

Annual Report 2025

Permanent TSB Group Holdings plc



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Generally but not always words such as "expect", "anticipate", "intend", "plan", "estimate", "aim", "forecast", "project", "target", "goal", "believe", "may", "could", "will", "seek", "would", "should", "continue", "assume" and similar expressions (or their negative) identify certain forward-looking statements but their absence does not mean that a statement is not forward-looking. The forward-looking statements in this document are based on numerous assumptions regarding the Group's present and future business strategies and the environment in which the Group will operate in the future. Forward-looking statements involve inherent known and unknown risks, uncertainties and contingencies because they relate to events and depend on circumstances that may or may not occur in the future and may cause the actual results, performance or achievements of the Group to be materially different from those expressed or implied by such forward-looking statements. Many of these risks and uncertainties relate to factors that are beyond the Group's ability to control or estimate precisely, such as future global, national and regional economic conditions, levels of market interest rates, credit or other risks of lending and investment activities, competition and the behaviour of other market participants, the actions of regulators and other factors such as changes in the political, social and regulatory framework in which the Group operates or in economic or technological trends or conditions. Material economic assumptions underlying the forward-looking statements are discussed further in Market context.

Past performance should not be taken as an indication or guarantee of future results, and no representation or warranty, express or implied, is made regarding future performance. Nothing in this document should be considered to be a forecast of future profitability or financial position and none of the information in this document is intended to be a profit forecast or profit estimate.

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Investor and shareholder information and services including these Annual Reports, are available on-line at www.permanenttsbgroup.ie.

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Financial Highlights

Financial Performance

Underlying profit (a)

2025: €175m

2025	€175m
2024	€180m
2023	€166m

Profit before taxation

2025: €128m

2025	€128m
2024	€159m
2023	€79m

Transformation and simplification

Adjusted cost to income ratio (d)

2025: 75%

2025	75%
2024	74%
2023	66%

Net interest margin % (b)

2025: 2.03%

2025	2.03%
2024	2.20%
2023	2.32%

Return on tangible equity % (c)

2025: 7.3%

2025	7.3%
2024	7.5%
2023	6.5%

Customer deposits (e)

2025: €25.6bn

2025	€25.6bn
2024	€24.1bn
2023	€23.0bn

Sustainability

CET1 Ratio (f)

2025: 15.9%

2025	15.9%
2024	14.7%
2023	14.0%

NPL Ratio (g)

2025: 1.4%

2025	1.4%
2024	1.8%
2023	3.3%

Risk weighted assets (RWA) (h)

2025: €10,936m

2025	€10,936m
2024	€11,494m
2023	€11,546m

- (a) Operating profit before exceptional and other non-recurring items. See table 1 in the Alternative Performance Measures (APM) on page 405 for a reconciliation of underlying profit to operating profit on an IFRS basis.
- (b) Defined as net interest income (NII) divided by average interest-earning assets.
- (c) Defined as profit after tax less AT1 coupons paid (before exceptional and non-recurring items) expressed as a percentage of targeted CET1 capital.
- (d) Defined as total operating expenses (excluding exceptional and other non-recurring items) divided by total operating income.
- (e) Defined as the total of current accounts, retail deposits and corporate deposits.
- (f) Total common equity tier 1 (CET 1) capital on a fully loaded basis divided by total risk weighted assets (RWAs).
- (g) Defined as non-performing loans (NPL) expressed as a percentage of the total gross loans of the bank.
- (h) RWAs are the Group's assets and off balance sheet exposures, weighted according to risk.

Non-Financial Highlights

Environmental

€1.26bn in Green Mortgage Lending during 2025 (+44% YoY, accounting for 44% of New Mortgage Lending)

Validation of the Bank's Science-Based Targets (SBTs) by the Science Based Target initiative (SBTi)*
Targets include:

Scope 1: Reduce absolute scope 1 GHG emissions 42% by 2030 from a 2023 base year

Scope 2: Continue active annual sourcing of 100% renewable electricity from 2023 through 2030

Scope 3: Reduce all in-use operational GHG emissions from the Bank's Mortgage Loan Portfolio**
51.5% per square meter by 2030 from a 2023 base year

Issuance of a €300m Green Tier 2 instrument through the Bank's Green Bond Framework (11.5 times oversubscribed)



Our Commitment to Building a Sustainable Business

Our purpose is to work together to build trust with our customers and communities. Our Sustainability Strategy gives us an opportunity to put our purpose into action by channelling investment and directing our impact towards areas that enhance societal wellbeing

* The Science Based Targets initiative (SBTi) is a global framework that helps companies and financial institutions set greenhouse gas emissions reduction targets aligned with the latest climate science to combat climate change

** Targets set on Residential Mortgage Loan Portfolio only.

*** The United Nation's Sustainable Development Goals (SDGs) were launched in 2015 to provide a plan of action for people, planet and prosperity. While we recognise that we may contribute to all 17 SDGs in some way, we have identified 7 as being core to our Sustainability Strategy.

Social

c.56m in Impact Lending during 2025 (+16% YoY), channelling finance into key SME green and social sectors

76% Culture Index Score, +6% above our target of 70%

A multi-year partnership with AslAm, Ireland's Autism Charity, and PTSB's full branch network accredited as Autism Friendly



Ambitions For 2026

Deliver on the commitments set out within PTSB's Sustainability Strategy 2025-2027 across each of its areas of focus – Investing for Impact, Protecting our Planet and Shaping an Inclusive Future:

Investing for Impact

- Continue to support customers in making their homes more energy efficient through delivery of the Bank's green products and propositions
- Drive growth across our Business Banking Portfolio through a focus on Impact Lending, supporting businesses that are delivering positive social or environmental outcomes

Protecting our Planet

- Increase our focus on ESG Risk management through delivery of the Bank's ESG Risk Action Plan
- Reduce the Bank's carbon emissions in line with our validated SBTs through delivery of PTSB's Carbon Reduction Plan

Shaping an Inclusive Future

- Improve the financial literacy of our customers through financial education, inclusion supports and the delivery of digital tools that ensure that they have the confidence to make informed financial decisions and the knowledge to plan for their future
- Elevate our social impact through partnerships and continue to support local communities through our PTSB Community programming

Chair's Statement

PTSB delivered a strong performance throughout 2025. As a purpose-driven organisation, we are committed to working together to build trust with our customers and communities. We are meeting personal and business customer needs through our competitive and innovative propositions, and we are well placed to continue to drive sustainable business growth and deliver for the Bank and its shareholders in 2026 and beyond.



At PTSB we made real progress in 2025, strengthening our position in the Irish retail banking market while continuing to deliver a positive impact for our customers, colleagues and wider communities. PTSB serves c. 1.3 million customers in Ireland, and it is a privilege to do so.

In 2025, the Board approved an integrated strategic plan, a multi-year strategy incorporating business, financial, change, and workforce plans, designed to drive sustainable growth and transformation across the bank with a strong focus on securing customer interests. We have seen positive progress delivering on this strategy as demonstrated by the financial and business outcome for 2025. These results show the strength of our business franchise with underlying profit before tax of €175 million and return on tangible equity of 7.3%.

At PTSB, we are committed to competing in the Irish mortgage market to provide greater choice for customers and in 2025 lived up to this commitment by funding c.20% of all mortgages issued. We understand the need for home ownership and the importance of making the mortgage journey as simple and straightforward as possible. That is why a key component of our business strategy is 'own a home' which focuses on delivering exceptional customer experience and ensuring we continue to deliver for both current and future generations of homeowners.

Our results in 2025 also demonstrate progress in diversifying our business, with our Business Banking book increasing by 9% last year including a 15% increase in our SME business, while net fee and commission income increased by 5% compared with 2024.

An important development for PTSB was notification in January 2026 by the Central Bank of Ireland that our Internal Ratings Based (IRB) Mortgage Models application had been approved. Looking forward, the application of the new Models will materially reduce the capital intensity of PTSB's new mortgage lending, with the capital benefit increasing over time as the Bank grows its new lending volumes. This was a significant milestone in our ongoing transformation and will enable us to compete more effectively into the future.

Governance and management

As we continue to make strong progress in delivering our integrated strategic plan, our colleagues remain central to how we deliver on our purpose of building trust with customers and communities. Sustaining an inclusive, supportive and high-performing culture is fundamental to this progress and underpins the way we work and deliver sustainable business growth. In 2025, we launched an updated 3-year wellbeing strategy and several other important initiatives designed to strengthen colleague wellbeing, deepen our culture of inclusion and ensure our people are supported to reach their full potential.

We were also proud to retain our 'Investors in Diversity Gold' accreditation from the Irish Centre for Diversity, with our Inclusion Score rising to over 80%. This places PTSB above both the national and Financial Services benchmarks and positions us among only c.39 organisations in Ireland to hold this accreditation, an important recognition of the Bank's leadership and continued prioritisation of inclusion. PTSB remains committed to delivering on our Diversity, Equity & Inclusion (DEI) Strategy by positioning colleagues and sustainability

as core enablers of the Business Strategy, and clearly articulating how DEI supports growth, customer value, workforce sustainability and regulatory alignment.

Outlook

Of course, a material development in 2025 was the announcement by the Bank that it had commenced a Formal Sale Process (FSP) to identify a new owner. I mentioned at the launch of the FSP that it was the right time to seek a new long-term owner for the Bank to enable PTSB unlock its potential for further growth and scale. The Board is carefully governing the ongoing FSP to ensure regulatory compliance, confidentiality and continued business stability during the offer period. We will provide a further update to the market when appropriate.

As we look to the future and despite much global uncertainty over the last year, the Irish economy has continued to demonstrate its resilience to external shocks underpinned by strong economic growth, labour market and household deposit dynamics. For PTSB, our focus remains steadfastly on delivering our business and financial plans, deepening our customer relationships, diversifying our income and differentiating through exceptional customer experience.

Finally, I would like to acknowledge and thank my colleagues across the Bank, led by our Chief Executive, Eamonn Crowley, and the Executive team, for their unwavering commitment over recent years to transform the Bank and position it for future growth.

A handwritten signature in dark ink, reading 'Julie O'Neill'.

Julie O'Neill
Chair

Chief Executive Review

PTSB's 2025 Annual Results reflect another year of strong business and financial performance for the Bank.

With our strong capital and liquidity positions, we are in prime position to continue to provide much needed competition in the Irish market and achieve our Ambition to become Ireland's best personal and business bank through exceptional customer experiences.



Introduction

2025 was a significant and transformational year for PTSB, as we took decisive steps towards our ambition of becoming Ireland's best personal and business bank through exceptional customer experiences.

The year marked the launch of our refreshed Business Strategy 2025–2027, setting a clear and confident direction for the next phase of sustainable business growth.

Despite operating in a less favourable macroeconomic environment, where falling interest rates placed pressure on the wider sector, the Bank delivered a robust commercial and financial performance. Stabilising interest rate conditions supported renewed revenue momentum in the second half of the year and a strong underlying performance by the Bank.

The transformation undertaken in recent years is now delivering tangible and sustainable results. This progress is evident across the business, including the proposed final dividend to shareholders, the Bank's first since 2008. In January 2026, the Bank's application to use its new IRB Mortgage Models was approved by the Central Bank of Ireland. This was an extremely positive outcome for PTSB which reflects our strategy, prudent credit risk approach and strong asset quality.

These milestones highlight the strong progress we are making. We are further advancing our position as a challenger bank that delivers attractive, sustainable returns and provides meaningful choice for customers in a market that needs greater competition.

In October 2025, the Board announced the commencement of a Formal Sale Process (FSP). If successful, this FSP would result in the exit of the State's last remaining shareholding in the Irish banking sector and, return capital to the State and taxpayers.

This FSP is a positive development for PTSB and evidence of the Bank's position of strength in the Irish retail banking market. The FSP process is progressing in line with expectations, and the Bank will provide a further update to the market when appropriate.

Throughout 2025, we introduced a range of new products and competitive rate changes to better meet customers' needs, including a major overhaul of our personal loan offering. Interest rates on some loans were reduced by up to 4.9%, with rates now among the most competitive in the market, including a market-leading 5.99% rate for loans from €25,000. Existing customers can apply for loans online via Open24.ie or through the PTSB mobile app, with real-time decisions and instant transfer of funds to their PTSB account when approved. The improvements introduced to our consumer term-lending offering last September have performed well in the market as outlined in the section below.

Our core mortgage business continued to perform strongly in 2025, with our differentiated customer experience and brand positioning resonating with customers. New mortgage market share increased by over 3% to approximately 20%.

We also continued to diversify our loan book in 2025, with an increase in new Business Banking lending (SME and Asset Finance) and a resulting expansion of the overall portfolio. This remains a significant long-term growth opportunity for the Bank.

Business Performance Overview

Funding

Customer Accounts

The Bank's customer deposit base delivered a strong performance in 2025. At 31 December 2025, customer deposit accounts were €25.6 billion, an increase of €1.5 billion, or up 6% on prior year. Retail deposit balances of €14.5 billion increased by 8% last year, while current accounts of €9.5 billion were up by 4%.

PTSB remains strongly funded by retail deposits and current accounts, comprising 87% of the total funding profile and reflecting a strong liquidity and funding position.

Current account balances accounted for around one-fifth of this growth, reflecting economic buoyancy in the general economy and the reduced attractiveness of term accounts as interest rates declined.

In October, the Bank widened its funding base by successfully refinancing its Tier 2 notes issuing a €300 million Green Tier 2 bond which priced with a coupon of 3.875%, with strong demand from investors.

Chief Executive Review

(continued)

Lending

In lending, total gross customer loans in 2025 amounted to €22.6 billion at year end and were up 4% for the year on an underlying basis. Within this, total new lending of €3.4 billion, rose by 31% which was an exceptional performance and pointing to momentum in the business.

Our core mortgage book grew by 3% and our share of new mortgage drawdowns was c.20% for the year up from 16.4% in 2024. The Bank has a strong profile towards fixed-rate products, which accounted for c. 94% of our new mortgage lending.

This very good performance was set against the backdrop of an overall mortgage market in Ireland that was strong in 2025 at €14.5 billion, up 15% on the prior year, and split between €12.3 billion of loans for house purchase and €2.2 billion of top-up / re-mortgaging activity.

We continued to make progress in diversifying our loan book with new lending in Business Banking (SME and Asset Finance) up 4% and growth in the book of 9% to c. €1.3 billion. SME had a stronger year than Asset Finance with growth in the book of 15%.

The enhancements to our consumer term lending proposition last September have also struck a chord in the market. New lending was up 10% for the year, and growth in the book was 12% in 2025.

The scale of our growth and transformation of recent years is highlighted by the increase in our Balance Sheet to over €30.5 billion last year, up almost 50% from €20.3 billion in 2019.

Financial Performance Overview

The Bank reported a Profit Before Tax of €128 million for 2025 (2024: €159 million) and an underlying Profit Before Tax of €175 million (2024: €180 million). This was a good performance in the context of operating in an environment of falling interest rates.

Operating Income

Net Interest Income (NII) of €590 million was 4% lower, primarily due to falling interest rates, as a reduction in margins offset higher average interest earning assets. However, NII in H2 was level with H2 2024 and 5% higher when compared with H1 2025.

The Net Interest Margin (NIM) was 2.03% for 2025, from 2.20% in the prior year, which was consistent with our guidance of >2.0% for the year. The Q4 exit NIM was 2.08% and the Bank's margin is recovering as the carryover effect of falling ECB rates on our assets is offset by an easing in the average cost of term deposits, and a benefit from maturing fixed rate mortgages refinancing onto higher rates.

Non-interest income was €65 million up 8%, boosted by €7 million in other income relating to foreign currency and hedging gains. Core net fees and commissions were up 5% to €58 million driven largely by growth in current account fee income.

Operating Expenses

There is an ongoing focus in the Bank on cost management and we are pleased to report that total operating costs reduced to €519 million, which was lower than our guidance of c. €525 million. Regulatory charges were lower than expected at €25 million as the Bank incurred no charge for the Single Resolution Fund or Deposit Guarantee Scheme during 2025. Excluding these charges, the Bank's Cost Income Ratio was 75% with the ratio falling over the course of the year to closer to 74% in the second half.

The number of employees (Full-time Equivalent*) reduced by more than 300 or 10% to 2,918, reflecting the Bank's voluntary severance scheme and natural attrition. A generalised pay rise of 4%, and continued investment in customer enhancements and technology resilience partly offset the benefit of lower FTE.

Aligned to our Value Stream approach, the Bank's Strategic Business Transformation (SBT) programme, which focuses on operational improvements and cost efficiency, is also progressing well. These initiatives include digitalising customer correspondence, contact service transformation and delivery of

a fully online mortgage sales and service journey. Together they will enable us to both improve customer and colleague experiences while continuing to reduce costs in absolute terms.

Exceptional charges were €47 million, €35 million of which related to the voluntary severance scheme, and €12 million comprised provisions of other non-core items.

Asset Quality

Asset Quality remains strong and for the fifth year in a row we recorded an impairment release in the Income Statement, releasing €39 million or a cost of risk of -18bps. This compared with guidance of 0bps. Non-Performing Loans reduced to €0.3 billion at December 2025 from €0.4 billion at December 2024, largely due to the loan sale announced last November. These loans were derecognised at year-end and replaced with a receivable. NPLs represented 1.4% of gross loans at year end which is below our European peers and compares with c. 28% at its peak.

Our total provisions were €320 million at the end of 2025 which included €57 million of model overlays. This compares with €392 million and €92 million respectively at the end of 2024. Our coverage ratio reduced to 1.4% of gross loans at the end of 2025 from 1.8% in December 2024, while coverage on our home loan book is now at levels closer to peers.

Capital

The Bank's Common Equity Tier 1 (CET1) ratio at the end of December 2025 remained strong at a reported 15.9% (14.7% at the end of December 2024). This is net of a deduction for our proposed dividend and is well above our 2025 regulatory requirement of approximately 10.69%.

Sustainable Business Growth

2025 marked the beginning of the next phase of growth for PTSB. Early in the year, we launched our refreshed Business Strategy 2025–2027, which focuses on deepening customer relationships, diversifying income and differentiating through exceptional customer experience. Delivering on this strategy is fundamental to enabling PTSB achieve its ambition.

* Employee numbers represent Full-Time Equivalents (FTE). This excludes seasonal workers and staff on maternity leave, career breaks, or long-term absence.

The progress we are making against this strategy is already evident. PTSB continues to differentiate through exceptional customer experiences, and our investment in brand, products and services is resonating strongly with customers. This contributed to improved Relationship Net Promoter Scores, which increased by a further 2 points to 24 points, or up 14 points over the past three years. We also continue to score more than 9 out of 10 for our key customer journeys, while customer consideration of PTSB for their next financial product stands at an encouraging 71%.

The Bank continued to invest in its digital offering, with further enhancements delivered throughout 2025, including new in app functionality such as Biometrics, Quick Balance, and gambling block features. Our active digital customer base in 2025 was 62%, up marginally on prior year.

Our Sustainability Strategy 2025–2027 was launched in May 2025 and focuses on channelling our investment and directing our impact towards areas that enhance societal wellbeing. A key programme delivered under this commitment includes the development of the Bank's Science-based carbon emission reduction targets (SBTs) aligned with Science Based Targets initiative's (SBTi) standards. Our SBTs were validated by the Science-based Target initiative during 2025 and include:

- Scope 1: Reduce absolute scope 1 GHG emissions 42% by 2030 from a 2023 base year
- Scope 2: Continue active annual sourcing of 100% renewable electricity from 2023 through 2030
- Scope 3: Reduce all in-use operational GHG emissions from the Bank's Mortgage Loan Portfolio 51.5% per square meter by 2030 from a 2023 base year.

In 2025, the bank delivered €1.26 billion in Green Mortgage Lending during 2025, + 44% YoY and accounting for 44% of New Mortgage Lending, as we supported customers in their transition to a low-carbon economy.

To support our customers as they take practical steps to make their homes more energy efficient, in January 2026 we launched a new bespoke Home Upgrade

Tool that provides homeowners with personalised upgrade solutions, from full retrofits to individual measures such as attic insulation. We also introduced a market leading rate of 2.99%, with reductions of up to 0.56% on SBCI Home Energy Upgrade Loans.

We are also seeing sustainability drive commercial growth across our Business Banking Portfolio, with €56m (+16% YoY) of new lending in 2025 being categorised as Impact Lending, supporting businesses that are delivering positive social or environmental outcomes.

In addition, PTSB received an upgraded MSCI ESG Rating of 'A' and improved its CDP (formerly the Carbon Disclosure Project) rating from a 'C' to a 'B'. These upgrades recognise the progress that the Bank is making in actively managing our environmental impact, while demonstrating a commitment to long-term sustainability.

From a social impact perspective, the PTSB Community Fund is now recognised across the charity sector in Ireland as having a significant role to play in supporting local charities and organisations to widen their impact in local communities. Since the Fund's establishment in 2020, the Bank has contributed more than €2.5 million in funding, and during 2025 we were proud to further extend our impact donating €270,000 to our six PTSB Community partners.

As outlined by the Chair in her statement, PTSB continues to have a strong commitment to diversity and inclusion. Last year, we built on our partnership with Ireland's Autism Charity, AsIAm, having become the first bank in Ireland to receive Autism friendly branch accreditation. All 98 of PTSB's branches are now certified as Autism friendly. During 2025, PTSB was proud to support AsIAm as it launched the Autism Friendly Towns initiative to help cities, towns and villages across Ireland to become more inclusive.

PTSB was also proud to have been awarded 'Company of the Year' at the National Diversity and Inclusion Awards 2026, marking us as the first retail bank in Ireland to earn this distinction since its establishment.

Strategy and Outlook

Over the last number of years, the Bank has undergone a very significant transformation, as evidenced by our ability to propose a dividend to shareholders for the first time in 18 years. Furthermore, the completion of the IRB process transforms annual capital generation and puts the Bank on a new footing and provides a platform for its benefits to be felt over the coming years.

At the heart of our transformation is our commitment to our customers and our brand promise to be 'Altogether More Human'. Our purpose is to build trust with our customers and communities, and this guides how we plan, prioritise and continually improve what PTSB delivers for customers.

PTSB is fully committed to providing competition in the market and offering customers greater choice. As we look towards 2026, we do so with confidence in our ability to deliver on our purpose and to build on the momentum we have created. This year, as PTSB marks its 210-year anniversary, we do so with pride in our legacy and with absolute confidence that we will continue to support customers and communities for many years to come.

Eamonn Crowley
Chief Executive

Market Context

Retail Banking Trends in Ireland 2025

In 2025, Ireland's retail banking landscape was shaped by easing inflation, ECB rate cuts, and continued shifts in customer behaviour.

Mortgage market activity strengthened despite supply constraints, with higher overall payout values reflecting rising house prices. Despite this, market activity continues to be influenced by affordability pressures and the cost-of-living dynamics. Consumer Finance also expanded sharply, particularly across car, home-improvement and green lending, and PTSB responded with a refreshed proposition that delivered a positive customer response and market share gains.

Digital adoption accelerated further, with customers increasingly expecting instant, low-friction experiences and continuing to migrate to digital channels. In 2025, PTSB saw nearly half of our 28,600 new current accounts opened via our App — and c.165 million digital logins across App and Web. Mobile continues to be the primary channel for daily money management, driving demand for seamless self-service features and digital product journeys. PTSB responded by advancing our digital transformation journey, enhancing digital capabilities, onboarding and in-life journeys, and accelerating digital product innovation. For PTSB, an example of this was our Quick Balance feature, rolled out in November, which allows customers to instantly view their balance without logging in while maintaining full security.

Customer migration across channels continued, reinforcing the need for seamless experiences spanning digital, voice and in-person touchpoints. Banks such as PTSB invested accordingly to ensure consistent service, strengthened customer experience, and improved operational efficiency. Delivering exceptional experiences across our in-person, digital, voice and intermediary channels remain a core priority as we strengthen our multichannel capability to meet evolving customer expectations.

Loyalty-driven product innovation continued to gain momentum in Irish retail banking, with customers increasingly

gravitating toward products that offer tangible, everyday value. Reflecting this trend, PTSB's 'Explore' current account earned two major European Loyalty Awards — *Best Cashback Loyalty Initiative in Europe* and *Best European Loyalty Program / Initiative* — demonstrating how enhanced rewards, personalised value, and customer-centric design are becoming differentiators in a competitive market.

Sustainability remained a strong customer priority, as highlighted in our Reflecting Ireland report series in 2025. Banks like PTSB responded by expanding sustainability linked offerings and amplifying initiatives that support environmentally-focused businesses. Inclusivity also featured prominently highlighting the sector's broader shift toward more inclusive, socially conscious banking, such as PTSB's three year partnership with AslAm. In 2025, PTSB became the first Irish bank to achieve Autism Friendly accreditation across its branch network.

