the T2 items of the institution (negative amount)			
42a	Other regulatory adjustments to AT1 capital			
43	Total regulatory adjustments to Additional Tier 1 (AT1) capital			
44	Additional Tier 1 (AT1) capital			
45	Tier 1 capital (T1 = CET1 + AT1)	956.7		894.1
Tier 2 (T2) capital: instruments				
46	Capital instruments and the related share premium accounts	87.9	b	94.2
47	Amount of qualifying items referred to in Article 484(5) CRR and the related share premium accounts subject to phase out from T2 as described in Article 486(4) CRR			
EU-47a	Amount of qualifying items referred to in Article 494a(2) CRR subject to phase out from T2			
EU-47b	Amount of qualifying items referred to in Article 494b(2) CRR subject to phase out from T2			
48	Qualifying own funds instruments included in consolidated T2 capital (including minority interests and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties			
49	of which: instruments issued by subsidiaries subject to phase out			
50	Credit risk adjustments			
51	Tier 2 (T2) capital before regulatory adjustments	87.9		94.2

		a	b	
		Amount on disclosure date	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation	Amount on disclosure date
EUR million		31 Dec 2025		31 Dec 2024
Tier 2 (T2) capital: regulatory adjustments				
52	Direct, indirect and synthetic holdings by an institution of own T2 instruments and subordinated loans (negative amount)			
53	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)			
54	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)			
54a	Not applicable			
55	Direct, indirect and synthetic holdings by the institution of the T2 instruments and subordinated loans of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)			
56	Not applicable			
EU-56a	Qualifying eligible liabilities deductions that exceed the eligible liabilities items of the institution (negative amount)			
EU-56b	Other regulatory adjustments to T2 capital			
57	Total regulatory adjustments to Tier 2 (T2) capital			
58	Tier 2 (T2) capital	87.9		94.2
59	Total capital (TC = T1 + T2)	1 044.6		988.3
60	Total Risk exposure amount	4 129.0		4 608.6
Capital ratios and requirements including buffers				
61	Common Equity Tier 1 capital	23.17%		19.40%
62	Tier 1 capital	23.17%		19.40%
63	Total capital	25.30%		21.44%
64	Institution CET1 overall capital requirements	9.15%		9.14%
65	of which: capital conservation buffer requirement	2.50%		2.50%
66	of which: countercyclical capital buffer requirement	0.02%		0.02%
67	of which: systemic risk buffer requirement	1.00%		1.00%
EU-67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer requirement			
EU-67b	of which: additional own funds requirements to address the risks other than the risk of excessive leverage	1.13%		1.13%
68	Common Equity Tier 1 capital (as a percentage of risk exposure amount) available after meeting the minimum capital requirements	15.30%		11.44%
National minima (if different from Basel III)				
69	Not applicable			
70	Not applicable			
71	Not applicable			

		a	b	Amount on disclosure date 31 Dec 2024
		Amount on disclosure date 31 Dec 2025	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation	
EUR million				
Amounts below the thresholds for deduction (before risk weighting)				
72	Direct and indirect holdings of own funds and eligible liabilities of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions)			
73	Direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 17.65% thresholds and net of eligible short positions)			
74	Not applicable			
75	Deferred tax assets arising from temporary differences (amount below 17.65% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met)	2.8		3.9
Amounts below the thresholds for deduction (before risk weighting)				
76	Credit risk adjustments included in T2 in respect of exposures subject to standardised approach (prior to the application of the cap)			
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach			
78	Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)			
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach			

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

Template EU CC2 presents the reconciliation of regulatory own funds to S-Bank's balance sheet items. The reference letters correspond to the elements disclosed earlier in template EU CC1.

31 Dec 2025		a	b	c
EUR million		Balance sheet as in published financial statements As at period end	Under regulatory scope of consolidation As at period end	Reference
Assets - Breakdown by asset classes according to the balance sheet in the published financial statements				
1	Cash and cash equivalents	2 535.3	2 535.3	
2	Debt securities eligible for refinancing with central banks	854.2	854.2	h
3	Receivables from credit institutions	27.9	27.9	
4	Receivables from customers	9 407.6	9 407.6	
5	Debt securities	191.3	191.3	h
6	Derivatives	29.5	29.5	h
7	Shares and interests	16.3	16.3	h
8	Holdings in associated companies	0.0	0.0	
9	Intangible assets	62.5	62.5	a
10	Tangible assets	10.1	10.1	
11	Tax assets	3.0	3.0	
12	Prepayments and accrued income	96.8	96.8	
13	Other assets	5.2	5.2	
	Total assets	13 239.8	13 239.8	
Liabilities - Breakdown by liability classes according to the balance sheet in the published financial statements				
1	Liabilities to credit institutions	57.2		
2	Liabilities to customers	10 241.5		
3	Issued bonds	1 616.5		
4	Subordinated debts	90.0	87.9	b
5	Derivatives	4.5		h
6	Provisions	0.2		
7	Tax liabilities	8.2		
8	Accrued expenses	100.1		
9	Other liabilities	80.1		
	Total liabilities	12 198.2	87.9	
Shareholders' Equity				
1	Share capital	82.9	82.9	c
2	Reserves	482.3	482.3	d,e

31 Dec 2025		a	b	c
EUR million		Balance sheet as in published financial statements As at period end	Under regulatory scope of consolidation As at period end	Reference
3	Of which: Fair value reserve	-1.5	-1.5	d
4	Of which: Reserve for invested non-restricted equity	483.8	483.8	e
5	Retained earnings	476.3	456.3	f, g
6	Of which: Retained earnings from previous years	393.2	393.2	f
7	Of which: Profit/loss for the period	83.1	63.0	g
8	Total shareholders' equity	1 041.6	1 021.5	
9	Total liabilities and shareholder's equity	13 239.8	1 109.4	

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

Table EU CCA presents the main features of regulatory own funds instruments and eligible liabilities instruments, as referred to in points (b) and (c) of Article 437 of the CRR. Additional information on these instruments is provided in the 2025 annual report and in the Group's notes.

31 Dec 2025		a	b	c	d	e
		Instruments for meeting own funds requirements				
1	Issuer	S-Bank Ltd (currently S-Bank Plc)	S-Bank Ltd (currently S-Bank Plc)	S-Bank Ltd (currently S-Bank Plc)	S-Bank Plc	S-Bank Plc
2	Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	N/A	FI4000210877	FI4000292735	FI4000466628	FI4000512702
2a	Public or private placement	N/A	Private	Private	Private	Private
3	Governing law(s) of the instrument	Finnish law	Finnish law	Finnish law	Finnish law	Finnish law
3a	Contractual recognition of write down and conversion powers of resolution authorities	N/A	Yes	Yes	Yes	Yes
<i>Regulatory treatment</i>						
4	Current treatment taking into account, where applicable, transitional CRR rules	Common Equity Tier 1	Tier 2	Tier 2	Tier 2	Tier 2
5	Post-transitional CRR rules	Common Equity Tier 1	Tier 2	Tier 2	Tier 2	Tier 2
6	Eligible at solo/(sub-)consolidated/ solo&(sub-)consolidated	Solo and consolidated	Solo and consolidated	Solo and consolidated	Solo and consolidated	Solo and consolidated
7	Instrument type (types to be specified by each jurisdiction)	Share as published in Regulation (EU) No 575/2013 article 28	Tier 2 as published in Regulation (EU) No 575/2013 article 63	Tier 2 as published in Regulation (EU) No 575/2013 article 63	Tier 2 as published in Regulation (EU) No 575/2013 article 63	Tier 2 as published in Regulation (EU) No 575/2013 article 63

31 Dec 2025		a	b	c	d	e
Instruments for meeting own funds requirements						
8	Amount recognised in regulatory capital or eligible liabilities (Currency in million, 31 Dec 2025)	EUR 82.9M	EUR 2.1M	EUR 2.6M	EUR 25.1M	EUR 58.1M
9	Nominal amount of instrument	EUR 82.9M	EUR 4.3M	EUR 2.7M	EUR 25.5M	EUR 57.5M
EU-9a	Issue price	N/A	100%	100%	100%	100%
EU-9b	Redemption price	N/A	100% of nominal amount	100% of nominal amount	100% of nominal amount	100% of nominal amount
10	Accounting classification	Shareholders' equity	Liability at amortised cost	Liability at amortised cost	Liability at amortised cost	Liability at amortised cost
11	Original date of issuance	N/A	30 June 2016	18 December 2017	1 December 2020	8 October 2021
12	Perpetual or dated	Perpetual	Dated	Dated	Dated	Dated
13	Original maturity date	No maturity	30 June 2026	18 December 2027	1 December 2030	8 October 2031
14	Issuer call subject to prior supervisory approval	N/A	Yes	Yes	Yes	Yes
15	Optional call date, contingent call dates and redemption amount	N/A	The debenture will be repaid based on its nominal value in equal instalments annually on 30 June, with the first instalment being paid on 30 Jun. 2021 and the last on 30 Jun. 2026. The issuer reserves the right to repay the debenture before the maturity date. The repayment can take place no earlier than five (5) years after the issuance of the loan, unless the Financial Supervision Authority grants permission for repayment earlier than in five (5) years. In addition tax or capital event redemption.	The debenture will be repaid based on its nominal value in equal instalments annually on 18 December, with the first instalment being paid on 18 Dec. 2022 and the last on 18 Dec. 2027. The issuer reserves the right to repay the debenture before the maturity date. The repayment can take place no earlier than five (5) years after the issuance of the loan, unless the Financial Supervision Authority grants permission for repayment earlier than in five (5) years. In addition tax or capital event redemption.	The debenture will be repaid based on its nominal value in equal instalments annually on 1 December, with the first instalment being paid on 1 Dec. 2026 and the last on 1 Dec. 2030. The issuer reserves the right to repay the debenture before the maturity date. The repayment can take place no earlier than five (5) years after the issuance of the loan, unless the Financial Supervision Authority grants permission for repayment earlier than in five (5) years. In addition tax or capital event redemption.	The debenture will be repaid based on its nominal value in equal instalments annually on 8 October, with the first instalment being paid on 8 October 2027 and the last on 8 October 2031. The issuer reserves the right to repay the debenture before the maturity date. The repayment can take place no earlier than five (5) years after the issuance of the loan, unless the Financial Supervision Authority grants permission for repayment earlier than in five (5) years. In addition tax or capital event redemption.
16	Subsequent call dates, if applicable	N/A	30 June each year after the first call date.	18 December each year after the first call date.	1 December each year after the first call date.	8 October each year after the first call date.
<i>Coupons / dividends</i>						
17	Fixed or floating dividend/coupon	N/A	Floating	Floating	Floating	Floating
18	Coupon rate and any related index	N/A	EURIBOR of 12 months + 1.8% annual interest	EURIBOR of 12 months + 1.8% annual interest	EURIBOR of 12 months + 2.0% annual interest	EURIBOR of 12 months + 2.0% annual interest
19	Existence of a dividend stopper	N/A	No	No	No	No
EU-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Fully discretionary	Mandatory	Mandatory	Mandatory	Mandatory
EU-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Fully discretionary	Mandatory	Mandatory	Mandatory	Mandatory

31 Dec 2025		a	b	c	d	e
		Instruments for meeting own funds requirements				
21	Existence of step up or other incentive to redeem	N/A	No	No	No	No
22	Noncumulative or cumulative	N/A	Noncumulative	Noncumulative	Noncumulative	Noncumulative
23	Convertible or non-convertible	N/A	Convertible	Convertible	Convertible	Convertible
24	If convertible, conversion trigger(s)		The instrument may be subject of a conversion by decision of the Finnish Financial Stability Authority.	The instrument may be subject of a conversion by decision of the Finnish Financial Stability Authority.	The instrument may be subject of a conversion by decision of the Finnish Financial Stability Authority.	The instrument may be subject of a conversion by decision of the Finnish Financial Stability Authority.
25	If convertible, fully or partially	N/A	Fully or Partially	Fully or Partially	Fully or Partially	Fully or Partially
26	If convertible, conversion rate	N/A	To be determined by the resolution authority.	To be determined by the resolution authority.	To be determined by the resolution authority.	To be determined by the resolution authority.
27	If convertible, mandatory or optional conversion	N/A	N/A	N/A	N/A	N/A
28	If convertible, specify instrument type convertible into	N/A	Common Equity Tier 1	Common Equity Tier 1	Common Equity Tier 1	Common Equity Tier 1
29	If convertible, specify issuer of instrument it converts into	N/A	S-Bank Plc	S-Bank Plc	S-Bank Plc	S-Bank Plc
30	Write-down features	N/A	Yes	Yes	Yes	Yes
31	If write-down, write-down trigger(s)	N/A	In accordance with the Act on the Resolution of Credit Institutions and Investment firms (1194/2014), the debenture may be subject of a write-down or conversion by decision of the Finnish Financial Stability Authority.	In accordance with the Act on the Resolution of Credit Institutions and Investment firms (1194/2014), the debenture may be subject of a write-down or conversion by decision of the Finnish Financial Stability Authority.	In accordance with the Act on the Resolution of Credit Institutions and Investment firms (1194/2014), the debenture may be subject of a write-down or conversion by decision of the Finnish Financial Stability Authority. In addition, a write-down may trigger if the issuer's CET1 capital ratio falls below seven (7) percent on a regular observation date or on an additional observation date.	In accordance with the Act on the Resolution of Credit Institutions and Investment firms (1194/2014), the debenture may be subject of a write-down or conversion by decision of the Finnish Financial Stability Authority. In addition, a write-down may trigger if the issuer's CET1 capital ratio falls below seven (7) percent on a regular observation date or on an additional observation date.
32	If write-down, full or partial	N/A	Full or partial	Full or partial	Full or partial	Full or partial
33	If write-down, permanent or temporary	N/A	Permanent	Permanent	Permanent	Permanent
34	If temporary write-down, description of write-up mechanism	N/A	N/A	N/A	N/A	N/A
34a	Type of subordination (only for eligible liabilities)	N/A	N/A	N/A	N/A	N/A
EU-34b	Ranking of the instrument in normal insolvency proceedings	1	3	3	3	3
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Tier 2 (columns b to e)	Senior non-preferred	Senior non-preferred	Senior non-preferred	Senior non-preferred
36	Non-compliant transitioned features	No	No	No	No	No

31 Dec 2025		a	b	c	d	e
		Instruments for meeting own funds requirements				
37	If yes, specify non-compliant features	N/A	N/A	N/A	N/A	N/A
37a	<i>Link to the full term and conditions of the instrument (signposting)</i>	The terms and conditions of the instrument can be found on issuers website: https://www.s-pankki.fi/fi/s-pankki-yrityksena/sijoittajille/debt-investors/prospectuses-and-final-terms/	The terms and conditions of the instrument can be found on issuers website: https://www.s-pankki.fi/fi/s-pankki-yrityksena/sijoittajille/debt-investors/prospectuses-and-final-terms/	The terms and conditions of the instrument can be found on issuers website: https://www.s-pankki.fi/fi/s-pankki-yrityksena/sijoittajille/debt-investors/prospectuses-and-final-terms/	The terms and conditions of the instrument can be found on issuers website: https://www.s-pankki.fi/fi/s-pankki-yrityksena/sijoittajille/debt-investors/prospectuses-and-final-terms/	The terms and conditions of the instrument can be found on issuers website: https://www.s-pankki.fi/fi/s-pankki-yrityksena/sijoittajille/debt-investors/prospectuses-and-final-terms/

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

4 COUNTERCYCLICAL CAPITAL BUFFERS

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

The countercyclical capital buffer rate remained unchanged at 0.02 per cent (0.02) on 31 December 2025.

