BANCA GENERALI

Pillar 3

2026

DISCLOSURES
SITUATION AT 30 JUNE

Pillar 3 - Disclosures
at 30 June 2026

BOARD OF DIRECTORS
29 JULY 2026

This Document has been translated from that issued in Italy, from the Italian into the English language, solely for the convenience of international readers. The Italian version remains the definitive version.

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FOREWORD

The new prudential supervisory provisions applicable to banks and banking groups came into force in the EU law on 1 January 2014. They were drafted as part of the Basel Committee agreements ("Basel 3") and designed to strengthen banks' capacity to absorb shocks caused by financial and economic stresses, regardless of their origin, improve risk management and governance, and reinforce transparency and reporting.

In continuity with the previous framework, the regulatory scheme requires that intermediaries publish a public disclosure (**Public Disclosure or Pillar 3**) aimed at combining minimum capital requirements (Pillar 1) and the prudential control process (Pillar 2), by identifying information transparency requirements that permit the market operators to have access to full, relevant and reliable information about:

- capital adequacy;
- risk exposure;
- general characteristics of systems intended to identify, measure and manage such risks;
- assets pledged;
- leverage ratio.

Bank of Italy Circular No. 285 "*Supervisory Provisions for Banks*" of 17 December 2013, as further updated, which covers this subject in Chapter 13, Part Two, does not establish specific rules for drafting and publishing Pillar 3, but merely reproduces the list of provisions laid down on the matter in Regulation EU No. 575/2013 (CRR – Capital Requirements Regulation) and Directive 2014/59/EU of the European Parliament (BRRD – Banking Recovery and Resolution Directive).

The subject is therefore governed directly by:

a) the CRR, Part 8 "Disclosure by institutions" (Articles 431–455), and Part 10, Title I, Chapter 3 "Transitional provisions for disclosure of own funds" (Article 492);
b) the BRRD, Article 45-*decies*, paragraph 3, "Supervisory reporting and public disclosure of the requirement";
c) Regulations of the European Commission concerning regulatory or implementing technical standards with regard to uniform templates for disclosing the different types of information required by the CRR and the BRRD.
   These include:
   - Commission Implementing Regulation (EU) No. 2021/453 of March 2021 with regard to the specific reporting requirements for market risk. These reporting requirements are not applicable to Banca Generali Group at 30 June 2026, as its trading activities fall within the defined exemption thresholds (Article 325-*bis* CRR);
   - Commission Implementing Regulation (EU) No. 2021/637, endorsing the new provisions of Regulation No. 2019/876, in force as of 30 June 2021 that amended Regulation (EU) No. 575/2013;
   - Commission Implementing Regulation (EU) No. 2022/631 of 13 April 2022 as regards the disclosure of exposures to interest rate risk on positions not held in the trading book;
   - Commission Implementing Regulation (EU) No. 2022/2453, enacting the EBA's proposal for implementing technical standards (ITS) on Pillar 3 disclosures on environmental, social and governance (ESG) risks. The provisions on ESG risk disclosure apply with effect from 28 June 2022 for large entities that have issued securities admitted to trading on a regulated market of any Member State, as defined in Article 4(1)(21) of Directive 2014/65/EU;
   - Regulation (EU) 2024/1623 (also known as CRR3) amending Regulation (EU) No. 575/2013 as regards requirements for credit risk, credit valuation adjustment risk, operational risk, market risk and the output floor. The said Regulation also updated the Public Disclosure framework, by introducing new and amended disclosure requirements associated with the finalisation of the Basel 3 reforms, including the disclosure of crypto-asset exposures, the proportioned extension of ESG risk disclosure to all institutions, and new disclosure requirements relating to the shadow banking system;
d) the Guidelines of the European Banking Authority (EBA) on:
   - materiality, proprietary and confidentiality and on disclosure frequency (EBA/GL/2014/14);
   - LCR disclosure (EBA/GL/2017/01);
   - disclosure requirements for mitigating the impact of the introduction of IFRS 9 on own funds (EBA/GL/2018/01), subsequently amended to ensure compliance with the CRR 'quick fix' in response to the COVID-19 pandemic (EBA/GL/2020/12);
   - disclosure of non-performing and forborne exposures (EBA/GL/2018/10) and subsequent amendments (EBA/GL/2022/13).

   With regard to the aforementioned Guidelines, it bears remarking that:

   1. in accordance with the proportionality principle, some of the additional disclosures required apply solely to larger banks, with the exception of (i) specific information on governance arrangements provided for in the Guidelines EBA/GL/2016/11 and (ii) quantitative information on LCR to be presented in a simplified template, including by less significant banks;
   2. Banca Generali Group did not opt to apply the amendments to the phase-in regime for the application of IFRS 9 (Article 473-*bis* of CRR) to calculate its Own Funds.