Business Banking Trends in Ireland 2025

The Irish economy has shown notable resilience, emerging strongly from the pandemic and withstanding the inflationary pressures of the past two years, as well as the more recent challenges posed by the US trade tariffs. Following recent ECB interest rate cuts, many businesses are now looking to expand and capitalise on sustained market demand. However, ongoing volatility in raw material and fuel costs continues to pose challenges and requires careful management. In 2026, key sectors expected to drive growth in new lending include wholesale, retail, agriculture, and human health.

SMEs are adapting their business models effectively through innovation and automation, with an increasing focus on sustainability to improve overall performance. Supports such as the Strategic Banking Corporation of Ireland's (SBCI) Growth & Sustainability Loan Scheme (GSLs) are providing vital mechanisms to help SMEs invest and expand. The SBCI's suite of loan guarantee schemes have also played

a significant role in strengthening the bank's reputation in the SME market and accelerating growth across all product lines.

However, tight labour markets and skills shortages remain significant challenges, with employment close to full capacity at 2.8 million people. Inflation and interest rates eased in 2025, and Ireland is expected to see stronger economic growth than most of Europe in 2026. SMEs also continue to benefit from ongoing multinational investment, with Ireland remaining the EU's only English-speaking economy and a key hub for global firms.

Greater clarity in US-EU trade relations from mid-2025, following new tariff agreements, has further improved certainty for SMEs after a period of volatility through late 2024 and early 2025.

PTSB continued to expand its business lending activities during the period, while providing timely and appropriate support to customers experiencing financial difficulty. New SME market lending continued to grow in 2025, supported by strong demand linked to succession planning, management buyouts, and elevated refinancing activity. The Bank's business lending portfolio remains well diversified across industry sectors, underpinned by ongoing investment in new Business Banking capabilities.

During 2025 PTSB has grown our Business Banking SME loans and Asset Finance products across our customer base by over €440m. The Bank also strengthened its Business Banking team by adding experienced specialists, enhancing customer support and reinforcing PTSB's ambition to establish itself as one of the top three Business Banks in the Irish market. PTSB Asset Finance business has continued to finance assets across a wide range of sectors including transport, agriculture, and manufacturing.

Our Strategy, Business Model and Culture

Introduction

Over the past year, we have strengthened our position as Ireland's third largest full-service retail bank by executing on our strategic priorities. Guided by deep customer insight, we are delivering new products, enhancing our processes, and embedding operational excellence to deliver exceptional customer experiences while continuing to grow and diversify our business.

PTSB has a proud and rich heritage, operating as a bank in Ireland for over 200 years and supporting customers to meet their various financial needs. Throughout this time, our focus has been on delivering exceptional customer experiences and connecting with local communities. This remains at the forefront of the Bank's Strategy, especially in a world where customer needs and behaviours are ever evolving and where we are seeing great technological advancements. Securing customer interests and delivering positive customer outcomes are at the heart of our Ambition and Purpose at PTSB and drive everything we do as an organisation.

PTSB has successfully strengthened its Balance Sheet through 2025, with significant growth in deposits and lending and the Bank has established strong foundations from which to continue to grow sustainably into the future. With strong capital and liquidity positions and the approval by the Central Bank of Ireland's of PTSB's IRB mortgage model review in January 2026, the Bank is well positioned to continue to provide much needed competition in the Irish market into the future and achieve our ambition of being Ireland's best personal and business bank through exceptional customer experiences.

Our Business Model

PTSB is focused exclusively on Personal and Business Banking with limited participation in Corporate Banking within the Republic of Ireland — a position that remains central to the delivery of our Strategy. Ireland continues to be one of the fastest-growing economies in Europe, with mortgage market lending forecast to expand by c.10% annually to 2030, supported by strong population growth and sustained housing demand. This macroeconomic backdrop provides a favourable environment for PTSB to grow and deepen its presence in priority segments.

Building on our established strength in the Mortgage market, our Business Strategy is focused on diversifying income streams and reducing reliance on interest-based revenue. In Business Banking, we continue to expand our footprint across Credit Lending and Asset Finance, supporting SMEs and key industry sectors with tailored lending and advisory solutions. In Personal Banking, we are enhancing our offering across Consumer Term Loans, Deposits and Current Accounts, Insurance, and Pensions & Investments. This strategic expansion will continue to increase Non-Interest Income while strengthening long-term customer engagement.

PTSB is well positioned to provide much-needed competition in the Irish market. Our Business Model is differentiated by a clear Ambition, a trust-led Purpose, and a compelling Brand Promise. Our "Altogether More Human" brand promise places customer experience at the centre of how we operate — combining the convenience of digital solutions with meaningful human support. This positions PTSB as an experience-led bank committed to challenging the status quo, building trust with customers and communities, and becoming Ireland's best personal and business bank through exceptional customer experiences.

“PTSB has a proud and rich heritage, operating as a bank in Ireland for over 200 years and supporting customers to meet their various financial needs.”

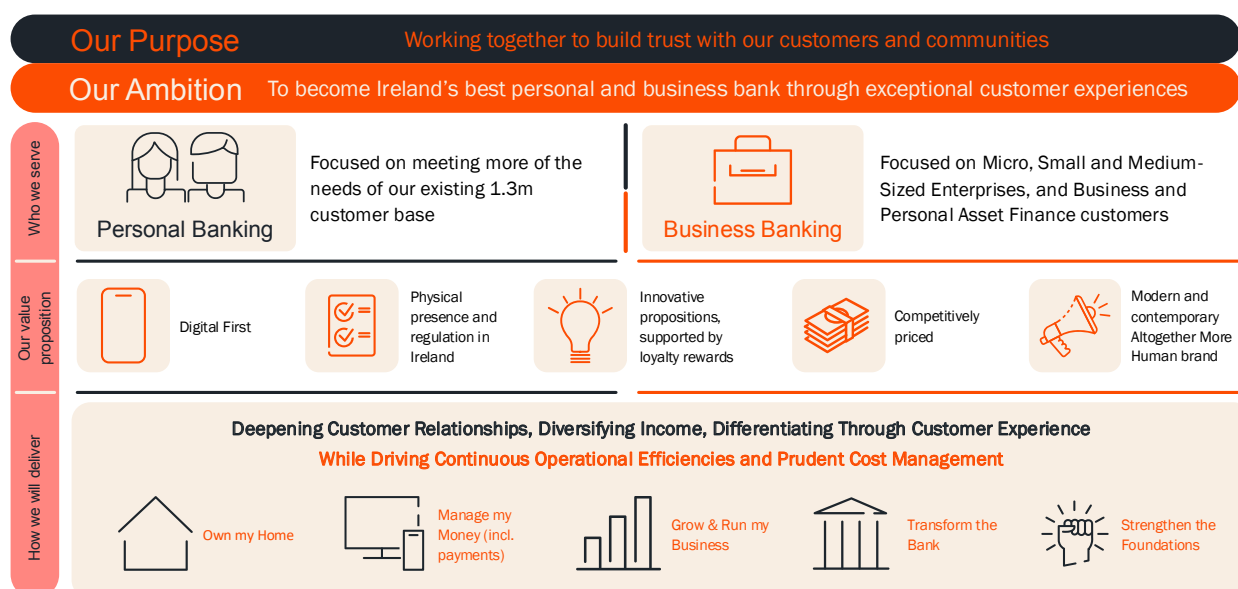
Our Strategy, Business Model and Culture

(continued)

Our Strategy

The Bank has a clear and long-term strategic direction aimed at delivering sustainable growth, enhancing customer experiences, and transforming the organisation for the future. Our strategy is structured around three distinct phases, each building the capabilities and momentum required to realise our ambition:

- Phase 1: Optimise our operating model and refine our customer propositions to become fit for future growth;
- Phase 2: Evolve and develop offers to deepen customer relationships and grow income; and
- Phase 3: Drive diversification and accelerate sustainable growth.



2025 marked the first year of the Bank's three year Strategy and Strategic Plan, initiating Phase 1 of our Strategic Direction for 2025–2027. During this phase, we were focused on deepening customer relationships, diversifying income streams, and elevating customer experience, while maintaining a strong focus on operational efficiency and disciplined cost management. This foundation will enable the Bank to deliver on its long term ambitions and position itself for the growth phases to follow.

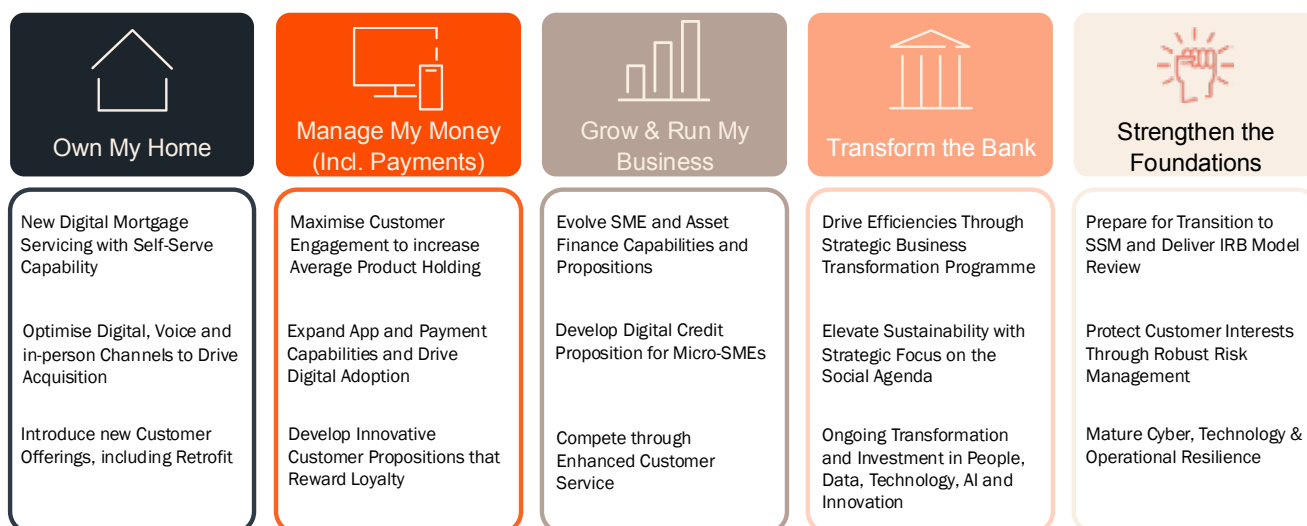
- **Deepening our customer relationships** means that we actively grow the breadth of business we do with our 1.3m existing customers, meeting all their financial needs – whether that is a current account, mortgage, insurance, wealth service or all four.
- **Diversifying our income** means we attract new current account customers and grow in areas such as business banking and asset finance while maintaining and growing our mortgage market share.
- **Differentiating through customer experience** means we provide a seamless digital-first customer experience, complemented by the very best human support, while offering our customers innovative products and services that truly meet their needs.
- We do all of this while **driving continuous operational efficiencies and practising prudent cost management**, so we can continue to grow and prosper in a sustainable manner and generate returns for our shareholders.

Delivering Our Strategy

The Bank has a three year Integrated Plan in place to ensure our resources and investment are prioritised to deliver against our strategy. To ensure we can achieve our objectives, our strategy is being delivered through five Value Streams:

- **Own My Home** – Further enhancing our mortgage and consumer finance offerings to ensure we can meet the needs of our customers at every stage of their home journey
- **Manage My Money** – Improving our digital experience and launch innovative new products while maximising customer engagement
- **Grow & Run My Business** – Diversifying our business by evolving our business banking capabilities and propositions
- **Transform the Bank** – Driving efficiencies through simplification, while investing in people, data, technology, AI and innovation, and elevating our sustainability agenda
- **Strengthen the Foundations** – Securing customer interests through robust risk management, and maturing our cyber, technology and operational resilience

Deepening Customer Relationships, Diversifying Income, Differentiating Through Customer Experience While Driving Continuous Operational Efficiencies and Prudent Cost Management



2025 marked a year of meaningful strategic progress, with delivery momentum evident across all five Value Streams. During the year, we advanced several initiatives that strengthened our customer proposition, enhanced our operational resilience, and built the foundations for sustainable long-term growth. Notable achievements included:

- Enhancing our Consumer Lending proposition with a refreshed Term Lending offering launched in September, supporting improved customer choice and competitiveness
- Introducing a market leading Everyday Banking In App Gambling Block, reinforcing our commitment to customer protection and digital innovation, together with the roll-out of new functionality such as Biometrics, Google Pay SCA, Quick Balance display and Card Freezing
- Advancing our Contact Centre Transformation with progress recognised through the Transformation in Finance Award at the Financial Services Awards
- Submitting our IRB Mortgage Model Review to the Central Bank of Ireland, a key milestone in advancing our regulatory and capital agenda

Across each Value Stream, we have defined detailed three year delivery plans that align to our strategic priorities. We continue to monitor progress rigorously through a structured performance framework and Value Stream KPIs, ensuring disciplined execution, visibility of outcomes, and accountability for delivery.

Our Strategy, Business Model and Culture

(continued)

Culture

At PTSB, we describe our culture as the way we do things: We are open. We are inclusive. We build trust. We are One PTSB.

At PTSB, our culture is the way we do things; open, inclusive, and built on trust. It shapes how we work, treat customers and colleagues, and live our Values every day. Our Purpose is 'Working together to build trust with our customers and communities' and our Ambition is 'To become Ireland's best personal and business bank through exceptional customer experiences'. Guided by our Values and supported by our Culture Charter, we strive to create a consistent, inclusive environment where colleagues can bring their authentic selves to work, foster collaboration and deliver on our brand promise: Altogether more human. Our culture is constantly evolving, as we proactively enhance what makes us unique while addressing areas that need improvement, ensuring we continue to grow and adapt to meet the needs of our customers, colleagues, and communities.

Evolving Our Commitment to Culture in 2025

In 2025, we strengthened our commitment to building a responsible and sustainable business for our customers, colleagues, and communities. At the heart of this commitment is our ambition to continuously evolving our culture, embedding improvements, leveraging key enablers, and addressing barriers to progress.

Transparency remains central, with cultural outcomes regularly tracked, measured, and reported using a range of culture metrics across the organisation. Building on this commitment, and on the strong 2024 IBCB eist survey results, which showed trust improving across the industry, PTSB continues to perform ahead of key benchmarks, with 71% of colleagues confident we do what's right. This places us seven percentage points above the Edelman Trust Barometer's 2025 Financial Services benchmark of 64%, demonstrating our continued strength in trust and cultural performance. We will continue to focus on sustaining this momentum in the upcoming eist survey in 2026.



We engaged an independent external provider to review our organisational culture on behalf of the Nominations, Culture & Ethics Committee, reinforcing our commitment to continuous cultural evolution. The review confirmed that our culture is strong and mature, underpinned by a solid framework and the dedication of our colleagues. We are incorporating the external feedback into our plans to evolve our culture to 2030, ensuring we remain focused on continuous improvement, transparency, and accountability.

The Senior Executive Accountability Regime (SEAR), which came into effect on 1 July 2025, is now a key part of the Central Bank of Ireland's Individual Accountability Framework and strengthens governance, clarity of responsibility, and personal accountability across the sector. As part of embedding SEAR, we continue to enhance our conduct standards, responsibility mapping and oversight processes, ensuring PTSB operates with transparency, ethical leadership and clear decision making.

As part of our commitment to diversity, equity and inclusion, PTSB was the 12th company in Ireland to achieve Investors in Diversity Gold accreditation from the Irish Centre for Diversity in 2023 and proudly retained this status in 2025. This

places PTSB among just 39 organisations nationally to hold this prestigious accreditation, and only 17 that have been reassessed as Gold accredited as at the end of December 2025, recognising our leadership and sustained focus in this area.

We also launched the Unity Network, bringing together all five of our Employee Resource Groups (ERG): ADAPT, BALANCE, DICE, LIVEWELL, and PRISM. This initiative fosters collaboration, innovation, and intersectionality across the organisation, strengthening support for our Diversity, Equity and Inclusion (DEI) Strategy. For us, ERGs are more than social networks, they are change agents that amplify diverse voices, influence policy, and shape a culture of inclusion, including championing greater understanding and support for neurodiverse talent. By creating a workplace where every voice is valued and introducing a shared sponsorship model with two ExCo Sponsors per ERG, we have enhanced visibility and support for initiatives that bring our brand promise, Altogether More Human, to life. Ultimately, the Unity Network enables a collective voice and a direct line to leadership, helping to build a culture where everyone feels they belong, not just as employees, but as whole people.

During the year, we introduced our Wellbeing Strategy 2025–2028, building on our long-standing commitment to mental, physical, social, and financial wellbeing. This strategy focuses on measurable outcomes and impactful goals, ensuring a healthy and supportive environment for all colleagues. It reflects our dedication to best practice and continuous improvement, following our achievement of the KeepWell Mark accreditation in 2024.

In addition, we evolved the behavioural definition of our Customer Focus value to better reflect our deep commitment to customer-centricity. Our refreshed behavioural definition, 'We put our customers' interests at the heart of everything we do', moves beyond transactional outcomes to a broader, values-driven promise. This ensures that every decision, interaction, and innovation at PTSB is guided by a genuine focus on securing our customers' interests, building trust, and delivering exceptional experiences.

In line with our Purpose of building trust with our customers, and in delivering on our Ambition, we are committed to embedding a culture of customer centricity across PTSB and have made significant progress in recent years with a robust Customer Experience Strategy, a bank-wide CX Continuous Improvement Forum, CX Accreditation and enhanced Conduct Training which demonstrates our ongoing commitment to securing customer interests.

In 2025, PTSB made significant progress on our Customer Informed Decision Making (CIDM) programme, which further strengthens and embeds customer centric thinking into every strategic and operational decision. CIDM ensures that the customer is considered and customer impacts are consistently assessed across all change activity, from strategy development through to new initiatives, reinforcing our responsibility under the Consumer Protection Code (CPC) to secure customer interests, act in line with reasonable expectations, and deliver fair outcomes. Supported by tools such as Customer Impact Assessments, Our Customer Yes Checks, and Customer Journey Mapping, CIDM provides a structured, Bank wide approach while maintaining local accountability for customer outcomes.

A strong customer-centric culture should ultimately be felt by our customers, and the progress we made in 2025 is reflected in clear improvements in our customer experience RNPS¹ metric. These gains show that our focus on strengthening customer centricity, embedding CIDM, and aligning with CPC standards is already delivering better experiences,

clearer outcomes and greater trust. By bringing the voice of the customer to the centre of how we think, plan, design, deliver and improve our services, we reinforce the impact of our cultural ambition, demonstrating how a healthy culture enables us to deliver consistently better outcomes for our customers.

Our Culture and Inclusion Highlights in 2025

Our Annual Every Voice Counts Colleague Engagement Survey revealed our culture remains resilient despite a challenging macroeconomic environment.

Our Culture Index is ahead of target	At 76% (+6% pts above target), our culture index has demonstrated remarkable strength despite a challenging macro environment.
	With 78% of colleagues looking forward to work, these results highlight the success of our inclusive, values-driven culture in fostering engagement and belonging across PTSB.
Our Risk Culture index remains strong	At 77%, this reflects our shared commitment to responsible decision-making and ethical conduct, ensuring that our customer promise is underpinned by robust risk awareness and teamwork.
Our Purpose and Values continue to resonate strongly with colleagues	89% of colleagues tell us that they understand our Purpose and Values.
Investors in Diversity Gold accreditation from the Irish Centre for Diversity	We were proud to be re-accredited with Investors in Diversity Gold in 2025 achieving a significantly improved Inclusion Score, 80% (up +4% pts from 2022), positioning PTSB above the National Benchmark (78%) and Financial Services Benchmark (79%) in Ireland.
An inclusive culture in PTSB drives engagement and exceptional customer experiences which is key to becoming Ireland's best personal and business bank	88% of colleagues feel comfortable being themselves at work, highlighting our commitment to creating a psychologically safe environment where diversity and authenticity are valued. This sense of belonging is reinforced by 86% of colleagues reporting clarity in their roles, which supports confidence in daily work. 91% of colleagues collaborate well within their teams and 91% say their teams work effectively across functions to deliver for our customers and communities.
We recognise the need for continued effort on Gender Pay Equity	We have published our sixth annual Gender Pay Gap Report, which stands at 18.1%. Alongside this, our EU Pay Transparency work will enhance pay clarity and strengthen reporting to help tackle pay discrimination and support equal pay. We remain firmly committed to improving gender balance and strengthening fairness and transparency across PTSB. PTSB is also a proud supporter of Ireland's Women in Finance Charter, an industry initiative supported by Government, and as one of the first signatories, we continue to reinforce our commitment to advancing gender balance at Senior Leadership levels.

1. Relationship Net Promoter Score

Our Strategy, Business Model and Culture

(continued)

We have 12 cultural enablers which help shape and guide our cultural journey, and include:

Living as Leaders - Join the Conversation

2025 marked the fifth year of our partnership with LIFT Ireland (Leading Ireland's Future Together), further strengthening our commitment to values-led leadership. Our Living as Leaders Programme is designed to support colleagues in role-modelling our Values through their actions and words aligned to our Purpose and Values. In 2025, Living as Leaders Programme became mandatory, with People Leaders hosting monthly roundtables to foster self-awareness and a growth mindset, turning positive behaviours into lasting habits.

Our schools' partnership with LIFT Ireland through their "**Changing Futures for the Better - Schools Initiative**" continued throughout 2025 and will carry forward into 2026. LIFT remains active in over 432 secondary schools across Ireland, where students and teachers have embraced the LIFT Ireland Programme. In 2025, the curriculum reached more than 32,000 students in communities nationwide, bringing the total to 120,000 students since LIFT's inception in 2018.

Speak Freely - Change Behaviour by Starting the Conversation

PTSB is committed to creating a culture where colleagues feel psychologically safe and empowered to speak up. Through our **Speak Freely Culture**, we encourage open dialogue and provide clear procedures for raising concerns without fear of retribution. Progress is measured through our Every Voice Counts (EVC) and Micropulse surveys, with the 2025 EVC survey showing **73% of colleagues feel psychologically safe**.

In 2025, we reinforced this commitment through initiatives such as our **Speak Freely Week**, People Manager and Speak Freely champion training, mandatory conduct e-learning, and spotlight communications. We continue to monitor Speak Freely usage and report regularly to the Executive Committee and Board, ensuring transparency and trust. Our goal remains clear: to foster a psychologically safe environment where colleague concerns and feedback are heard and acted upon.

Ways of Working (Hybrid Flexible Working)

PTSB supports a wide range of flexible and hybrid working options and encourages teams to create **Team Commitment Charters** so they can tailor their approach where possible. Through our Smarter Working Programme, we provide choice and flexibility in how, where, and when colleagues work, supported by digital tools, collaborative spaces, and initiatives that promote new ways of working. This flexibility has strengthened colleague engagement, supported higher female participation in the workforce, and enabled better balance between work and personal responsibilities. Our commitment to making Flexible Working work even better remains central to creating an inclusive, high performing culture where colleagues feel empowered, connected, and able to deliver exceptional experiences for our customers.



Values in Practice Awards

At PTSB, we foster a culture of recognition where colleagues celebrate those living our Values and making a positive impact on our business, customers, and community. Our 'Values In Practice' (VIP) programmes include the Annual VIP Awards, which recognise outstanding contributions during a dedicated nomination period, and VIP Everyday Recognition, which is available year-round for colleagues to say thank you.

2025 was a milestone year for recognition at PTSB, with record engagement in our Annual VIP Programme. Over 3,000 nominations were submitted for the Annual VIP Awards, the highest since the programme launched seven years ago, showcasing colleagues' exceptional contributions to our business, customers, and communities. This surge in participation reflects the strength of our culture of recognition and the commitment of colleagues to celebrate those living our Values every day.

The Irish Banking Culture Board (IBCB)

PTSB remains deeply committed to the Irish Banking Culture Board (IBCB) and actively contributes to its programmes of work alongside the other member banks. In 2025, we played an important role in sector-wide initiatives focused on customer care, financial inclusion, and wellbeing. We were also proud to achieve significant recognition at the IBCB's *Proud to Work in Banking Awards*, winning four out of eight categories: **Accountability, Leadership, Speaking Up, and Psychological Safety and Respect & Empathy**.

This reflects our ongoing dedication to fostering a positive, values-driven culture within PTSB and across the wider banking sector.