31 Dec 2025		a	b	c	d	e	f	g	h	i	j	k	l	m
		General credit exposures		Relevant credit exposures – Market risk		Securitisation exposures Exposure value for non-trading book	Total exposure value	Own fund requirements			Total	Risk-weighted exposure amounts	Own fund requirements weights (%)	Counter-cyclical buffer rate (%)
EUR million		Exposure value under the standardised approach	Exposure value under the IRB approach	Sum of long and short positions of trading book exposures for SA	Value of trading book exposures for internal models			Relevant credit risk exposures – Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book				
010	Breakdown by country:													
	001: Finland	12 213.6					12 213.6	264.7			264.7	3 308.8	97.34%	0.00%
	002: Norway	138.7					138.7	1.2			1.2	15.5	0.46%	2.50%
	003: Canada	118.4					118.4	1.9			1.9	23.9	0.70%	0.00%
	004: Sweden	54.7					54.7	0.8			0.8	10.1	0.30%	2.00%
	005: Netherlands	39.9					39.9	0.3			0.3	4.2	0.12%	2.00%
	006: Denmark	15.7					15.7	0.2			0.2	2.1	0.06%	2.50%
	007: United States	13.7					13.7	1.2			1.2	14.6	0.43%	0.00%
	008: Switzerland	10.2					10.2	0.6			0.6	7.8	0.23%	0.00%
	009: France	8.6					8.6	0.1			0.1	1.1	0.03%	1.00%
	010: United Kingdom	4.3					4.3	0.1			0.1	1.5	0.04%	2.00%
	011: United Arab Emirates	4.1					4.1	0.2			0.2	2.2	0.06%	0.00%
	012: Germany	3.3					3.3	0.1			0.1	0.8	0.02%	0.75%
	013: Spain	2.4					2.4	0.0			0.0	0.6	0.02%	0.50%
	014: Estonia	2.0					2.0	0.1			0.1	0.6	0.02%	1.50%
	015: Singapore	1.5					1.5	0.1			0.1	0.9	0.03%	0.00%
	016: Belgium	1.2					1.2	0.1			0.1	1.5	0.04%	1.00%
	017: Australia	1.1					1.1	0.0			0.0	0.4	0.01%	1.00%
	018: Italy	1.0					1.0	0.0			0.0	0.3	0.01%	0.00%
	019: Other countries	7.0					7.0	0.2			0.2	2.5	0.07%	
020	Total	12 641.4					12 641.4	271.9			271.9	3 399.3	100.00%	

31 Dec 2024

	a	b	c	d	e	f	g	h	i	j	k	l	m
	General credit exposures		Relevant credit exposures – Market risk		Securitisation exposures Exposure value for non-trading book	Total exposure value	Own fund requirements			Total	Risk-weighted exposure amounts	Own fund requirements weights (%)	Counter-cyclical buffer rate (%)
	Exposure value under the standardised approach	Exposure value under the IRB approach	Sum of long and short positions of trading book exposures for SA	Value of trading book exposures for internal models			Relevant credit risk exposures – Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book				
EUR million													
010 Breakdown by country:													
001: Finland	11 941.5					11 941.5	298.9			298.9	3 736.3	98.12%	0.00%
002: Canada	127.3					127.3	1.0			1.0	12.9	0.34%	0.00%
003: Norway	56.4					56.4	0.8			0.8	9.7	0.26%	2.50%
004: Sweden	46.3					46.3	1.3			1.3	15.8	0.41%	2.00%
005: Netherlands	25.2					25.2	0.2			0.2	2.8	0.07%	2.00%
006: United States	16.7					16.7	0.8			0.8	10.0	0.26%	0.00%
007: Denmark	10.6					10.6	0.2			0.2	1.9	0.05%	2.50%
008: France	9.9					9.9	0.1			0.1	1.7	0.04%	1.00%
009: Switzerland	9.8					9.8	0.4			0.4	4.6	0.12%	0.00%
010: Germany	6.8					6.8	0.2			0.2	2.7	0.07%	0.75%
011: United Kingdom	4.4					4.4	0.1			0.1	1.3	0.03%	2.00%
012: Spain	3.0					3.0	0.1			0.1	1.1	0.03%	0.00%
013: Estonia	2.6					2.6	0.1			0.1	0.9	0.02%	1.50%
014: United Arab Emirates	2.6					2.6	0.1			0.1	1.0	0.03%	0.00%
015: Singapore	2.1					2.1	0.1			0.1	0.8	0.02%	0.00%
016: Hong Kong	1.6					1.6	0.0			0.0	0.6	0.01%	0.50%
017: Belgium	1.4					1.4	0.1			0.1	0.8	0.02%	1.00%
018: Italy	1.1					1.1	0.0			0.0	0.4	0.01%	0.00%
019: Other countries	8.4					8.4	0.2			0.2	2.7	0.07%	0.00%
020 Total	12 277.8					12 277.8	304.6			304.6	3 808.0	100.00%	

4.2 EU CCYB2 - AMOUNT OF INSTITUTION-SPECIFIC COUNTERCYCLICAL CAPITAL BUFFER

Countercyclical capital buffer requirement remained close to last year's level, at EUR 1.0 million (0.9).

31 Dec 2025

EUR million		a
1	Total risk exposure amount	4 129.0
2	Institution specific countercyclical capital buffer rate	0.02%
3	Institution specific countercyclical capital buffer requirement	1.0

31 Dec 2024

EUR million		a
1	Total risk exposure amount	4 608.6
2	Institution specific countercyclical capital buffer rate	0.02%
3	Institution specific countercyclical capital buffer requirement	0.9

5 LEVERAGE RATIO

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

31 Dec 2025		a
EUR million		Applicable amount
1	Total assets as per published financial statements	13 239.8
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation	
3	(Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference)	
4	(Adjustment for temporary exemption of exposures to central banks (if applicable))	
5	(Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting framework but excluded from the total exposure measure in accordance with point (i) of Article 429a(1) CRR)	
6	Adjustment for regular-way purchases and sales of financial assets subject to trade date accounting	
7	Adjustment for eligible cash pooling transactions	
8	Adjustment for derivative financial instruments	-45.9
9	Adjustment for securities financing transactions (SFTs)	
10	Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	310.4
11	(Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital)	-1.1
EU-11a	(Adjustment for exposures excluded from the total exposure measure in accordance with point (c) and point (ca) of Article 429a(1) CRR)	
EU-11b	(Adjustment for exposures excluded from the total exposure measure in accordance with point (j) of Article 429a(1) CRR)	
12	Other adjustments	-63.7
13	Total exposure measure	13 439.4

31 Dec 2024		a
EUR million		Applicable amount
1	Total assets as per published financial statements	13 249.6
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation	
3	(Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference)	
4	(Adjustment for temporary exemption of exposures to central banks (if applicable))	
5	(Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting framework but excluded from the total exposure measure in accordance with point (i) of Article 429a(1) CRR)	
6	Adjustment for regular-way purchases and sales of financial assets subject to trade date accounting	
7	Adjustment for eligible cash pooling transactions	
8	Adjustment for derivative financial instruments	-43.8
9	Adjustment for securities financing transactions (SFTs)	
10	Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	249.7
11	(Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital)	-0.6
EU-11a	(Adjustment for exposures excluded from the total exposure measure in accordance with point (c) and point (ca) of Article 429a(1) CRR)	
EU-11b	(Adjustment for exposures excluded from the total exposure measure in accordance with point (j) of Article 429a(1) CRR)	
12	Other adjustments	-62.8
13	Total exposure measure	13 392.1

5.2 EU LR2 - LRCOM: LEVERAGE RATIO COMMON DISCLOSURE

S-Bank's leverage ratio (LR) of 7.1 per cent (6.7) was strong, exceeding both the regulatory requirement of 3.0 per cent and the internal minimum target level. The change in the leverage ratio during the reporting period is described in more detail in table EU LRA.

EUR million		CRR leverage ratio exposures	
		a 31 Dec 2025	b 31 Dec 2024
On-balance sheet exposures (excluding derivatives and SFTs)			
1	On-balance sheet items (excluding derivatives, SFTs, but including collateral)	13 177.6	13 117.7
2	Gross-up for derivatives collateral provided, where deducted from the balance sheet assets pursuant to the applicable accounting framework		
3	(Deductions of receivables assets for cash variation margin provided in derivatives transactions)		
4	(Adjustment for securities received under securities financing transactions that are recognised as an asset)		
5	(General credit risk adjustments to on-balance sheet items)		-0.6
6	(Asset amounts deducted in determining Tier 1 capital)	-64.8	-0.4
7	Total on-balance sheet exposures (excluding derivatives and SFTs)	13 112.8	13 116.6
Derivative exposures			
8	Replacement cost associated with SA-CCR derivatives transactions (ie net of eligible cash variation margin)		
EU-8a	Derogation for derivatives: replacement costs contribution under the simplified standardised approach	0.5	
9	Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions		
EU-9a	Derogation for derivatives: Potential future exposure contribution under the simplified standardised approach	15.7	
EU-9b	Exposure determined under Original Exposure Method		25.8
10	(Exempted CCP leg of client-cleared trade exposures) (SA-CCR)		
EU-10a	(Exempted CCP leg of client-cleared trade exposures) (simplified standardised approach)		
EU-10b	(Exempted CCP leg of client-cleared trade exposures) (Original Exposure Method)		
11	Adjusted effective notional amount of written credit derivatives		
12	(Adjusted effective notional offsets and add-on deductions for written credit derivatives)		
13	Total derivatives exposures	16.2	25.8
Securities financing transaction (SFT) exposures			
14	Gross SFT assets (with no recognition of netting), after adjustment for sales accounting transactions		
15	(Netted amounts of cash payables and cash receivables of gross SFT assets)		
16	Counterparty credit risk exposure for SFT assets		
EU-16a	Derogation for SFTs: Counterparty credit risk exposure in accordance with Articles 429e(5) and 222 CRR		
17	Agent transaction exposures		
EU-17a	(Exempted CCP leg of client-cleared SFT exposure)		
18	Total securities financing transaction exposures		
Other off-balance sheet exposures			
19	Off-balance sheet exposures at gross notional amount	2 649.9	2 342.3
20	(Adjustments for conversion to credit equivalent amounts)	-2 339.6	-2 092.6

EUR million		CRR leverage ratio exposures	
		a 31 Dec 2025	b 31 Dec 2024
21	(General provisions deducted in determining Tier 1 capital and specific provisions associated with off-balance sheet exposures)		
22	Off-balance sheet exposures	310.4	249.7
Excluded exposures			
EU-22a	(Exposures excluded from the total exposure measure in accordance with point (c) and point (ca) of Article 429a(1) CRR)		
EU-22b	(Exposures exempted in accordance with point (j) of Article 429a(1) CRR (on and off balance sheet))		
EU-22c	(Excluded exposures of public development banks (or units) - Public sector investments)		
EU-22d	(Excluded exposures of public development banks (or units) - Promotional loans)		
EU-22e	(Excluded passing-through promotional loan exposures by non-public development banks (or units))		
EU-22f	(Excluded guaranteed parts of exposures arising from export credits)		
EU-22g	(Excluded excess collateral deposited at triparty agents)		
EU-22h	(Excluded CSD related services of CSD/institutions in accordance with point (o) of Article 429a(1) CRR)		
EU-22i	(Excluded CSD related services of designated institutions in accordance with point (p) of Article 429a(1) CRR)		
EU-22j	(Reduction of the exposure value of pre-financing or intermediate loans)		
EU-22k	(Excluded exposures to shareholders according to Article 429a (1), point (da) CRR)		
EU-22l	(Exposures deducted in accordance with point (q) of Article 429a(1) CRR)		
EU-22m	(Total exempted exposures)		
Capital and total exposure measure			
23	Tier 1 capital	956.7	894.1
24	Total exposure measure	13 439.4	13 392.1
Leverage ratio			
25	Leverage ratio (%)	7.12%	6.68%
EU-25	Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%)	7.12%	6.68%
25a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) (%)	7.12%	6.68%
26	Regulatory minimum leverage ratio requirement (%)	3.00%	3.00%
EU-26a	Additional own funds requirements to address the risk of excessive leverage (%)		
EU-26b	of which: to be made up of CET1 capital		
27	Leverage ratio buffer requirement (%)		
EU-27a	Overall leverage ratio requirement (%)	3.00%	3.00%
Choice on transitional arrangements and relevant exposures			
EU-27b	Choice on transitional arrangements for the definition of the capital measure	Fully phased in	Fully phased in
Disclosure of mean values			
28	Mean of daily values of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivable		
29	Quarter-end value of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables		
30	Total exposure measure (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	13 439.4	13 392.1

EUR million		CRR leverage ratio exposures	
		a 31 Dec 2025	b 31 Dec 2024
30a	Total exposure measure (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	13 439.4	13 392.1
31	Leverage ratio (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	7.12%	6.68%
31a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	7.12%	6.68%

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

The template presents the breakdown of on-balance sheet exposures by exposure class. Loans secured by mortgages of immovable properties represented the largest exposure class, accounting for 54.0 per cent of the total on-balance-sheet exposures.

31 Dec 2025		a
EUR million		CRR leverage ratio exposures
EU-1	Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:	13 177.6
EU-2	Trading book exposures	14.9
EU-3	Banking book exposures, of which:	13 162.7
EU-4	Covered bonds	465.6
EU-5	Exposures treated as sovereigns	2 754.8
EU-6	Exposures to regional governments, MDB, international organisations and PSE, not treated as sovereigns	
EU-7	Institutions	367.2
EU-8	Secured by mortgages of immovable properties	7 122.2
EU-9	Retail exposures	2 084.0
EU-10	Corporates	103.8
EU-11	Exposures in default	148.0
EU-12	Other exposures (eg equity, securitisations, and other non-credit obligation assets)	117.1

31 Dec 2024		a
EUR million		CRR leverage ratio exposures
EU-1	Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:	13 117.0
EU-2	Trading book exposures	17.6
EU-3	Banking book exposures, of which:	13 099.4
EU-4	Covered bonds	310.9
EU-5	Exposures treated as sovereigns	2 910.3
EU-6	Exposures to regional governments, MDB, international organisations and PSE, not treated as sovereigns	
EU-7	Institutions	270.8
EU-8	Secured by mortgages of immovable properties	6 930.4
EU-9	Retail exposures	2 309.2
EU-10	Corporates	174.9
EU-11	Exposures in default	142.1
EU-12	Other exposures (eg equity, securitisations, and other non-credit obligation assets)	50.9

5.4 EU LRA: DISCLOSURE OF LR QUALITATIVE INFORMATION

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

The risk of excessive leverage is managed as part of the internal capital management process and ALM. Capital management process is based on a proactive approach considering S-Bank's strategy, business plan, and risk strategy.

In the risk strategy, S-Bank has set an internal minimum level of 4.0 per cent for the leverage ratio. Within the annual business plan, growth targets are evaluated, taking into consideration the risk of excessive leverage. The ICLAAP process further describes stress scenarios and identifies mitigation measures for leverage ratio. These mitigation measures may include, but are not limited to, adjusting the balance sheet and increasing the Tier 1 capital. Leverage ratio is set as one of the indicators in the group's recovery plan.

S-Bank monitors and reports the leverage ratio as part of the monthly risk reporting to the Board of Directors. The goal for active monitoring of the leverage ratio exposure and Tier 1 capital development is to prevent instances where leverage ratio would exceed S-Bank's risk appetite. S-Bank has described escalation process in the risk strategy for any internal limit breaches, as well as early warning levels.

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

S-Bank's leverage ratio (LR) of 7.1 per cent (6.7) was strong and exceeded the regulatory requirement of 3.0 per cent and internal minimum target level of 4.0 per cent.

The strengthening of the leverage ratio was primarily due to growth in Tier 1 capital, which was mainly driven by the positive profit performance. The total leverage ratio exposure measure increased by EUR 47.3 million, reflecting a higher amount of off-balance sheet exposures.

6 LIQUIDITY REQUIREMENTS

6.1 EU LIQ1 - QUANTITATIVE INFORMATION OF LCR

EUR million	Scope of consolidation: consolidated	a	b	c	d	a	b	c	d
		Total unweighted value (average)				Total weighted value (average)			
EU 1a	Quarter ending on (DD Month YYYY)	31 Dec 2025	30 Sep 2025	30 Jun 2025	31 Mar 2025	31 Dec 2025	30 Sep 2025	30 Jun 2025	31 Mar 2025
EU 1b	Number of data points used in the calculation of averages	12	12	12	12	12	12	12	12
HIGH-QUALITY LIQUID ASSETS									
1	Total high-quality liquid assets (HQLA)					3 006.0	3 091.9	3 206.4	3 294.3
CASH - OUTFLOWS									
2	Retail deposits and deposits from small business customers, of which:	9 226.0	8 915.9	8 524.8	8 142.3	573.1	570.6	551.8	509.2
3	Stable deposits	7 626.2	7 330.8	7 010.1	6 728.3	381.3	366.5	350.5	336.4
4	Less stable deposits	765.9	694.0	619.8	550.9	84.2	76.1	67.7	59.6
5	Unsecured wholesale funding	712.7	697.5	664.0	632.2	398.8	394.7	374.0	352.9
6	Operational deposits (all counterparties) and deposits in networks of cooperative banks	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
7	Non-operational deposits (all counterparties)	696.0	680.6	646.9	615.1	382.1	377.8	356.9	335.8
8	Unsecured debt	16.7	16.9	17.1	17.1	16.7	16.9	17.1	17.1
9	Secured wholesale funding					0.0	0.0	0.0	0.0
10	Additional requirements	1 647.3	1 616.0	1 584.6	1 559.6	112.3	110.6	108.8	107.2
11	Outflows related to derivative exposures and other collateral requirements	29.5	29.4	29.0	28.1	29.5	29.4	29.0	28.1
12	Outflows related to loss of funding on debt products	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
13	Credit and liquidity facilities	1 617.8	1 586.6	1 555.6	1 531.5	82.8	81.2	79.8	79.1
14	Other contractual funding obligations	39.7	170.1	170.2	170.5	15.8	146.4	146.4	146.4
15	Other contingent funding obligations	1 057.7	994.1	944.1	890.6	78.2	75.4	73.4	71.1
16	TOTAL CASH OUTFLOWS					1 178.2	1 297.7	1 254.4	1 186.8
CASH - INFLOWS									
17	Secured lending (e.g. reverse repos)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
18	Inflows from fully performing exposures	118.0	114.3	109.6	101.0	76.3	72.9	70.8	66.4
19	Other cash inflows	15.2	12.4	12.2	9.9	15.2	12.4	12.2	9.9
EU-19a	(Difference between total weighted inflows and total weighted outflows arising from transactions in third countries where there are transfer restrictions or which are denominated in non-convertible currencies)								
EU-19b	(Excess inflows from a related specialised credit institution)								
20	TOTAL CASH INFLOWS	133.2	126.7	121.9	110.9	91.5	85.2	83.1	76.3
EU-20a	Fully exempt inflows								
EU-20b	Inflows subject to 90% cap								
EU-20c	Inflows subject to 75% cap	133.2	126.7	121.9	110.9	91.5	85.2	83.1	76.3

EUR million	Scope of consolidation: consolidated	a	b	c	d	a	b	c	d
		Total unweighted value (average)				Total weighted value (average)			
TOTAL ADJUSTED VALUE									
EU-21	LIQUIDITY BUFFER					3 006.0	3 091.9	3 206.4	3 294.3
22	TOTAL NET CASH OUTFLOWS					1 086.7	1 212.3	1 171.2	1 110.6
23	LIQUIDITY COVERAGE RATIO					279.33%	267.37%	292.50%	320.10%

6.2 EU LIQB ON QUALITATIVE INFORMATION ON LCR, WHICH COMPLEMENTS TEMPLATE EU LIQ1

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

Template EU LIQ1 presents quantitative information of the liquidity coverage ratio (LCR) as averages of month-end over 12-months preceding the end of each quarter in 2025. S-Bank's average LCR over 12-months in 2025 was 279.3 per cent (323.0) and LCR at the end of 2025 was 318.1 per cent (285.4). The main driver of LCR net cash outflows throughout the year were deposits. The liquidity buffer is primarily held in Level 1 central bank reserves.

b) Explanations on the changes in the LCR over time

In 2025, changes in the LCR are mainly explained by maturing wholesale funding and by repayment of funding related to the Handelsbanken transaction.

c) Explanations on the actual concentration of funding sources

S-Bank's funding is primarily based on the deposit portfolio and thus the main sources of funding are the deposit and savings accounts of its household customers. Funding from retail customer deposits is very diversified and largely considered stable funding. S-Bank has a bond programme, under which the bank can issue senior preferred notes, senior non-preferred notes, covered bonds and additional tier 1 capital notes. As of December 2025, S-Bank has issued covered bonds for nominal value of EUR 1 000 million, senior preferred MREL

eligible bonds for nominal value of EUR 452 million and senior non-preferred bonds for nominal value of EUR 150 million under the bond programme. Other sources of funding include wholesale market deposits from corporate customers and institutions, as well as certificates of deposits.