In addition, the Bank of Italy, by its Communication of 30 June 2020, implemented the Guidelines of the European Banking Authority (EBA) on reporting (on a quarterly basis) and disclosure (on a half-year basis) of exposures subject to measures applied in response to the Covid-19 crisis (EBA/GL/2020/07). The EBA repealed these Guidelines on 16 December 2022. However, the Bank of Italy has kept active reporting of loans backed by government guarantees for less-significant institutions (LSIs).

After Regulation (EU) 2024/1623 (CRR3) became applicable, the framework of uniform templates relating to Public Disclosure is governed by Commission Implementing Regulation (EU) 2024/3172, as amended by Commission Implementing Regulation (EU) 2026/722, which introduced the operating provisions for the use of the EBA single access point/Pillar 3 Data Hub and the related submission procedures in PDF and XBRL-csv format. Commission Implementing Regulation (EU) 2021/637 will continue to apply — solely with regard to the

transitional arrangements relating to market risk — until 31 December 2026.
As of the Pillar 3 Public Disclosure of June 2025, Banca Generali Group submits to the Supervisory Authority all the required Pillar 3 components in XBRL-CSV format.

Pursuant to Article 433-*quater*, Banca Generali Group falls within the scope of other listed institutions and publishes, on a half-year basis, the Pillar 3 Public Disclosure, and in particular the key metrics provided for in Article 447.

Disclosures are of a qualitative and quantitative nature, structured so as to provide as complete as possible an overview of the risks assumed, the characteristics of the relevant governance and control systems and the capital adequacy of Banca Generali Group.

The Group does not use internal models to calculate capital requirements for Pillar 1 risks and the disclosures set out in Articles 438 ((e) and (h)), 439 ((l) and (j)), 452, 453 and 455 therefore are not provided.

Since the Group is not identified as a "G-SII" the disclosure under Article 441 is not provided.

The Pillar 3 Public Disclosures are drafted at the consolidated level by the Banking Parent Company.

Unless otherwise specified, all amounts are in thousands of euros.

Compliance with public disclosure requirements is an essential condition for Banca Generali Group to be eligible, for prudential purposes, for the effects of credit risk mitigation (CRM) techniques.

Given the public significance of Pillar 3, the document is submitted to the competent Corporate Bodies for approval by the Manager in charge of preparing the Company's financial reports. In accordance with Article 154-*bis* of Legislative Decree No. 58/98 (TUF), the document is then submitted for the related attestation.

In order to ensure compliance with disclosure requirements, Banca Generali Group has adopted organisational measures suitable to ensuring the fulfilment of disclosure obligations. Top management analyses the assessment and verification of information quality, inasmuch as the law specifies that these activities fall within the remit of corporate bodies on an independent basis.

In order to conform to the requirements of the supervisory legislation, Banca Generali Group has defined an internal process for determining Public Disclosures regarding Banca Generali S.p.A. (the "Parent Company") and, insofar as applicable, the Companies (the "Group Companies") subject to consolidated prudential regulatory rules.

Banca Generali Group regularly publishes its Pillar 3 Public Disclosures on its website and on the EBA P3DH portal, at the following addresses:

www.bancagenerali.com/investors/reports-and-relations
https://edap-public.eba.europa.eu

Additional information concerning the Group's risk profile, pursuant to Article 434 of the CRR, was also published in the Consolidated Interim Report at 30 June 2026. In light of the above Article, if similar information is already disclosed in two or more media, a reference to that information is included in each medium.

1. DISCLOSURE OF KEY METRICS

The following table shows Banca Generali Group's regulatory key metrics.

In detail, it contains the balance sheet aggregates and the value of the risk-weighted assets, as well as the capital ratios and the regulatory requirements that the Bank has to comply with.

The table also provides the main liquidity ratios, i.e., Liquidity Coverage Ratio (LCR) and Net Stable Funding Ratio (NSFR), and their main components.