Culture in 2026 and Beyond

As we enter 2026, PTSB remains committed to living our Values, shaping behaviours and guiding decisions. Since starting our cultural journey in 2015, we've made strong progress, but culture is ever evolving and there's more to do to create a consistent experience with trust at the core.

Building trust is central to our strategy and vital as we progress significant readiness work for the revised Consumer Protection Code (CPC) ahead of its commencement on 24 March 2026. The updated Code introduces strengthened obligations for firms, including a greater focus on ensuring firms secure customers' interests, inform customers effectively, and enhance protections for consumers in vulnerable circumstances, including those experiencing financial abuse. These changes reflect the Central Bank's modernised, customer-focused expectations, and PTSB has prioritised embedding them across our culture, systems and customer journeys to reinforce trust and deliver stronger outcomes.

This milestone reinforces our responsibility to securing customer interests and to strengthen confidence. Culture is not a one-off, it's a continuous journey requiring collaboration, psychological safety, and shared commitment.

Together, step by step, we'll keep evolving to make a lasting impact and ensure PTSB is prepared and ready for the future.

Financial Review

The Group has delivered a strong financial performance in 2025, with continued focus on strengthening the foundations of the Bank for future success. The balance sheet has grown over €1.5bn year-on-year, with continued excellent asset quality and an NPL ratio of 1.4%. Gross loans and advances to customers increased by 4% driven by strong growth in the mortgage book.

The Group has returned an underlying profit of €175m for the year ended 31 December 2025, which is a decrease of €5m from 2024. Net interest income has decreased by 4% compared with last year due to the reducing interest rate environment. Total operating expenses (excluding exceptional and other non-recurring items) have decreased by 2% year on year, as a result of targeted initiatives implemented by the Group to reduce its cost base and create efficiencies. Asset quality remained strong with an impairment write-back of €39m on loans and advances to customers for the year ended 31 December 2025. These are the main items which result in the Group delivering an overall profit before tax for the year of €128m, which is a decrease of €31m compared to 2024.

The Group continued to manage its capital and liquidity positions prudently during the year. The liquidity and capital positions of the Group remain well above all minimum regulatory requirements, with CET1 and Total Capital reported as 15.9% and 20.9% respectively. The Liquidity Coverage Ratio was 277%, and the Net Stable Funding Ratio was 163%.

Asset quality has continued to remain strong during 2025. The Group's NPL ratio

for the year ended 31 December 2025 is 1.4%, a decrease of 40bps compared with 2024. The Group continues to monitor and manage carefully the impact of inflation on our customers and any expected credit losses.

The outlook for the Bank remains strong, and the Group expects to deliver sustainable profitability over the medium term.

Basis of preparation

The financial review is prepared using International Financial Reporting Standards (IFRS) and non-IFRS measures to analyse the Group's financial performance for the financial year ended 31 December 2025.

Non-IFRS measures are used by Management to assess the financial performance of the Group and to provide insights into financial and operational performance on a consistent basis across various financial years. They also provide details regarding the elements of performance which the Group considers important in its performance assessment and which it can influence.

Non-IFRS measures are however not a substitute for IFRS measures and IFRS measures should be preferred over non-IFRS measures where applicable.

The Group applies a well-defined accounting policy for exceptional items

(see note 1) and exceptional items are considered to include:

- Profit/loss on disposal of businesses;
- Gain on bargain purchase in respect of business combinations;
- Profit/loss on material deleveraging prior to 31 December 2021, including any increase in impairment arising solely due to the sale of NPLs becoming part of the Group's recovery strategy;
- Material restructuring costs; and
- Material transaction, integration and restructuring costs associated with acquisitions (including potential liquidations).

However, from time-to-time certain material non-recurring items occur which do not meet the definition of exceptional items as set out in the accounting policy. To assist the users of the financial statements and to ensure consistency in reporting with other financial institutions, these items are disclosed separately from underlying profit in the financial review. These items are clearly identified as non-IFRS items and reconciled back to the IFRS income statement in the Alternative Performance Measures section on page 405.

A reconciliation between the underlying profit and operating profit on an IFRS basis is set out on page 405.

Management has provided further information on IFRS and non-IFRS measures including the calculation in the Alternative Performance Measures section on pages 405 to 411.

Financial Review

(continued)

Basis of calculation

Percentages presented throughout the financial review are calculated using absolute values and therefore the percentages may differ from those calculated using rounded numbers.

Management performance summary consolidated income statement

	Table	Year ended 31 December 2025 €m	Year ended 31 December 2024 €m
Net interest income	1	590	612
Net fee and commission income		58	55
Net other income		7	5
Total operating income		655	672
Total operating expenses (excluding exceptional items and other non-recurring items, bank levy and other regulatory charges)	3	(494)	(498)
Bank levy and other regulatory charges		(25)	(33)
Underlying profit before impairment¹		136	141
Impairment write-back on loans and advances to customers	4	39	39
Underlying profit before exceptional and other non-recurring items		175	180
<i>Exceptional items comprise:</i>	5	(42)	-
Impairment write-back arising from deleveraging of loans pre-2021		-	2
Voluntary severance and other costs		(42)	(2)
<i>Other non-recurring items comprise:</i>	5	(5)	(21)
Impairment charge on deleveraging of loans		-	(9)
Charges in relation to legacy legal cases		(5)	(3)
Other		-	(9)
Profit before taxation		128	159
Taxation		(14)	3
Profit for the year		114	162

1 See table 1 in the Alternative Performance Measures on page 405 for a reconciliation of underlying profit to operating profit on an IFRS basis.

Management performance summary consolidated income statement - key highlights

- **Total operating income has decreased by €17m during 2025 primarily due to:**
 - **Net interest income** decreased by €22m (4%) during 2025 to €590m. The decrease is mainly driven by lower ECB interest rates and higher interest expense on term deposits, partly offset by lower wholesale funding costs.
 - **Net fees and commission income** is €58m for the year ended 31 December 2025, an increase of €3m compared to 2024. The increase is primarily due to the full year impact of a change in current account pricing introduced in April 2024.
 - **Net other income** is €7m for the year ended 31 December 2025, a €2m increase compared to 2024.
- **Operating expenses (excluding exceptional items and other non-recurring items, bank levy and other regulatory charges)** are €494m for the year ended 31 December 2025 compared to €498m at 31 December 2024. The decrease is driven by decreased staff costs due to lower average staff numbers, a reduction in other administrative expenses and depreciation, partly offset by an increase in amortisation of intangible assets.
- **Bank levy and other regulatory charges** is €25m for the year ended 31 December 2025, compared to €33m for the year ended 31 December 2024. The decrease is primarily due to a €7m decrease in the Deposit Guarantee Scheme (DGS) fees with a write-back in 2025 due to the DGS fund reaching its target level in 2025, and a €2m write-back of Central Bank Industry Funding Levy fees.
- **Impairment** is reporting a write-back of €39m on loans and advances to customers for the year ended 31 December 2025. The write-back is primarily due to the revised residential Mortgage model components as part of the Provisions Model Programme.
- **Other non-recurring items** of €5m for the year ended 31 December 2025 compared to €21m for the year ended 31 December 2024. The non-recurring items comprised of €5m in provisions relating to legacy legal cases.

Net interest income	Net interest margin
€590m	2.03%

Table 1: Net interest income

	Year ended 31 December 2025 €m	Year ended 31 December 2024 €m
Interest income	878	899
Interest expense	(288)	(287)
Net interest income	590	612
Net interest margin (NIM)	2.03%	2.20%

Net Interest Income

Net interest income of €590m for the year ended 31 December 2025 decreased by €22m (4%), compared to the prior year. This was driven by:

- Lower interest income due to reducing ECB interest rates;
- Higher interest costs driven by term deposit growth; offset by
- Lower wholesale funding costs due to favourable movements in the interest rate swap portfolio and lower average Repo volumes and rates.

Table 2: Average balance sheet¹

	Year ended 31 December 2025			Year ended 31 December 2024		
	Average balance €m	Interest €m	Average yield/ rate %	Average balance €m	Interest €m	Average yield/ rate %
Interest-earning assets						
Loans and advances to customers	21,795	736	3.38%	21,221	747	3.52%
Debt securities	4,910	99	2.01%	3,855	65	1.69%
Loans and advances to banks	2,247	43	1.86%	2,610	87	3.33%
Total average interest earning assets	28,952	878	3.03%	27,686	899	3.25%
Non-interest earning assets	972			1,000		
Total assets	29,924	878		28,686	899	
Interest-bearing liabilities						
Customer accounts	25,093	184	0.73%	23,541	139	0.59%
Debt securities in issue	1,677	92	5.49%	1,686	115	6.82%
Lease liabilities	33	1	2.63%	34	1	2.94%
Subordinated liabilities	279	7	2.51%	250	9	3.60%
Deposits by banks	164	4	2.44%	567	23	4.06%
Total average interest-bearing liabilities	27,246	288	1.06%	26,078	287	1.10%
Non-interest-bearing liabilities	172			151		
Total liabilities	27,418	288		26,229	287	
Total average equity attributable to owners	2,506			2,457		
Total equity and liabilities	29,924			28,686		
Net interest margin			2.03%			2.20%

¹ Where applicable, line items include hedging derivative balances and hedging income and expense.

Financial Review

(continued)

Net interest margin

NIM decreased by 17bps to 2.03% for the year ended 31 December 2025 compared to 2.20% for the prior year. The Group's NIM has decreased due to the impact of the reducing interest rate environment on interest earning assets, higher deposit costs from higher term balances, offset by lower wholesale funding costs.

Interest income/average interest earning assets

- Interest income on loans and advances to customers decreased by €11m. This was primarily due to lower average mortgage rates following a softening interest rate environment which more than offset the impact of a €574m increase in average loan volumes.
- Interest income on debt securities increased by €34m due to an increase in volumes, with lower yielding debt securities being replaced by higher yielding assets.
- Interest income on loans and advances to banks decreased by €44m primarily due to lower volumes and lower average ECB interest rates leading to decreased yields on excess liquidity held with the Central Bank.

Interest expense/average interest bearing liabilities

- Interest expense on customer accounts has increased by €45m. This increase reflects an increase in average balances and migration to higher rate term deposit accounts. New flows to term slowed post rate reductions in April and October, driving a decrease in the average cost of customer accounts in the second half of 2025.
- Interest expense on debt securities in issue decreased by €23m during the year mainly from favourable movements in the MTN interest rate swap portfolio.
- Interest expense on subordinated liabilities decreased €2m due to favourable movements in the Tier 2 interest rate swap portfolio.
- Interest expense on deposits by banks decreased by €19m due to a decrease in the average balance driven by a reduction in repurchase activity levels and rates.

Table 3: Total operating expenses

	Year ended 31 December 2025 €m	Year ended 31 December 2024 €m
Staff costs		
Wages and salaries (including commission paid to sales staff)	187	190
Social insurance	23	22
Pension costs	21	21
Total staff costs	231	233
Other general and administrative expenses ¹	179	183
Administrative, staff and other expenses	410	416
Depreciation of property and equipment	27	29
Amortisation of intangible assets ²	57	53
Total operating expenses (excluding exceptional and other non-recurring items, bank levy and regulatory charges)	494	498
Bank levy	23	23
Other regulatory charges	2	10
Total operating expenses (excluding exceptional and other non-recurring items)	519	531
Headline cost to income ratio³	79%	79%
Adjusted cost to income ratio⁴	75%	74%
Closing staff numbers^{5,6}	3,026	3,359
Average staff numbers⁶	3,223	3,349

¹ 2025 excludes €5m (2024: €3m) of cost relating to legacy legal cases presented in non-recurring items.

² 2024 excludes €9m amortisation presented in non-recurring items.

³ Defined as total operating expenses (excluding exceptional and other non-recurring items) divided by total operating income.

⁴ Defined as total operating expenses (excluding exceptional, other non-recurring items, bank levy and other regulatory charges) divided by total operating income see table 3 in the Alternative Performance Measures on page 406.

⁵ Closing staff numbers are calculated on a Full Time Equivalent basis.

⁶ Includes staff on long-term absence, career breaks and maternity leave.

Operating expenses

Staff costs

Staff costs have decreased by €2m during 2025, primarily due to a decrease in average FTE of 126 across the Bank during 2025 being partially offset by an increase in average salaries from annual pay agreement.

General and administrative expenses

Other general and administrative expenses have decreased by €4m during 2025, as a result of targeted initiatives implemented by the Bank to reduce its cost base.

Bank levy and other regulatory charges

Bank levy and other regulatory charges were €25m for the year ended 31 December 2025. Other regulatory charges include €3m for the Central Bank Industry Funding Levy (31 December 2024: €4m) and €2m related to other regulatory charges (31 December 2024: €2m), partially offset by the reversal of a €3m accrual relating to the Deposit Guarantee Scheme (DGS), which no longer applies as the scheme is now fully funded.

Adjusted cost income ratio

Total operating expense (excluding exceptional and other non-recurring items, bank levy and other regulatory charges) of €494m and total operating income of €655m for the year ended 31 December 2025 results in an adjusted cost income ratio of 75% for 2025, compared to an adjusted cost income ratio of 74% for the year ended 31 December 2024, with the ratio falling from over 76% in the first half of 2025 to closer to 74% in the second half..

Impairment

€39m write-back

Table 4: Impairment

	Year ended 31 December 2025 €m	Year ended 31 December 2024 €m
Total impairment write-back on loans and advances to customers	39	39

Impairment recognised on loans and advances to customers for the year ended 31 December 2025 is a write-back of €39m, primarily due to the revised residential mortgage model components as part of the Provisions model programme in 2025 along with strong underlying customer performance and a favourable macro-economic environment. A write-back of €39m was also recognised for the year ended 31 December 2024 reflecting strong underlying performance within the loan book and a favourable macro-economic environment.

Financial Review

(continued)

Exceptional and other non-recurring items

€47m

Table 5: Exceptional and other non-recurring items

	Year ended 31 December 2025	Year ended 31 December 2024
	€m	€m
Exceptional items		
Impairment write-back arising from deleveraging of loans pre-2021	-	(2)
Voluntary severance and other costs	42	2
Other non-recurring items		
Impairment charge on deleveraging of loans ¹	-	9
Other items ²	5	12
Exceptional items and other non-recurring items	47	21

1 Included in IFRS impairment charge.

2 Included in IFRS administrative, staff and other expenses, with €9m for 2024 included in amortisation of intangible assets.

Exceptional items

Exceptional and other non-recurring items, as viewed by Management for the year ended 31 December 2025 is a charge of €47m which comprises:

Voluntary severance and other costs

Voluntary severance and other costs of €42m relate to costs incurred as part of the Group's voluntary severance scheme (€35m), additional costs arising in respect of a previous disposal of a business (€4m) and costs relating to the commencement of the Formal Sale Process (€3m).

Other non-recurring items

Other items

Include €5m in charges relating to legacy legal cases.

Summary consolidated statement of financial position

	Table	31 December 2025	31 December 2024
		€m	€m
Assets			
Home loans		20,401	19,629
Buy-to-let		331	389
Total residential mortgages		20,732	20,018
Commercial mortgages		499	443
Consumer finance (including finance leases and hire purchase receivables)		1,018	962
Total loans and advances to customers (net of provisions)	6	22,249	21,423
Debt securities		5,360	4,327
Remaining asset balances		2,856	3,182
Total assets		30,465	28,932
Liabilities and equity			
Current accounts		9,544	9,187
Retail deposits		14,485	13,465
Corporate and institutional deposits		1,570	1,468
Total customer accounts	8	25,599	24,120
Debt securities in issue		1,723	1,731
Remaining liabilities		662	549
Total liabilities		27,984	26,400
Total equity		2,481	2,532
Total equity and liabilities		30,465	28,932
Liquidity coverage ratio¹		277%	255%
Net stable funding ratio²		163%	166%
Loan to deposit ratio³		87%	89%
Return on tangible equity⁴		7.3%	7.5%

1 Calculated based on the Commission Delegated Regulation (EU) 2015/61.

2 Defined as the ratio of available stable funding to required stable funding (Article 428b)

3 Defined as the ratio of loans and advances to customers compared to customer accounts as presented in the statement of financial position.

4 Defined as profit after tax less AT1 coupons paid (before exceptional and non-recurring items) expressed as a percentage of targeted CET1 capital

Summary consolidated statement of financial position - key highlights

- **Net Loans and advances to customers** are €22,249m as at 31 December 2025, an increase of €826m from €21,423m at 31 December 2024, due to growth in new lending volumes with a strong market share of new mortgage lending.
- **Debt securities** are €5,360m as at 31 December 2025, an increase of €1,033m from €4,327m at 31 December 2024 due to the purchase of additional bonds in 2025. During 2025, the Group added French, Dutch and Belgian covered bonds to its HQLA (high quality liquid asset) bond portfolio. These are dual recourse, AAA rated debt instruments secured by a cover pool of residential mortgage assets to which investors have a preferential claim. Expanding into new security asset classes and jurisdictions helps diversify credit, geographic, and issuer risks, which is a prudent risk management strategy.
- **Remaining asset balances** are €2,856m as at 31 December 2025, a decrease of €326m from €3,182m at 31 December 2024. This is primarily due to a decrease in deposits held with the CBI.
- **Customer accounts** are €25,599m at 31 December 2025, an increase of €1,479m from 31 December 2024, reflecting a strong performance in acquiring and retaining Customer deposits.
- **Remaining liabilities** increased by €113m primarily due to a net increase of €90m in Subordinated Liabilities.

Financial Review

(continued)

Table 6(a): Summary of movement in loans and advances to customers

	31 December 2025	31 December 2024
	€m	€m
Gross loans and advances to customers 1 January	21,515	21,688
New lending ¹	3,225	2,442
Redemptions and repayments of existing loans	(2,392)	(2,252)
Write-offs and restructures	(13)	(22)
Net movement from non-performing and other ²	(74)	(341)
Gross loans and advances to customers 31 December	22,261	21,515

1 New lending during the year is stated net of repayments.

2 Portfolio sale (2024: Glas 3; 2025 Glas 3.1).

Table 6(b): Composition of loans and advances to customers

	31 December 2025	31 December 2024
	€m	€m
Residential mortgages:		
Home loans	20,249	19,539
Buy-to-let	376	464
Total residential mortgages	20,625	20,003
Commercial ¹	557	493
Consumer finance	607	553
Finance leases and hire purchase receivables	472	466
Gross loans and advances to customers	22,261	21,515
<i>Of which are reported as non-performing loans</i>	308	382
Deferred fees, discounts and business combination related fair value adjustments	308	300
Provision for impairment losses	(320)	(392)
Net loans and advances to customers	22,249	21,423

1 The Bank's SME mortgage lending is captured within the Commercial line above.

Total loans and advances to customers (net)

€22,249m

Total gross new lending for 2025 amounted to €3,445m, up 31% from €2,622m in 2024, with H2 2025 continuing the strong momentum shown in the first half of the year. New mortgage lending totalled €2.9bn, an increase of 39% year-on-year with the Bank recording a strong market share of new mortgage drawdowns of c. 20% for 2025, an increase of over 3ppts from that recorded in 2024.

SME new lending for 2025 was €235m, up 10% compared to the prior year as we continued our momentum in this area. Asset finance new lending was €215m, a 2% decrease compared to the prior year driven by a relatively flat market for vehicle sales, while the commercial business to business lending area continued to perform strongly.

The Group recorded gross new personal term lending of €145m, a 10% increase compared to 2024 (€132m). Our recently announced (Sept'25) enhancements to our proposition in this area have been positively received, with a 36% increase in payouts in the second half of 2025 over the first half (and +26% vs H2 2024).

NPLs

NPLs as a %
of gross loans

€308m

1.4%

Table 7: NPLs

	31 December 2025	31 December 2024
	€m	€m
Home loans	215	259
Buy-to-let	43	71
Commercial ¹	21	24
Consumer finance	21	20
Finance leases and hire purchase receivables	8	8
Non-performing loans	308	382
NPLs as % of gross loans	1.4%	1.8%
Foreclosed assets²	4	7
Non-performing assets (NPAs)³	312	389
NPAs as % of gross loans	1.4%	1.8%

1 The Bank's SME mortgage lending is captured within the Commercial line above.

2 Foreclosed assets are defined as assets held on the balance sheet which are obtained by taking possession of collateral or by calling on similar credit enhancements.

3 Non-performing assets are defined as NPLs plus foreclosed assets.

NPLs as a percentage of gross loans were 1.4% at 31 December 2025, an improvement of 40bps compared with 2024. The decrease was driven by lower new Default flows and the sale of the non-performing Glas 3.1 loan portfolio sale during the year. The Group remains committed to providing ongoing support to our customers as they navigate the impact of increased living costs.

Customer accounts

€25,599m

Table 8: Customer accounts

	31 December 2025	31 December 2024
	€m	€m
Current accounts	9,544	9,187
Retail deposits	14,485	13,465
Total retail deposits	24,029	22,652
Corporate deposits	1,570	1,468
Total customer deposits	25,599	24,120
Loan to deposit ratio¹	87%	89%

1 Defined as the ratio of loans and advances to customers compared to customer accounts as presented in the SOFP see table 9 in the Alternative Performance Measures on page 407.

At 31 December 2025, customer accounts increased 6% to €25,599m from €24,120m at 31 December 2024, reflecting a strong performance in acquiring and retaining customer deposits.

This strong deposit performance has contributed to a slight decrease in the loan to deposit ratio, from 89% at end 2024 to 87% at end December 2025.

Capital Management

Capital Management Objectives and Policies

The objective of the Group's capital management policy is to ensure that the Group has sufficient capital to cover the risks of its business, support its strategy and to comply with prevailing regulatory capital requirements at all times. The policy requires the Group to minimise refinancing risk by managing the maturity profile of non-equity capital. The capital adequacy requirements, set by the Regulator, are used by the Group as the basis for its capital management. The Group seeks to maintain sufficient capital to ensure that all regulatory requirements are met.

Regulatory Framework

The Group's regulatory requirements, commonly known as CRD IV, are contained within EU Regulation 575/2013 ('the CRR'), which is directly applicable in all EU countries. Directive 2013/36/EU ('CRD IV') has been transposed into Irish law through S.I. No. 158 of 2014, as well as various technical standards and EBA guidelines. Under these requirements, the Group's total capital for Pillar 1 must be adequate to cover its credit, market and operational risks, including capital buffers. The Group must also hold sufficient capital to cover the additional risks identified under Pillar 2 including any add-ons imposed on the Group as part of the supervisory SREP assessment.

Implementation of the CRD IV legislation commenced on a phased basis from 1 January 2014. The CRD IV transition rules resulted in a number of deductions from CET1 capital being introduced on a phased basis, all of which are now fully implemented. The ratios outlined in this section reflect the Group's interpretation of the CRD IV rules as published on 27 June 2013 and subsequent clarifications, including ECB regulation 2016/445 on the exercise of options and discretions.

Regulatory Capital Developments

In October 2021, the European Commission published a legislative proposal, in the form of amendments to the CRR and CRD, to implement the final revisions to the Basel Framework which, among other things, will see changes to the Credit Risk and Operational Risk frameworks. The amendments to the final Basel III standards, harmonised supervisory authority powers, introduced an RWA output floor for banks adopting an Internal Rating Based (IRB) approach and brought ESG criteria into risk assessment. The final elements of the implementation of Basel III in the European Union have been agreed and endorsed by the Council and Parliament and implemented in EU law. In December 2024, the preparatory bodies of the Council and Parliament endorsed the banking package consisting of:

- a legislative act to amend the Capital Requirements Directive (Directive 2013/36/EU); and
- a legislative act to amend the Capital Requirements Regulation (Regulation No (EU) 2013/575).

The new CRR rules (CRR III) have been applicable from 1 January 2025 and the Group's capital ratios at 31 December 2025 are calculated on a CRR III basis.

The Central Bank increased the Countercyclical Buffer ("CCyB") to 1.5% in June 2024 and it was maintained throughout 2025. This is in line with the Central Bank's objective of building up the CCyB to 1.5% when risk conditions are deemed to be neither elevated nor subdued. Future CCyB rate decisions will be based on macro-financial conditions in a manner consistent with this strategy.

On 26 September 2023, the Central Bank informed the Group of the outcome of the annual assessment of Other Systemically Important Institutions (O-SIIs) in Ireland. As a result of the assessment, the Central Bank has assessed the Group as an O-SII and requires the Group to maintain a 0.5% O-SII buffer from 1 January 2025.

The outcome of the 2025 SREP assessment resulted in a -25bps reduction to P2R: full 25bps reduction is realised on Total Capital requirements reducing to 19bps on Tier1 and 14bps on CET1.