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

S-Bank's liquidity buffer consists of high-quality level 1 and 2 unencumbered liquid assets. At the end of 2025, the liquidity buffer totalled to buffer value of EUR 3 115.2 million (3 147.7), of which 95.8 per cent (95.4) are very high-quality Level 1 assets and 4.2 per cent (4.6) are Level 2 assets. Liquidity buffer is presented as month-end-averages for each quarter in template EU LIQ1.

e) Derivative exposures and potential collateral calls

At the end of the year, S-Bank had only EUR nominated interest rate swaps, that are cleared both bilaterally and through the Central Clearing Counterparty (CCP). S-Bank anticipates and calculates the potential future collateral calls with the historical look back approach.

f) Currency mismatch in the LCR

S-Bank does not have any material exposures or liabilities in foreign currency.

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

S-Bank considers that all relevant items within its operations have been captured in the LCR disclosure template (EU LIQ1).

6.3 EU LIQ2: NET STABLE FUNDING RATIO

31 Dec 2025		a	b	c	d	e
		Unweighted value by residual maturity				Weighted value
EUR million		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
Available stable funding (ASF) Items						
1	Capital items and instruments	1 021.5	0.0	87.9	0.0	1 021.5
2	Own funds	1 021.5	0.0	87.9	0.0	1 021.5
3	Other capital instruments		0.0	0.0	0.0	0.0
4	Retail deposits		9 091.4	335.7	16.5	8 923.8
5	Stable deposits		8 179.5	277.4	13.9	8 047.9
6	Less stable deposits		911.8	58.3	2.7	875.8
7	Wholesale funding:		823.4	59.0	1 545.9	1 890.0
8	Operational deposits		0.0	0.0	0.0	0.0
9	Other wholesale funding		823.4	59.0	1 545.9	1 890.0
10	Interdependent liabilities		0.0	0.0	0.0	0.0
11	Other liabilities:	32.3	162.8	0.7	10.0	10.4
12	NSFR derivative liabilities	32.3				
13	All other liabilities and capital instruments not included in the above categories		162.8	0.7	10.0	10.4
14	Total available stable funding (ASF)					11 845.6
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					52.6
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool		30.4	30.6	1 044.6	939.8
16	Deposits held at other financial institutions for operational purposes		0.0	0.0	0.0	0.0
17	Performing loans and securities:		456.9	368.1	7 671.2	5 845.3
18	Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		0.0	0.0	0.0	0.0
19	Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		37.2	1.0	27.3	31.5
20	Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		207.8	154.1	1 396.1	5 561.4
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		11.6	11.1	783.0	3 664.5
22	Performing residential mortgages, of which:		202.9	191.0	5 969.2	0.0
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		165.4	140.6	4 601.8	0.0
24	Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products		9.0	22.0	278.7	252.3
25	Interdependent assets		0.0	0.0	0.0	0.0
26	Other assets:		192.6	4.9	219.5	350.0
27	Physical traded commodities				0.0	0.0
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		19.6	0.0	0.0	16.6
29	NSFR derivative assets		33.3			33.3
30	NSFR derivative liabilities before deduction of variation margin posted		1.0			0.0
31	All other assets not included in the above categories		138.7	4.9	219.5	300.1

31 Dec 2025		a	b	c	d	e
		Unweighted value by residual maturity				Weighted value
EUR million		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
32	Off-balance sheet items		2 767.0	0.0	0.0	165.5
33	Total RSF					7 353.1
34	Net Stable Funding Ratio (%)					161.10%

30 Sep 2025		a	b	c	d	e
		Unweighted value by residual maturity				Weighted value
EUR million		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
Available stable funding (ASF) Items						
1	Capital items and instruments	1 008.2	87.0	5.9	0.0	1 008.2
2	Own funds	1 008.2	87.0	5.9	0.0	1 008.2
3	Other capital instruments		0.0	0.0	0.0	0.0
4	Retail deposits		9 170.4	242.7	8.2	8 904.0
5	Stable deposits		8 279.3	199.5	7.1	8 062.0
6	Less stable deposits		891.1	43.2	1.1	842.0
7	Wholesale funding:		811.1	7.1	1 545.8	1 862.3
8	Operational deposits		0.0	0.0	0.0	0.0
9	Other wholesale funding		811.1	7.1	1 545.8	1 862.3
10	Interdependent liabilities		0.0	0.0	0.0	0.0
11	Other liabilities:	19.1	163.6	0.0	11.3	11.3
12	NSFR derivative liabilities	19.1				
13	All other liabilities and capital instruments not included in the above categories		163.6	0.0	11.3	11.3
14	Total available stable funding (ASF)					11 785.9

30 Sep 2025		a	b	c	d	e
		Unweighted value by residual maturity				Weighted value
EUR million		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					52.9
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool		31.5	30.5	1 044.3	940.4
16	Deposits held at other financial institutions for operational purposes		0.0	0.0	0.0	0.0
17	Performing loans and securities:		499.4	351.4	7 645.5	5 815.4
18	Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		0.0	0.0	0.0	0.0
19	Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		54.5	2.4	27.2	33.8
20	Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		199.1	152.2	1 392.4	5 545.6
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		13.1	9.8	780.8	3 711.0
22	Performing residential mortgages, of which:		204.5	182.6	5 981.0	0.0
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		166.4	141.4	4 674.1	0.0
24	Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products		41.2	14.3	245.0	236.0

30 Sep 2025

EUR million		a	b	c	d	e
		No maturity	Unweighted value by residual maturity			Weighted value
			< 6 months	6 months to < 1yr	≥ 1yr	
25	Interdependent assets		0.0	0.0	0.0	0.0
26	Other assets:		130.9	4.8	218.6	313.3
27	Physical traded commodities				0.0	0.0
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		19.6	0.0	0.0	16.6
29	NSFR derivative assets		22.2			22.2
30	NSFR derivative liabilities before deduction of variation margin posted		3.1			0.2
31	All other assets not included in the above categories		86.0	4.8	218.6	274.3
32	Off-balance sheet items		2 789.0	0.0	0.0	166.6
33	Total RSF					7 288.7
34	Net Stable Funding Ratio (%)					161.70%

30 Jun 2025

EUR million		a	b	c	d	e
		No maturity	Unweighted value by residual maturity			Weighted value
			< 6 months	6 months to < 1yr	≥ 1yr	
Available stable funding (ASF) Items						
1	Capital items and instruments	989.8	85.0	4.0	4.3	994.1
2	Own funds	989.8	85.0	4.0	4.3	994.1
3	Other capital instruments		0.0	0.0	0.0	0.0
4	Retail deposits		8 976.6	263.7	13.9	8 747.3
5	Stable deposits		8 124.7	218.3	11.4	7 937.3
6	Less stable deposits		851.9	45.4	2.5	810.1
7	Wholesale funding:		814.5	10.5	1 545.8	1 854.1
8	Operational deposits		0.0	0.0	0.0	0.0
9	Other wholesale funding		814.5	10.5	1 545.8	1 854.1
10	Interdependent liabilities		0.0	0.0	0.0	0.0
11	Other liabilities:	25.3	181.8	0.0	11.3	11.3
12	NSFR derivative liabilities	25.3				
13	All other liabilities and capital instruments not included in the above categories		181.8	0.0	11.3	11.3
14	Total available stable funding (ASF)					11 606.9
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					50.7
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool		32.0	31.8	1 113.3	1 000.6
16	Deposits held at other financial institutions for operational purposes		0.0	0.0	0.0	0.0
17	Performing loans and securities:		468.9	365.7	7 546.5	5 749.6
18	Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		0.0	0.0	0.0	0.0

30 Jun 2025

EUR million		a	b	c	d	e
		No maturity	Unweighted value by residual maturity			Weighted value
			< 6 months	6 months to < 1yr	≥ 1yr	
19	Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		25.3	28.6	24.6	41.4
20	Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		195.6	152.0	1 375.0	5 490.9
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		10.7	10.4	755.1	3 655.2
22	Performing residential mortgages, of which:		190.0	176.2	5 930.6	0.0
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		152.6	144.7	4 623.5	0.0
24	Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products		58.0	8.9	216.3	217.3
25	Interdependent assets		0.0	0.0	0.0	0.0
26	Other assets:		141.6	6.1	220.0	324.1
27	Physical traded commodities					0.0
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		21.6	0.0	0.0	18.4
29	NSFR derivative assets		26.0			26.0
30	NSFR derivative liabilities before deduction of variation margin posted		0.7			0.0
31	All other assets not included in the above categories		93.3	6.1	220.0	279.7
32	Off-balance sheet items		2 622.5	0.0	0.0	157.9
33	Total RSF					7 282.9
34	Net Stable Funding Ratio (%)					159.37%

31 Mar 2025

EUR million		a	b	c	d	e
		No maturity	Unweighted value by residual maturity			Weighted value
			< 6 months	6 months to < 1yr	≥ 1yr	
Available stable funding (ASF) Items						
1	Capital items and instruments	972.6	8.7	85.1	0.0	972.6
2	Own funds	972.6	8.7	85.1	0.0	972.6
3	Other capital instruments		0.0	0.0	0.0	0.0
4	Retail deposits		8 849.9	173.5	10.7	8 538.7
5	Stable deposits		7 994.3	145.4	9.1	7 741.9
6	Less stable deposits		855.5	28.1	1.6	796.8
7	Wholesale funding:		1 208.7	2.4	1 545.8	1 772.1
8	Operational deposits		0.0	0.0	0.0	0.0
9	Other wholesale funding		1 208.7	2.4	1 545.8	1 772.1
10	Interdependent liabilities		0.0	0.0	0.0	0.0
11	Other liabilities:	25.4	169.4	1.8	12.6	13.5
12	NSFR derivative liabilities	25.4				
13	All other liabilities and capital instruments not included in the above categories		169.4	1.8	12.6	13.5
14	Total available stable funding (ASF)					11 296.9

31 Mar 2025

EUR million		a	b	c	d	e
		No maturity	Unweighted value by residual maturity			Weighted value
			< 6 months	6 months to < 1yr	≥ 1yr	
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					49.2
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool		31.5	31.2	1 116.9	1 002.6
16	Deposits held at other financial institutions for operational purposes		0.0	0.0	0.0	0.0
17	Performing loans and securities:		489.0	406.1	7 518.7	5 740.4
18	<i>Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut</i>		0.0	0.0	0.0	0.0
19	<i>Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions</i>		21.0	35.1	21.6	41.3
20	<i>Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:</i>		212.6	145.1	1 351.7	5 489.3
21	<i>With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk</i>		13.9	9.7	734.1	3 714.5
22	<i>Performing residential mortgages, of which:</i>		196.5	185.2	5 957.1	0.0
23	<i>With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk</i>		153.4	148.1	4 730.4	0.0
24	<i>Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products</i>		59.0	40.7	188.3	209.9
25	Interdependent assets		0.0	0.0	0.0	0.0
26	Other assets:		141.0	5.1	217.8	320.6
27	<i>Physical traded commodities</i>				0.0	0.0
28	<i>Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs</i>		22.9	0.0	0.0	19.5
29	<i>NSFR derivative assets</i>		27.8			27.8
30	<i>NSFR derivative liabilities before deduction of variation margin posted</i>		2.4			0.1
31	<i>All other assets not included in the above categories</i>		88.0	5.1	217.8	273.2
32	Off-balance sheet items		2 565.8	0.0	0.0	154.2
33	Total RSF					7 267.2
34	Net Stable Funding Ratio (%)					155.45%

7 CREDIT RISK QUALITY

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

After accounting for accumulated impairment, the loan portfolio decreased to EUR 9.4 billion (9.5) during the financial year, and there were no major changes in the distribution between different credit products.

31 Dec 2025		a	b	c	d	e	f	g	h	i	j	k	l	m	n		o
		Gross carrying amount/nominal amount						Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						Accumulated partial write-off	Collateral and financial guarantees received		
EUR million		Performing exposures			Non-performing exposures			Performing exposures – accumulated impairment and provisions			Non-performing exposures – accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions				On performing exposures	On non-performing exposures	
		Of which stage 1	Of which stage 2		Of which stage 2	Of which stage 3		Of which stage 1	Of which stage 2		Of which stage 2	Of which stage 3					
005	Cash balances at central banks and other demand deposits	2 556.7	2 556.7														
010	Loans and advances	9 310.4	8 721.8	588.6	169.5		169.5	-26.6	-5.7	-21.0	-21.4		-21.4		7 896.5	113.6	
020	Central banks																
030	General governments																
040	Credit institutions																
050	Other financial corporations	48.8	48.8					-0.1	-0.1							46.7	
060	Non-financial corporations	1 180.0	1 179.8	0.2				-0.8	-0.8	-0.0						1 146.1	
070	Of which SMEs	1 052.8	1 052.6	0.2				-0.8	-0.8	-0.0						1 019.6	
080	Households	8 081.6	7 493.2	588.4	169.5		169.5	-25.7	-4.7	-21.0	-21.4		-21.4		6 703.7	113.6	
090	Debt securities	1 063.0	901.9					-0.1	-0.1								
100	Central banks																
110	General governments	221.9	60.9					-0.0	-0.0								
120	Credit institutions	803.5	803.5					-0.1	-0.1								
130	Other financial corporations	11.1	11.1					-0.0	-0.0								
140	Non-financial corporations	26.4	26.4					-0.0	-0.0								
150	Off-balance-sheet exposures	2 648.0	2 571.3	76.7	1.9		1.9	-1.0	-0.1	-0.8	-0.1		-0.1			114.2	0.6
160	Central banks																
170	General governments																
180	Credit institutions																
190	Other financial corporations	54.0	54.0					-0.0	-0.0								
200	Non-financial corporations	186.0	186.0					-0.0	-0.0							32.8	
210	Households	2 408.0	2 331.3	76.7	1.9		1.9	-1.0	-0.1	-0.8	-0.1		-0.1		81.4	0.6	
220	Total	15 578.1	14 751.7	665.3	171.3		171.3	-27.7	-5.9	-21.8	-21.5		-21.5		8 010.7	114.3	

31 Dec 2024

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
	Gross carrying amount/nominal amount					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions					Accumulated partial write-off	Collateral and financial guarantees received			
	Performing exposures		Non-performing exposures			Performing exposures – accumulated impairment and provisions		Non-performing exposures – accumulated negative changes in fair value due to credit risk and provisions				On performing exposures	On non-performing exposures		
	Of which stage 1	Of which stage 2		Of which stage 2	Of which stage 3	Of which stage 1	Of which stage 2		Of which stage 2	Of which stage 3					
EUR million															
005 Cash balances at central banks and other demand deposits	2 921.5	2 921.5													
010 Loans and advances	9 385.5	8 828.4	557.1	164.3		164.3	-28.8	-6.6	-22.1	-22.2		-22.2		8 040.2	112.4
020 Central banks															
030 General governments															
040 Credit institutions															
050 Other financial corporations	64.4	64.4					-0.1	-0.1						62.5	
060 Non-financial corporations	1 153.8	1 125.7	28.1	9.0		9.0	-1.4	-0.4	-1.0	-1.0		-1.0		1 127.6	8.0
070 <i>Of which SMEs</i>	1 048.5	1 020.4	28.1	9.0		9.0	-1.4	-0.4	-1.0	-1.0		-1.0		1 022.5	8.0
080 Households	8 167.2	7 638.2	529.0	155.3		155.3	-27.2	-6.1	-21.1	-21.3		-21.3		6 850.0	104.4
090 Debt securities	638.2	638.2					-0.1	-0.1							
100 Central banks															
110 General governments	7.2	7.2					-0.0	-0.0							
120 Credit institutions	561.4	561.4					-0.1	-0.1							
130 Other financial corporations	10.8	10.8					-0.0	-0.0							
140 Non-financial corporations	58.7	58.7					-0.0	-0.0							
150 Off-balance-sheet exposures	2 340.8	2 270.8	70.0	1.4		1.4	-1.1	-0.2	-0.9	-0.1		-0.1		98.2	0.5
160 Central banks															
170 General governments															
180 Credit institutions															
190 Other financial corporations	54.0	54.0					-0.0	-0.0							
200 Non-financial corporations	171.9	171.9					-0.0	-0.0						23.1	
210 Households	2 115.0	2 044.9	70.0	1.4		1.4	-1.1	-0.1	-0.9	-0.1		-0.1		75.1	0.5
220 Total	15 286.1	14 658.9	627.1	165.7		165.7	-30.0	-6.9	-23.1	-22.3		-22.3		8 138.4	112.8

7.2 EU CR1-A: MATURITY OF EXPOSURES

Maturity distribution of exposures remained stable in 2025.