TEMPLATE EU KM1 - KEY METRICS (1 OF 2)

		A	B	C
		30.06.2026	31.12.2025	30.06.2025
Available own funds (amounts)				
1	Common Equity Tier 1 (CET1) capital	981,167	933,220	899,788
2	Tier 1 capital	1,082,098	1,033,729	1,000,390
3	Total capital	1,082,098	1,033,729	1,000,390
Risk-weighted exposure (amounts)				
4	Total risk-weighted exposure amount	5,699,345	5,464,859	5,086,223
4a	Total risk-weighted exposure (pre-floor)	5,699,345	5,464,859	5,086,223
Capital ratios (as a percentage of risk-weighted exposure amount)				
5	Common Equity Tier 1 ratio (%)	17.2150%	17.0770%	17.6910%
5b	Common Equity Tier 1 ratio considering unfloored TREA (%)	17.2150%	17.0770%	17.6910%
6	Tier 1 ratio (%)	18.9860%	18.9160%	19.6690%
6b	Tier 1 ratio considering unfloored TREA (%)	18.9860%	18.9160%	19.6690%
7	Total capital ratio (%)	18.9860%	18.9160%	19.6690%
7b	Total capital ratio considering unfloored TREA (%)	18.9860%	18.9160%	19.6690%
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 (%)	1.9000%	2.2000%	2.2000%
EU 7e	of which: to be made up of CET1 capital (percentage points)	1.1000%	1.2000%	1.2000%
EU 7f	of which: to be made up of Tier 1 capital (percentage points)	1.4000%	1.7000%	1.7000%
EU 7g	Total SREP own funds requirements (%)	9.9000%	10.2000%	10.2000%
Combined buffer requirement (as a percentage of risk-weighted exposure amount)				
8	Capital conservation buffer (%)	2.5000%	2.5000%	2.5000%
EU 8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	-	-	-
9	Institution specific countercyclical capital buffer (%)	0.0860%	0.0670%	0.0810%
EU 9a	Systemic risk buffer (%)	0.3855%	0.3929%	0.4047%
10	Global Systemically Important Institution buffer (%)	-	-	-
EU 10a	Other Systemically Important Institution buffer (%)	-	-	-
11	Combined buffer requirement (%)	2.9715%	2.9599%	2.9857%
EU 11a	Overall capital requirements (%)	12.8720%	13.1600%	13.1860%
12	CET1 available after meeting the total SREP own funds requirements (%)	9.0864%	8.7159%	9.4686%
Leverage ratio				
13	Leverage ratio total exposure measure	18,832,966	18,536,646	17,570,761
14	Leverage ratio	5.7458%	5.5767%	5.6935%

TEMPLATE EU KM1 - KEY METRICS (2 OF 2)

		A	B	C
		30.06.2026	31.12.2025	30.06.2025
Additional own funds requirements to address the risk of excessive leverage (as a percentage of leverage ratio total exposure amount)				
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 (%)	3.0000%	3.0000%	3.0000%
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 (%)	3.0000%	3.0000%	3.0000%
Liquidity Coverage Ratio				
15	Total high-quality liquid assets (HQLA) (Weighted value - average)	9,978,337	9,541,224	9,128,996
EU 16a	Cash outflows - Total weighted value	3,329,359	3,195,039	3,005,477
EU 16b	Cash inflows - Total weighted value	332,345	292,369	238,023
16	Total net cash outflows (adjusted value)	2,997,014	2,902,670	2,767,453
17	Liquidity coverage ratio (%)	332.7970%	328.7453%	330.0935%
Net Stable Funding Ratio				
18	Total available stable funding	11,707,845	11,676,076	10,993,522
19	Total required stable funding	4,790,465	4,869,850	4,692,616
20	NSFR ratio (%)	244.3989%	239.7626%	234.2728%

At 30 June 2026, Common Equity Tier 1 (CET1) capital amounted to 981,167 thousand euros, up compared to 31 December 2025 (933,220 thousand euros) and compared to 30 June 2025 (899,788 thousand euros).

Risk-weighted exposures amounted to 5,699,345 thousand euros, up compared to the value at 31 December 2025 (5,464,859 thousand euros) and at 30 June 2025 (5,086,223 thousand euros). Capital ratios also increased compared to 31 December 2025 in terms of both CET1 ratio (17.2150% at 30 June 2026 compared to 17.0770% at 31 December 2025) and Total Capital Ratio (18.9860% at 30 June 2026 compared to 18.9160% at 31 December 2025), continuing to be well above the SREP requirement that the Bank has to comply with (Overall Capital Requirement – OCR) equal to 12.8720%, and including the combined buffer.

With regard to the combined buffer, the Bank must hold a 2.9715% buffer, broken down as follows:

- a 2.5% capital conservation buffer;
- a 0.0860% countercyclical capital buffer;
- a 0.3855% systemic risk buffer.