The Group monitors these changes and other emerging developments as they relate to regulatory capital to ensure compliance with all requirements when applicable.

Regulatory Capital Requirements

The Group's 31 December 2025 capital requirements have been updated to reflect the Group's most recent SREP Assessment.

The Group's Common Equity Tier1 (CET1) Capital Requirement of 10.69% (31 December 2024: 10.33%) is comprised of a Pillar 1 minimum requirement of 4.5%, P2R of 1.69% (31 December 2024: 1.83%), Capital Conservation Buffer (CCB) of 2.5%, CCyB of 1.5% and, effective 1 January 2025, the application of a 0.5% O-SII buffer.

The Group's Total Capital Requirement of 15.50% (31 December 2024: 15.25%) is comprised of a Pillar 1 minimum requirement of 8%, P2R of 3.0% (31 December 2024: 3.25%), CCB of 2.5%, CCyB of 1.5% and O-SII buffer of 0.5%.

These requirements exclude Pillar 2 Guidance (P2G) which is not publicly disclosed.

Capital Ratios at 31 December 2025

At 31 December 2025, the regulatory CET1 is 15.9% (31 December 2024: 14.7%) and Total Capital ratio is 20.9% (31 December 2024: 20.4%), exceeding the Group's 2025 regulatory capital requirement of 10.69% CET1 and 15.50% Total Capital.

The increase in the CET1 ratio (+120bps) in the year is primarily due to the application of CRR3 in 2025 of c. +1.2% and organic capital generation c. +0.7%, partially offset by RWA growth c. -0.4%, investment in software assets c. -0.3% and proposed dividends c. -0.1%.

The Total Capital ratio also includes a call and non-replacement of a €125m AT1 instrument and derecognition of €250m Tier 2 and replaced with a Tier2 instrument of €300m.

At 31 December 2025 the Group's leverage ratio is 6.5% (31 December 2024: 7.1%). The decrease in the year is primarily due to balance sheet growth and a decrease in Tier 1 Capital.

Table 9 outlines the Group's regulatory capital positions:

Table 9: Regulatory capital

	31 December 2025	31 December 2024
	€m	€m
Capital Resources:		
Common Equity Tier 1	1,739	1,684
Additional Tier 1 ¹	245	368
Tier 1 Capital	1,984	2,052
Tier 2 Capital	298	292
Total Capital	2,282	2,344
 Risk Weighted Assets	 10,936	 11,494
Capital Ratios:		
Common Equity Tier 1 Capital	15.9%	14.7%
Tier 1 Capital	18.2%	17.9%
Total Capital	20.9%	20.4%
Leverage Ratio²	6.5%	7.1%

1 The amount of Additional Tier 1 Capital and Tier 2 instruments included within the consolidated capital of the holding company is restricted within the limits laid down under the CRR. Effective 1 January 2018, these restrictions are now fully phased in.

2 The leverage ratio is calculated by dividing Tier 1 Capital by gross balance sheet exposure (total assets and off-balance sheet exposures).

Table 10 provides a reconciliation from the statutory shareholders' funds to the Group's regulatory CET1 Capital.

Table 10: CET1 Capital

	31 December 2025	31 December 2024
	€m	€m
Total Equity	2,481	2,532
Less: AT1 Capital	(245)	(368)
Adjusted Capital	2,236	2,164
Prudential Filters:		
Intangibles	(169)	(144)
Deferred Tax	(298)	(312)
Provision Coverage Capital Deduction	(13)	(17)
AT1 Distribution Accrual	(6)	(7)
Proposed Dividend	(10)	-
Other	(1)	-
Common Equity Tier 1	1,739	1,684

Capital Management

(continued)

Regulatory Capital

At 31 December 2025 the Group's regulatory CET1 capital increased by €55m to €1,739m (31 December 2024: €1,684m). The increase is primarily due to profit recognised in the year (c.+€114m) partially offset by increased prudential deduction for Intangible Assets (-€25m) and AT1 Coupon payments (-€43m).

Minimum Requirement for Own Funds & Eligible Liabilities (MREL)

The Group's MREL Minimum Regulatory and Combined Buffer Requirement at 31 December 2025 is 28.19% (31 December 2024: 28.60%) of Total Risk Exposure Amount (TREA) and 5.91% on a Leverage Ratio basis (31 December 2024: 5.91%). The MREL Minimum Regulatory and Combined Buffer Requirement consists of minimum regulatory requirement of 23.69% (31 December 2024: 24.60%) and the Group's Combined Buffer Requirement of 4.5% at 31 December 2025 (31 December 2024: 4.0%) comprising the CCB of 2.5%, CCyB of 1.5% and O-SII buffer of 0.5%.

The Group's MREL position at 31 December 2025 is 36.5% on an RWA basis and 13.0% on a leverage basis. The Group maintains an internal management buffer over MREL regulatory requirements at all times.

Risk Weighted Assets (RWAs)

Table 11 sets out the Group's RWAs at 31 December 2025 and 31 December 2024.

Table 11: Risk Weighted Assets

	31 December 2025	31 December 2024
	€m	€m
RWAs		
Credit Risk	8,959	9,705
Counterparty Credit Risk ¹	89	112
Securitisation Risk	-	-
Operational Risk	1,062	946
Other ²	826	731
Total RWAs	10,936	11,494

1 Counterparty credit risk includes Treasury, Repo & CVA RWAs

2 Other consists primarily of Property & Equipment, Intangible Assets and Prepayments

RWAs at 31 December 2025 decreased by €558m to €10,936m (31 December 2024: €11,494m). The decrease in Credit Risk RWAs is primarily driven by CRR3 impact partially offset by net loan book growth with increased Operational Risk RWAs reflecting profitability of the Bank. Average RWAs for the year ended 31 December 2025 are €10,990m (31 December 2024: €11,521m).

Risk Management

The information in Section 3.1, 3.2 and 3.3 on pages 46 to 59 in Risk Management identified as audited (with the exception of the boxed parts of these sections clearly identified as unaudited), forms an integral part of the audited financial statements as described in the basis of preparation on page 295. All other information in Risk Management is additional information and does not form part of the audited financial statements.

1. Risk Management and Governance

The nature of risk taking is fundamental to a financial institution's business profile. It follows that prudent risk management forms an integral part of the Bank's governance structure.

Within the boundaries of the Board-approved Risk Appetite Statement (RAS), the Bank follows an integrated approach to Risk Management, to ensure that all key risks faced by the Group are appropriately identified, assessed and managed. This approach ensures that robust mechanisms are in place to protect and direct the Bank in recognising the economic substance of its risk exposure.

The Bank implements a Risk Management process, which consists of the following key aspects:

- Risk Identification;
- Risk Assessment and Measurement;
- Risk Mitigation and Control;
- Risk Monitoring and Testing; and
- Risk Reporting and Escalation.

Enterprise Risk Management Framework

Within the Internal Control Framework ('ICF'), the Enterprise Risk Management Framework ('ERMF') is the Group's overarching risk management framework articulating the management process governing risks within the following key risk categories: Capital Adequacy Risk; Liquidity and Funding Risk; Market Risk; Credit Risk; Business Risk; Operational Risk; Information and Communication Technology ('ICT') Risk; Model Risk; Compliance Risk (including 'AML'); Conduct & Reputational Risk, Climate-Related and Environmental Risk ('CRE').

The ERMF outlines the Group-wide approach to the identification; assessment and measurement; mitigation and control; monitoring and testing; and, reporting and escalation of breaches across the outlined risk categories. The Group manages, mitigates, monitors and reports its risk exposure through a set of risk management processes, activities and tools.

The Board Risk and Compliance Committee ('BRCC') provides oversight and advice to the Board on risk governance and supports the Board in carrying out its responsibilities for ensuring that risks are properly identified, assessed, mitigated, monitored and reported and that the Group's strategy is consistent with the Group's Risk Appetite.

Risk Appetite and Strategy

The Bank's Risk Appetite Statement ('RAS') documents are owned by the Board, supported by the Chief Risk Officer ('CRO'), and describe the Bank's risk appetite at the enterprise level. The RAS serves as a boundary to business, support, and control function leaders; enables a consistent approach to risk management; endorses risk discipline; and integrates risk management into decision-making at all levels of the organisation. The RAS further ensures the Bank's risk is communicated clearly and well understood by both Senior Management and Bank employees so that risk management is continually embedded into the Bank's culture.

The structure of the RAS enables the Bank to maintain robust discussions of risk taking and risk management and provides a commonly understood baseline against which management recommendations and decisions can be debated and effectively and credibly challenged.

The RAS is an articulation of how the Bank's appetite for and tolerance of risk will be

expressed. This comes in the form of qualitative statements about the nature and type of risk that the Bank will take on, and quantitative limits and thresholds that define the range of acceptable risk.

The RAS includes component risk appetite statements for each of the distinct key risk categories defined, including qualitative expressions of risk appetite as well as quantitative measures i.e., key risk indicators ('KRIs') supporting qualitative expression. KRIs are monitored and reported to ensure prompt and proactive assessment of their impact on adherence with the Board-approved risk appetite.

The Bank has a straight-forward business model, to deliver a full-service Retail and SME Bank with a medium risk appetite exclusively focused on the Republic of Ireland.

Risk Governance

The Bank's risk governance structure establishes the authority, responsibility, and accountability for risk management across the Bank and enables effective and efficient monitoring, escalation, decision-making, and oversight with respect to risks by appropriate Board and management-level governing bodies.

The responsibilities set out below relate to risk management activities. Further roles and responsibilities are documented in the Internal Control Framework ("ICF"), the Board Manual and the Group Risk committees' Terms of Reference.

The design of the Bank's risk governance structure is informed by a set of risk governance principles that are based on relevant regulatory guidelines. These principles include:

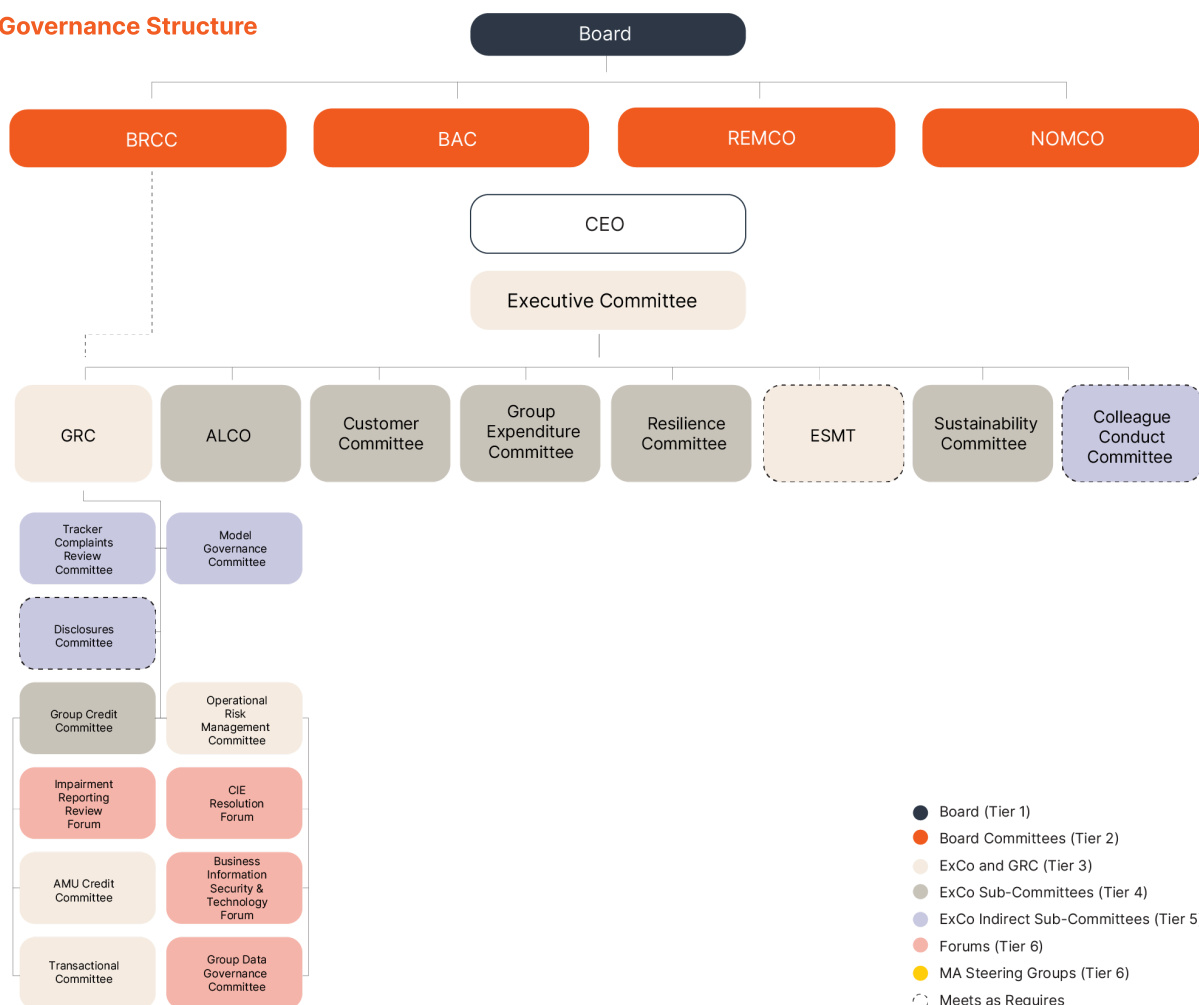
Risk Management

(continued)

- **Committee Structure:** The number of committees at Board and Management levels reflects the nature and types of risk faced by the Bank. Criteria for establishing risk sub-committees give due consideration to the: purpose of the committee; duration of the committee; proposed membership; committee reporting line; and flight path for outputs from the committee.
- **Board Committees:** Made up of Executive and Non-Executive Directors whose role is to support the Board in overseeing risk management and overseeing and challenging Senior Management's decisions.
- **Management Committee:** Bring together senior managers in the Bank who individually and collectively possess the requisite skills, expertise, qualifications, knowledge and experience to exercise sound, objective judgement, commensurate with the risk profile of the Bank.
- **Independence Safeguards:** The risk governance structure features safeguards to protect the independence of key relationships between Senior Executives and the Board. In this respect, the ExCo may not override or modify decisions of the Assets and Liabilities Committee (ALCo), Group Risk Committee ('GRC') or Group Credit Committee ('GCC'), but may appeal decisions to the Board (or relevant Board committee). Additionally, the CRO is assigned the right to refer/appeal planned management action agreed by ExCo risk sub-committees, where the CRO considers such action to be inconsistent with adherence to the Board-approved risk appetite.
- **Flow of Risk Information:** The risk governance structure establishes independent reporting lines which facilitate effective risk oversight by the Board via the Board Risk and Compliance Committee ('BRCC').
- **Communication of Risk Information:** Risk information is prioritised and presented in a concise, fully contextualised manner to enable robust challenge and informed decision-making throughout the risk governance structure.
- **Appropriateness:** The number of overall governance committees/fora in the Bank, the length of time per meeting, the number of meetings per year, and the number of meetings each Director/Executive attends are appropriate to the Bank's resources and business model. This should be reviewed on a regular basis and the feedback of the committee members should be sought.

The diagram below depicts the Bank's risk governance structure.

Risk Governance Structure



Key Risk Governance Roles and Responsibilities

Committee/Role	Key Responsibilities
Board Responsible for the Bank's business model and strategy, financial soundness, key personnel decisions, internal organisation, governance structure and practices, risk management and compliance obligations.	A key role of the Board is to ensure that risk and compliance are properly managed in the business. Key risk responsibilities of the Board include, but are not limited to: • Understanding the risks to which the Bank is exposed and establishing a documented Risk Appetite for the Bank; • Defining the strategy for the ongoing management of material risks; and • Ensuring that there is a robust and effective ICF that includes well-functioning independent internal risk management, compliance and internal audit functions as well as an appropriate financial reporting and accounting framework. The Board is collectively responsible for the governance of the Bank. A number of Committees assist the Board and Executive Committee in managing and monitoring the risks and opportunities that sustainability (including CR&E Risk) present. Within the Bank, sustainability is coordinated at an enterprise-level, with the functions and business segments sharing responsibility for addressing risks and opportunities.
Board Risk and Compliance Committee (BRCC) Oversees and provides guidance to the Board on risk governance and strategy. This guidance includes recommendations to the Board on current and future risk exposure, tolerance and appetite. The committee oversees Management's implementation of risk strategy including capital and liquidity strategy, the setting of risk and compliance policies and the embedding and maintenance throughout the Bank of a supportive culture in relation to the management of risk and compliance.	The Committee supports the Board in carrying out its responsibilities of ensuring that risks are properly identified, assessed, mitigated, monitored and reported, and that the Bank is operating in line with its approved Risk Appetite. Key activities of the BRCC include, but are not limited to: • Reviewing and making recommendations to the Board on the Bank's risk profile, both current and emerging, encompassing all relevant risks categories as described in the Enterprise Risk Management Framework (ERMF); • Reviewing and making recommendations to the Board in relation to the Group's ERMF, RAS and the Group Recovery and Resolution Plan; • Support the Board in ensuring that strategic decisions take into account resolution-related interconnections impacting resolvability; • Oversee the achievement of the resolution objectives and the operationalisation of the bank's resolution strategy; • Monitoring and escalating positions outside Risk Appetite to the Board, within agreed timeframes and approving and overseeing proposed Remediation Plans aimed at restoring the Bank's risk profile to within the approved Risk Appetite; • Reviewing and approving the key components of the Bank's Risk Management Architecture and relevant supporting documents; • Communicating all issues of material Bank reputational and operational risk directly to the Board; • Reviewing and approving Credit Policy, Credit related strategy and any material amendments to Credit Policy; • Oversight of credit and provision models, including approving all material aspects of credit risk, capital and impairment model rating and estimation processes, reviewing and approving the annual Model Risk Plan, monitoring its implementation, and reviewing the outputs of internal ratings, default and loss estimates (including Expected Credit Loss outcomes under IFRS 9); • Reviewing and making recommendations to the Board on the adequacy of capital and liquidity in the context of the Bank's current and planned activities (via reviewing relevant outputs from Internal Capital Adequacy Assessment Process (ICAAP) and Internal Liquidity Adequacy Assessment Process (ILAAP), including in relation to proposed mergers, acquisitions or disposals; • To oversee the Bank's approach to complying effectively with its legal/regulatory obligations on Anti-Money Laundering (AML) and Countering the Financing of Terrorism & Financial Sanctions (CFT/FS); • In conjunction with the Board Audit Committee, assess the introduction and management of regulatory developments and horizon risks in relation to Operational Resilience, Digital Operational Resilience and Third Party resilience. Communicate material resilience issues to the Board as appropriate; • Review any changes to the risk strategy resulting from, changes in the business model, market developments or recommendations made by the risk management function; • Assess the impact of Climate-Related and Environmental Risk (including financial and credit risks) on the Bank's overall Risk Profile; • Review and monitor the performance, effectiveness and independence of the Risk Function and the Chief Risk Officer, to whom there shall be solid reporting lines from all Risk and Regulatory Compliance Functions across the Bank; • Review and monitor the performance, effectiveness and independence of the Compliance function and the Head of Regulatory Compliance and Conduct Risk; and • Promoting a sound Risk Culture across the Bank. The BRCC has delegated responsibility from the Board to assess the impact of CR&E risk on the Bank's overall Risk Profile. The BRCC consists of 5 Non-Executive Directors, one of whom chairs the Committee.

Risk Management

(continued)

Committee/Role	Key Responsibilities
Executive Committee (ExCo) ExCo is the Senior Management Executive Committee for the Group, and is the custodian of the Group's collective Strategic Portfolio, Medium Term Plan and Risk Management Architecture as developed through the annual Strategic Planning Process (SPP). ExCo is the accountable body for the Group's operations, compliance and performance; defining the Group's organisational structure; ensuring the adoption, application and maintenance of all standards set by the Board; and a forum for Group-wide colleagues and other functional issues and ensuring that a robust and resilient operating framework exists within which the Group's activities are undertaken. The committee is chaired by the Chief Executive Officer (CEO) who is accountable to the Board.	In the context of Risk Management, ExCo is primarily responsible for: • The oversight of strategic risk associated with the development and execution of the Group's Strategic Plan and Financial Plans. The Group Risk Committee (GRC) is a Committee of ExCo with delegated responsibility for Group-wide risk management issues. The ExCo is the ultimate point of escalation for Group-wide specific issues save for those matters reserved for the Board or its Committees; • Ensuring that the operations, compliance and performance (through delivery of the Strategic Plan and Medium Term Plan, as well as policies, practices and decisions of the Group) are carried out appropriately, are correctly aligned to the Bank's Purpose / Ambition and to the interests of its key stakeholders (customers, colleagues, and shareholders) while operating within applicable regulatory and legal requirements; and • The Executive Committee (ExCo) is the ultimate management committee responsible for the development and implementation of the Bank's Sustainability Strategy and CR&E risk implementation. This will include consideration of the Bank's sustainability-related IROs.

Committee/Role	Key Responsibilities
Assets and Liabilities Committee (ALCo) On delegated authority from the Board Risk and Compliance Committee (BRCC), ALCo reviews, and is responsible for the oversight of all activities relating to Asset & Liability Management (ALM), Liquidity & Funding Risk and Market Risks (including Interest Rate Risk, Treasury Counterparty risk and Foreign Exchange Risk), and Capital Management. The Committee discharges this responsibility by providing governance over policies, methodologies and framework documents deployed to manage the above risks; and via the oversight of the activities and assumptions related to the coordination of the Bank's ICAAP, ILAAP, Recovery Plan and Resolution Planning. ALCo is the body accountable for the evaluation of other potential drivers of earnings volatility, including, but not limited to, competitive and external market pressures, and for approving optimisation and hedging strategies against those risks. In addition, ALCo is responsible for approving the pricing of new product offerings or applying material changes to the pricing of existing products. ALCo is an ExCo Sub-Committee and is accountable to ExCo. The committee is chaired by the Chief Financial Officer (CFO).	Key activities of the ALCo include, but are not limited to: • Provision of information to, and production of, the macro-economic assumptions; stress scenario development; and capital, liquidity & funding elements within the Bank's Medium-Term Planning Process ('MTP'). • Initial governing body responsible for developing and maintaining the Bank's recovery plan, ensuring the accurate and timely reporting of all information required for recovery and resolution purposes; the implementation of measures necessary to achieve the operationalisation of recovery and resolution planning strategies, and for overseeing the co-ordination of the Bank's compliance in those respects. • Responsible for overseeing Resolution Planning activity which involves delivering the prescribed templates/annual submissions and responding to ad hoc information requests, as well as addressing the priorities identified by the SRB/CBI in their letters to the Bank. • Provision of information to, and production of, the Internal Capital Adequacy Assessment Process (ICAAP) and Internal Liquidity Assessment Process (ILAAP); and review, challenge, provide oversight and submission onward for approval by the Board. • Monitor the minimum capital requirements set by the Bank's Regulators and the Basel III minimum Solvency rules, as implemented by the CRD IV Directive and Regulation, detailing the Pillar 1 minimum capital ratios that the Bank needs to hold. • Review the Bank's capital position, including an assessment of trends in Pillar 1 and Pillar 2 capital requirements and the Pillar 1 Plus position. • Maintain oversight and management of the on-going execution of capital-impacting stress testing exercises. While the Board maintains overall responsibility for the stress testing programme, it delegates detailed execution responsibilities to ALCo, which scrutinizes practical aspects including methodologies, translation of macro-economic variables to internal risk parameters, and assessment of risk correlations/concentrations. • Consider both the quality and quantity of capital held by the Bank, including the composition of the Bank's total capital resources (i.e., the preferred split of CET 1, Tier 1, and Tier 2 capital) while remaining within the parameters of the Risk Appetite Framework, and recommend any remedial actions to ExCo/Board accordingly. • Maintain, monitor, and enforce adherence to the Bank's Risk Management Frameworks and Policies for all Liquidity, Market, and Capital related risks. • Oversee and monitor the ALM, Treasury, and Market and Capital risks to which the Bank is exposed, and consider and approve strategies to mitigate such risks. • Maintain and assess the ALM, Treasury, and Market, and Capital Risk profiles against set limits and propose remediation plans to restore Risk Appetite where required. • Approve the pricing for new products or material changes to the pricing for existing products which have interest rate or capital implications, as recommended, including overseeing the inputs for the Bank's pricing models. • Approve Funds Transfer Pricing (FTP) methodology, ensuring the process is economically fair, transparent, and incentivizes appropriate behaviour in accordance with FTP Policy.