31 Dec 2025		a	b	c	d	e	f
EUR million		Net exposure value					Total
		On demand	<= 1 year	> 1 year <= 5 years	> 5 years	No stated maturity	
1	Loans and advances	18.5	123.9	535.8	8 365.3	388.3	9 431.8
2	Debt securities		292.9	732.6	30.9		1 056.4
3	Total	18.5	416.8	1 268.4	8 396.2	388.3	10 488.2

31 Dec 2024		a	b	c	d	e	f
EUR million		Net exposure value					Total
		On demand	<= 1 year	> 1 year <= 5 years	> 5 years	No stated maturity	
1	Loans and advances	8.4	112.7	607.4	8 386.9	383.4	9 498.8
2	Debt securities		194.1	433.9			628.1
3	Total	8.4	306.9	1 041.3	8 386.9	383.4	10 126.9

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

The stock of non-performing exposures increased slightly in 2025.

31 Dec 2025			31 Dec 2024		
EUR million		a	EUR million		a
		Gross carrying amount			Gross carrying amount
010	Initial stock of non-performing loans and advances	164.3	010	Initial stock of non-performing loans and advances	92.6
020	Inflows to non-performing portfolios	136.2	020	Inflows to non-performing portfolios	181.9
030	Outflows from non-performing portfolios	-131.1	030	Outflows from non-performing portfolios	-110.1
040	Outflows due to write-offs	-33.1	040	Outflows due to write-offs	-34.9
050	Outflow due to other situations	-97.9	050	Outflow due to other situations	-75.2
060	Final stock of non-performing loans and advances	169.5	060	Final stock of non-performing loans and advances	164.3

7.4 EU CQ1: CREDIT QUALITY OF FORBORNE EXPOSURES

The carrying amount of performing forborne exposures in relation to loans and advances was at the level of 2.5 per cent (2.3). The corresponding ratio of non-performing forborne exposures was 0.7 per cent (0.6).

		a		b		c		d		e		f		g		h	
		Gross carrying amount/nominal amount of exposures with forbearance measures								Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions				Collateral received and financial guarantees received on forborne exposures			
EUR million		Performing forborne	Non-performing forborne			On performing forborne exposures	On non-performing forborne exposures								Of which collateral and financial guarantees received on non-performing exposures with forbearance measures		
			Of which defaulted	Of which impaired													
005	Cash balances at central banks and other demand deposits																
010	Loans and advances	239.7	66.2	66.2	66.2	-7.0	-5.2					257.0				51.8	
020	Central banks																
030	General governments																
040	Credit institutions																
050	Other financial corporations																
060	Non-financial corporations																
070	Households	239.7	66.2	66.2	66.2	-7.0	-5.2					257.0				51.8	
080	Debt Securities																
090	Loan commitments given	0.1	0.0	0.0	0.0	0.0	0.0					0.1				0.0	
100	Total	239.7	66.2	66.2	66.2	-7.0	-5.2					257.1				51.8	

31 Dec 2024

		a	b	c	d	e		f	g	h
		Gross carrying amount/nominal amount of exposures with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collateral received and financial guarantees received on forbore exposures		
		Performing forbore	Non-performing forbore		Of which defaulted	Of which impaired	On performing forbore exposures	On non-performing forbore exposures		Of which collateral and financial guarantees received on non-performing exposures with forbearance measures
EUR million										
005	Cash balances at central banks and other demand deposits									
010	Loans and advances	216.7	59.3	59.3	59.3	-6.9	-6.7	233.3	44.7	
020	Central banks									
030	General governments									
040	Credit institutions									
050	Other financial corporations									
060	Non-financial corporations	5.6				0.0		5.6		
070	Households	211.1	59.3	59.3	59.3	-6.9	-6.7	227.7	44.7	
080	Debt Securities									
090	Loan commitments given	0.1	0.0	0.0	0.0	0.0	0.0	0.1	0.0	
100	Total	216.7	59.3	59.3	59.3	-6.9	-6.7	233.4	44.7	

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

The amount of non-performing loans (NPL) in the balance sheet was EUR 169.5 million (164.3), of which corporate customers amounted to EUR 0.0 million (9.0). The NPL ratio, which describes non-performing exposures in relation to loans and advances, was 1.8 per cent (1.7).

31 Dec 2025		a	b	c	d	e	f	g	h	i	j	k	l
		Gross carrying amount/nominal amount											
		Performing exposures			Non-performing exposures								
EUR million			Not past due or past due ≤ 30 days	Past due > 30 days ≤ 90 days		Unlikely to pay that are not past due or are past due ≤ 90 days	Past due > 90 days ≤ 180 days	Past due > 180 days ≤ 1 year	Past due > 1 year ≤ 2 years	Past due > 2 years ≤ 5 years	Past due > 5 years ≤ 7 years	Past due > 7 years	Of which defaulted
005	Cash balances at central banks and other demand deposits	2 556.7	2 556.7										
010	Loans and advances	9 310.4	9 268.3	42.1	169.5	104.3	27.1	14.6	14.1	8.0	0.5	0.8	169.5
020	Central banks												
030	General governments												
040	Credit institutions												
050	Other financial corporations	48.8	48.8										
060	Non-financial corporations	1 180.0	1 180.0	0.0									
070	Of which SMEs	1 052.8	1 052.8	0.0									
080	Households	8 081.6	8 039.5	42.1	169.5	104.3	27.1	14.6	14.1	8.0	0.5	0.8	169.5
090	Debt securities	1 063.0	1 063.0										
100	Central banks												
110	General governments	221.9	221.9										
120	Credit institutions	803.5	803.5										
130	Other financial corporations	11.1	11.1										
140	Non-financial corporations	26.4	26.4										
150	Off-balance-sheet exposures	2 648.0			1.9								1.9
160	Central banks												
170	General governments												
180	Credit institutions												
190	Other financial corporations	54.0											
200	Non-financial corporations	186.0											
210	Households	2 408.0			1.9								1.9
220	Total	15 578.1	12 888.0	42.1	171.3	104.3	27.1	14.6	14.1	8.0	0.5	0.8	171.3

31 Dec 2024

		a	b	c	d	e	f	g	h	i	j	k	l
		Gross carrying amount/nominal amount											
		Performing exposures			Non-performing exposures								
			Not past due or past due ≤ 30 days	Past due > 30 days ≤ 90 days		Unlikely to pay that are not past due or are past due ≤ 90 days	Past due > 90 days ≤ 180 days	Past due > 180 days ≤ 1 year	Past due > 1 year ≤ 2 years	Past due > 2 years ≤ 5 years	Past due > 5 years ≤ 7 years	Past due > 7 years	Of which defaulted
EUR million													
005	Cash balances at central banks and other demand deposits	2 921.5	2 921.5										
010	Loans and advances	9 385.5	9 346.7	38.8	164.3	100.9	34.4	12.9	9.9	4.9	0.6	0.8	164.3
020	Central banks												
030	General governments												
040	Credit institutions												
050	Other financial corporations	64.4	64.4										
060	Non-financial corporations	1 153.8	1 153.8		9.0	9.0							9.0
070	Of which SMEs	1 048.5	1 048.5		9.0	9.0							9.0
080	Households	8 167.2	8 128.4	38.8	155.3	91.9	34.4	12.9	9.9	4.9	0.6	0.8	155.3
090	Debt securities	638.2	638.2										
100	Central banks												
110	General governments	7.2	7.2										
120	Credit institutions	561.4	561.4										
130	Other financial corporations	10.8	10.8										
140	Non-financial corporations	58.7	58.7										
150	Off-balance-sheet exposures	2 340.8			1.4								1.4
160	Central banks												
170	General governments												
180	Credit institutions												
190	Other financial corporations	54.0											
200	Non-financial corporations	171.9											
210	Households	2 115.0			1.4								1.4
220	Total	15 286.1	12 906.5	38.8	165.7	100.9	34.4	12.9	9.9	4.9	0.6	0.8	165.7

7.7 EU CQ5: CREDIT QUALITY OF LOANS AND ADVANCES BY INDUSTRY

Majority of S-Bank's exposures are not classified by industry, as they consist mainly of household customers credits, which reduces industry concentration risk. Corporate lending is targeted mainly at financing of housing companies, in which the credit risk is divided among the shareholders of the housing company.

The distribution by industry remained stable compared to previous year.

		a	b	c	d	e	g
		Gross carrying amount/nominal amount			Of which subject to impairment	Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures
		Of which non-performing					
EUR million			Of which defaulted				
31 Dec 2025							
010	Agriculture, forestry and fishing	0.2			0.2	-0.0	
020	Mining and quarrying						
030	Manufacturing	0.3			0.3	-0.0	
040	Electricity, gas, steam and air conditioning supply						
050	Water supply						
060	Construction	1.1			1.1	-0.0	
070	Wholesale and retail trade	0.2			0.2	-0.0	
080	Transport and storage	0.3			0.3	-0.0	
090	Accommodation and food service activities						
100	Information and communication	1.0			1.0	-0.0	
110	Financial and insurance activities	8.4			8.4	-0.0	
120	Real estate activities	1157.9			1157.9	-0.7	
130	Professional, scientific and technical activities	7.9			7.9	-0.0	
140	Administrative and support service activities	0.4			0.4	-0.0	
150	Public administration and defense, compulsory social security						
160	Education	0.3			0.3	-0.0	
170	Human health services and social work activities	1.8			1.8	-0.0	
180	Arts, entertainment and recreation	0.3			0.3	-0.0	
190	Other services						
200	Total	1180.0			1180.0	-0.8	

		a	b		c	d	e	g	
		Gross carrying amount/nominal amount					Of which subject to impairment	Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures
		Of which non-performing		Of which defaulted					
EUR million									
010	Agriculture, forestry and fishing	0.2				0.2		-0.0	
020	Mining and quarrying								
030	Manufacturing	0.3				0.3		-0.0	
040	Electricity, gas, steam and air conditioning supply								
050	Water supply								
060	Construction	1.1				1.1		-0.0	
070	Wholesale and retail trade	0.3				0.3		-0.0	
080	Transport and storage	0.3				0.3		-0.0	
090	Accommodation and food service activities								
100	Information and communication	1.0				1.0		-0.0	
110	Financial and insurance activities	7.9				7.9		-0.0	
120	Real estate activities	1141.0	9.0	9.0		1141.0		-2.4	
130	Professional, scientific and technical activities	8.7				8.7		-0.0	
140	Administrative and support service activities	0.4				0.4		-0.0	
150	Public administration and defense, compulsory social security								
160	Education	0.3				0.3		-0.0	
170	Human health services and social work activities	1.1				1.1		-0.0	
180	Arts, entertainment and recreation	0.3				0.3		-0.0	
190	Other services								
200	Total	1162.8	9.0	9.0		1162.8		-2.4	

8 CREDIT RISK MITIGATION TECHNIQUES

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

The distribution of different CRM techniques remained stable. Exposures secured by real estate collateral account for approximately 86.6 per cent (87.7), whereas exposures secured by guarantees account for approximately 13.4 per cent (12.3) of the covered exposures.

31 Dec 2025		Unsecured carrying amount	Secured carrying amount			
			Of which secured by collateral	Of which secured by financial guarantees		
					Of which secured by credit derivatives	
EUR million		a	b	c	d	e
1	Loans and advances	3 542.2	8 446.3	7 310.6	1 135.7	
2	Debt securities	1 056.4				
3	Total	4 598.6	8 446.3	7 310.6	1 135.7	
4	Of which non-performing exposures	21.7	126.3	109.8	16.6	
EU-5	Of which defaulted	21.7	126.3			

31 Dec 2024		Unsecured carrying amount	Secured carrying amount			
			Of which secured by collateral	Of which secured by financial guarantees		
					Of which secured by credit derivatives	
EUR million		a	b	c	d	e
1	Loans and advances	3 908.2	8 512.2	7 468.9	1 043.2	
2	Debt securities	628.1				
3	Total	4 536.3	8 512.2	7 468.9	1 043.2	
4	Of which non-performing exposures	21.0	121.1	98.5	22.6	
EU-5	Of which defaulted	21.0	121.1			

9 CREDIT RISK STANDARDISED APPROACH (SA)

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

The template includes on- and off-balance-sheet exposures, except for exposures subject to counterparty credit risk framework. Total on- and off-balance sheet exposure amount post CCF and CRM totalled EUR 13 173.2 million at the end of the year, increasing by EUR 28.1 million from the year-end 2024. The most substantial exposure classes are exposures secured by mortgages on immovable property and retail exposures.

As the EU CR4 template format has been amended following the CRR3 regulatory changes, comparative figures are not presented.

31 Dec 2025		Exposures before CCF and before CRM		Exposures post CCF and post CRM		RWEAs and RWEAs density	
		On-balance-sheet exposures	Off-balance-sheet exposures	On-balance-sheet exposures	Off-balance-sheet exposures	RWEAs	RWEAs density (%)
EUR million	Exposure classes	a	b	c	d	e	f
1	Central governments or central banks	2 567.3		3 566.8	27.5		0.00%
2	Non-central government public sector entities	160.9		160.9			0.00%
EU 2a	Regional governments or local authorities	160.9		160.9			0.00%
EU 2b	Public sector entities						
3	Multilateral development banks	4.1		4.1			0.00%
EU 3a	International organisations	22.2		22.2			0.00%
4	Institutions	366.8		365.4	0.0	74.5	20.39%
5	Covered bonds	465.2		465.2		58.3	12.53%
6	Corporates	103.8	182.7	164.6	0.6	81.9	49.54%
6.1	Of which: Specialised Lending						
7	Subordinated debt exposures and equity	4.7		4.7		11.8	250.00%
EU 7a	Subordinated debt exposures						
EU 7b	Equity	4.7		4.7		11.8	250.00%
8	Retail	2 084.0	2 395.1	1 025.2	3.9	769.2	74.75%
9	Secured by mortgages on immovable property and ADC exposures	7 122.2	70.2	7 122.2	28.1	2 227.8	31.16%
9.1	Secured by mortgages on residential immovable property - non IPRE	6 430.8	36.4	6 430.8	14.5	1 925.6	29.88%
9.2	Secured by mortgages on residential immovable property - IPRE	676.1	0.8	676.1	0.3	259.4	38.36%
9.3	Secured by mortgages on commercial immovable property - non IPRE						
9.4	Secured by mortgages on commercial immovable property - IPRE						
9.5	Acquisition, Development and Construction (ADC)	15.3	33.1	15.3	13.2	42.8	150.00%
10	Exposures in default	146.8	1.9	146.8	0.3	176.7	120.16%
EU 10a	Claims on institutions and corporates with a short-term credit assessment						
EU 10b	Collective investment undertakings (CIU)	11.5	0.0	11.5	0.0	22.7	196.49%
EU 10c	Other items	53.2		53.2		50.8	95.46%
11	not applicable						
12	TOTAL	13 112.8	2 649.9	13 112.8	60.4	3 473.8	26.37%

9.2 EU CR5 – STANDARDISED APPROACH

The template shows the allocation of risk weights of on- and off-balance sheet exposures post risk mitigation techniques and post conversion factor. Exposures subject to counterparty credit risk framework are also excluded. The key changes arise from CRR3 regulatory revisions, which modified the allocation of exposures across the corporate, retail, and exposures secured by mortgages on immovable property and ADC exposure classes.

As the EU CR5 template format has been amended following the CRR3 regulatory changes, comparative figures are not presented.