Leverage ratio amounted to 5.7458% at 30 June 2026, up compared to 31 December 2025. Total exposure was 18,832,966 thousand euros at 30 June 2026 compared to 18,536,646 thousand euros at 31 December 2025. Said ratio is well above the total leverage requirement of 3%. The Bank is not subject to additional own funds requirements to address the risk of excessive leverage and is not required to comply with a leverage ratio buffer requirement.

The short-term liquidity coverage ratio (LCR) was well above the limit set of 100% (the average value of the last twelve monthly measurements as of 30 June 2026 was slightly above 332%) by virtue of an average value of the last twelve monthly liquidity buffer measurements of approximately 9,978,337 thousand euros and an average value of the last twelve total net liquidity outflow measurements of approximately 2,997,014 thousand euros.

In June 2021, following the application of the measures contained in CRR2, the Net Stable Funding Ratio (NSFR) became fully effective. It represents a long-term (1 year) liquidity requirement for banks, calculated as the ratio of Available Stable Funding (ASF) to Required Stable Funding (RSF). At 30 June 2026, the NSFR ratio was approximately 244.4%, far above the minimum requirement of 100%, with Available Stable Funding at 11,707,845 thousand euros and Required Stable Funding at 4,790,465 thousand euros.

2. DISCLOSURE OF KEY METRICS ON OWN FUNDS AND ELIGIBLE LIABILITIES AND THE REQUIREMENTS FOR OWN FUNDS AND ELIGIBLE LIABILITIES BY RESOLUTION ENTITIES

Based on Commission Implementing Regulation (EU) 2021/763 of 23 April 2021, the deadline for complying with disclosure requirements on MREL should coincide with the end of the transitional period set forth by Article 45-*quaterdecies*, paragraph 1(3), of Directive 2014/59/EU, thus at the earliest on 1 January 2024, without prejudice to the fact that the Resolution Authority may set a transitional period that ends after that date where duly justified and appropriate.

Based on the order for the determination of the minimum requirement for own funds and eligible liabilities (MREL) dated 15 September 2023, the Resolution Authority set for Banca Generali Group a transitional period of 3 years before entry into effect of the binding requirement, commencing upon adoption of the resolution plan. Accordingly, the MREL disclosures will become binding on 1 January 2027.

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

Not applicable to Banca Generali.

DECLARATION OF THE MANAGER IN CHARGE OF PREPARING THE COMPANY'S FINANCIAL REPORTS

Declaration Pursuant to Article 154-*bis*, Second Paragraph of Legislative Decree No. 58 of 24 February 1998

The undersigned Dr. Tommaso Di Russo, ***Chief Financial Officer*** and Manager in charge of preparing the financial reports of Banca Generali S.p.A., with headquarters in Trieste, via Machiavelli No. 4, recorded in the Register of Companies of Trieste under n. 00833240328 (Economic Administrative Directory n. 103698), for the intent and purpose of article 154-*bis*, second paragraph, of Legislative Decree 24 February 1998 No. 58, to the best of his knowledge in light of the position held,

declares

that the accounting information contained in this document corresponds to the document results, books and accounting records.

Trieste, 29 July 2026

Dr. Tommaso Di Russo
Manager in charge of preparing
the company's financial reports
BANCA GENERALI S.p.A.

Tommaso di Russo

LIST OF TABLES

The following is a list of the quantitative tables included in the Pillar 3 disclosures and that refer to EBA guidelines (EBA/GL/2018/10, EBA/GL/2020/07, EBA/GL/2020/12, EBA/ITS/2021/07) and Regulation (EU) 637/2021.

LIST OF THE QUANTITATIVE TABLES REFERRING TO EBA GUIDELINES/EU REGULATIONS	REGULATORY FRAMEWORK	PILLAR 3 SECTION
Template EU KM1 - Key metrics	Commission Implementing Regulation (EU) 2021/637 of 15 March 2021	Disclosure of key metrics
EU KM2: Key metrics - MREL and, where applicable, G-SII requirement for own funds and eligible liabilities	Commission Implementing Regulation (EU) 2021/637 15 March 2021	n.a.

Banca Generali S.p.A.

Registered office
Via Machiavelli 4 - 34132 Trieste - Italy

Share capital
Authorised 119,378,836 euros
Subscribed and paid 116,851,637 euros

Tax code and Trieste register
of companies: 00833240328
VAT number: 01333550323

Company managed and coordinated
by Assicurazioni Generali S.p.A.
Bank which is a member of the Interbank Deposit Protection
Fund Registration with the bank register of the Bank
of Italy under No. 5358
Parent Company of the Banca Generali Banking Group
registered in the banking group register
ABI code 03075.9

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