Risk Management

(continued)

Committee/Role	Key Responsibilities
Group Risk Committee (GRC) GRC is an ExCo sub-committee chaired by the CRO, who has unfettered access to the BRCC. It serves as a forum for Group-wide risk management issues and maintains oversight across all of the Bank's key risk categories, excluding those which fall under the remit of the ALCo.	The GRC monitors and enforces adherence to the Group's Risk Frameworks, Risk Policies and Risk Limits. It is the guardian of the Group's Risk Register and Risk Appetite and is responsible for monitoring the total risk position of the Group. Key activities of GRC include, but are not limited to: • Measuring and monitoring the total risk position of the Group and maintaining a Risk Register of Top and Emerging risks facing the Group, together with an assessment of the probability and severity of those risks; • Monitoring and reporting on regulatory developments and upstream/horizon risks in relation to all relevant risk categories and communicating all material issues to the BRCC or the Board as appropriate; • Monitoring and assessing the Group's risk profile and action trackers against risk appetite and recommending remediation plans to restore risk appetite where required; • Reporting any breaches of approved thresholds in accordance with agreed protocol; • Recommending proposed changes to the Group's risk appetite for Board approval; and • Maintaining, monitoring and enforcing adherence to the ERMF, for all key risk categories excluding those which fall directly under the remit of the ALCo.
Customer Committee (CustCo) Customer Committee is a sub-committee of ExCo and is chaired by the Chief Retail Banking Officer. The purpose of the Committee is to support commercial growth while securing customer interests remain at the forefront of decision making, in the context of building customer trust and executing a purpose-led, customer growth strategy.	To ensure that consideration of the customer is a key part of its decision making process, the Committee allocates sufficient time to facilitate meaningful discussions of the customer, with the aim of improving customer experience, delivering better outcomes and enabling relationship growth. It has a number of key remits, namely to: • Prioritise opportunities, resources and capabilities in order to deliver sustainable commercial growth; • Provide guidance to Executive Management (including ExCo and ExCo sub-committees) on business and commercial proposals which may have a material impact on customers and on the endorsement of such proposals; • Review and action, where required, customer performance indicators aligned to the Bank's strategy; • Review relevant significant customer events, issues and complaints, when escalated by relevant sub-committees and forums, in order to provide guidance on significant issues/events, and in order to delegate appropriate action by relevant sub-committees; • Review and action, where required, Conduct Risk indicators that exist within the Bank against the Board-approved Conduct Risk Appetite and Principles; and • Serve as the central oversight body for all significant customer matters ensuring fair treatment of customers.

Committee/Role	Key Responsibilities
Sustainability Committee (SusCo) The SusCo is a sub-committee of the Executive Committee (ExCo) and is in place to provide oversight of all activity relating to the environmental, social and governance (ESG) factors that are core to operating our business in a responsible and sustainable way. The SusCo is chaired by the Chief Sustainability and Corporate Affairs Officer and includes representation from Executive Committee members and Senior Leaders representing business units across the organisation.	The SusCo is responsible for the delivery of PTSB's Sustainability Strategy 2025-2027 by ensuring that there is sufficient governance, oversight, alignment and challenge of activity across each of its key areas of focus. Key activities of the SusCo include, but are not limited to: • Leading the implementation of the Bank's Sustainability Strategy, ensuring that all activity is embedded into the Bank's Business Strategy and Integrated Strategic Plan; • Ensuring that Sustainability-related Impacts (identified through the Bank's Double Materiality Assessment) are appropriately considered; • Identifying key stakeholder groups that will be required to deliver on Sustainability Strategy objectives; - Assigning business owners to manage and deliver sustainability programming across the key areas of focus set out within the Sustainability Strategy; - Overseeing delivery of the Bank's Science-based Targets (SBTs), including Carbon Reduction Plan activity and associated policies; - Developing sustainability Key Performance Indicators (KPIs) and processes that enable the Bank to effectively measure and manage them; and, - Monitoring and reporting progress to the Board and Executive Committee at regular intervals throughout the year
Group Credit Committee (GCC) GCC oversees and is accountable for the execution and delivery of portfolio credit risk management, encompassing the identification, measurement, monitoring and reporting of Portfolio Credit Risks. GCC ensures that the appropriate operating frameworks governing the portfolio credit risk management activities of the Bank are approved and are enforced. It operates as the forum for Bank-wide portfolio credit risk management issues across the full Credit Risk Management Lifecycle. GCC is a sub-committee of GRC.	The GCC is responsible for developing and implementing portfolio credit policy within the Group. The policy addresses all material aspects of the full credit lifecycle, including Credit Risk assessment and mitigation, collateral requirements, collections and forbearance and the risk grading of individual credit exposures. Key activities of the GCC include, but are not limited to: • Recommending the relevant portfolio credit risk elements of the Bank's RAS for approval by the Board; • Recommending approval following challenge of the proposed impairment charge and approach, including changes to the Bank's IFRS 9 provision models under the Provision Model Program, to higher authorities (BRCC/BAC) for reporting periods; • Monitoring adherence to the Group's Credit Policy, including discretion limits and structure for underwriting, scoring, collections, recoveries and provisioning within the boundaries of the Group's RAS (as approved by the Board); • Monitoring the portfolio credit risks to which the Group is exposed; • Maintaining and assessing the portfolio credit risk profile against set limits and proposing remediation plans to restore risk appetite/limits where required; • Reporting any breaches of approved limits in accordance with agreed protocol; and • Acting as the gateway through which decisions required from higher authorities are reviewed prior to submission (e.g. BRCC/Board) and they are the forum review of Group-wide credit risk management issues.

Risk Management

(continued)

Committee/Role	Key Responsibilities
Operational Risk Management Committee (ORMC) ORMC is a sub-committee of the Group Risk Committee (GRC), established with delegated authority to operate and make decisions in accordance with the Terms of Reference approved by GRC. GRC retains overall responsibility for the oversight of Operational and Information Communication Technology (ICT) risks.	ORMC is responsible for supporting GRC in monitoring the Operational and ICT risks to which the Bank is exposed and for overseeing risk mitigation performance and prioritisation related to the management and control of these risks. It supports the activities of the GRC in its monitoring and enforcing adherence to the Bank's Risk Frameworks, Policies and Limits. In fulfilling this role, the ORMC reviews and discusses the outputs and results of the Risk and Control Self-Assessment (RCSA) Process, Operational Risk Event Reporting and various other assessments (including New Product Approval (NPAP) and Third Party Risk Management (TPRM) assessments), monitoring and testing activities to create awareness of commonly experienced Operational and ICT risk matters, to share learnings and to enhance the control environment across the Bank. The key responsibilities of the ORMC include, but are not limited to: • Oversee the implementation of the Bank's Operational and ICT Risk Management Frameworks, including compliance with relevant Operational and ICT risk policies and procedures; • Monitor the implementation of policies and ensure ongoing adherence through operational controls; • Review and approve Operational and ICT Risk policies, as agreed with the Chair of GRC, (via delegated authority from GRC) and recommend approval of Operational and ICT Risk Frameworks to the GRC (and subsequently BRCC); • Review and recommend approval of qualitative and quantitative Operational and ICT Risk appetite metrics and limits/thresholds to GRC, report any breaches in accordance with the agreed process and discuss remediation plans relating to any relevant Risk Appetite breaches; • Appraise Material Operational and ICT risk events, identify and report on the underlying root causes of these events, share lessons learned; • Develop, review and recommend approval of scenarios relating to potential Operational and ICT risk events in order to inform the Bank's capital assessment processes (e.g. ICAAP and Stress Testing) and submit these to the GRC for their review and approval; and • Consider Operational and ICT risk developments including peer, regulatory, and industry developments, and external incidents that may impact the Bank directly, or relate to potential risks.

Role of the Chief Risk Officer (CRO)

The CRO has independent oversight of the Bank's risk management activities across all key risk categories. The CRO is responsible for independently assessing, monitoring and reporting all material risks to which the Bank is, or may become, exposed. The CRO is a member of the ExCo and directly manages the Bank's Risk (and Compliance) function.

The CRO has a direct reporting line to the Board and the Board Risk and Compliance Committee. In line with this reporting mandate, the Chief Risk Officer has a right of escalation and can refer any decision of ExCo or the ExCo Committees/Sub-Committees to the Board Risk and Compliance Committee (or Board) for review.

The CRO has overall responsibility for overseeing the development and implementation of the Bank's Risk function (incl. Compliance function), including overseeing development of the Enterprise Risk Management Framework, supporting risk frameworks, policies, processes, models and reports and ensuring these are

sufficiently robust to support delivery of the Bank's strategic objectives and all of its risk-taking activities.

The CRO is accountable for developing and maintaining the Group's RAS Framework, which the CRO submits to GRC for recommendation to BRCC, who in turn recommend approval to the Board. The CRO is responsible for translating the approved risk appetite into risk limits which cascade throughout the Group. Together with Management, the CRO is actively engaged in monitoring the Group's performance relative to risk limit adherence and reporting this to the Board. The CRO's responsibilities also encompass independent review and participation in the Group's Strategic Planning Process (SPP), capital and liquidity planning and the development and approval of new products. Specifically, the CRO is tasked with:

- Providing Second Line of Defence assurance to the Board across all key risk categories;

- Providing independent advice to the Board on all key risk issues, including the risk appetite and risk profile of the Group;
- Monitoring and enforcing Group-wide adherence to frameworks, policies, and procedures, with the aim of ensuring that risk-taking is in line with Board approved risk appetite;
- Monitoring material risks to which the Group is, or may become, exposed, and overseeing development of risk mitigating responses as appropriate;
- Developing and submitting the ICAAP, ILAAP, Recovery Planning and Resolution Planning for Board approval; and
- Developing and maintaining the Group's risk management structure.
- In connection with these responsibilities, the CRO is assigned the right of appeal over planned management action agreed by ExCo Risk Sub-Committees (such as ALCo and the GCC) when the CRO considers such action to be inconsistent with adherence to the Board approved risk appetite.

Three Lines of Defence

A 'Three Lines of Defence' model has been adopted by the Group as defined in the ICF for the effective oversight and management of risks across the Group.

Line Of Defence	High-Level Roles And Responsibilities
First Line of Defence First line functions and teams incur risks as they undertake frontline commercial and operational activities. They are responsible for identifying, owning, managing, monitoring and mitigating these risks through the effective design and operation of mitigating controls to ensure compliance with internal and external requirements. Critically, the First Line of Defence executes its business and operational activities in a manner consistent with the enterprise-wide risk appetite and managers take risks appropriately.	First Line – Business Units • Embedding the ICF and its supporting frameworks (e.g. Enterprise Risk Management Framework) and sound risk management practices into standard operating practices, including by creating clear links between maintaining and delivering robust governance and risk and control processes to performance management; • Establishing appropriate governance structures to support the implementation of the ICF and achieve the Bank's strategic, business, operational, risk, and assurance objectives; • Complying in full and within the spirit and letter of relevant regulations and legal obligations applicable to business and operational activities; • Identifying, assessing, measuring, monitoring, mitigating, reporting and owning all risks associated with business and operational activities across the Bank's risk categories in a manner consistent with the Bank's Enterprise Risk Management Framework; • Cultivating a strong risk culture that encourages prompt identification and escalation of issues and fostering an environment of continuous improvement and open engagement; • Providing assurance to relevant governance bodies on the management of risk in their functions and the effective operation and reporting of relevant controls; and • Ensuring fair customer outcomes in all aspects of the Bank's operation and decision-making.
Second Line of Defence The Group Risk Function is an independent Risk Management function, under the direction of the CRO, and is the key component of the Group's Second Line of Defence. The Group Risk Function is responsible for ensuring that all risks to which the Bank is, or may become, exposed to are identified, assessed, measured, monitored, mitigated, and reported on by the relevant units in the institution.	Second Line – Group Risk Function • Developing and monitoring the implementation of the Enterprise Risk Management Framework, enterprise-wide Risk Appetite Statement and risk policies, systems, processes and procedures; • Assessing First Line Of Defence adherence to the enterprise risk management framework, risk appetite, and risk limits to determine whether first line of defence units meet the standards for their risk management roles and responsibilities; • Reviewing, assisting, and, as appropriate, challenging the first line of defence risk management activities, and escalating issues if risk management concerns are not adequately addressed by first line of defence; • Establishing, maintaining, and delivering a program of monitoring, testing, and selected validation; • Cultivating a strong risk culture that encourages prompt identification and escalation of issues and fostering an environment of continuous improvement and open engagement; and • Providing comprehensive and understandable information, independent of the First Line of Defence, to relevant governance bodies – through ongoing risk management committee updates – on the state of the Bank's overall risk and control environment and the effectiveness of risk management, including risk issues and risk management deficiencies, and adherence to the Bank's risk appetite, limits, and enterprise risk management framework.

Risk Management

(continued)

Line Of Defence	High-Level Roles And Responsibilities
Third Line of Defence Group Internal Audit (GIA) comprises the Third Line of Defence. It plays a critical role by providing independent assurance to the Board over the adequacy, effectiveness and sustainability of the Group's internal control, risk management and governance systems and processes, thereby supporting both the Board and Senior Management in promoting effective and sound risk management and governance across the Group. All activities undertaken within, and on behalf of, the Group are within the scope of GIA. This includes the activities of risk and control functions established by the Group. The Head of GIA reports directly to the Chair of the Board Audit committee (BAC), thus establishing and maintaining independence of the function.	Third Line – Group Internal Audit - Developing a risk-based annual audit plan: developed in the final quarter of each year this plan sets out the program of audit reviews to be undertaken in the following year and is based upon a GIA's own risk assessment. This plan is cognisant of the bank's strategy and the risks both to this, and within this, strategy, and aims to provide meaningful input to assist in its controlled and well-governed execution. Accordingly, risk-based evaluation of the bank's risk identification, assessment and evaluation and risk management and mitigation approaches fall within this remit, as do assessments of adherence to policies and procedures (including methodologies and standards), along with the controls in place to ensure regulatory compliance; - Reporting on identified risk management, governance and control weaknesses: GIA reports on all identified issues to both business owners and Senior Management, and to the Board of Directors (via the Board Audit Committee); - Monitoring and reporting on the disposition of agreed remediating actions: As required under professional standards, GIA also monitors the status of all issues and actions previously raised, and reports on the progress being made by business units in implementing agreed action plans; and - Providing insights into risk, governance and control measures which may strengthen the bank's system of internal control in a carefully structured manner such that GIA's independence is preserved.

2. Principal Risks and Uncertainties

Risk registers from across the Group's First Line and Risk functions, developed through both top down and bottom-up Risk Identification and RCSA processes, form the foundation of the Group's Top and Emerging Risks report. This report is presented to the Risk Committees for review to ensure comprehensive identification, measurement, management, and monitoring of all material risks.

The following outlines the principal risk factors that could materially impact the Group's business, financial condition, operational resilience, and strategic delivery over the next 12 months and medium term. This list is not exhaustive and reflects a dynamic risk environment influenced by both internal transformation and external volatility. The risk factors discussed below should not be regarded as a complete and comprehensive statement of all potential risks and uncertainties. The precise nature of all risks and uncertainties that the Group faces cannot be predicted as several of these are outside of the Group's control. As at 31 December 2025, the following are the top three emerging risks considered by the Bank:

Emerging Risks

The Group's emerging risk profile reflects a dynamic and increasingly complex operating environment shaped by macroeconomic uncertainty, accelerated AI adoption, and regulatory divergence with policy volatility across major jurisdictions. The following three themes represent the most strategically significant emerging risks for the Group over the next 12 months and into the medium term.

1. Prolonged low growth macroeconomic environment

Macroeconomic conditions remain uncertain, and the economy is at risk of entering a period of low or volatile growth, characterised by weaker demand, reduced investment and elevated volatility. This would depress lending demand, reduce fee income, increase credit stress in segments that become more vulnerable, weaken investor confidence, increase funding costs and increase cost reduction impacting operations. Strategic plans would require recalibration and poorly timed efficiency programs could heighten operational risk.

Underlying drivers include persistent trade tensions and tariff exposure, tightening credit conditions, geopolitical conflict, regulatory and fiscal unpredictability and cautious consumer and business sentiment. The Group continues to monitor macro indicators as early warning signals, stress test findings, and preserve delivery flexibility so that

portfolio, change and cost actions can be adjusted as conditions evolve.

2. Autonomous ("agentic") AI and information integrity

Rapid adoption of AI, particularly systems capable of initiating actions with limited human intervention raise the risk that processes operate outside intended parameters. Without strong safeguards, explainability and oversight, agentic AI can scale errors quickly, modify workflows in unintended ways, and create accountability gaps, with potential for operational disruption, customer detriment and regulatory exposure.

In parallel, broader technological change (including AI-enabled personalisation and automation across digital channels) is reducing friction in the financial system, compressing customer decision cycles, accelerating switching behaviour, and enabling near-real-time movement of funds. As payment journeys and digital propositions become more seamless, the pace of deposit outflows can increase under stress. This increases the need for Bank to be on strong operational readiness, ensure clear customer communications, and monitoring of early-warning indicators that link digital channel behaviour to funding and liquidity risk management.

A related area of concern is information integrity. With the growing availability of AI-generated content and reliance on unverified public datasets, there is an increased risk of inaccurate information being embedded into analysis, reporting and decision making, resulting in misinformed strategies, compliance breaches, and reputational harm if disclosures or outcomes are later found to be flawed.

Clear detection and classification of AI use cases, strengthened governance across the model lifecycle, targeted controls for higher risk decisions, and proportionate assurance of third-party providers are integral to maintaining traceability, identifying control failures, protecting customer outcomes, and meeting evolving supervisory expectations.

3. Policy-driven uncertainty (including relevant international policy signals)

Policy settings in major economies remain fluid, with increasingly divergent cross-border requirements emerging across data, AI, privacy, cloud, and payments (including digital currency developments such as the Digital Euro). This regulatory divergence combined with policy volatility such as shifts in U.S. fiscal and trade posture, can translate into duplicated systems, region-specific processes and extended delivery timelines. Abrupt rule changes risk stranding investments, driving up compliance and change costs, and contributing to delivery fatigue where programmes must be re-sequenced at pace.

Digital currency initiatives, particularly the Digital Euro, could further reshape the payments landscape and customer expectations, driving changes in bank operating models, customer journeys, and the competitive set. These shifts could have potential implications for funding mix, product design, and compliance and implementation costs as requirements evolve. Key channels also include uncertainty around U.S. policy that may slow or redirect investment and weaken multilateral coordination, as well as the expansion of trade barriers to digital services, which complicates cross-border operating models and supplier arrangements.

Economist Update Introduction

Tariffs clouded the economic outlook for 2025. Not only was trade with the US expected to be hit, but investment decisions

were expected to be paused as businesses waited for the picture to become clearer. Initial expectations were that the Irish economy would take a heavy hit. In the end, the impact was relatively modest: the EU and US agreed on a 15% tariff deal, and pharmaceuticals were exempt from tariffs for three years. Nevertheless, as the Central Bank notes, “although recent developments have contributed to a somewhat improved global growth outlook, risks facing the financial system remain elevated,” and “downside risks to domestic economic growth remain significant, given Ireland’s structural openness and reliance on US foreign direct investment.”

Economic Outlook / Growth

In its January 2026 World Economic Outlook, the IMF expects global growth of “3.3% for 2026 and 3.2% for 2027”, compared with 3.3% in 2025. It forecasts growth of 1.8% for advanced economies and 4.2% for emerging markets in 2026.

The ECB is upbeat about the euro area’s near-term outlook: “The euro area economy is proving to be more resilient than expected. As household incomes rise, government spending increases, financing conditions improve, and foreign demand rebounds, growth should average 1.2% in 2026, 1.4% in 2027, and 1.4% in 2028.”

The ESRI expects Irish consumption expenditure to grow by 2.5% in 2026, slightly below the 2.9% in 2025. It forecasts that modified domestic demand (MDD) will increase by 2.1% in 2026, down from 4.0% in 2025.

Inflation Rates and Interest Rates

The IMF expects global headline inflation “to decline from an estimated 4.1% in 2025 to 3.8% in 2026 and further to 3.4% in 2027.” The ECB reported Eurozone inflation of 2.1% in 2025 and expects headline inflation of “1.9% in 2026, 1.8% in 2027 and 2.0% in 2028.” It adds that “core inflation should decline as wage pressures and services inflation moderate.” The Central Statistics Office (CSO) reported that the Irish “Consumer Price Index (CPI) rose by 2.8% between December 2024 and December 2025” while the ESRI forecasts consumer price inflation of 2.1% in 2026.

The ECB reduced its deposit rate from 3% to 2% over the first six months of 2025 and has kept it at that level since. It continues to state

that “it will follow a data-dependent and meeting-by-meeting approach to determining the appropriate monetary policy stance” and that “its interest rate decisions will be based on its assessment of the inflation outlook and the risks surrounding it.” The market expects the ECB to keep the deposit rate at 2% throughout 2026.

Government Finances

Government debt has risen significantly worldwide in recent years, and many countries have debt-to-GDP ratios above 100% while running current budget deficits. There is growing concern that the situation is unsustainable. The Department of Finance cautions that “there is mounting evidence that the scale of borrowing by advanced economies – both now and expected borrowing in the coming years – is putting global sovereign debt markets under pressure.”

Ireland’s debt-to-GNI* ratio is 62%. It has modest funding requirements in the coming years, and interest accounts for only 2.2% of Government revenue. It holds an AA rating from all credit rating agencies. The weighted-average maturity of its debt is 10.6 years, and it pays a weighted-average interest rate of 1.5%. The Government reported an underlying budget surplus of €3.8bn in 2025, with corporate tax receipts rising by €4.8bn to €32.9bn.

Nevertheless, as the Irish Fiscal Advisory Council notes, the budget surplus is “driven by extraordinary corporation tax receipts”, without which “there would be a significant and growing deficit.” It highlights the “large budgetary challenges in the decades ahead”, including the “costs from an ageing population and climate change.” The Department of Finance cautions: “On a per capita basis, public debt in Ireland amounts to €40,500 per person, a figure which is high relative to other advanced economies.”

Employment

Unemployment ticked upwards in 2025. “On an annual basis, the unemployment rate increased from 4.5% in January 2025 to 4.7% in January 2026,” according to the CSO. “The seasonally adjusted number of people unemployed was 138,400 in January 2026,” 8,600 higher than in January 2025. Meanwhile, the employment rate fell by 0.6% to 74.7%, and the participation rate fell by 0.1% to 66.5%.

Risk Management

(continued)

Despite the uncertain economic backdrop, IDA Ireland reported a “record number of investments approved” of 323, a 38% increase on 2024, and said it expected this to “create over 15,300 new jobs, 14% up on last year.” It noted that “employment in IDA client companies increased by 1.5% year-on-year in 2025 to 312,400.” The CSO reports that 57% of the workforce are third-level educated.

The ESRI is forecasting employment growth of 1.1% in 2026, down from 2.0% in 2025, bringing the total employment level to 2.844m. It expects the unemployment rate to increase to 5.2%.

Average weekly earnings topped €1,000 for the first time in Q3 2025, up 4.9% year on year, according to the CSO.

Banking

The Central Bank comments that while “domestic bank profitability has moderated since the interest rate cycle peak,” it “remains above its pre-2022 level.” It notes that “the structure of domestic bank business models means that net interest income is the driving factor behind profitability, particularly in periods where loan impairments are low.” It added: “The share of domestic bank loan balances classified as IFRS9 stage 2 or stage 3 has continued to trend downwards since 2022 ... This is despite the rise in interest rates experienced by borrowers, cost-of-living pressures faced by households, and input cost pressures faced by business borrowers.” It reported that the stage 2 and stage 3 shares stood at 8.9% and 1.9%, respectively, in 2025 Q2. It further noted that “the results of the EBA 2025 stress test indicate that domestic banks are resilient even under a severe but plausible macroeconomic shock.”

The Central Bank is sanguine about mortgage credit risk: “Credit growth has picked up, driven by mortgage lending and supported by easing interest rates, but overall growth remains consistent with increased nominal income. ... Mortgage credit growth has accelerated, but at a pace consistent with growth in disposable incomes, and new lending standards remain prudent.”

The Central Bank estimates that “household borrowers and businesses are in a relatively strong financial position and appear resilient even in the event of an escalation of geopolitical risks.” It notes that “profit margins

for domestic firms continue to be robust and measures of distress” remain low, and it assesses “the domestic commercial real estate (CRE) market” as continuing to stabilise, “though structural market changes since the pandemic are likely to persist.”