31 Dec 2025		Risk weight												
		0%	2%	4%	10%	20%	30%	35%	40%	45%	50%	60%	70%	75%
EUR million	Exposure classes	a	b	c	d	e	f	g	h	i	j	k	l	m
1	Central governments or central banks	3 594.3												
2	Non-central government public sector entities	160.9												
EU 2a	Regional governments or local authorities	160.9												
EU 2b	Public sector entities													
3	Multilateral development banks	4.1												
EU 3a	International organisations	22.2												
4	Institutions	36.7	19.6			186.5	122.4			0.2				
5	Covered bonds				347.4	117.8								
6	Corporates					35.9					100.9			12.1
6.1	Of which: Specialised Lending													
7	Subordinated debt exposures and equity													
EU 7a	Subordinated debt exposures													
EU 7b	Equity													
8	Retail exposures									20.9				990.0
9	Secured by mortgages on immovable property and ADC exposures					5 442.1	87.4	88.9		210.6		11.0		1 222.9
9.1	Secured by mortgages on residential immovable property - non IPRE					5 241.3								1 154.2
9.1.1	no loan splitting applied													14.0
9.1.2	loan splitting applied (secured)					5 241.3								
9.1.3	loan splitting applied (unsecured)													1 140.2
9.2	Secured by mortgages on residential immovable property - IPRE					200.8	87.4	88.9		210.6		11.0		68.8
9.3	Secured by mortgages on commercial immovable property - non IPRE													
9.3.1	no loan splitting applied													
9.3.2	loan splitting applied (secured)													
9.3.3	loan splitting applied (unsecured)													
9.4	Secured by mortgages on commercial immovable property - IPRE													
9.5	Acquisition, Development and Construction (ADC)													
10	Exposures in default													
EU 10a	Claims on institutions and corporates with a short-term credit assessment													
EU 10b	Collective investment undertakings (CIU)													
EU 10c	Other items	6.6				0.0								
11	not applicable													
EU 11c	TOTAL	3 824.8	19.6		347.4	5 782.3	209.8	88.9		231.4	101.0	11.0		2 225.0

31 Dec 2025		Risk weight											Total	Of which unrated	
		80%	90%	100%	105%	110%	130%	150%	250%	370%	400%	1250%			Others
		n	o	p	q	r	s	t	u	v	w	x			y
EUR million	Exposure classes														
1	Central governments or central banks													3 594.3	
2	Non-central government public sector entities													160.9	
EU 2a	Regional governments or local authorities													160.9	
EU 2b	Public sector entities														
3	Multilateral development banks													4.1	
EU 3a	International organisations													22.2	
4	Institutions													365.4	
5	Covered bonds													465.2	
6	Corporates			16.4										165.3	148.4
6.1	Of which: Specialised Lending														
7	Subordinated debt exposures and equity							4.7						4.7	4.7
EU 7a	Subordinated debt exposures														
EU 7b	Equity							4.7						4.7	4.7
8	Retail exposures			18.2										1 029.1	1 029.1
9	Secured by mortgages on immovable property and ADC exposures			49.9	7.6			29.7						7 150.2	7 150.2
9.1	Secured by mortgages on residential immovable property - non IPRE			49.9										6 445.4	6 445.4
9.1.1	no loan splitting applied													14.0	14.0
9.1.2	loan splitting applied (secured)													5 241.3	5 241.3
9.1.3	loan splitting applied (unsecured)			49.9										1 190.1	1 190.1
9.2	Secured by mortgages on residential immovable property - IPRE				7.6			1.2						676.4	676.4
9.3	Secured by mortgages on commercial immovable property - non IPRE														
9.3.1	no loan splitting applied														
9.3.2	loan splitting applied (secured)														
9.3.3	loan splitting applied (unsecured)														
9.4	Secured by mortgages on commercial immovable property - IPRE														
9.5	Acquisition, Development and Construction (ADC)							28.5						28.5	28.5
10	Exposures in default			87.8				59.3						147.1	147.1
EU 10a	Claims on institutions and corporates with a short-term credit assessment														
EU 10b	Collective investment undertakings (CIU)										0.4	11.2	11.6	11.6	
EU 10c	Other items			43.9				2.8					53.2	46.7	
11	not applicable														
EU 11c	TOTAL			216.2	7.6			89.0	7.5			0.4	11.2	13 173.2	8 537.8

10 COUNTERPARTY CREDIT RISK

10.1 EU CCR1 – ANALYSIS OF CCR EXPOSURE BY APPROACH

During the second quarter of the year 2025, S-Bank changed its method for calculating the counterparty credit risk (CCR) from the original exposure method to a simplified standardised approach for counterparty credit risk. The change in the calculation method was due to an increase in the S-Bank’s derivative position.

The condition for using the simplified standardised approach for counterparty credit risk is that the size of the derivative business is equal to or less than 10 per cent of total assets and EUR 300 million. At the end of 2025, the size of the derivative business, calculated in accordance with the CRR, was EUR 63.8 million when including central counterparty (CCP) exposures. It should be noted that the template EU CCR1 excludes exposures to CCPs. However, these exposures are presented separately in template EU CCR8.

The exposure value of the counterparty credit risk amounted to EUR 10.8 million (13.8) excluding exposures to CCP. The risk weighted exposure amount also remained at a low level. S-Bank utilises netting agreements in the calculation of capital requirement for derivatives.

31 Dec 2025		a	b	c	d	e	f	g	h
EUR million		Replacement cost (RC)	Potential future exposure (PFE)	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre-CRM	Exposure value post-CRM	Exposure value	RWEA
EU-1	EU - Original Exposure Method (for derivatives)				1.4				
EU-2	EU - Simplified SA-CCR (for derivatives)	0.4	7.4		1.4	10.8	10.8	10.8	2.2
1	SA-CCR (for derivatives)				1.4				
2	IMM (for derivatives and SFTs)								
2a	<i>Of which securities financing transactions netting sets</i>								
2b	<i>Of which derivatives and long settlement transactions netting sets</i>								
2c	<i>Of which from contractual cross-product netting sets</i>								
3	Financial collateral simple method (for SFTs)								
4	Financial collateral comprehensive method (for SFTs)								
5	VaR for SFTs								
6	Total					10.8	10.8	10.8	2.2

31 Dec 2024

		a	b	c	d	e	f	g	h
EUR million		Replacement cost (RC)	Potential future exposure (PFE)	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre-CRM	Exposure value post-CRM	Exposure value	RWEA
EU-1	EU - Original Exposure Method (for derivatives)	0.4	9.5		1.4	13.8	13.8	13.8	2.8
EU-2	EU - Simplified SA-CCR (for derivatives)				1.4				
1	SA-CCR (for derivatives)				1.4				
2	IMM (for derivatives and SFTs)								
2a	<i>Of which securities financing transactions netting sets</i>								
2b	<i>Of which derivatives and long settlement transactions netting sets</i>								
2c	<i>Of which from contractual cross-product netting sets</i>								
3	Financial collateral simple method (for SFTs)								
4	Financial collateral comprehensive method (for SFTs)								
5	VaR for SFTs								
6	Total					13.8	13.8	13.8	2.8

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

CCR exposures toward qualifying central counterparty (QCCP) clearing are presented in column b with a risk weight of 2 per cent.

31 Dec 2025		Risk weight											Total exposure value
		a	b	c	d	e	f	g	h	i	j	k	
EUR million	Exposure classes	0 %	2 %	4 %	10 %	20 %	50 %	70 %	75 %	100 %	150 %	Others	
1	Central governments or central banks												
2	Regional government or local authorities												
3	Public sector entities												
4	Multilateral development banks												
5	International organisations												
6	Institutions		5.3			10.8							16.2
7	Corporates												
8	Retail												
9	Institutions and corporates with a short-term credit assessment												
10	Other items												
11	Total exposure value		5.3			10.8							16.2

31 Dec 2024		Risk weight											Total exposure value
		a	b	c	d	e	f	g	h	i	j	k	
EUR million	Exposure classes	0 %	2 %	4 %	10 %	20 %	50 %	70 %	75 %	100 %	150 %	Others	
1	Central governments or central banks												
2	Regional government or local authorities												
3	Public sector entities												
4	Multilateral development banks												
5	International organisations												
6	Institutions		12.0			13.8							25.8
7	Corporates												
8	Retail												
9	Institutions and corporates with a short-term credit assessment												
10	Other items												
11	Total exposure value		12.0			13.8							25.8

10.3 EU CCR5 – COMPOSITION OF COLLATERAL FOR CCR EXPOSURES

S-Bank utilises netting agreements in the calculation of capital requirement for derivatives. The amount of cash collateral received in form of variation margin from QCCP was EUR 31.9 million (31.4). The collateral posted (initial margin) consists solely of exposures to the QCCP.

		a	b	c	d	e	f	g	h
		Collateral used in derivative transactions				Collateral used in SFTs			
		Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral	
EUR million	Collateral type	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated
31 Dec 2025									
1	Cash – domestic currency	57.2		19.5					
2	Cash – other currencies								
3	Domestic sovereign debt								
4	Other sovereign debt								
5	Government agency debt								
6	Corporate bonds								
7	Equity securities								
8	Other collateral								
9	Total	57.2		19.5					

		a	b	c	d	e	f	g	h
		Collateral used in derivative transactions				Collateral used in SFTs			
		Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral	
EUR million	Collateral type	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated
31 Dec 2024									
1	Cash – domestic currency	65.7		15.2					
2	Cash – other currencies								
3	Domestic sovereign debt								
4	Other sovereign debt								
5	Government agency debt								
6	Corporate bonds								
7	Equity securities								
8	Other collateral								
9	Total	65.7		15.2					

10.4 EU CCR8 – EXPOSURES TO CCPS

Regulatory exposure value toward the qualifying central counterparty (QCCP) decreased during the year, partly due to the transition from the original exposure method to the simplified standardised approach for counterparty credit risk. Risk weighted assets remained at a low level.

31 Dec 2025		a	b	31 Dec 2024		a	b
EUR million		Exposure value	RWEA	EUR million		Exposure value	RWEA
1	Exposures to QCCPs (total)		0.1	1	Exposures to QCCPs (total)		0.2
2	Exposures for trades at QCCPs (excluding initial margin and default fund contributions); of which	5.3	0.1	2	Exposures for trades at QCCPs (excluding initial margin and default fund contributions); of which	12.0	0.2
3	(i) OTC derivatives	5.3	0.1	3	(i) OTC derivatives	12.0	0.2
4	(ii) Exchange-traded derivatives			4	(ii) Exchange-traded derivatives		
5	(iii) SFTs			5	(iii) SFTs		
6	(iv) Netting sets where cross-product netting has been approved			6	(iv) Netting sets where cross-product netting has been approved		
7	Segregated initial margin	19.5		7	Segregated initial margin	15.2	
8	Non-segregated initial margin			8	Non-segregated initial margin		
9	Prefunded default fund contributions			9	Prefunded default fund contributions		
10	Unfunded default fund contributions			10	Unfunded default fund contributions		
11	Exposures to non-QCCPs (total)			11	Exposures to non-QCCPs (total)		
12	Exposures for trades at non-QCCPs (excluding initial margin and default fund contributions); of which			12	Exposures for trades at non-QCCPs (excluding initial margin and default fund contributions); of which		
13	(i) OTC derivatives			13	(i) OTC derivatives		
14	(ii) Exchange-traded derivatives			14	(ii) Exchange-traded derivatives		
15	(iii) SFTs			15	(iii) SFTs		
16	(iv) Netting sets where cross-product netting has been approved			16	(iv) Netting sets where cross-product netting has been approved		
17	Segregated initial margin			17	Segregated initial margin		
18	Non-segregated initial margin			18	Non-segregated initial margin		
19	Prefunded default fund contributions			19	Prefunded default fund contributions		
20	Unfunded default fund contributions			20	Unfunded default fund contributions		

11 CREDIT VALUATION ADJUSTMENT

11.1 EU CVA1 - CREDIT VALUATION ADJUSTMENT UNDER THE REDUCED BASIC APPROACH

S-Bank's total own funds requirement for credit valuation adjustment (CVA) was EUR 0.8 million, of which EUR 0.7 million was calculated using the reduced basic approach. In addition, the simplified treatment for derivative positions in collective investment undertakings (CIUs) contributed EUR 0.1 million.

As the EU CVA1 template is disclosed for the first time, comparative figures are not presented.

31 Dec 2025		a	b
EUR million		Components of Own Funds Requirements	Own funds requirements
1	Aggregation of systematic components of CVA risk	1.3	
2	Aggregation of idiosyncratic components of CVA risk	1.0	
3	Total		0.7

12 OPERATIONAL RISK

12.1 EU OR2 - BUSINESS INDICATOR, COMPONENTS AND SUBCOMPONENTS

At the end of the year, the business indicator component (BIC) amounted to EUR 51.5 million, while the business indicator (BI) stood at EUR 428.9 million. The Handelsbanken transaction, executed during 2024, contributed EUR 22.8 million to the BI. The largest subcomponents of the BI were the interest, lease and dividend component (ILDC) and the services component (SC). S-Bank has applied the accounting approach to determine the financial component (FC) consistently over the past three financial years.

The information in columns a–c has not been disclosed, as these columns relate to the reporting template (C16.02) for which the reporting obligation becomes effective as of June 2026. As the EU OR2 template is disclosed for the first time, comparative figures are not presented.

31 Dec 2025		a	b	c	d
EUR million	BI and its subcomponents	31 Dec 2025	31 Dec 2024	31 Dec 2023	Average value
1	Interest, lease and dividend component (ILDC)				291.1
EU 1	ILDC related to the individual institution/consolidated Group (excluding entities considered by Article 314(3))				
1a	Interest and lease income				
1b	Interest and lease expense				
1c	Total assets/Asset component				
1d	Dividend income/ dividend component				
2	Services component (SC)				135.7
2a	Fee and commission income				
2b	Fee and commission expense				
2c	Other operating income				
2d	Other operating expense				
3	Financial component (FC)				2.1
3a	Net profit or loss applicable to trading book (TB)				
3b	Net profit or loss applicable to banking book (BB)				
EU 3c	Approach followed to determine the TB/BB boundary (PBA or accounting approach)				Accounting approach
4	Business Indicator (BI)				428.9
5	Business indicator component (BIC)				51.5
EUR million	Disclosure on the BI:	a			
6a	BI gross of excluded divested activities	428.9			
6b	Reduction in BI due to excluded divested activities				
EU 6c	Impact in BI of mergers/acquisitions	22.8			

12.2 EU OR3 - OPERATIONAL RISK OWN FUNDS REQUIREMENTS AND RISK EXPOSURE AMOUNTS

The risk exposure amount for operational risk was EUR 643.4 million (716.1). The implementation of CRR3 regulation reduced risk exposure amount by EUR 116.4 million, due to the adoption of a new standardised approach for operational risk. Excluding the CRR3-related changes, operational risk increased by EUR 43.7 million during the year, mainly driven by the strong growth in the net interest income over the past three years.

As the EU OR3 template is disclosed for the first time, comparative figures are not presented.

31 Dec 2025

EUR million		a
1	Business Indicator Component (BIC)	51.5
EU1	Alternative Standardised Approach (ASA) Own Funds Requirements (OROF) under Article 314(4)	
2	<i>Not applicable</i>	
3	Minimum Required Operational Risk Own Funds Requirements (OROF)	51.5
4	Operational Risk Exposure Amounts (REA)	643.4

13 INTEREST RATE RISK OF NON-TRADING BOOK ACTIVITIES

13.1 EU IRRBBA - QUALITATIVE INFORMATION ON INTEREST RATE RISKS OF NON-TRADING BOOK ACTIVITIES

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

The interest rate risk in the banking book (IRRBB) consists of lending and borrowing by the banking business and the investments and funding of the Treasury unit. The interest rate risk refers to impact on the present value of the balance sheet and on earnings resulting from changes in interest rates. The structural interest rate risk in the banking book arises from differences between the interest rate fixings and maturities of financial assets and liabilities.

The NII risk and the EVE risk measure the impact of interest rate changes from different perspectives. The EVE risk reflects the change in the net present value of financial assets and liabilities on the balance sheet, i.e. the change in the theoretical economic value of equity. The NII risk measures the potential change in S-Bank's earnings over a defined time horizon. S-Bank calculates the EV risk for all interest

rate sensitive instruments and separately for instruments measured at fair value. Both EVE and NII risks are assessed under various parallel and non-parallel interest rate shock scenarios.

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

IRRBB risk is managed by planning the balance sheet structure, interest rate linkages, as well as through interest rate derivatives in accordance with bank's hedging strategy of the interest rate risk. The objective of hedging interest rate risk is to limit the decrease in net interest income and changes in fair value caused by interest rate fluctuations. S-Bank accepts a moderate level of IRRBB risk in a controlled manner. The Board of Directors has set the principles for interest rate risk management and risk limits for the IRRBB risk, which are monitored and reported actively to the management of S-Bank. The Treasury unit is tasked with the day-to-day management of the Group's IRRBB risks within the scope of its authorisations. The Asset and Liability Management Committee is responsible for the operational measurement, monitoring and

reporting of IRRBB risks in accordance with the procedures agreed within the organisation. The Risk Control function supervises the management of S-Bank's IRRBB risks and the effectiveness and use of the applied IRRBB models.

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

IRRBB risk is monitored daily for the EV risk for instruments measured at fair value and monthly for the EVE and the NII risk. Additional IRRBB risk reporting is performed in the middle of the month if necessary. EVE risk is calculated using run-off balance sheet assumption. NII risk is based on constant balance sheet assumption and is measured for a 12-month horizon according to EBA's SOT methodology. NII risk is also calculated using dynamic balance sheet assumption including the impact of market value changes. In addition, IRRBB risk is monitored monthly using repricing gap analysis, in which financial assets and liabilities are grouped over time periods based on their interest rate fixings.

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

S-Bank uses the six supervisory interest rate shock scenarios in calculating both the economic value and the net interest income risks. In addition, internally defined parallel shift shock scenarios and basis risk scenarios are used for estimating interest rate risk.

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

Not applicable.

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

In addition to the balance sheet structure and interest rate linkages planning, IRRBB risk is also hedged by using interest rate derivatives for the interest rate risk of fixed-rate debt securities, deposits and self-issued bonds. S-Bank applies fair value hedge accounting for the eligible hedged positions as described in the Notes of the financial statement.

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

The repricing maturity of non-maturity deposits has been determined based on historical deposit outflows and the pass-through rate of deposits. Repricing maturity is modelled separately for transactional and non-transactional retail deposits and wholesale deposits. The loan prepayment rates have been determined based on actual historical prepayment rates for retail and wholesale customer loans. Prepayment rates are modelled as dependent on the interest rate scenario.

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

The economic value of equity (EVE) risk measures changed moderately compared to the end of the previous year. The EVE sensitivity of deposits increased due to a transition in the contractual reference rate for transaction deposits. EVE sensitivities remained low across all supervisory shock scenarios. The net interest income (NII) risk measure decreased in the Parallel shock down (-200 bps) scenario during the financial year which was mainly due to increased derivative hedging.

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

No other relevant information.

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

The average repricing maturity assigned for core retail non-maturity deposits is 2 years and 1.2 years for full amount of retail non-maturity deposits. The longest maturity assigned for core retail non-maturity deposits is 4 years. The average repricing maturity for core non-financial wholesale

non-maturity deposits is 3 months and 1 month for full amount of non-financial wholesale non-maturity deposit. The longest maturity assigned to non-financial wholesale non-maturity deposits is 6 months. Overnight maturity is used for all non-core non-maturity deposits.