The Central Bank reported that mortgage rates fell by 0.30% to 3.50% over the year to December 2025, while overnight deposit rates held steady at 0.13%. It noted that “92% of the volume of new mortgage agreements had a fixed rate, compared to 75% in December 2024.” It also reported that household deposits increased by 6.8% (€10.9bn) to €172bn in the year ending December 2025. Of these, 85% were overnight deposits.

BPFI reported that over 46,000 mortgages, valued at €14.5bn, were drawn down in 2025, representing increases of 7.7% and 15.2% on the previous year's figures, and noted that these were the “highest annual drawdown values since 2008.” It also reported that over 27,000 first-time buyer mortgages, valued at €8.8bn, were drawn down in 2025, adding that this was “the highest value since the drawdowns data series began in 2003.”

Housing

“Over 36,000 new dwellings were completed in 2025”, according to the CSO, representing “an increase of 20.4% from 2024 and the highest number of completions since the series began in 2011.” However, the ESRI expects only 35,000 houses to be completed in 2026, noting that “if realised, this will mean another year when housing output will lag estimates of need.” BPFI suggests that skills shortages will continue to hamper the sector's ability to increase output, noting that “employment in the sector remains around 50,000 lower than its peak in 2007.” It expresses concern that the decline in commencements will make it challenging for the sector to increase output beyond 2026.

The Central Bank is also downbeat: “The fall in institutional residential real estate investment activity in recent years poses risks to future supply. A complex and protracted planning process, infrastructural capacity constraints, and an insufficient supply of zoned land could impede future investment in housing and have been the focus of government policies to increase housing supply.”

The Government hopes that the VAT reduction on apartments will make apartment construction viable once more. Its Accelerating Infrastructure action plan aims to address barriers to infrastructure development that are impeding housing development. The Central Bank emphasises that “investment is needed to alleviate capacity constraints which are evident in the supply of housing, critical energy and physical infrastructure” but cautions that “balancing sustainable growth in spending while addressing investment gaps is crucial in mitigating already present overheating risks.”

According to Daft, the “number of second-hand homes for sale on 1 December 2025 was just over 11,500 – up 7% on a year ago but less than half pre-covid levels”. It noted that the “volume of second-hand homes put up for sale over the course of 2025 was just over 53,000 ... down about 10% compared to the pre-covid level.” It reported that there were 58,000 housing market transactions in the year to September 2025, comprising 13,000 newly built homes, and 45,000 second-hand homes.

Daft reported that “inflation in open-market rents stood at 4.3% in the year to September 2025” and that “market rents are now one third above pre-Covid levels and two thirds higher than the Celtic Tiger peak.” It also reported that “the average monthly rent nationwide for a two-bedroom apartment was €2,080”, with the figure for Dublin at €2,444.

House Prices

The CSO reported that the national Residential Property Price Index (RPPI) rose by 6.6% over the 12 months to November 2025, down from 9.6% a year earlier. This left the index 24% above its pre-crisis peak in April 2007. Daft noted that “in 2025Q4, the average price nationwide for a three-bedroom semi-detached home was €423,000 – or €3,795 per square metre.” It added that “in late 2025, housing market participants expected prices nationally to increase by 3.8% during 2026.”

The Central Bank notes that “house price inflation remains elevated, due to the continued imbalance between the demand and supply for housing.” It comments that “despite rising household income, growth in property prices has resulted in a higher increase in the house price-to-income ratio in Ireland relative to other countries.”

Overall Position

2026 is likely to be another volatile year, as geopolitical concerns continue to reverberate across markets. As the IMF notes: "Risks are tilted to the downside. Prolonged uncertainty, more protectionism, and labour supply shocks could reduce growth. Fiscal vulnerabilities, potential financial market corrections, and erosion of institutions could threaten stability." It adds that "headwinds from shifting trade policies are offset by tailwinds from surging investment related to technology, including artificial intelligence."

The Central Bank notes the "clear disconnect between economic uncertainty and the pricing of risk in financial markets" as "equity markets reach record highs, and corporate bond spreads are compressed." It emphasises the risks, noting that "fiscal deficits persist in many advanced economies, leading to growing sovereign debt burdens."

The Irish economy emerged largely unscathed from the economic turmoil in 2025. While specific export-oriented industries, such as the whiskey industry, suffered, much of the rest of the economy withstood the challenges. Many businesses managed to front-load production to get ahead of the tariffs in 2025, but no such strategy can be implemented this year. The Central Bank cautions that while "growth in the domestic economy has remained strong ... risks from geopolitical and trade uncertainty are significant given Ireland's structural openness and reliance on US FDI."

Business Risk

Business Risk is defined as the risk that volumes may decline, margins may shrink, or management costs may increase, arising from an underperforming Business model and/or failure in the Group's strategic ambitions.

From the Group's perspective, Business Risk is further divided into two sub-risk categories, as follows:

- **Business Model Risk**, which is defined as the risk that the Group does not generate a short-term financial return to meet resolution tests ('viability') and/or is unable to deliver minimum acceptable returns to its shareholders ('sustainability').
- **Strategic Risk**, which is defined as the risk that results from a failure to prepare for, or respond to, changes in the external environment or market (usually linked to factors such as the activities of competitors, changing customer preferences, product obsolescence, technology developments and regulatory changes).

Business Model risk is typically assessed over a one-year horizon, while strategic risk generally relates to a longer timeframe and pertains to volatilities in earnings arising from a failure to develop and execute an appropriate strategy. Business Units are responsible for the delivery of their business plans and management of such factors as pricing, sales/lending volumes, operating expenses and other variables that may impact earnings volatility. Pricing decisions, and changes thereto, are reviewed and approved by the Bank's Assets and Liabilities Committee. The development of new markets, products and services and significant changes to existing ones is addressed under the Group's New Product Approval process.

Business Unit strategy is developed within the boundaries of the Group's Strategy as well as the Group's Risk Appetite.

Climate-Related & Environmental Risk

PTSB is committed to the management of Climate-Related & Environmental (CR&E) Risk, aided by regulatory guidance, to play our part as corporate citizens. Understanding of how best to respond to climate and other environmental change is continually evolving and with this our knowledge of associated risks continues to develop.

In 2025, the Bank was pleased to launch our refreshed Sustainability Strategy 2025-2027 in response to evolving market conditions and to reinforce its commitment to long-term sustainable growth. Through this new Strategy, CR&E Risks and opportunities remain a focus under both the 'Protecting our Planet' and 'Investing for Impact' pillars. The Bank is working to manage and mitigate against CR&E Risk, while also finding new and innovative ways to help our stakeholders to navigate the transition to a low carbon economy. This is complemented by "Sustainable Business Growth" as one of the

refreshed Strategic Priorities outlining the Bank's commitment to building a sustainable organisation that is fit for the future.

PTSB has formally defined CR&E Risk, categorising into two Sub-Risk Categories as follows:

1. Physical Risks - The risk of economic cost and financial losses resulting from the increasing severity and frequency of:

- **Acute Physical Risk** – arises from extreme weather events such as floods, storms, droughts and heatwaves.
- **Chronic Physical Risk** – arises from longer-term gradual shifts in the climate patterns, such as increasing temperatures, sea-level rises, water stress, biodiversity loss, land use change, habitat destruction and resource scarcity.

2. Transition Risk - The risk of economic cost, financial loss or an adverse outcome related to the process of adjustment towards a low-carbon economy and more environmentally sustainable economy. Transitioning to a low-carbon economy may require substantial policy, legal, technology and market changes. These changes may result in financial loss and reputational risk to organisations, with the severity of this depending on the scope and speed of change required. Transition Risk may include:

- **Policy Risks** that come with the evolution of policies and regulations that promote the adaptation to a less carbon intensive and more sustainable economy, and those that constrain actions that lead to climate change and harm the environment.
- **Legal Risk** that relates to litigation claims against institutions and their representatives who fail to mitigate and adapt to climate change, and who fail to disclose material climate and environmental information.
- **Market Risks** that arise through changing demand and supply for commodities, products and services.
- **Reputation Risk** that relates to the changing stakeholder perception of institutions' contribution to or detracting from the transition to a lower-carbon economy.

Risk Management

(continued)

The management of CR&E risk is aligned to key processes and components set out in the Bank's Enterprise Risk Management Framework (ERMF), which identifies core risk management stages which collectively ensure that the Bank appropriately identifies and manages current and emerging risk the Bank is exposed to.

Consideration of the impact of CR&E Risk on each of the Key Risk Categories has been considered as part of the Bank's CR&E Risk Materiality Assessment, this included a qualitative review of Nature-related risk. This assessment contains a detailed review of the potential impacts of CR&E risk upon the Gross Risk Profile of the Bank across all Key Risk Categories defined in the ERMF, with a blend of quantitative and qualitative elements. The assessment includes a granular review and identification of CR&E risk drivers (across Physical and Transition sub-risks) and corresponding transmission channels that could manifest for PTSB across all conventional Key Risk Categories as defined in the ERMF.

The Bank has established strong governance structures surrounding CR&E Risk with the establishment of the Sustainability Programme which includes three underlying workstreams, one of which is focused primarily on CR&E Risk Management. The Sustainability Programme is led by the Sustainability Committee (SusCo). The SusCo acts on delegated authority from the ExCo, to provide oversight in line with supervisory expectations on the execution of the Bank's refreshed Sustainability Strategy 2025-2027, including a focus on CR&E risk integration under the 'Protecting our Planet' pillar. This is achieved by ensuring that there is sufficient oversight, alignment, governance and challenge of activity across key areas of focus for the Bank. Supporting the SusCo, a Sustainability Programme Steering Group is in place, consisting of members from the Bank's Senior Leadership Team with enterprise-wide representation to ensure a holistic and integrated approach to support execution.

Over the last number of years, the Bank has made progress integrating CR&E Risk considerations into operational processes and strategic decision-making. PTSB deployed resources to ensure the delivery of the ESG Risk Strategy and is proactive in and committed to maturing this integration into 2026 and beyond. This work enables the organisation to make progress across a number of areas.

A summary of progress includes:

- Establishing effective governance for the management of CR&E Risk across the Bank;
- Introducing the first enterprise-wide CR&E Risk Management Framework (CR&E RMF);
- Enhancing the CR&E Risk Materiality Assessment, which assesses CR&E Risk as an impact and driver of other Key Risk Categories;
- Delivering the first Qualitative Review of nature-related risk across all Key Risk Categories as part of the work to mature the CR&E Materiality Assessment;
- Developing CR&E Key Risk Indicators;
- Enhancing the Risk Appetite Statement (RAS) with quantitative elements that encompasses the cross-cutting nature of CR&E risk;
- Sourcing and integrating CR&E Risk data for Bank use to inform CR&E Risk analysis;
- Implementing a CR&E Risk Stress Test aligned closely with the ECB Stress Test Methodology;
- Integrating CR&E Risk considerations into the Bank's ICAAP and ILAAP processes;
- Ensuring CR&E Risk is considered in the Bank's product development through the establishment of Green Product and Proposition Design Principles;
- Establishing a Carbon Reduction Plan and,
- Establishing a Science Based Targets for emissions reductions Programme.

The Bank has mobilised investment toward positive CR&E Risk activity by supporting customers and counterparties in navigating their transition to a low carbon economy. CR&E Risk is considered in the Bank's

product development process through establishment of Green Product and Proposition Design Principles.

The Bank has made progress, including:

- c.€1.26bn in Green Mortgage Lending in 2025 accounting for 44% of New Mortgage Lending;
- Participation in the SBCI Growth and Sustainability Loan Scheme, offering €70 million in low-cost loans to SMEs;
- €100 million in funding allocated as part of SBCI Home Energy Upgrade Loan Scheme – the first lender to launch the Scheme; and,
- €500m Green Senior HoldCo, the first Green Bond issuance under the Bank's Green Bond Framework. The Bond issued on 10 April 2024 with maturity date 10 July 2030 (first call 10 July 2029).

These developments make up the first steps towards an envisioned suite of Sustainable Finance Product offerings, with proposition development continuing on future products.

As CR&E risk continues to evolve, the potential effect of Physical (Acute & Chronic) and Transition Risk on the Bank will be continually reviewed. The assessment of effects as set out in the CR&E Risk Materiality Assessment will develop over time as the Bank sources critical data to incorporate further quantitative analysis. This is supported by ongoing data remediation, with dedicated resources in place to support and further develop CR&E Risk data availability and granularity.

Furthermore, with the launch of the refreshed Sustainability Strategy 2025-2027 delivery of the objectives set out within the strategy support our goal to further integrate sustainability into all areas of our business by channelling investment and directing our impact toward areas that enhance societal wellbeing. This includes consideration for ESG risk, incorporating a focus on Climate-Related and Environmental (CR&E) risk and opportunities.

Credit Risk

Credit Risk is defined as the risk of financial loss due to the failure of a customer, guarantor or counterparty, to meet their financial obligations to the Bank as they fall due.

The Group's customer exposures are originated and managed in Ireland. The Group's principal exposure is to residential mortgages secured firstly by a first legal charge on the property. Economic uncertainty, as well as the socio-political environment and inflation adversely impact or cause further deterioration in the credit quality of the Group's loan portfolios. This may give rise to increased difficulties in relation to the recoverability of loans or other amounts due from borrowers, resulting in further increases in the Group's impaired loans and impairment provisions.

As losses from customer credit risk are the principal financial risk to which the Group is exposed more detailed analysis of the risks, risk management policies and current portfolio segmentation is provided in section 3.1 of the Risk Management Report.

Capital Adequacy Risk

Capital Adequacy Risk is the risk that the Group does not have sufficient capital to cover the risk exposures of its business, support its strategy, and comply with regulatory capital requirements at all times.

The Group's business and financial condition could be negatively affected if the amount of its capital is insufficient due to:

- Materially worse than expected financial performance;
- Increases in risk-weighted assets;
- Excessive growth in asset volumes;
- Changes in the prescribed regulatory framework; or
- The sales of assets.

The core objective of the Group's capital management framework is to ensure it complies with regulatory capital requirements (Capital Requirements Regulation (CRR and CRR2), Capital Requirements Directive IV (CRD IV) and the Banking Recovery and Resolution Directive (BRRD)) and that it maintains sufficient capital to cover its business risks and strategy.

As outlined in the Group's RAS, the Group undertakes an Internal Capital Adequacy Assessment Process (ICAAP) to ensure that it is adequately capitalised against the inherent risks to which its business operations are exposed and to maintain an appropriate level of capital to meet the minimum regulatory and Supervisory Review and Evaluation Process (capital requirements). The ICAAP is subject to review and evaluation by the CBI as part of its Supervisory Review and Evaluation Process.

The management of capital within the Group is monitored by the BRCC, ExCo and ALCo in accordance with the Board-approved capital adequacy risk management framework.

Government Control and Intervention

In 2011, the Minister for Finance of Ireland became the owner of 99% of the issued ordinary shares of the Group which reduced to c.75% following the successful capital raise in 2015. The completion of the first phase the Ulster Bank transaction, combined with the recent disposal of an additional 5% tranche in 2023, has further reduced the Minister for Finance's stake to c.57%.

The risk is that the Irish Government, through its direct majority shareholding of the Group, uses its voting rights or intervenes in the conduct and management of the business in a way that may not be in the best interests of the Group's other stakeholders.

The Minister for Finance and the Group entered into a Relationship Framework Agreement dated 23 April 2015. The Framework Agreement provides that the Minister will ensure that the investment in the Group is managed on a commercial basis and will engage with the Group, including in respect of the manner in which he exercises his voting rights, in accordance with best institutional shareholder practice in a manner proportionate to the shareholding interest of the State in the Group.

Current and future budgetary policy, taxation, the insolvency regime and other measures adopted by the State to deal with the economic situation in Ireland may have an adverse impact on the Group's customers' ability to repay their loans, the Group's ability

to repossess collateral and its overall pricing policy.

Liquidity and Funding Risks

Liquidity Risk is the risk that the Group has insufficient funds to meet its financial obligations and regulatory requirements as and when they arise either through inability to access funding sources or monetise liquid assets.

Funding Risk is the risk that the Group is not able to achieve its target funding mix, is too dependent on particular funding instruments, funding sources (retail/wholesale) or funding tenors, fails to meet regulatory requirements and, in extremis, is not able to access funding markets or can only do so at excessive cost and/or Liquidity Risk.

These risks are inherent in banking operations and can be heightened by other factors and changes in credit ratings or market dislocation. The level of Liquidity Risk further depends on the size and quality of the Group's liquid asset buffer, the maturity profile of funding, as well as broader market factors such as depositor and investor sentiment/behaviour.

It is likely that risks would be further exacerbated in times of stress. Given the nature of the Group's retail focus which stems from its business model; liquidity and funding risk will arise naturally due to the maturity transformation of primarily short term deposits into longer term loans.

The Group's Risk Appetite Statement and the associated Liquidity & Funding Risk Management Framework set out the Group's approach to the management of Liquidity & Funding Risk, including the Group's approach to risk identification, assessment, measurement, monitoring, mitigation and reporting. The Liquidity & Funding Risk Framework is approved by the BRCC on the recommendation of the ALCo and GRC.

Risk Management

(continued)

The management of the Group's liquidity and funding risks are subject to strict internal controls and reporting procedures and are monitored by the ALCo, GRC and the BRCC on a regular basis. Group Treasury is responsible for the management of liquidity and funding risk. Group Risk and GIA provide further oversight and challenge and ensure compliance to the Group's Liquidity and Funding Risk Management Framework.

For further details on Funding and Liquidity Risk, see section 3.2.

Market Risk

Market Risk is defined as 'the risk of losses in on and off-balance sheet positions arising from adverse movements in market prices. Often market risk cannot be fully eliminated through diversification, though it can be mitigated via hedging'.

From the Group's perspective, Market Risk consists of three components being Interest Rate Risk, Credit Spread Risk and Foreign Exchange Risk. These risks are covered in detail in section 3.3.

The Group's Risk Appetite Statement and the associated Market Risk Framework set out the Group's approach to the management of Market Risk, including the Group's approach to Market Risk identification, assessment, measurement, monitoring, mitigation and reporting. The Market Risk Framework is approved by the BRCC on the recommendation of the ALCo and GRC.

All market risks arising within the Group are subject to strict internal controls and reporting procedures and are monitored by the ALCo, GRC and BRCC on a regular basis. Group Treasury is responsible for the management of market risk exposures on the balance sheet. Group Risk and Group Internal Audit provide further oversight and challenge of Group Treasury's compliance with the Market Risk Framework and associated Policies.

Model Risk

Model risk is defined by the Group as an adverse outcome (incorrect or unintended decision) that occurs as a direct result of weaknesses or failures in the design, implementation or use of a model. The adverse consequences include financial loss, poor business or strategic decision-making, or damage to the Group's reputation.

In terms of risk appetite, the Group expects that all material models function as intended. The key factors which influence model risk within PTSB include:

- Macroeconomic risk – the Group's suite of models is built on data that spans the period immediately prior to the Global Financial crisis through the recent recovery. The degree to which the impacts of a new economic downturn will mirror the last is uncertain. The degree of risk increases with the speed and volatility of economic change;
- Regulatory change – the pace of evolution of regulation and guidance increases the burden of maintaining the Group's regulatory models;
- Competition for skills – significant competition exists within the Irish market for those with the experience and expertise to build, implement and interpret models; and
- Data – encouraging customers to share their data, particularly in the area of environment and sustainability is a strategic area of focus for the Group in enhancing model risk management.

Model risk is managed in accordance with the Group's Model Risk Framework. This framework provides the foundation for managing and mitigating model risk within the Group. Accountability is cascaded from the Board and senior management via the Group RMF. This provides the basis for the Group Model Risk Policy, which defines the mandatory requirements for models across the Group, including:

- the scope of models covered by the policy, including model materiality;
- roles and responsibilities, including ownership, independent oversight and approval;
- key principles and controls regarding data integrity, development, validation, implementation, ongoing maintenance and revalidation, monitoring, and the process for non-compliance; and
- The model owner taking responsibility for ensuring the fitness for purpose of the models and rating systems, supported and challenged by an independent specialist function within Risk that reports directly to the CRO.

The above ensures all models in scope of policy, including those involved in IFRS 9 and regulatory capital calculation, are developed consistently and are of sufficient quality to support business decisions and meet regulatory requirements.

The Group Model Governance Committee (MGC), a sub-committee of the GRC (Group Risk Committee), is the primary body for overseeing model risk. The Group RAS (Risk Appetite Statement) requires that key performance indicators are monitored for every model to ensure they remain fit-for-purpose or appropriate mitigation is in place. Material model issues are reported monthly to Group and Board Risk Committees with more detailed papers as necessary to focus on key issues.

Operational Risk and ICT Risk

Operational Risk is defined as the risk of loss or unplanned gains resulting from inadequate or failed processes or systems, human error or from external events. This includes: operational resilience & continuity; third party and outsourcing including sub-outsourcing; transaction and account processing; fraud; financial reporting; health, safety & physical security; people; property; change and data management risk.

Information Communication Technology (ICT) Risk is defined as the risk of loss due to a breach of confidentiality, failure of integrity of systems and data, inappropriateness or unavailability of systems and data. ICT Risk includes risks associated with poor ICT governance, oversight and risk management as well as security risks resulting from inadequate or failed internal processes or external events including cyber-attacks or inadequate physical security.

Risks from both these risk categories are inherently present in the Group's business. Any significant disruption to the Group's ICT systems, including breaches of data security or cyber security could harm the Group's reputation and adversely affect the Group's operations or financial condition materially.

The Group aims to minimise the level of serious disruption or loss caused by Operational or IT issues to its customers, employees, brand and reputation.

The Group's Operational Risk and ICT Risk Management Framework outlines the Group's approach to managing Operational and ICT risks and associated risk exposures and is applicable Group-wide. The Framework outlines the specific governance structures and processes that enable the management of the Bank's Operational & ICT Risks, it defines the roles and responsibilities for the oversight of Operational and ICT risks, along with the ownership and processes in place for the identification, assessment, mitigation, monitoring, testing and reporting of Operational and ICT risks in the Group.

In support of the above, the Group utilises a Risk and Control Self-Assessment methodology to:

- Identify, measure and control Operational Risk, ICT Risk, Compliance Risk, Conduct and Reputational Risks across the Group which aids the consistent approach to risk management and aids the business in their decision making process.
- Support the ability to track any control design or operational effectiveness deficiencies that are identified through the process. This ensures that comprehensive remediation plans are created, monitored and tracked through to closure.

The ORMC monitors the Operational and ICT Risks to which the Group is exposed to and oversees risk mitigation including performance and prioritisation related to the management and control of these risks. In fulfilling this role, The ORMC reviews and discusses the outputs and results of the Risk and Control Self-Assessment (RCSA) Process, control testing and Operational Risk Event Reporting and various other assessment, monitoring and testing activities to create awareness of commonly experienced Operational and ICT risk matters, to share learnings and to enhance the control environment across the Group. Furthermore, the ORMC reviews and monitors Operational and ICT risk RAS, the Operational and IT KRIs, emerging risks and other relevant Operational and ICT risk metrics on an ongoing basis.

ORMC also monitors the oversight of new or amended Third Party/Outsourcing relationships, new products, and/or significant changes to existing products and Strategic Change that is implemented across the bank and highlight any risks where required.

External Fraud remains at a high threat level with many customers targeted/responding to fraudulent SMS and phone calls in circulation, divulging their credentials to fake websites. There has been a significant increase in this activity since 2020 and PTSB have been recognised as being to the fore in seeking ways to protect our customers and the bank. We continue to work on our own initiative but also collectively with many external stakeholders i.e. other FI's, BPFi, CBI, UCD Cyber Centre, Gardaí, ComReg, Telco's and Fintech to reduce impact. The creation and launch of "PTSB Protect" to our customer base and added to our app as an opt-in solution informs customers using the service of known fake SMS being received to their Smart phone. PTSB Protect is the first of such technology to be deployed by any bank. We have also enhanced our fraud monitoring capabilities in the card transactions space with the 'Foresight' fraud scoring tool being added to our strategies, this is currently proving beneficial from both a fraud prevention and customer impacting perspective. By continuing to innovate and react to the ever changing environment, we can continue to maintain best in class status, whilst maintaining a balance between providing a frictionless customer journey but also managing the risk.

The external cyber threat environment continues to evolve and remains a focus for the Banking industry globally. Continuous improvement in our cyber defences is a strategic priority with investment accordingly to enhance the control environment. The Cyber and Information Security Strategy 2025-2027, was approved at Board Audit Committee in May 2025. This focusses on continuous improvement in our cyber defences in light of an increasingly hostile cyber threat environment, as well as further maturing and embedding of our alignment with DORA. It includes a special measures workstream to accelerate key network resilience enhancements identified following recent DDoS incidents.

Scenario testing is performed on an annual basis, as outlined in the Enterprise Risk Management Framework (ERMF), for critical processes including but not limited to: Payments Systems Failure, Information Security, Cyber Security, Internal Fraud, Business Disruption and ICT Resilience to ensure existing processes support timely recovery. Monitoring and incident management processes are in place to

detect and recover from both cyber-attacks and ICT issues which may affect the availability of critical IT systems. Regular disaster recovery testing of critical systems is conducted in order to test IT resilience. Any changes made to the Group's IT systems or applications are governed by a change management process.

Internal controls are tested on a continual basis to provide assurance on the design effectiveness and operating effectiveness of controls captured in the RCSA process. This system of internal control is designed to provide reasonable, but not absolute, assurance against the risk of material errors, fraud or losses occurring. Effective controls will work to reduce the likelihood of a risk occurring and/or the impact should the risk materialise.

Independent risk based control assurance reviews are also undertaken mainly in relation to key processes to provide an assessment of how effective associated risks are controlled and managed.

Weakness in the Group's internal control system or breaches/alleged breaches of laws or regulations could result in increased regulatory supervision, enforcement actions and other disciplinary action, and could have a material adverse impact on the Group's results, financial condition and prospects. To quantify the potential impact of weaknesses in this regard, and to strengthen the Group's system of internal controls through the consideration of unexpected events, scenario analysis and stress testing are conducted on a regular basis.

Risk culture is a component of the Bank's culture. A sound risk culture drives and supports risk awareness, desired behaviours and judgements about risk-taking. It bolsters effective risk management, promotes prudent risk-taking, and ensures that any emerging risks or risk-taking activities beyond the Bank's risk appetite are identified, assessed, escalated and managed in a timely manner. A key objective of the Group's Risk Management approach is to create a culture of risk awareness where all staff have an understanding of Operational and ICT risk and the role they each play in ensuring that any impacts/losses are minimised.

Risk Management

(continued)

The Group may engage the services of third parties to support delivery of its objectives or to complement its existing processes. The risk associated with these activities is categorised as 'Third Party and Outsourcing Risk' and is defined as the risk of loss or reputational damage connected with the engagement and management of Third Parties and outsourced service providers (including sub-outsourcing) contracted internally or externally (for example, for the purposes of customer engagement, data processing, systems development, Cloud services or IT systems), including lack of third party diversification, inadequate third party business continuity plans or insufficient monitoring and oversight of the engagement.

The Group's Third Party Risk Management Policy sets out the minimum requirements and roles and responsibilities necessary to ensure consistent identification management and mitigation of Third Party and Outsourcing risks across the Group, as defined in the Group's ERMF, and Operational and IT Risk Management Framework. The policy outlines the processes and controls required for identifying, assessing, mitigating and managing these risks.

Conduct and Reputational Risk

Conduct Risk is the risk that the conduct of the Group towards customers or the market leads to poor customer outcomes, a failure to meet customers' or regulators' expectations, or breaches of regulatory rules or laws.

Conduct Risk can occur in every aspect of the Group's activities, including through:

- The strategy of the Group and how it is executed;
- The way the Group is run and managed;
- The existence of group think or localised cultures;
- The lack of psychological safety for staff in facilitating a robust speak freely process;
- The design type and pricing of products/services offered, the customers to whom they are offered and the distribution channels used;
- The way sales are made or transactions are executed;
- The post-sales fulfilment process throughout the life of the product;
- The management of different customer cohorts recognising that some customers may require additional assistance at a point in time or on a permanent basis; and
- Interactions with customers throughout the lifetime of the relationship, including when customers make complaints either

directly or through the Financial Services and Pensions Ombudsman or where customer-impacting errors occur. See note 30 and note 41 to the financial statements for further information on legacy legal cases.

The Group recognises that the management and mitigation of Conduct Risk is fundamental and intrinsically linked to the achievement of our purpose 'Working together to build trust with our customers and communities'. It recognises that Conduct Risk can occur in every aspect of the Group's activities and is committed to continuing to achieve best practice in this area.

The Group's Senior Management are responsible for the identification and management of Conduct Risk in their business areas and for ensuring fair customer outcomes, and the Regulatory Compliance function is responsible for second line Conduct Risk oversight. The Group is guided by a Conduct Risk Management Framework, including a Board-approved Risk Appetite and Conduct Risk Principles. Its purpose is to help ensure that the Group achieves its strategic objectives by acting honestly, fairly and professionally in the best interests of its customers and the integrity of the market, and acts with due skill, care and diligence. In doing so, the Group is placing the achievement of fair outcomes for its customers at the heart of its strategy, governance and operations.

Board and Senior Management have ensured that there is regular reporting of metrics and Key Risk Indicators against the Conduct Risk Appetite as well as events that could affect or have already impacted on customers. The primary governance body responsible for Conduct issues is the Customer Committee (a sub-committee of ExCo).

Reputational Risk is the risk of brand damage and/or financial loss arising from a failure to meet stakeholders' expectations of the Group or the failure of organisational structure and governance arrangements within the Group to embed desired behaviours and culture. The reputation of PTSB is founded on trust from its employees, customers, shareholders, regulators and from the public in general. Isolated events can undermine that trust and negatively impact the Group's reputation. Negative public opinion can result from the actual or perceived manner in which the Group conducts its business activities, from the Group's financial performance, the level of

direct and indirect Government support or actual or perceived practices in the banking and financial industry. It is often observed that reputational risk is in fact a consequence of other risks. Negative public opinion may adversely affect the Group's ability to keep and attract customers which in turn may adversely affect the Group's financial condition and operations. The Group cannot be sure that it will be successful in avoiding damage to its business from reputational risk.

Compliance Risk

Compliance risk is the risk of material financial loss or liability, legal or regulatory sanctions, or brand damage arising from the failure to comply with, or adequately plan for, changes to official sector policy, laws, regulations, major industry standards, compliance policies and procedures, or expectations of customers and other stakeholders.

As a financial services firm, the Group is subject to extensive and comprehensive legislation and regulation by a number of regulatory authorities. The Group is an Other Systemically Important Institution (OSII) since November 2023 and is directly supervised by the Central Bank of Ireland, as the National Competent Authority. The Board is responsible for overseeing the management of compliance risk, with senior management having a primary responsibility to effectively manage compliance with applicable laws and regulations and for ensuring that the Group has and effectively employs the resources, procedures, systems and controls, including monitoring, necessary to ensure compliance with all existing and forthcoming legislation.

First Line Assurance teams are in place with the Regulatory Compliance function responsible for second line oversight, including the updating of the Regulatory Compliance Framework. This Framework supports the Group to achieve its strategic priorities while managing regulatory compliance risks within the Board-approved Regulatory Compliance risk appetite. In addition, it sets out how the Group manages current and emerging regulatory compliance risk, details the key principles, objectives, and primary components of the Group's approach to regulatory compliance risk management, and sets out regulatory compliance risk management responsibilities across the three lines of defence model.

The Group is exposed to many forms of risk in connection with compliance with such laws and regulations, including, but not limited to:

- The risk that changes to the laws and regulations under which the Group operates will materially impact on the Group's liquidity, capital, profitability, product range, distribution channels or markets;
- The risk that the Group is unable to respond to the scale of regulatory change and implement all required changes in full or on time, or the challenge of meeting regulatory changes will impact the Group's abilities to undertake other strategic initiatives;
- The level of costs associated with the regulatory overhead including, but not limited to, the industry funding levy, funding the resolution fund established under the Single Resolution Mechanism or levies in respect of applicable compensation schemes (including the Investor Compensation Scheme and the Deposit Guarantee Scheme (DGS));
- Non-compliance with organisational requirements, such as the requirement to have robust governance arrangements, effective processes to identify, manage, monitor and report the risks the Group is or might be exposed to, and internal control mechanisms, including sound administrative and accounting procedures and effective control and safeguard arrangements for information processing systems;
- The possibility of mis-selling financial products or the mishandling of complaints related to the sale of such products by or attributed to an employee of the Group, including as a result of having sales practices, complaints procedures and/or reward structures in place that are determined to have been inappropriate or the risk that previous practices are deemed inappropriate when assessed against current standards;
- Breaching laws and requirements relating to data protection, the detection and prevention of money laundering, terrorist financing, sanctions, bribery, corruption and other financial crime; and
- Non-compliance with legislation relating to unfair or required contractual terms or disclosures.

Regulatory Developments

The level of regulatory change remains high at both a European and national level. The level and complexity of change continues to be an area of focus for the Bank while Regulators continue to emphasise the importance of culture, conduct risk, consumer protection risk, data protection, diversity practices, financial literacy, operational and IT resilience, cyber security, financial crime, digitalisation and climate related and environmental risk.

From a European perspective, economic competitiveness continues to be a focus, with regulatory simplification remaining high on the agenda, along with progressing legislative changes including the implementation of Basel III reforms; progressing the EU Payments and Anti-Money Laundering packages along with the implementation of the Digital Euro. The key European Regulatory Developments are:

- Legislative progress continues on the implementation of the Basel III reforms. The amendments to the Capital Requirements Directive 6 (CRD 6) become applicable in January 2026 and the European co-legislators have entrusted the European Supervisory Authorities (ESAs), and in particular the European Banking Authority (EBA), to develop a series of technical standards and guidelines that are essential to fully bring into operation and clarify the primary legislation. The standards will cover a broad scope of areas including ESG; Governance; Market Risk and Benchmarking;
- The EU Payments package, which includes the updated Payment Services Directive (PSD 3); the new Payment Services Regulation and the Financial Data Access Regulation (FIDA), is designed to modernise and harmonise payment services across the EU and the relevant regulations continue to progress through the EU Legislative process with implementation expected from 2027;
- The legislation to introduce the Digital Euro, which is the proposed central bank digital currency for the Euro area and is seen as a strategic move to strengthen Europe's monetary sovereignty and reduce reliance on external payment systems, is expected to be published in 2026 with a full launch anticipated by 2029;

- The revised Consumer Credit Directive and the revised Distance Marketing Directive have both been published and they come into effect in 2026 and the new EU Artificial Intelligence Act, which was published in June 2024, comes into effect on various dates from 2024 through to mid-2027; and
- As part of the AML package, the European Anti-Money Laundering Authority (AMLA) commenced operations in mid-2025 and the new AML Regulation (AMLR) will be effective from July 2027. The AMLR introduces significant reforms aimed at strengthening the EU's framework against money laundering and terrorist financing. The AMLA are expected to publish guidelines on the implementation of the AMLR in 2026. From a Sanctions perspective, with the continued conflict in Ukraine, Middle East, amongst other geopolitical developments, it is anticipated that the EU sanctions regime will be kept under regular review. Additionally, the EBA issued two sets of sanctions guidelines which are applicable from 30th December 2025.

At a National level, the key regulatory development relates to the Central Bank of Ireland's revised Consumer Protection Code (CPC). The revised CPC, which comprises two regulations and three guidance documents, is effective from March 2026.

The revised CPC has been modernised to:

- Align requirements with an increasingly digital financial services environment.
- Incorporate a consumer perspective in the design and delivery of financial products.
- Safeguard customers' interests by considering consumers in the development of a firm's strategy, business model, and commercial decision-making process.
- Protect consumers against fraud and scams, and support customers in vulnerable circumstances.
- Extend the requirements to other financial products.

Risk Management (continued)

3. Group Risks

The Board has overall responsibility for the establishment and oversight of the ERMF. The Board has established the BRCC, which is responsible for oversight and advice on risk governance, the current risk exposures of the Group and future risk strategy, including strategy for capital and liquidity management and the embedding and maintenance of a supportive culture in relation to the management of risk throughout the Group. The BRCC, in turn, delegates responsibility for the monitoring and management of specific risks to committees accountable to it such as the GRC, GCC and the ALCo.

The BAC, consisting of members of the Board, oversees how Management monitors compliance with the Group's risk management policies and procedures and reviews the adequacy of the Risk Management Framework in relation to the risks faced by the Group in consultation with the BRCC. The BAC is assisted in its oversight role by GIA. GIA undertakes both routine and ad hoc reviews of risk management controls and procedures, the results of which are reported to the BAC.

In line with IFRS 7, the following risks to which the Group is exposed are discussed in detail below:

- Credit Risk;
- Liquidity Risk; and
- Market Risk (including foreign currency exchange risk, credit spread risk and interest rate risk).

The key financial risks arise in the underlying subsidiary companies of Permanent TSB Group Holdings plc (PTSBGH). All of the Directors of PTSBGH are also Directors of the Board of Permanent TSB plc (PTSB).

3.1 Customer Credit Risk

Definition of Customer Credit Risk

Customer credit risk is defined as the risk of financial loss due to the failure of a customer, guarantor or counterparty, to meet their financial obligations to the Bank as they fall due. A Credit Risk can be one of the following types including default risk, concentration risk, migration risk, collateral risk, country/sovereign risk and climate related and environmental risk.

Default Risk

Credit Default Risk is the risk that a customer will not be able to meet the required

payments on their debt obligation to the Bank when they become due. An increase in the risk of default may be as a result of one or a number of factors including, but not limited to:

- Deterioration observed in an individual borrower's capacity to meet payments as they become due;
- Deterioration observed or expected in macroeconomic or general market conditions;
- Regulatory change; and
- Environmental factors that impact on the credit quality of the counterparty.

Concentration Risk

Concentration Risk is the risk of excessive credit concentration to an individual, counterparty, group of connected counterparties, industry sector, geographic area, type of collateral or product type leading to above normal losses.

Migration Risk

Migration Risk is the risk of loss due to a ratings (internal/external) downgrade which indicates a change in the credit quality of an exposure.

Collateral Risk

Collateral Risk is the potential risk of loss arising from a change in security value or enforceability due to errors in nature, quantity or pricing of the collateral.

Country/Sovereign Risk

The risk of having exposure to a foreign country, arising from possible changes in the business environment that may adversely affect operating profits or the value of assets related to the country.

Climate Related and Environmental Risk

Credit related Climate and Environmental Risk manifests through both physical and transition channels. This risk can lead to declines in the value of the Bank's collateral on customer loans, or elevated risk of customer default. This risk may be elevated if the Bank's borrowers do not adapt to the evolving Stakeholder, Regulatory and Legislative expectations to contribute to the transition to a low carbon economy.

Climate related risk modelling capability is still evolving and the Bank is heavily focused on improving its data to support future development. However, the Bank's portfolio is heavily weighted towards retail mortgages meaning the risks are well understood. The

Bank currently has low exposure to SME lending where the direct manifestation of climate risk may be more diverse. Management deem the Bank's ECL stock at 31 December 2025 appropriately captures the current level of climate risk within the portfolio.

Lending officers consider Climate and Sustainability Risks for each SME lending application, and assessment criteria for new Residential property lending incorporate an evaluation of potential physical risks including flood, subsidence, coastal and environmental risks as part of the valuation process. Retail mortgage lending should not proceed unless the customer has obtained home insurance which covers the impacts of climate related physical risks.

Governance

Credit Risk Appetite defines the Group's tolerance for risk and its willingness to grant credit based on product type, customer type, collateral concerns and various other risk factors. The Board is ultimately responsible for the governance of credit risk across the Group, setting the Risk Appetite and ensuring that there are appropriate processes, systems and reporting lines in place to monitor and manage risks against the appetite.

The BRCC, a sub-committee of the Board provides oversight to the Board on the setting and monitoring of the Risk Appetite and risk governance. The Group Credit Risk Management Framework specifies those Credit policies that require approval by the BRCC. Under the Group Credit Risk Management Framework, the BRCC may also delegate to the GRC, who in turn delegates to the GCC, the authority to approve certain Credit policies, subject to these policies remaining within specified policy boundaries. Any amendment to policy which results in a policy breaching these boundaries requires the BRCC's approval.

The GCC is responsible for the execution and delivery of the Group's system of Portfolio Credit Risk Management. The Board has granted authority to the BRCC to approve a delegated framework of lending authority within which the GCC and Credit function operate.

Credit Risk Management

The Group's credit risk management approach is focused on detailed credit assessment at initial underwriting stage together with early borrower engagement where there are signs of pre-arrears or delinquency with a view to taking remedial action to prevent the loan defaulting. Where a borrower is in pre-arrears, arrears or default the Group will consider offering treatments/options which apply to the borrower's circumstance cognisant of appropriateness, affordability and sustainability.

The Group's system of Portfolio Credit Risk Management incorporates the following key components:

- Credit policy;
- Lending authorisation;
- Credit risk mitigation;
- Credit risk monitoring;
- Arrears management and forbearance; and
- Credit risk measurement.

Credit Policy

To aid in the management of credit risk, the Group has put in place credit policies which set out the core values and principles governing the provision and management of credit. These policies take account of the Group's Risk Appetite Statement, applicable sectorial credit limits, the Group's historical experience and resultant loan losses, the markets in which the business units operate and the products which the Group provides. Each staff member involved in assessing or managing credit has a responsibility to ensure compliance with these policies and effective procedures are in place to manage the control and monitoring of exceptions to policy.

Lending Authorisation

The Group's credit risk management systems operate through a hierarchy of lending authorities. Exposures above certain predetermined levels require approval by the Transactional Credit Committee (TCC), a subcommittee of the GCC or the GCC. Below

the TCC level, a tiered level of discretion applies with individual discretion levels set to reflect the relevant staff members' level of seniority, expertise and experience and the Group's operational needs. All mortgage lending is currently approved by experienced credit risk professionals assisted by scoring models. For Group unsecured personal lending portfolios and certain hire purchase receivable portfolios, scoring models and automated processes are utilised to support the credit decision process for those segments that present a lower credit risk. Exposures that present a higher credit risk but remain within Risk Appetite are manually reviewed prior to approval.

Credit Risk Mitigation

The granting of a loan in the first instance is always assessed based on the borrower's repayment capacity and proven ability. Credit risk mitigation forms a key supplementary element of the credit granting process. Credit risk mitigation includes the requirement to obtain collateral, depending on the nature of the product, as set out in the Group's policies and procedures. The Group takes collateral as a secondary source, which can be called upon if the borrower is unable or unwilling to service and repay the debt as originally assessed. At portfolio level, credit risk is assessed in relation to name, sector and geographic concentration.

Collateral

The nature and level of collateral required depends on several factors including, but not limited to, the amount of the exposure, the type of facility made available, the term of the facility, the amount of the borrower's own cash input and an evaluation of the level of risk or probability of default (PD).

Various types of collateral are accepted, including property, securities, cash and guarantees etc., grouped broadly as follows:

- real estate;
- collateral financed under Asset Finance agreements;
- financial collateral (lien over deposits, shares, etc.); and
- other collateral (guarantees, etc.).

Valuation Methodologies

The valuation methodologies for the Group's key mortgage portfolios of collateral held are adjusted for costs to sell, as appropriate:

Residential property valuations are based on the CSO Residential Property Price Index (RPPI) or on a recent valuation from a professional valuer. In respect of residential property securing performing loan exposures of greater than €0.5m, the Group policy is to ensure an independent valuation is updated within the last 3 years. For residential property securing NPL exposures of greater than €0.3m, the Group policy is to ensure an independent valuation is updated within the last year.

Commercial property valuations are based on opinions from professional valuers, the Investment Property Database Index, local knowledge of the properties, benchmarking similar properties and other industry-wide available information, including estimated yields discount rates. In respect of commercial property securing performing loan exposures of greater than €0.5m, the Group policy is to ensure an independent valuation is updated within the last 3 years. For commercial property securing NPL exposures of greater than €0.3m, the Group policy is to ensure an independent valuation is updated within the last year.

The valuation methodologies outlined above are determined as close to the statement of financial position date as is feasible and are therefore considered by the Group to reflect its best estimate of current values of collateral held.

The Group's requirements in respect of collateral in relation to (i) completion; (ii) taking of security; (iii) valuation; and (iv) ongoing management are set out in credit policies.

The following table details the loan balance distribution by indexed Loan to Value (LTV) band for the Group's residential mortgage portfolio (home loan and buy-to-let).

Risk Management

(continued)

Residential Mortgage Exposures by Indexed LTV

	Home loans	Buy-to-let	Total
31 December 2025	€m	€m	€m
Less than 70%	17,679	320	17,999
71% to 90%	2,500	31	2,531
91% to 100%	46	9	55
Subtotal	20,225	360	20,585
Greater than 100%	24	16	40
Total Residential Mortgages	20,249	376	20,625
Commercial*			557
Consumer finance			607
Finance leases and hire purchase receivables			472
Gross Loans and advances to customers			22,261
Deferred fees, discounts and business combination related fair value adjustment			308
Gross Loans and advances to customers and deferred fees			22,569
Less provision for impairment (note 21)			(320)
Net Loans and advances to customers			22,249

* The Bank's SME mortgage lending is captured within the Commercial line above.

	Home loans	Buy-to-let	Total
31 December 2024	€m	€m	€m
Less than 70%	16,978	357	17,335
71% to 90%	2,446	50	2,496
91% to 100%	77	20	97
Subtotal	19,501	427	19,928
Greater than 100%	38	37	75
Total Residential Mortgages	19,539	464	20,003
Commercial*			493
Consumer finance			553
Finance leases and hire purchase receivables			466
Gross Loans and advances to customers			21,515
Deferred fees, discounts and business combination related fair value adjustment			300
Gross Loans and advances to customers and deferred fees			21,815
Less provision for impairment (note 21)			(392)
Net Loans and advances to customers			21,423

* The Bank's SME mortgage lending is captured within the Commercial line above.

Credit Risk Monitoring

Credit Risk Appetite Metrics and Limits are designed to align with the strategic objectives of the Group to maintain stable earnings growth, stakeholder confidence and capital adequacy. This is achieved through setting concentration limits for higher risk product and business segments, ensuring new business meets pricing hurdle rates and through monitoring default rates and losses. Limits are also set in the context of the peer group and regulatory and economic landscape, to ensure the Group does not become an outlier in the market. Regular updates are presented to the GCC and the GRC and BRCC which include an overview, trends, limit categories and detail of

mitigation plans proposed where a particular parameter is close or at its limit. Credit Risk Appetite is considered an integral part of the Integrated Strategic Planning Process and reviewed at various checkpoints in the year to ensure the appetite is being met and is not expected to be breached during the budget time frame.

Arrears Management and Forbearance

Forbearance occurs when a borrower is granted a temporary or permanent concession or agreed change to a loan ("forbearance measure") for reasons relating to the actual or apparent financial stress or distress of that borrower. Forbearance has not occurred where the concession or

agreed change to a loan does not arise from actual or apparent financial distress.

Forbearance is offered on secured and unsecured portfolios.

The Group is committed to supporting customers that are experiencing financial difficulty and seeks to work with those customers to find a sustainable solution through proactive arrears management and forbearance. Group credit policy and procedures are designed to comply with the requirements of the CBI Code of Conduct on Mortgage Arrears (CCMA), which sets out the framework that must be used when dealing with borrowers in mortgage arrears or in pre-arrears.

The Group's forbearance strategy is built on appropriateness, affordability and sustainability. The main objectives of this strategy are to ensure that arrears solutions are considered appropriate for the borrower, are sustainable in the long-term, that they comply with all regulatory requirements and where possible keep residential mortgage borrowers in their home.

Types of forbearance treatment currently offered by the Group include short term temporary arrangements (such as a payment moratorium) and term appropriate treatments (such as reduced payment, arrears capitalisation and term extension). Requests for concessions in recent years are arising as a result of temporary cash flow problems and an inability to repay at contractual maturity, whereas during the 2008 financial crisis such requests reflected more in-depth long-term affordability issues. This is further reflected in the change in the volume and nature of forbearance measures availed.

A request for forbearance is a trigger event for the Group to undertake an assessment of the customer's financial circumstances prior to any decision to grant a forbearance

treatment. Where a borrower has been granted a forbearance treatment, the loan is considered to have experienced a significant increase in credit risk (SICR) and is classified as Stage 2 for Expected Credit Loss (ECL) assessment purposes under IFRS 9. The customer assessment may also result in the customer being classified as Stage 3, credit impaired as a result of the requirement for a specific impairment provision.

Further deterioration in the individual circumstances of the borrower or where expected improvement in the borrower's circumstances fails to materialise may result in non-compliance with the revised terms and conditions of the forbearance measure. In such circumstances the Group may consider a further forbearance request to secure some level of repayment on the loan.

The effectiveness of forbearance measures over the lifetime of the arrangements are subject to ongoing management and review. A forbearance measure is considered to be effective if the borrower meets the modified terms and conditions over a sustained period of time resulting in an improved outcome for the borrower and the Group.