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

EUR million	Supervisory shock scenarios	a		b		c		d	
		Changes of the economic value of equity		Changes of the net interest income					
		31 Dec 2025	31 Dec 2024	31 Dec 2025	31 Dec 2024				
1	Parallel up	27.4	-2.5	35.1	25.4				
2	Parallel down	-14.2	16.4	-46.0	-70.0				
3	Steeper	-23.2	6.4						
4	Flattener	29.3	-5.0						
5	Short rates up	24.8	-7.9						
6	Short rates down	-20.9	8.0						

14 ENCUMBERED AND UNENCUMBERED ASSETS

14.1 EU AE1 - ENCUMBERED AND UNENCUMBERED ASSETS

The asset encumbrance ratio for S-Bank was 8.5 per cent (9.0) at the end of the year. Asset encumbrance decreased slightly during 2025. When asset encumbrance ratio is below 15.0 % and total assets are under EUR 30 billion, the additional asset quality information in columns 030, 050, 080 and 100 of the template EU AE1 or columns 030 and 060 of the template EU AE2 are not applicable.

The disclosures on asset encumbrance are presented using median values of carrying amounts. Median values are rolling quarterly medians over the reporting period.

Please note that the carrying amounts of encumbered and unencumbered assets in row 120 have been corrected for the year 2024.

31 Dec 2025		Carrying amount of encumbered assets		Fair value of encumbered assets		Carrying amount of unencumbered assets		Fair value of unencumbered assets	
			of which notionally eligible EHQLA and HQLA		of which notionally eligible EHQLA and HQLA		of which EHQLA and HQLA		of which EHQLA and HQLA
EUR million		010	030	040	050	060	080	090	100
010	Assets of the disclosing institution	1 163.0				11 973.1			
030	Equity instruments					16.6			
040	Debt securities					925.0		937.1	
050	of which: covered bonds					455.0		455.0	
060	of which: securitisations								
070	of which: issued by general governments					127.6		127.6	
080	of which: issued by financial corporations					772.0		778.1	
090	of which: issued by non-financial corporations					25.6		25.6	
120	Other assets	1 163.0				11 031.2			

31 Dec 2024		Carrying amount of encumbered assets		Fair value of encumbered assets		Carrying amount of unencumbered assets		Fair value of unencumbered assets	
			of which notionally eligible EHQLA and HQLA		of which notionally eligible EHQLA and HQLA		of which EHQLA and HQLA		of which EHQLA and HQLA
EUR million		010	030	040	050	060	080	090	100
010	Assets of the disclosing institution	1 194.8				9 904.3			
030	Equity instruments					18.9			
040	Debt securities					630.8		630.8	
050	of which: covered bonds					304.7		304.7	
060	of which: securitisations								
070	of which: issued by general governments					6.7		6.7	
080	of which: issued by financial corporations					552.7		552.7	
090	of which: issued by non-financial corporations					69.9		69.9	
120	Other assets	1194.8				9 257.1			

14.2 EU AE2 - COLLATERAL RECEIVED AND OWN DEBT SECURITIES ISSUED

The disclosures on asset encumbrance are presented using median values of carrying amounts. Median values are rolling quarterly medians over the reporting period.

31 Dec 2025		Fair value of encumbered collateral received or own debt securities issued		Unencumbered Fair value of collateral received or own debt securities issued available for encumbrance	
			of which notionally eligible EHQLA and HQLA		of which EHQLA and HQLA
EUR million		010	030	040	050
130	Collateral received by the disclosing institution				
140	Loans on demand				
150	Equity instruments				
160	Debt securities				
170	of which: covered bonds				
180	of which: securitisations				
190	of which: issued by general governments				

31 Dec 2025		Fair value of encumbered collateral received or own debt securities issued		Unencumbered Fair value of collateral received or own debt securities issued available for encumbrance	
		010	of which notionally eligible EHQLA and HQLA 030	040	of which EHQLA and HQLA 050
EUR million					
200	of which: issued by financial corporations				
210	of which: issued by non-financial corporations				
220	Loans and advances other than loans on demand				
230	Other collateral received				
240	Own debt securities issued other than own covered bonds or securitisations				
241	Own covered bonds and securitisations issued and not yet pledged				
250	TOTAL COLLATERAL RECEIVED AND OWN DEBT SECURITIES ISSUED		1 163.0		

31 Dec 2024		Fair value of encumbered collateral received or own debt securities issued		Unencumbered Fair value of collateral received or own debt securities issued available for encumbrance	
		010	of which notionally eligible EHQLA and HQLA 030	040	of which EHQLA and HQLA 050
EUR million					
130	Collateral received by the disclosing institution				
140	Loans on demand				
150	Equity instruments				
160	Debt securities				
170	of which: covered bonds				
180	of which: securitisations				
190	of which: issued by general governments				
200	of which: issued by financial corporations				
210	of which: issued by non-financial corporations				
220	Loans and advances other than loans on demand				
230	Other collateral received				
240	Own debt securities issued other than own covered bonds or securitisations				
241	Own covered bonds and securitisations issued and not yet pledged				
250	TOTAL COLLATERAL RECEIVED AND OWN DEBT SECURITIES ISSUED		1 194.8		

14.3 EU AE3 - SOURCES OF ENCUMBRANCE

31 Dec 2025		Matching liabilities, contingent liabilities or securities lent	Assets, collateral received and own debt securities issued other than covered bonds and securitisations encumbered
EUR million		010	030
010	Carrying amount of selected financial liabilities	1 017.1	1 162.4

31 Dec 2024		Matching liabilities, contingent liabilities or securities lent	Assets, collateral received and own debt securities issued other than covered bonds and securitisations encumbered
EUR million		010	030
010	Carrying amount of selected financial liabilities	1 013.2	1 194.2

14.4 EU AE4 - ACCOMPANYING NARRATIVE INFORMATION

j) General narrative information on asset encumbrance

The disclosures on asset encumbrance are presented using median values of carrying amounts. Median values are rolling quarterly medians over the year 2025. Assets are considered encumbered if they have been pledged or given as collateral, or if they guarantee a transaction included in the balance sheet. Other assets that are not freely available to the Group are also considered encumbered.

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

Asset encumbrance decreased slightly during 2025. All encumbered assets are within the parent entity of the group. The asset encumbrance ratio was 8.5 per cent (9.0) at the end of 2025. S-Bank has pre-pledged securities to access central bank monetary policy operations and central bank credit facilities. These pre-pledged debt securities have been classified as unencumbered within these disclosure tables.

15 MREL

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

S-Bank covers the MREL requirements with instruments qualifying for own funds and eligible liabilities. Eligible liabilities consist of Senior Preferred and Senior Non-Preferred bonds issued under the bond programme with residual maturity over one year. The latest MREL decision, set by the Financial Stability Authority, has been given on 25 March 2025.

Based on the latest decision, the minimum requirement based on total risk exposure amount was 21.94 per cent, and the minimum requirement based on the total amount of exposures used in the calculation of the leverage ratio was 7.80 per cent. For the requirement based on total risk exposure amount, an additional CBR (Combined Buffer Requirement) must also be fulfilled. On 31 December 2025, the CBR was equal to 3.52 per cent. The Financial Stability Authority has not set a specific subordination requirement for S-Bank.

S-Bank has not disclosed columns b-f because G-SII requirement for own funds and eligible liabilities (TLAC) is not applicable to S-Bank.

		a
		Minimum requirement for own funds and eligible liabilities (MREL)
		31 Dec 2025
Own funds and eligible liabilities, ratios and components		
1	Own funds and eligible liabilities	1 610.8
EU-1a	Of which own funds and subordinated liabilities	1 194.9
2	Total risk exposure amount of the resolution group (TREA)	4 129.0
3	Own funds and eligible liabilities as a percentage of the TREA	39.01%
EU-3a	Of which own funds and subordinated liabilities	28.94%
4	Total exposure measure (TEM) of the resolution group	13 439.4
5	Own funds and eligible liabilities as percentage of the TEM	11.99%
EU-5a	Of which own funds or subordinated liabilities	8.89%
6a	Does the subordination exemption in Article 72b(4) of Regulation (EU) No 575/2013 apply? (5% exemption)	
6b	Aggregate amount of permitted non-subordinated eligible liabilities instruments if the subordination discretion in accordance with Article 72b(3) of Regulation (EU) No 575/2013 is applied (max 3.5% exemption)	
6c	If a capped subordination exemption applies in accordance with Article 72b (3) of Regulation (EU) No 575/2013, the amount of funding issued that ranks pari passu with excluded liabilities and that is recognised under row 1, divided by funding issued that ranks pari passu with excluded liabilities and that would be recognised under row 1 if no cap was applied (%)	
Minimum requirement for own funds and eligible liabilities (MREL)		
EU-7	MREL expressed as a percentage of the TREA	21.94%
EU-8	Of which to be met with own funds or subordinated liabilities	
EU-9	MREL expressed as a percentage of the TEM	7.80%
EU-10	Of which to be met with own funds or subordinated liabilities	

Please note that rows EU-1a, EU-3a and EU-5a have been amended on 4 May 2026 after the initial publication of Pillar 3 Report on 19 March 2026 due to the corrected classification of Senior Non-Preferred liabilities.

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

The composition of MREL items is reported on highest level of consolidation.

S-Bank has not disclosed columns b-c because G-SII requirement for own funds and eligible liabilities (TLAC) is not applicable to S-Bank.

31 Dec 2025		a
EUR million		Minimum requirement for own funds and eligible liabilities (MREL)
Own funds and eligible liabilities and adjustments		
1	Common Equity Tier 1 capital (CET1)	956.7
2	Additional Tier 1 capital (AT1)	
3	Empty set in the EU	
4	Empty set in the EU	
5	Empty set in the EU	
6	Tier 2 capital (T2)	87.9
7	Empty set in the EU	
8	Empty set in the EU	
11	Own funds for the purpose of Articles 92a of Regulation (EU) No 575/2013 and 45 of Directive 2014/59/EU	1 044.6
Own funds and eligible liabilities: Non-regulatory capital elements		
12	Eligible liabilities instruments issued directly by the resolution entity that are subordinated to excluded liabilities (not grandfathered)	150.3
EU-12a	Eligible liabilities instruments issued by other entities within the resolution group that are subordinated to excluded liabilities (not grandfathered)	
EU-12b	Eligible liabilities instruments that are subordinated to excluded liabilities issued prior to 27 June 2019 (subordinated grandfathered)	
EU-12c	Tier 2 instruments with a residual maturity of at least one year to the extent they do not qualify as Tier 2 items	
13	Eligible liabilities that are not subordinated to excluded liabilities (not grandfathered pre-cap)	415.9
EU-13a	Eligible liabilities that are not subordinated to excluded liabilities issued prior to 27 June 2019 (pre-cap)	
14	Amount of non subordinated eligible liabilities instruments, where applicable after application of Article 72b (3) CRR	
15	Empty set in the EU	
16	Empty set in the EU	
17	Eligible liabilities items before adjustments	566.2
EU-17a	Of which subordinated liabilities items	150.3
Own funds and eligible liabilities: Adjustments to non-regulatory capital elements		
18	Own funds and eligible liabilities items before adjustments	1 610.8
19	(Deduction of exposures between multiple point of entry (MPE) resolution groups)	

31 Dec 2025		a
EUR million		Minimum requirement for own funds and eligible liabilities (MREL)
20	(Deduction of investments in other eligible liabilities instruments)	
21	Empty set in the EU	
22	Own funds and eligible liabilities after adjustments	1 610.8
EU-22a	Of which: own funds and subordinated liabilities	1 194.9
Risk-weighted exposure amount and leverage exposure measure of the resolution group		
23	Total risk exposure amount (TREA)	4 129.0
24	Total exposure measure (TEM)	13 439.4
Ratio of own funds and eligible liabilities		
25	Own funds and eligible liabilities as a percentage of TREA	39.01%
EU-25a	Of which own funds and subordinated liabilities	28.94%
26	Own funds and eligible liabilities as a percentage of TEM	11.99%
EU-26a	Of which own funds and subordinated liabilities	8.89%
27	CET1 (as a percentage of the TREA) available after meeting the resolution group's requirements	1.23%
28	Institution-specific combined buffer requirement	
29	of which capital conservation buffer requirement	
30	of which countercyclical buffer requirement	
31	of which systemic risk buffer requirement	
EU-31a	of which Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer	
Memorandum items		
EU-32	Total amount of excluded liabilities referred to in Article 72a(2) of Regulation (EU) No 575/2013	

Please note that rows 12, 13, EU-17a, EU-22a, EU-25a and EU-26a have been amended on 4 May 2026 after the initial publication of Pillar 3 Report on 19 March 2026 due to the corrected classification of Senior Non-Preferred liabilities.

15.3 EU TLAC3 - CREDITOR RANKING - RESOLUTION ENTITY

The resolution entity is S-Bank Plc and therefore creditor ranking is reported on S-Bank Plc individual level of consolidation.

31 Dec 2025		Insolvency ranking				Sum of 1 to n
		1 (most junior)	3	8	9 (most senior)	
1	Description of insolvency rank (free text)	CET1	T2	Senior non-preferred liabilities	Claims without priority or guarantee	
2	Empty set in the EU					
3	Empty set in the EU					
4	Empty set in the EU					
5	Own funds and liabilities potentially eligible for meeting MREL	961.4	87.9	150.3	415.9	1 615.5
6	of which residual maturity ≥ 1 year < 2 years		2.6			2.6
7	of which residual maturity ≥ 2 year < 5 years		25.1	150.3	415.9	591.3
8	of which residual maturity ≥ 5 years < 10 years		58.1			58.1
9	of which residual maturity ≥ 10 years, but excluding perpetual securities					
10	of which perpetual securities	961.4				961.4

16 CRR REFERENCE TABLE

Article of the CRR	Article name and disclosure requirement	Reference
435	Disclosure of risk management objectives and policies	
1	Institutions shall disclose their risk management objectives and policies for each separate category of risk, including the risks referred to in this Title. Those disclosures shall include:	-
a)	the strategies and processes to manage those categories of risks;	Part 1, tables: EU OVA, EU CRA, EU CCRA, EU CVAA, EU MRA, EU LIQA and EU ORA
b)	the structure and organisation of the relevant risk management function including information on the basis of its authority, its powers and accountability in accordance with the institution's incorporation and governing documents;	Part 1, tables: EU OVA, EU CRA, EU CCRA, EU CVAA, EU MRA, EU LIQA and EU ORA
c)	the scope and nature of risk reporting and measurement systems;	Part 1, tables: EU OVA, EU CRA, EU CCRA, EU CVAA, EU MRA, EU LIQA and EU ORA
d)	the policies for hedging and mitigating risk, and the strategies and processes for monitoring the continuing effectiveness of hedges and mitigants;	Part 1, tables: EU OVA, EU CRA, EU CCRA, EU CVAA, EU MRA, EU LIQA, EU ORA and EU CRC
e)	a declaration approved by the management body on the adequacy of the risk management arrangements of the relevant institution providing assurance that the risk management systems put in place are adequate with regard to the institution's profile and strategy;	Part 1, Chapter 2 and table: EU OVA
f)	a concise risk statement approved by the management body succinctly describing the relevant institution's overall risk profile associated with the business strategy; that statement shall include:	Part 1, Chapter 2 and table: EU OVA
i)	key ratios and figures providing external stakeholders a comprehensive view of the institution's management of risk, including how the risk profile of the institution interacts with the risk tolerance set by the management body;	Part 1, Chapter 2 and table: EU OVA
ii)	information on intragroup transactions and transactions with related parties that may have a material impact of the risk profile of the consolidated group.	Part 1, Chapter 2
2	Institutions shall disclose the following information regarding governance arrangements:	-
a)	the number of directorships held by members of the management body;	Part 1, table: EU OVB
b)	the recruitment policy for the selection of members of the management body and their actual knowledge, skills and expertise;	Part 1, table: EU OVB
c)	the policy on diversity with regard to selection of members of the management body, its objectives and any relevant targets set out in that policy, and the extent to which those objectives and targets have been achieved;	Part 1, table: EU OVB
d)	whether or not the institution has set up a separate risk committee and the number of times the risk committee has met;	Part 1, table: EU OVB
e)	the description of the information flow on risk to the management body;	Part 1, table: EU OVB
436	Disclosure of the scope of application	
	Institutions shall disclose the following information regarding the scope of application of this Regulation as follows:	-
a)	the name of the institution to which this Regulation applies;	Part 1, Chapter 1 and S-Bank's website:www.s-pankki.fi
b)	a reconciliation between the consolidated financial statements prepared in accordance with the applicable accounting framework and the consolidated financial statements prepared in accordance with the requirements on regulatory consolidation pursuant to Sections 2 and 3 of Title II of Part One; that reconciliation shall outline the differences between the accounting and regulatory scopes of consolidation and the legal entities included within the regulatory scope of consolidation where it differs from the accounting scope of consolidation; the outline of the legal entities included within the regulatory scope of consolidation shall describe the method of regulatory consolidation where it is different from the accounting consolidation method, whether those entities are fully or proportionally consolidated and whether the holdings in those legal entities are deducted from own funds;	Part 2, table: EU LIA and Part 2, template: EU LI3

Article of the CRR	Article name and disclosure requirement	Reference
c)	a breakdown of assets and liabilities of the consolidated financial statements prepared in accordance with the requirements on regulatory consolidation pursuant to Sections 2 and 3 of Title II of Part One, broken down by type of risks as referred to under this Part;	Part 2, template: EU LI1
d)	a reconciliation identifying the main sources of differences between the carrying value amounts in the financial statements under the regulatory scope of consolidation as defined in Sections 2 and 3 of Title II of Part One, and the exposure amount used for regulatory purposes; that reconciliation shall be supplemented by qualitative information on those main sources of differences;	Part 2, template: EU LI2
e)	for exposures from the trading book and the non-trading book that are adjusted in accordance with Article 34 and Article 105, a breakdown of the amounts of the constituent elements of an institution's prudent valuation adjustment, by type of risks, and the total of constituent elements separately for the trading book and non-trading book positions;	Part 2, template: EU PV1
f)	any current or expected material practical or legal impediment to the prompt transfer of own funds or to the repayment of liabilities between the parent undertaking and its subsidiaries;	Not applicable. See Part 2, table: Information not disclosed
g)	the aggregate amount by which the actual own funds are less than required in all subsidiaries that are not included in the consolidation, and the name or names of those subsidiaries;	Not applicable. See Part 2, table: Information not disclosed
h)	where applicable, the circumstances under which use is made of the derogation referred to in Article 7 or the individual consolidation method laid down in Article 9.	Not applicable. See Part 2, table: Information not disclosed
437	Disclosure of own funds Institutions shall disclose the following information regarding their own funds:	-
a)	a full reconciliation of Common Equity Tier 1 items, Additional Tier 1 items, Tier 2 items and the filters and deductions applied to own funds of the institution pursuant to Articles 32 to 36, 56, 66 and 79 with the balance sheet in the audited financial statements of the institution;	Part 2, templates: EU CC1 and EU CC2
b)	a description of the main features of the Common Equity Tier 1 and Additional Tier 1 instruments and Tier 2 instruments issued by the institution;	Part 2, template: EU CCA
c)	the full terms and conditions of all Common Equity Tier 1, Additional Tier 1 and Tier 2 instruments;	Part 2, template: EU CCA
d)	a separate disclosure of the nature and amounts of the following:	-
i)	each prudential filter applied pursuant to Articles 32 to 35;	Part 2, template: EU CC1
ii)	items deducted pursuant to Articles 36, 56 and 66;	Part 2, template: EU CC1
iii)	items not deducted pursuant to Articles 47, 48, 56, 66 and 79;	Part 2, template: EU CC1
e)	a description of all restrictions applied to the calculation of own funds in accordance with this Regulation and the instruments, prudential filters and deductions to which those restrictions apply;	Part 2, template: EU CC1
f)	a comprehensive explanation of the basis on which capital ratios are calculated where those capital ratios are calculated by using elements of own funds determined on a basis other than the basis laid down in this Regulation.	Part 2, template: EU CC1
437a	Disclosure of own funds and eligible liabilities Institutions that are subject to Article 92a or 92b shall disclose the following information regarding their own funds and eligible liabilities:	Not applicable under CRR since S-Bank is neither a G-SII nor a material subsidiary of non-EU G-SII. However, the disclosure requirement is required under BRRD (see Part 2, table BRRD reference table).
a)	the composition of their own funds and eligible liabilities, their maturity and their main features;	Not applicable under CRR
b)	the ranking of eligible liabilities in the creditor hierarchy;	Not applicable under CRR
c)	the total amount of each issuance of eligible liabilities instruments referred to in Article 72b and the amount of those issuances that is included in eligible liabilities items within the limits specified in Article 72b(3) and (4);	Not applicable under CRR
d)	the total amount of excluded liabilities referred to in Article 72a(2).	Not applicable under CRR

Article of the CRR	Article name and disclosure requirement	Reference
438	Disclosure of own funds requirements and risk-weighted exposure amounts	
	Institutions shall disclose the following information regarding their compliance with Article 92 of this Regulation and with the requirements laid down in Article 73 and in point (a) of Article 104 (1) of Directive 2013/36/EU:	-
a)	a summary of their approach to assessing the adequacy of their internal capital to support current and future activities;	Part 1, table: EU OVC
b)	the amount of the additional own funds requirements based on the supervisory review process as referred to in Article 104(1), point (a), of Directive 2013/36/EU to address risks other than the risk of excessive leverage and its composition;	Part 2, template: EU KM1
c)	upon demand from the relevant competent authority, the result of the institution's internal capital adequacy assessment process;	Part 1, table: EU OVC
d)	the total risk exposure amount as calculated in accordance with Article 92(3) and the corresponding own funds requirements as determined in accordance with Article 92(2), to be broken down by the different risk categories or risk exposure classes, as applicable, set out in Part Three and, where applicable, an explanation of the effect on the calculation of the own funds and risk-weighted exposure amounts that results from applying capital floors and not deducting items from own funds;	Part 2, template: EU OV1
da)	where required to calculate the un-floored total risk exposure amount as calculated in accordance with Article 92(4), and the standardised total risk exposure amount as calculated in accordance with Article 92(5), to be broken down by the different risk categories or risk exposure classes, as applicable, set out in Part Three and, where applicable, an explanation of the effect on the calculation of own funds and risk-weighted exposure amounts that results from applying capital floors and not deducting items from own funds;	Not applicable. See Part 2, table: Information not disclosed
e)	the on- and off-balance-sheet exposures, the risk-weighted exposure amounts and associated expected losses for each category of specialised lending referred to in Article 153(5), Table 1, and the on- and off-balance-sheet exposures and risk-weighted exposure amounts for the categories of equity exposures set out in Article 133(3) to (6), and Article 495a(3);	Not applicable. See Part 2, table: Information not disclosed
f)	the exposure value and the risk-weighted exposure amount of own funds instruments held in any insurance undertaking, reinsurance undertaking or insurance holding company that the institutions do not deduct from their own funds in accordance with Article 49 when calculating their capital requirements on an individual, sub-consolidated and consolidated basis;	Not applicable. See Part 2, table: Information not disclosed
g)	the supplementary own funds requirement and the capital adequacy ratio of the financial conglomerate calculated in accordance with Article 6 of Directive 2002/87/EC and Annex I to that Directive where method 1 or 2 set out in that Annex is applied;	Not applicable. See Part 2, table: Information not disclosed
h)	the variations in the risk-weighted exposure amounts of the current disclosure period compared to the immediately preceding disclosure period that result from the use of internal models, including an outline of the key drivers explaining those variations.	Not applicable. See Part 2, table: Information not disclosed
439	Disclosure of exposures to counterparty credit risk	
	Institutions shall disclose the following information regarding their exposure to counterparty credit risk as referred to in Chapter 6 of Title II of Part Three:	-
a)	a description of the methodology used to assign internal capital and credit limits for counterparty credit exposures, including the methods to assign those limits to exposures to central counterparties;	Part 1, table: EU CCRA
b)	a description of policies related to guarantees and other credit risk mitigants, such as the policies for securing collateral and establishing credit reserves;	Part 1, table: EU CCRA
c)	a description of policies with respect to General Wrong-Way risk and Specific Wrong-Way risk as defined in Article 291;	Part 1, table: EU CCRA
d)	the amount of collateral the institution would have to provide if its credit rating was downgraded;	Part 1, table: EU CCRA
e)	the amount of segregated and unsegregated collateral received and posted per type of collateral, further broken down between collateral used for derivatives and securities financing transactions;	Part 2, template: EU CCR5
f)	for derivative transactions, the exposure values before and after the effect of the credit risk mitigation as determined under the methods set out in Sections 3 to 6 of Chapter 6 of Title II of Part Three, whichever method is applicable, and the associated risk exposure amounts broken down by applicable method;	Part 2, template: EU CCR1

Article of the CRR	Article name and disclosure requirement	Reference
g)	for securities financing transactions, the exposure values before and after the effect of the credit risk mitigation as determined under the methods set out in Chapters 4 and 6 of Title II of Part Three, whichever method is used, and the associated risk exposure amounts broken down by applicable method;	Part 2, template: EU CCR1
h)	the exposure values after credit risk mitigation effects and the associated risk exposures for credit valuation adjustment capital charge, separately for each method as set out in Title VI of Part Three;	Not applicable
i)	the exposure value to central counterparties and the associated risk exposures within the scope of Section 9 of Chapter 6 of Title II of Part Three, separately for qualifying and non-qualifying central counterparties, and broken down by types of exposures;	Part 2, template: EU CCR8
j)	the notional amounts and fair value of credit derivative transactions; credit derivative transactions shall be broken down by product type; within each product type, credit derivative transactions shall be broken down further by credit protection bought and credit protection sold;	Not applicable. See Part 2, table: Information not disclosed
k)	the estimate of alpha where the institution has received the permission of the competent authorities to use its own estimate of alpha in accordance with Article 284(9);	Part 2, template: EU CCR1
l)	separately, the disclosures included in point (e) of Article 444 and point (g) of Article 452;	Part 2, template: EU CCR3
m)	for institutions using the methods set out in Sections 4 to 5 of Chapter 6 of Title II Part Three, the size of their on- and off-balance-sheet derivative business as calculated in accordance with Article 273a(1) or (2), as applicable. Where the central bank of a Member State provides liquidity assistance in the form of collateral swap transactions, the competent authority may exempt institutions from the requirements in points (d) and (e) of the first subparagraph where that competent authority considers that the disclosure of the information referred to therein could reveal that emergency liquidity assistance has been provided. For those purposes, the competent authority shall set out appropriate thresholds and objective criteria.	Part 2: narrative information in the EU CCR1 template Not applicable to S-Bank.
440	Disclosure of countercyclical capital buffers Institutions shall disclose the following information in relation to their compliance with the requirement for a countercyclical capital buffer as referred to in Chapter 4 of Title VII of Directive 2013/36/EU:	-
a)	the geographical distribution of the exposure amounts and risk-weighted exposure amounts of its credit exposures used as a basis for the calculation of their countercyclical capital buffer;	Part 2, template: EU CCyB1
b)	the amount of their institution-specific countercyclical capital buffer.	Part 2, template: EU CCyB2
441	Disclosure of indicators of global systemic importance	Not applicable. See Part 2, table: Information not disclosed
442	Disclosure of exposures to credit risk and dilution risk Institutions shall disclose the following information regarding their exposures to credit risk and dilution risk:	-
a)	the scope and definitions that they use for accounting purposes of 'past due' and 'impaired' and the differences, if any, between the definitions of 'past due' and 'default' for accounting and regulatory purposes;	Part 1, table: EU CRB
b)	description of the approaches and methods adopted for determining specific and general credit risk adjustments;	Part 1, table: EU CRB
c)	information on the amount and quality of performing, non-performing and forborne exposures for loans, debt securities and off-balance-sheet exposures, including their related accumulated impairment, provisions and negative fair value changes due to credit risk and amounts of collateral and financial guarantees received;	Part 2, templates: EU CR1, EU CQ1 and EU CQ5
d)	an ageing analysis of accounting past due exposures;	Part 2, template: EU CQ3
e)	the gross carrying amounts of both defaulted and non-defaulted exposures, the accumulated specific and general credit risk adjustments, the accumulated write-offs taken against those exposures and the net carrying amounts and their distribution by geographical area and industry type and for loans, debt securities and off-balance-sheet exposures;	Part 2, template: EU CQ5

Article of the CRR	Article name and disclosure requirement	Reference
f)	any changes in the gross amount of defaulted on- and off-balance sheet exposures, including, as a minimum, information on the opening and closing balances of those exposures, the gross amount of any of those exposures reverted to non-defaulted status or subject to a write-off;	Part 2, templates: EU CR1 and EU CR2
g)	the breakdown of loans and debt securities by residual maturity.	Part 2, template: EU CR1-A
443	Disclosure of encumbered and unencumbered assets Institutions shall disclose information concerning their encumbered and unencumbered assets. For those purposes, institutions shall use the carrying amount per exposure class broken down by asset quality and the total amount of the carrying amount that is encumbered and unencumbered. Disclosure of information on encumbered and unencumbered assets shall not reveal emergency liquidity assistance provided by central banks.	Part 2, templates: EU AE1, EU AE2, EU AE3 and EU AE4
444	Disclosure of the use of the Standardised Approach Institutions calculating their risk-weighted exposure amounts in accordance with Chapter 2 of Title II of Part Three shall disclose the following information for each of the exposure classes set out in Article 112:	-
a)	the names of the nominated ECAs and ECAs and the reasons for any changes in those nominations over the disclosure period;	Part 1, table: EU CRD
b)	the exposure classes for which each ECAI or ECA is used;	Part 1, table: EU CRD
c)	a description of the process used to transfer the issuer and issue credit ratings onto items not included in the trading book;	Part 1, table: EU CRD
d)	the association of the external rating of each nominated ECAI or ECA with the risk weights that correspond to the credit quality steps as set out in Chapter 2 of Title II of Part Three, taking into account that it is not necessary to disclose that information where the institutions comply with the standard association published by EBA;	Part 1, table: EU CRD
e)	the exposure values and the exposure values after credit risk mitigation associated with each credit quality step as set out in Chapter 2 of Title II of Part Three, by exposure class, as well as the exposure values deducted from own funds.	Part 2, templates: EU CR4, EU CR5
445	Disclosure of exposures to market risk under the standardised approach	Not applicable. See Part 2, table: Information not disclosed
445a	Disclosure of CVA risk	
1	Institutions subject to the own funds requirements for CVA risk shall disclose the following information:	-
a)	an overview of their processes to identify, measure, hedge and monitor their CVA risk;	Part 1, table: EU CVAA
b)	whether institutions meet all of the conditions set out in Article 273a(2); where those conditions are met, whether institutions have chosen to calculate the own funds requirements for CVA risk using the simplified approach set out in Article 385; where institutions have chosen to calculate the own funds requirements for CVA risk using the simplified approach, the own funds requirements for CVA risk in accordance with that approach;	Part 1, table: EU CVAA
c)	the total number of counterparties for which the standardised approach is used, with a breakdown by counterparty types.	Not applicable. See Part 2, table: Information not disclosed
2	Institutions using the standardised approach set out in Article 383 for calculating the own funds requirements for CVA risk shall disclose, in addition to the information referred to in paragraph 1 of this Article, the following information:	-
a)	the structure and the organisation of their internal CVA risk management function and governance;	Not applicable. See Part 2, table: Information not disclosed
b)	their total own funds requirements for CVA risk under the standardised approach with a breakdown by risk class;	Not applicable. See Part 2, table: Information not disclosed
c)	an overview of the eligible hedges used in that calculation, with a breakdown by type of instruments set out in Article 386(2).	Not applicable. See Part 2, table: Information not disclosed

Article of the CRR	Article name and disclosure requirement	Reference
3	Institutions using the basic approach set out in Article 384 for calculating the own funds requirements for CVA risk shall disclose, in addition to the information referred to in paragraph 1 of this Article, the following information:	-
a)	their total own funds requirements for CVA risk under the basic approach, and the components BACVA _{total} and BACVA _{crs-hedged} ;	Part 2, template: EU CVA1
b)	an overview of the eligible hedges used in that calculation, with a breakdown by type of instruments set out in Article 386(3).	Not applicable. See Part 2, table: Information not disclosed
446	Disclosure of operational risk management	
1	Institutions shall disclose the following information:	-
a)	the main characteristics and elements of their operational risk management framework;	Part 1, table: EU ORA
b)	their own funds requirement for operational risk equal to the business indicator component calculated in accordance with Article 313;	Part 2, template: EU OR3
c)	the business indicator, calculated in accordance with Article 314(1), and the amounts of each of the business indicator components and their sub-components for each of the three years relevant for the calculation of the business indicator;	Part 2, template: EU OR2
d)	the amount of the reduction of the business indicator for each exclusion from the business indicator in accordance with Article 315(2), as well as the corresponding justifications for such exclusions.	Part 2, template: EU OR2
2	Institutions that calculate their annual operational risk losses in accordance with Article 316(1) shall disclose the following information in addition to the information referred to in paragraph 1 of this Article:	-
a)	their annual operational risk losses for each of the last 10 financial years, calculated in accordance with Article 316(1);	Not applicable. See Part 2, table: Information not disclosed
b)	the number of exceptional operational risk events and the amounts of the corresponding aggregated net operational risk losses that were excluded from the calculation of the annual operational risk loss in accordance with Article 320(1), for each of the last 10 financial years, and the corresponding justifications for those exclusions.	Not applicable. See Part 2, table: Information not disclosed
447	Disclosure of key metrics	
	Institutions shall disclose the following key metrics in a tabular format:	-
a)	the composition of their own funds and their risk-based capital ratios as calculated in accordance with Article 92(2);	Part 2, template: EU KM1
aa)	where applicable, the risk-based capital ratios as calculated in accordance with Article 92(2), by using the un-floored total risk exposure amount instead of the total risk exposure amount;	Part 2, template: EU KM1
b)	the total risk exposure amount as calculated in accordance with Article 92(3) and, where applicable, the un-floored total risk exposure amount as calculated in accordance with Article 92(4);	Part 2, template: EU KM1
c)	where applicable, the amount and composition of additional own funds which the institutions are required to hold in accordance with point (a) of Article 104(1) of Directive 2013/36/EU;	Part 2, template: EU KM1
d)	the combined buffer requirement which the institutions are required to hold in accordance with Chapter 4 of Title VII of Directive 2013/36/EU;	Part 2, template: EU KM1
e)	their leverage ratio and the total exposure measure as calculated in accordance with Article 429;	Part 2, template: EU KM1
f)	the following information in relation to their liquidity coverage ratio as calculated in accordance with the delegated act referred to in Article 460(1):	-
i)	the average or averages, as applicable, of their liquidity coverage ratio based on end-of-the-month observations over the preceding 12 months for each quarter of the relevant disclosure period;	Part 2, template: EU KM1
ii)	the average or averages, as applicable, of total liquid assets, after applying the relevant haircuts, included in the liquidity buffer pursuant to the delegated act referred to in Article 460 (1), based on end-of-the-month observations over the preceding 12 months for each quarter of the relevant disclosure period;	Part 2, template: EU KM1

Article of the CRR	Article name and disclosure requirement	Reference
iii)	the averages of their liquidity outflows, inflows and net liquidity outflows as calculated pursuant to the delegated act referred to in Article 460(1), based on end-of-the-month observations over the preceding 12 months for each quarter of the relevant disclosure period;	Part 2, template: EU KM1
g)	the following information in relation to their net stable funding requirement as calculated in accordance with Title IV of Part Six:	-
i)	the net stable funding ratio at the end of each quarter of the relevant disclosure period;	Part 2, template: EU KM1
ii)	the available stable funding at the end of each quarter of the relevant disclosure period;	Part 2, template: EU KM1
iii)	the required stable funding at the end of each quarter of the relevant disclosure period;	Part 2, template: EU KM1
h)	their own funds and eligible liabilities ratios and their components, numerator and denominator, as calculated in accordance with Articles 92a and 92b and broken down at the level of each resolution group, where applicable.	Part 2, template: EU KM2
448	Disclosure of exposures to interest rate risk on positions not held in the trading book	
1	As from 28 June 2021, institutions shall disclose the following quantitative and qualitative information on the risks arising from potential changes in interest rates that affect both the economic value of equity and the net interest income of their non-trading book activities referred to in Article 84 and Article 98(5) of Directive 2013/36/EU:	-
a)	the changes in the economic value of equity calculated under the six supervisory shock scenarios referred to in Article 98(5) of Directive 2013/36/EU for the current and previous disclosure periods;	Part 2, template: EU IRRBB1
b)	the changes in the net interest income calculated under the two supervisory shock scenarios referred to in Article 98(5) of Directive 2013/36/EU for the current and previous disclosure periods;	Part 2, template: EU IRRBB1
c)	a description of key modelling and parametric assumptions, other than those referred to in points (b) and (c) of Article 98(5a) of Directive 2013/36/EU used to calculate changes in the economic value of equity and in the net interest income required under points (a) and (b) of this paragraph;	Part 2, table: EU IRRBBA
d)	an explanation of the significance of the risk measures disclosed under points (a) and (b) of this paragraph and of any significant variations of those risk measures since the previous disclosure reference date;	Part 2, table: EU IRRBBA
e)	the description of how institutions define, measure, mitigate and control the interest rate risk of their non-trading book activities for the purposes of the competent authorities' review in accordance with Article 84 of Directive 2013/36/EU, including:	Part 2, table: EU IRRBBA
i)	a description of the specific risk measures that the institutions use to evaluate changes in their economic value of equity and in their net interest income;	Part 2, table: EU IRRBBA
ii)	a description of the key modelling and parametric assumptions used in the institutions' internal measurement systems that would differ from the common modelling and parametric assumptions referred to in Article 98(5a) of Directive 2013/36/EU for the purpose of calculating changes to the economic value of equity and to the net interest income, including the rationale for those differences;	Part 2, table: EU IRRBBA
iii)	description of the interest rate shock scenarios that institutions use to estimate the interest rate risk	Part 2, table: EU IRRBBA
iv)	the recognition of the effect of hedges against those interest rate risks, including internal hedges that meet the requirements laid down in Article 106(3);	Part 2, table: EU IRRBBA
v)	an outline of how often the evaluation of the interest rate risk occurs;	Part 2, table: EU IRRBBA
f)	the description of the overall risk management and mitigation strategies for those risks;	Part 2, table: EU IRRBBA
g)	average and longest repricing maturity assigned to non-maturity deposits.	Part 2, table: EU IRRBBA
2	By way of derogation from paragraph 1 of this Article, the requirements set out in points (c) and (e)(i) to (e)(iv) of paragraph 1 of this Article shall not apply to institutions that use the standardised methodology or the simplified standardised methodology referred to in Article 84(1) of Directive 2013/36/EU.	Not applicable. IRRBB internal measurement system is used.

Article of the CRR	Article name and disclosure requirement	Reference
449	Disclosure of exposures to securitisation positions	Not applicable. See Part 2, table: Information not disclosed
Article 449a	Disclosure of environmental, social and governance risks (ESG risks)	Not applicable. See Part 2, table: Information not disclosed
Article 449b	Disclosure of aggregate exposure to shadow banking entities	Not applicable. S-Bank does not hold exposures to shadow banking entities.
450	Disclosure of remuneration policy	Information on the remuneration policy is disclosed in a separate document available on S-Bank's website: www.s-pankki.fi > S-Pankki yrityksenä > Tietoa meistä > Hallinnointi > Palkitseminen
451	Disclosure of the leverage ratio	
1	Institutions that are subject to Part Seven shall disclose the following information regarding their leverage ratio as calculated in accordance with Article 429 and their management of the risk of excessive leverage:	-
a)	the leverage ratio and how the institutions apply Article 499(2);	Part 2, template: EU LR2 - LRCOM
b)	a breakdown of the total exposure measure referred to in Article 429(4), as well as a reconciliation of the total exposure measure with the relevant information disclosed in published financial statements;	Part 2, templates: EU LR1 - LRSUM, EU LR2 - LRCOM, EU LR3 - LRSPL
c)	where applicable, the amount of exposures calculated in accordance with Articles 429(8) and 429a(1) and the adjusted leverage ratio calculated in accordance with Article 429a(7);	Part 2, template: EU LR2 - LRCOM
d)	a description of the processes used to manage the risk of excessive leverage;	Part 2, table: EU LRA
e)	a description of the factors that had an impact on the leverage ratio during the period to which the disclosed leverage ratio refers;	Part 2, table: EU LRA
f)	the amount of the additional own funds requirements based on the supervisory review process as referred to in Article 104(1), point (a), of Directive 2013/36/EU to address the risk of excessive leverage and its composition.	Not applicable to S-Bank
2	Public development credit institutions as defined in Article 429a (2) shall disclose the leverage ratio without the adjustment to the total exposure measure determined in accordance with point (d) of the first subparagraph of Article 429a(1).	Not applicable. S-Bank is not a public development credit institution.
3	In addition to points (a) and (b) of paragraph 1 of this Article, large institutions shall disclose the leverage ratio and the breakdown of the total exposure measure referred to in Article 429(4) based on averages calculated in accordance with the implementing act referred to in Article 430(7).	Not applicable. S-Bank is not a large institution.
451a	Disclosure of liquidity requirements	
1	Institutions that are subject to Part Six shall disclose information on their liquidity coverage ratio, net stable funding ratio and liquidity risk management in accordance with this Article.	Part 1, table: EU LIQA Part 2, table: EU LIQB Part 2, templates: EU LIQ1, EU LIQ2
2	Institutions shall disclose the following information in relation to their liquidity coverage ratio as calculated in accordance with the delegated act referred to in Article 460(1):	-
a)	the average or averages, as applicable, of their liquidity coverage ratio based on end-of-the-month observations over the preceding 12 months for each quarter of the relevant disclosure period;	Part 2, table: EU LIQB Part 2, template: EU LIQ1
b)	the average or averages, as applicable, of total liquid assets, after applying the relevant haircuts, included in the liquidity buffer pursuant to the delegated act referred to in Article 460(1), based on end-of-the-month observations over the preceding 12 months for each quarter of the relevant disclosure period, and a description of the composition of that liquidity buffer;	Part 2, table: EU LIQB Part 2, template: EU LIQ1
c)	the averages of their liquidity outflows, inflows and net liquidity outflows as calculated in accordance with the delegated act referred to in Article 460(1), based on end-of-the-month observations over the preceding 12 months for each quarter of the relevant disclosure period and the description of their composition.	Part 2, table: EU LIQB Part 2, template: EU LIQ1

Article of the CRR	Article name and disclosure requirement	Reference
3	Institutions shall disclose the following information in relation to their net stable funding ratio as calculated in accordance with Title IV of Part Six:	-
a)	quarter-end figures of their net stable funding ratio calculated in accordance with Chapter 2 of Title IV of Part Six for each quarter of the relevant disclosure period;	Part 2, template: EU LIQ2
b)	an overview of the amount of available stable funding calculated in accordance with Chapter 3 of Title IV of Part Six;	Part 2, template: EU LIQ2
c)	an overview of the amount of required stable funding calculated in accordance with Chapter 4 of Title IV of Part Six.	Part 2, template: EU LIQ2
4	Institutions shall disclose the arrangements, systems, processes and strategies put in place to identify, measure, manage and monitor their liquidity risk in accordance with Article 86 of Directive 2013/36/EU.	Part 1, table: EU LIQA
451b	Disclosure of crypto-asset exposures and related activities	Not applicable. See Part 2, table: Information not disclosed
452	Disclosure of the use of the IRB Approach to credit risk	Not applicable. See Part 2, table: Information not disclosed
453	Disclosure of the use of credit risk mitigation techniques	
	Institutions using credit risk mitigation techniques shall disclose the following information:	-
a)	the core features of the policies and processes for on- and off-balance-sheet netting and an indication of the extent to which institutions make use of balance sheet netting;	Part 1, table: EU CRC
b)	the core features of the policies and processes for eligible collateral evaluation and management;	Part 1, table: EU CRC
c)	a description of the main types of collateral taken by the institution to mitigate credit risk;	Part 1, table: EU CRC
d)	for guarantees and credit derivatives used as credit protection, the main types of guarantor and credit derivative counterparty and their creditworthiness used for the purpose of reducing capital requirements, excluding those used as part of synthetic securitisation structures;	Part 1, table: EU CRC
e)	information about market or credit risk concentrations within the credit risk mitigation taken;	Part 1, table: EU CRC
f)	for institutions calculating risk-weighted exposure amounts under the Standardised Approach or the IRB Approach, the total exposure value not covered by any eligible credit protection and the total exposure value covered by eligible credit protection after applying volatility adjustments; the disclosure set out in this point shall be made separately for loans and debt securities and including a breakdown of defaulted exposures;	Part 2, template: EU CR3
g)	the corresponding conversion factor and the credit risk mitigation associated with the exposure and the incidence of credit risk mitigation techniques with and without substitution effect;	Part 2, template: EU CR4
h)	for institutions calculating risk-weighted exposure amounts under the Standardised Approach, the on- and off-balance-sheet exposure value by exposure class before and after the application of conversion factors and any associated credit risk mitigation;	Part 2, template: EU CR4
i)	for institutions calculating risk-weighted exposure amounts under the Standardised Approach, the risk-weighted exposure amount and the ratio between that risk-weighted exposure amount and the exposure value after applying the corresponding conversion factor and the credit risk mitigation associated with the exposure; the disclosure set out in this point shall be made separately for each exposure class;	Part 2, template: EU CR4
j)	for institutions calculating risk-weighted exposure amounts under the IRB Approach, the risk-weighted exposure amount before and after recognition of the credit risk mitigation impact of credit derivatives; where institutions have received permission to use own LGDs and conversion factors for the calculation of risk-weighted exposure amounts, they shall make the disclosure set out in this point separately for the exposure classes subject to that permission.	Not applicable. See Part 2, table: Information not disclosed
454	Disclosure of the use of the Advanced Measurement Approaches to operational risk	Not applicable to S-Bank
455	Use of internal models for market risk	Not applicable. See Part 2, table: Information not disclosed

17 BRRD REFERENCE TABLE

Article of the BRRD	Article name and disclosure requirement	Reference
45i	Supervisory reporting and public disclosure of the requirement	
3	Entities referred to in paragraph 1 shall make the following information publicly available on at least an annual basis:	-
a)	the amounts of own funds that, where applicable, meet the conditions of point (b) of Article 45f(2) and eligible liabilities;	Part 2, template EU KM2
b)	the composition of the items referred to in point (a), including their maturity profile and ranking in normal insolvency proceedings;	Part 2, templates EUTLAC1 and EUTLAC3
c)	the applicable requirement referred to in Article 45e or Article 45f expressed in accordance with Article 45(2).	Part 2, template EU KM2

18 INFORMATION NOT DISCLOSED DUE TO NON-MATERIALITY, PROPRIETARY OR CONFIDENTIAL NATURE OR NOT APPLICABLE TO S-BANK GROUP

Classification of disclosure according to EBA ITS 2024/3172	Name of non-disclosed table or template	CRR Article reference	Reason for non-disclosure
Article 1: Disclosure of key metrics and overview of risk-weighted exposure amounts	Template EU INS1 – Insurance participations	Article 438(f)	Not applicable. S-Bank is not involved in any insurance undertakings.
	Template EU INS2 – Financial conglomerates information on own funds and capital adequacy ratio	Article 438(g)	
	Template EU CMS1 – Comparison of modelled and standardised risk weighted exposure amounts at risk level	Article 438(da)	Not applicable. S-Bank does not use the IRB approach.
	Template EU CMS2 – Comparison of modelled and standardised risk weighted exposure amounts for credit risk at asset class level	Article 438(da)	
Article 2: Disclosure of risk management objectives and policies	Row (b) of Template EU OVA – Institution risk management approach	Article 435(1)(b)	Detailed information on the approved limits of risks is used for strategic purposes and thus confidential.
Article 3: Disclosure of the scope of application	Table EU LIB – Other qualitative information on the scope of application	Article 436(f), (g) and (h)	Not disclosed due to non-materiality. The circumstances described in points (f) and (g) of Article 436 are not relevant to S-Bank. S-Bank does not make use of the derogation referenced to in point (h) of Article 436.
Article 7: Disclosure of indicators of global systemic importance	No template specified by EBA according to ITS 2024/3172	Article 441	Not applicable. S-Bank is not a G-SII.
Article 9: Disclosure of exposures to credit risk, dilution risk and credit quality	Template EU CR2a: Changes in the stock of non-performing loans and advances and related net accumulated recoveries	Article 442(c) and (f)	Not applicable. S-Bank's NPL ratio is below 5% threshold.
	Template EU CQ2: Quality of forbearance	Article 442(c)	Not applicable. S-Bank's NPL ratio is below 5% threshold.
	Template EU CQ4: Quality of non-performing exposures by geography	Article 442(c) and (e)	Not applicable. Non-domestic exposures are less than 10 per cent of the total exposures.
	Template EU CQ6: Collateral valuation – loans and advances	Article 442(c)	Not applicable. S-Bank's NPL ratio is below 5% threshold.
	Template EU CQ7: Collateral obtained by taking possession and execution processes	Article 442(c)	Not applicable. No loan collaterals were obtained for S-Bank's possession during the financial year.
	Template EU CQ8: Collateral obtained by taking possession and execution processes – vintage breakdown	Article 442(c)	Not applicable. S-Bank's NPL ratio is below 5% threshold.
Article 12: Disclosure of the use of the IRB Approach to credit risk	All templates	Article 438(h) Article 452 Article 453(g) and (j)	Not applicable. S-Bank does not use the IRB approach.
Article 13: Disclosure of specialised lending and equity exposures	Template EU CR10 – Specialised lending and equity exposures	Article 438(e)	Not applicable. S-Bank does not hold such exposures.

Classification of disclosure according to EBA ITS 2024/3172

Name of non-disclosed table or template	CRR Article reference	Reason for non-disclosure	
Article 14: Disclosure of exposures to counterparty credit risk	Template EU CCR4: IRB approach – CCR exposures by exposure class and PD scale	Article 439(l) referring to Article 452(g)	Not applicable. S-Bank does not use the IRB approach.
	Template EU CCR6: Credit derivatives exposures	Article 439(j)	Not applicable. S-Bank has no credit derivatives exposures.
	Template EU CCR7: RWEA flow statements of CCR exposures under the IMM	Article 438(h)	Not applicable. S-Bank does not use the IMM.
Article 15: Disclosure of exposures to securitisation positions	All templates	Article 449	Not applicable. S-Bank does not have securitisation positions.
Article 16: Disclosure of the use of the standardised approach and of the alternative internal models for market risk	All templates	Article 435(1)(a) to (d) Article 438(h) Article 445(1) and (2) Article 455(1)(a) to (f) Article 455(2) and (3),	S-Bank does not have a trading book, in accordance with the Capital Requirements Regulation, and hence the company is not subject to capital requirement for market risk.
Article 17: Disclosure of credit valuation adjustment risk	Template EU CVA 2 – Credit valuation adjustment risk under the Full Basic Approach (F-BA)	Article 445a(3)(a) and (b)	Not applicable. S-Bank does not apply the Full Basic Approach.
	Table EU CVAB – Qualitative disclosure requirements related to CVA risk for institutions using the Standardised Approach	Article 445a(2)(a)	Not applicable. S-Bank does not use the Standardised approach for CVA risk.
	Template EU CVA3 – Credit valuation adjustment risk under the Standardised Approach (SA)	Article 445a(1)(c) Article 445a(2)(b) and (c)	
	Template EU CVA4 – RWEA flow statements of credit valuation adjustment risk under the Standardised Approach (SA)	Article 438(d) and (h)	
Article 18: Disclosure of operational risk	Template EU OR1 – Operational risk losses	Article 446(2)(a) and (b)	Not applicable. S-Bank's business indicator is less than EUR 750 million.
Article 22: Disclosure of environmental, social and governance risks (ESG risks)	All templates	Article 449a	Not applicable. S-Bank is not a large institution. Disclosure requirements will be determined under step 2 of the CRR3 implementation.
Article 23: Disclosure of crypto assets	Template EU CAE1 – Exposures to crypto-assets	Article 451b	Not applicable. S-Bank does not hold crypto-assets.
Disclosure on MREL/TLAC information according to EBA ITS 2021/763	Template EU ILAC – Internal loss absorbing capacity: internal MREL and, where applicable, requirement for own funds and eligible liabilities for non-EU G-SIs	BRRD: Article 45i(3)(a), (b) and (c)	Not applicable. There is no internal MREL requirement for S-Bank.
	Template EU TLAC2: Creditor ranking – Entity that is not a resolution entity	BRRD: Article 45i(3)(b)	Not applicable. S-Bank is a resolution entity.



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