Credit Risk Measurement

Applications for credit are rated for credit quality as part of the origination and loan approval process. The risk, and consequently the credit grade, is reassessed monthly as part of a continuous assessment of account performance and other customer related factors.

Credit scoring plays a central role in the ratings process. Credit scoring combined with appropriate portfolio risk segmentation is the method used to assign grades, and in turn the PDs to individual exposures under each framework.

The Group, as approved by the Central Bank of Ireland, has adopted the standardised approach for calculation of Risk Weighted exposure amounts for the Buy-to-let mortgage, Commercial, SME, Consumer and Finance leases and hire purchase receivables portfolios. The standardised approach has been applied to the acquired Ulster Bank residential mortgage portfolios.

The following information has not been subject to audit by the Group's independent auditor.

The table below illustrates the relationship between the credit risk rating grades and PD percentages.

Credit Risk Rating Grade	PD %
Excellent	0% ≤ PD < 1.44%
Satisfactory	1.44% ≤ PD < 4.62%
Fair	4.62% ≤ PD < 100%
Non-performing	100%

IFRS 9 Stage 1 and Stage 2 classification is not dependent solely on the absolute probability of default. The IFRS 9 Stage 1 and Stage 2 classification is also dependant on the perceived significant increase in credit risk (SICR) which is the relative movement in the IFRS 9 probability of default since initial recognition. Therefore, there is no direct relationship between the credit risk rating grades and the IFRS 9 stage classification. However, the following relationship between the credit risk rating grades and the IFRS 9 stage classification can primarily be expected to exist:

- Satisfactory and Excellent risk profiles can primarily be expected to be classified as IFRS 9 Stage 1;
- Fair risk profile can primarily be expected to be classified as IFRS 9 Stage 2; and
- Non-performing will align to IFRS 9 Stage 3 or defaulted accounts.

Risk Management

(continued)

Credit Exposure

Maximum exposure to credit risk before collateral held or other credit enhancements

The table below outlines the maximum exposure to credit risk before collateral held or other credit enhancements in respect of the Group's financial assets as at the statement of financial position date.

	Notes	Year ended 31 December 2025 €m	Year ended 31 December 2024 €m
Cash at bank	12	75	72
Items in course of collection	12	25	23
Loans and advances to banks	13	1,719	2,202
Derivative financial instruments	14	24	59
Other assets	15	51	7
Debt securities	17	5,360	4,327
Loans and advances to customers	20	22,249	21,423
Credit commitments	41	1,554	1,618
		31,057	29,731

Further detail on loans and advances to customers is provided in note 36, Financial Risk Management.

The following tables outline the Group's exposure to credit risk by asset class

Debt securities

The Group is exposed to the credit risk on third parties where the Group holds debt securities (including sovereign debt). These exposures are subject to the limitations contained within the Board approved policies, with sovereign debt restricted to those countries that have an External Credit Assessment Institution (ECAI) rating of investment-grade.

The following table gives an indication of the level of creditworthiness of the Group's debt securities and is based on the ratings prescribed by Moody's Investor Services Limited and Standard and Poor's for the EU. There are no impaired debt securities as at 31 December 2025 or at 31 December 2024.

Debt securities neither past due nor impaired

	31 December 2025 €m	31 December 2024 €m
Rating		
Aaa	1,213	726
Aa1	340	292
Aa3	2,429	2,116
A3	1,137	439
Baa1	-	599
Baa2	241	-
Baa3	-	155
Total	5,360	4,327

The following table discloses, by country, the Group's exposure to sovereign and corporate debt as at:

	31 December 2025	31 December 2024
	€m	€m
Country		
Ireland	1,604	1,524
EU	1,012	658
Spain	842	599
France	721	578
Austria	340	292
Portugal	295	439
Italy	241	155
Belgium	220	82
Netherlands	85	-
Total	5,360	4,327

Loans and advances to banks

The Group has a policy to ensure that loans and advances to banks are held with investment grade counterparties, with any exceptions subject to prior approval by the BRCC. The following table gives an indication of the level of creditworthiness of the Group's loans and advances to banks and is based on credit ratings aligned to recognised External Credit Assessment Institutions, including Moody's and S&P.

	31 December 2025	31 December 2024
	€m	€m
Rating		
Aaa	1,399	1,887
Aa1	-	23
Aa2	38	6
Aa3	157	125
A1	66	90
A2	59	71
Total	1,719	2,202

Risk Management

(continued)

Asset Quality

The following tables provide detail of asset quality by Product and IFRS 9 stage. The asset quality risk profiles are linked to IFRS 9 PDs which is one of several measures used to assess SICR in the portfolio.

31 December 2025	Home loans	Buy-to-let	Total residential mortgages	Commercial**	Consumer and finance	Finance leases and hire purchase receivables	Total
Asset quality*	€m	€m	€m	€m	€m	€m	€m
Stage 1							
Excellent	18,080	165	18,245	51	145	136	18,577
Satisfactory	87	7	94	10	308	307	719
Fair	-	-	-	-	-	-	-
	18,167	172	18,339	61	453	443	19,296
Stage 2							
Excellent	746	18	764	3	3	-	770
Satisfactory	669	14	683	219	38	-	940
Fair	452	129	581	253	92	21	947
	1,867	161	2,028	475	133	21	2,657
Stage 3							
Defaulted	215	43	258	21	21	8	308
Total measured at amortised cost	20,249	376	20,625	557	607	472	22,261

* The information in the shaded box has not been subject to audit by the Group's Independent Auditor.

** The Bank's SME mortgage lending is captured within the Commercial line above

31 December 2024	Home loans	Buy-to-let	Total residential mortgages	Commercial**	Consumer and finance	Finance leases and hire purchase receivables	Total
Asset quality*	€m	€m	€m	€m	€m	€m	€m
Stage 1							
Excellent	17,604	185	17,789	62	146	-	17,997
Satisfactory	332	10	342	64	271	414	1,091
Fair	-	-	-	-	12	-	12
	17,936	195	18,131	126	429	414	19,100
Stage 2							
Excellent	504	68	572	4	1	4	581
Satisfactory	609	110	719	333	26	13	1,091
Fair	231	20	251	6	77	27	361
	1,344	198	1,542	343	104	44	2,033
Stage 3							
Defaulted	259	71	330	24	20	8	382
Total measured at amortised cost	19,539	464	20,003	493	553	466	21,515

* The information in the shaded box has not been subject to audit by the Group's Independent Auditor.

** The Bank's SME mortgage lending is captured within the Commercial line above

The tables below set out the asset quality of loans for which the Group has entered formal temporary and permanent forbearance arrangements with home loan, buy-to-let and commercial mortgage customers for the years ended 31 December 2025 and 2024.

Where a borrower has been granted a forbearance treatment, the loan is considered to have experienced a significant increase in credit risk and is classified as Stage 2 for Expected Credit Loss assessment purposes under IFRS 9.

31 December 2025	Home loans €m	Buy-to-let €m	Total residential mortgages €m	Commercial** €m	Total €m
*Stage 2					
Excellent	13	-	13	-	13
Satisfactory	25	1	26	-	26
Fair	39	2	41	-	41
	77	3	80	-	80
Stage 3					
Defaulted	114	12	126	4	130
Total measured at amortised costs	191	15	206	4	210

* The information in the shaded box has not been subject to audit by the Group's Independent Auditor.

** The Bank's SME mortgage lending is captured within the Commercial line above

31 December 2024	Home loans €m	Buy-to-let €m	Total residential mortgages €m	Commercial** €m	Total €m
*Stage2					
Excellent	33	1	34	-	34
Satisfactory	34	4	38	-	38
Fair	30	3	33	-	33
	97	8	105	-	105
Stage 3					
Defaulted	145	26	171	4	175
Total measured at amortised costs	242	34	276	4	280

* The information in the shaded box has not been subject to audit by the Group's Independent Auditor.

** The Bank's SME mortgage lending is captured within the Commercial line above

Loan Impairment

Under IFRS 9 an entity is required to track and assess changes in credit risk on financial instruments since origination and determine whether the credit risk on those financial instruments has increased significantly since initial recognition. The change in credit risk should be based on the change in the risk of default and not changes in the amount of ECL which may be expected on a financial instrument.

The standard is a 3-stage model for impairment, based on changes in credit risk quality since initial recognition:

Stage 1

Financial assets that have not had a SICR since initial recognition are classified as Stage 1. For these assets, 12-month ECL is recognised. 12-month ECL is the expected credit losses that result from default events among the Stage 1 population within 12 months of the reporting date. It is not the expected cash shortfalls over the 12 month period but the entire credit loss on an asset weighted by the probability that the loss will occur in the next 12 months. Therefore, all financial assets in scope will have an impairment provision equal to at least 12-month ECL.

Stage 2

Financial assets that have had a SICR since initial recognition but that do not have objective evidence of impairment are classified as Stage 2. For these assets, lifetime ECL is recognised, being the expected credit losses that result from default events among the Stage 2 population over the expected life of the financial instrument.

IFRS 9 does not define SICR but incorporates a rebuttable presumption that SICR has occurred when an exposure is greater than 30 days past due. The Group did not rebut this presumption for any portfolio.

Risk Management

(continued)

At each reporting date, the Group has relied on the following measures to identify a SICR in relation to an exposure since origination, and classification as Stage 2 within the IFRS 9 ECL framework:

- Delinquency – greater than 30 days past due;
- Forbearance – reported as currently forborne in accordance with European Banking Authority (EBA) NPL guidelines;
- Watchlist – accounts included on the Bank's Watchlist;
- Risk Grade – accounts that migrate to a risk grade which the Bank has specified as being outside its Risk Appetite for origination;
- Change in remaining lifetime PD – accounts that have a remaining lifetime PD that is in excess of the risk at which the Bank seeks to originate risk. This includes residential mortgage accounts where the remaining lifetime PD is more than double and more than 50 basis points higher than the remaining lifetime PD at initial recognition. For the purposes of this assessment, credit risk is based on an instrument's lifetime PD, not the losses expected to be incurred;
- Absolute level of 12 month PD – accounts that have a 12 month PD that is in excess of 20% at the reporting date;
- PD at maturity - non-standard mortgage exposures (i.e. interest only or part capital and interest accounts) have been identified as presenting an increased risk of default at maturity and are consequently classified as Stage 2; and
- Other risk indicators identified by management as giving rise to a significant increase in credit risk at the balance sheet date.

The assessment of SICR is performed on a relative basis and is symmetrical in nature, allowing credit risk of financial assets to move back to Stage 1 if the increase in credit risk since origination has reduced and is no longer deemed to be significant.

Transition from Stage 3 to Stage 2

Movements between Stage 2 and Stage 3 are based on whether financial assets meet the definition of default as at the reporting date.

Certain long-term forbearance treatments may transition from Stage 3 to Stage 2 in line with the definition of default but would not be expected to transition from Stage 2 to Stage 1 without an unwind of the forbearance treatment e.g. part capital and interest treatments.

Transition from Stage 2 to Stage 1

Exposures that are no longer 30 days past due do not transition automatically to Stage 1 (i.e. without probation) and other criteria needs to be met.

Forborne exposures where certain criteria are met transition from Stage 2 to Stage 1 (e.g. no longer classified as EBA forborne).

Stage 3

Financial assets that have objective evidence of impairment at the reporting date are classified as Stage 3, i.e. are credit impaired. For these assets, lifetime ECL is recognised.

The definition of default used in the measurement of ECL for IFRS 9 purposes is aligned to the regulatory definition of default used by the Group for credit risk management purposes, and which has been approved for use for capital management. For the Group's main Mortgage Portfolio, the definition of default approved for use under the Targeted Review of Internal Models (TRIM) from 31 December 2018 is also applied under IFRS 9. This definition of default has been designed to comply with the Regulatory requirements and guidelines on default, NPLs and forbearance.

IFRS 9 does not define default but incorporates a rebuttable presumption that default has occurred when an exposure is greater than 90 days past due. The Group did not rebut this presumption for any portfolio.

Under the Group's definition of default, an exposure is considered defaulted and is classified as Stage 3 credit-impaired where an account is greater than 90 days past due on any material credit obligation or is otherwise assessed as unlikely to pay. Where a material amount of principal or interest remains outstanding at the reporting date, the counting of days past due commences from the first date that a payment, or part thereof, met materiality thresholds and became overdue.

Key indicators of unlikely to pay include:

- Accounts that have, as a result of financial distress, received a concession from the Group with respect to terms or conditions. Such exposures will remain in Stage 3 until certain exit conditions are met and for a minimum probationary period of 12 months before moving to a performing classification;
- Accounts that have, as a result of financial distress, received a concession from the Group with respect to terms or conditions which result in a significant terminal payment. Such exposures must fulfil additional conditions in relation to that terminal payment before moving to a performing classification; and
- Accounts where the customer is assessed as otherwise unlikely to pay, including bankruptcy, personal insolvency, assisted voluntary sale, disposal, etc.

Exception to the general three stage impairment model

Purchased or Originated Credit Impaired (POCI) are excluded from the general 3 stage impairment model in IFRS 9. POCI assets are financial assets that are credit impaired on initial recognition. POCI assets are recorded at fair value at original recognition and interest income is subsequently recognised on a credit-adjusted effective interest rate (EIR) basis. ECLs are only recognised or released to the extent that there is a subsequent change in expected credit losses.

Low credit risk exemption

A low risk exemption can be availed of for financial instruments under IFRS 9 for which the Group can demonstrate objective evidence that these financial instruments are not subject to a SICR.

The Group considers credit risk on a financial instrument low if it meets the following conditions:

- Strong capacity by the borrower to meet their contractual cash flow obligations in the near term;
- Adverse changes in economic business conditions in the longer term may, but will not necessarily, reduce the ability of the borrower to fulfil their contractual cash flow obligations; and
- External rating of investment grade or an internal credit rating equivalent.

Modified financial assets

Where a financial asset is modified or an existing financial asset is replaced with a new one, an assessment is made to determine if the financial asset should be derecognised. If the terms are substantially different, the Group derecognises the original financial asset and recognises a new asset at fair value and recalculates a new EIR for the asset. The date of renegotiation is consequently considered to be the date of initial recognition for impairment calculation purposes, including for the purpose of determining whether a SICR has occurred. However, the Group also assesses whether the new financial asset recognised is deemed to be credit impaired at initial recognition, especially in circumstances where the renegotiation was driven by the debtor being unable to make the originally agreed payments. Differences in the carrying amount are also recognised in profit or loss as a gain or loss on derecognition. If the terms are not substantially different, the modification does not result in derecognition and the date of origination continues to be used to determine SICR.

ECL Framework

The Group's IFRS 9 models leverage, where possible, the systems and data that are used to calculate risk weighted assets for regulatory capital (IRB) purposes. In particular, key concepts such as the definition of default and measurement of credit risk (i.e. ranking of exposures for risk)

have been aligned across the impairment (accounting) and IRB frameworks. IFRS 9 models, however, differ from IRB models in a number of conceptual ways (e.g. the use of 'through the cycle' (TTC) for IRB versus 'point in time' for IFRS 9 inputs, 12 month ECL time horizon for IRB versus lifetime for IFRS 9 Stages 2 & 3) and, as a result, the Group did not leverage the outputs of its IRB models, but instead developed statistical models, which are based on the IRB scorecards but otherwise tailored to the requirements of IFRS 9.

Measurement

For all material portfolios, the Group has adopted an ECL framework that is cognisant of industry best practice, and reflects a component approach using Probability of Default (PD), Loss Given Default (LGD) and Exposure at Default (EAD) components calibrated for IFRS 9 purposes. To adequately capture life-time expected loss, the Group also models early redemptions as a separate component in the ECL calculation.

IFRS 9 PD

For estimating 12 month and lifetime default, the Group applies a statistical model methodology that allows the Group to estimate the risk that a loan will default at a given point in time by grouping exposures with similar risk characteristics and measuring the historic rate of default for exposures of this type. This technique effectively provides a TTC measure of likelihood of default. The Group then applies an economic response model to reflect current and future expected macroeconomic conditions.

Behavioural scorecards with key loan performance indicators for each customer are used for the purpose of grouping exposures with similar risk characteristics as described above. A PD is calculated for each group (referred to as risk grades) which drives the PD for the ECL process. All components of PD, risk grade, Observed Default Rates (ODR) and the economic response model are independently monitored by the Group's Model Risk Team to confirm ongoing fitness for purpose.

IFRS 9 LGD

For the Group's key mortgage portfolios, the LGD model assumes that the Group will have recourse to collateral in the event that an exposure fails to return to a performing state.

The IFRS 9 LGD model incorporates the probability of each defaulted account returning to performing together with the estimated loss rate should they return to performing and the estimated loss rate should they fail to return to performing. The Group has the same approach for LGD estimation for both 12 month and lifetime. As part of the Group's redevelopment of the IFRS 9 Mortgage LGD model during 2025, it was determined that the chosen modelling approach, which is aligned more closely with the Group's forward looking NPL strategy, did not appropriately capture the risk of elevated loss outcomes for a legacy cohort of aged Stage 3 exposures. The ECL on this cohort is determined through a non-modelled approach by the application of a Discounted Cash Flow (DCF) measurement method which takes into account current and expected payment patterns and assumptions with respect to collateral recoverability.

IFRS 9 EAD

For performing loans, the EAD is calculated for each future period based on the projected loan balance (after expected capital and interest payments) at that future period. A Credit Conversion Factor (CCF) is then applied to calculate the percentage increase in balance from the point of observation to the point of default including accrued missed interest payments and any related charges. The CCF is segmented by the accounts' repayment type.

Expected life

When measuring ECL, the Group must consider the maximum contractual period over which the Group is exposed to credit risk. All contractual terms should be considered when determining the expected life, including prepayment options, extension and rollover options. For most instruments, the expected life is limited to the remaining contractual life, adjusted as applicable for expected prepayments.

For certain revolving credit facilities that do not have a fixed maturity (e.g. credit cards and overdrafts), the expected life is estimated based on the period over which the Group is exposed to credit risk and where the credit losses would not be mitigated by management actions. For instruments in Stage 2 or Stage 3, loss allowances will cover expected credit losses over the expected remaining life of the instrument.

Risk Management

(continued)

Effective Interest Rate

The discount rate used by the Group in measuring ECL is the EIR (or 'credit-adjusted effective interest rate' for POCI financial assets) or an approximation thereof. For undrawn commitments, the EIR, or an approximation thereof, is applied when recognising the financial assets resulting from the loan commitment.

Write-off policy

The Group writes off an impaired financial asset (and the related impairment allowance), either partially or in full, when there is no realistic prospect of recovery or on foot of a negotiated settlement. Indicators that there is no prospect of recovery include the borrower being deemed unable to pay due their financial circumstances or the cost to be incurred in seeking recovery is likely to exceed the amount of the write-off. In circumstances where the net realisable value of any collateral has been determined and there is no reasonable expectation of further recovery, write-off may be earlier than collateral realisation. Write-off of financial assets subject to enforcement activity will take place on conclusion of the enforcement process.

In subsequent periods, any recoveries of amounts previously written off are credited to the provision for credit losses in the income statement.

Governance

The Group has a detailed framework of policies governing development, monitoring and validation of Models. Model Governance Committee (MGC) oversees the execution of this framework and approves model developments and notes model validation reports prior to their consideration by the GRC and/or the ALCo and the BRCC, where appropriate.

The GCC is responsible for oversight of changes to credit policies, data or management judgement in impairment model parameters and overlay adjustments to modelled ECL outcomes. The Impairment Reporting Review Forum (IRRF), a sub-committee of the GCC, is accountable for the review and recommendation for approval of the monthly and cumulative year-to-date actual impairment charge for the Group.

IFRS 9 ECL methodologies are subject to formal review by IRRF and approval by the GCC on a monthly basis and by the BRCC on a half-yearly basis. The adequacy of ECL allowance is reviewed by the BAC on a half-yearly basis.

Forward Looking Information (FLI)

IFRS 9 requires an unbiased and probability weighted estimate of credit losses by evaluating a range of possible outcomes that incorporates forecasts of future economic conditions. Macroeconomic factors and FLI are required to be incorporated into the measurement of ECL as well as the determination of whether there has been a SICR since origination.

Measurement of ECLs at each reporting period should reflect reasonable and supportable information.

The requirement to incorporate a range of unbiased future economic scenarios, including macroeconomic factors, is a distinctive feature of the ECL accounting framework, which increases both the level of complexity and judgement in the measurement of allowance for IFRS 9 credit losses.

The Group incorporates a number of macroeconomic impacts and scenarios into the ECL models.

The process to determine the FLI applied in the ECL models leverages existing ICAAP processes while recognising that IFRS 9 scenarios are not stress scenarios. The methodology to incorporate multiple economic scenarios into the ECL models considers, amongst other things, the Group's strategic planning process, the views of policy makers on longer term economic prospects and key macroeconomic risks. The Group has referenced publicly available information for key macroeconomic indicators including the Residential Property Price Index (RPPI), unemployment, interest rates, GDP and publicly available external macroeconomic forecasts including from the Department of Finance (DoF), the Central Bank of Ireland, the ESRI, the European Commission and the IMF. The Group employs the services of an independent economist to determine forecast macroeconomic scenarios. The governance and oversight process includes the review

and challenge by ALCo of FLI and its onward recommendation to the BRCC for approval. In general, a review and update of macroeconomic variables takes place at least bi-annually. Macroeconomic scenarios were most recently updated in December 2025. The Group adopts a minimum of three macroeconomic scenarios for ECL purposes, a four scenario approach is applied for residential mortgages and a three scenario approach is maintained for non-residential mortgage portfolios (see note 2, Critical accounting estimates and judgements for further detail).

IRRF reviews the scenario probabilities and recommends their use ahead of ALCo's subsequent recommendation to the BRCC for approval. Applying statistical techniques combined with expert credit judgement, the Group then formulates an unbiased probability weighted estimate of ECL at the reporting date (see note 2, Critical accounting estimates and judgements for further detail).

Expert Credit Judgement

In line with the requirements of the standard, the Group's ECL accounting framework methodology requires the Group to apply its experienced credit judgement in estimating ECL. At 31 December 2025, the impairment provision includes management adjustment in respect of impairment model parameters, adjustments to modelled outcomes and ECL non-modelled measurement for a cohort of aged defaults in Stage 3 (see note 2, Critical accounting estimates and judgements for further detail).

3.2 Funding and Liquidity Risk - audited

Funding Risk is the risk that the Group is not able to achieve its target funding mix, is too dependent on particular funding instruments, funding sources (retail/wholesale) or funding tenors, fails to meet regulatory requirements and, in extremis, is not able to access funding markets or can only do so at excessive cost and/or Liquidity Risk.

Liquidity Risk is the risk that the Group has insufficient funds to meet its financial obligations and regulatory requirements as and when they arise either through inability to access funding sources or monetise liquid assets.

These risks are inherent in banking operations and can be heightened by a number of factors, including over-reliance on a particular funding source or product type, changes in credit ratings or market dislocation.

The level of risk is dependent on the composition of the balance sheet, the maturity profile and the quantum and quality of the liquidity buffer. It is likely that these risks would be further exacerbated in times of stress. Given the nature of the Group's retail focus which stems from its business model, liquidity and funding risk will arise naturally due to the maturity transformation of primarily short-term deposits into longer term loans. With 92% of the balance sheet being deposit funded at the year end, exposure to a deposit run represents the primary liquidity and funding risk.

The following information has not been subject to audit by the Group's independent auditor.

(i) Regulatory Compliance

The Group is required to comply with the liquidity requirements of the CBI and the full spectrum of European regulatory requirements including CRR/III, CRD VI and associated Delegated Acts such as the Liquidity Coverage Ratio (LCR) Delegated Act.

The primary ratios calculated and reported are the LCR and the Net Stable Funding Ratio (NSFR). In addition, supplementary liquidity and funding metrics are measured and monitored on a regular basis.

Under the Bank Recovery and Resolution Directive (BRRD), the Group is required to adhere to a binding Minimum Requirement for Own Funds and Eligible Liabilities (MREL) as determined by the CBI, which represents a quantification of the eligible liabilities required to act as a buffer in the event of a resolution scenario. The Group has a senior unsecured issuance strategy to ensure ongoing compliance with the MREL requirement.

(ii) Risk Management, Measurement and Monitoring

Group Treasury are responsible for the day-to-day management of the Group's liquidity position and ensuring compliance with the regulatory requirements. In carrying out this responsibility, the principal objective is to ensure that adequate liquid assets are available at all times to meet the operational and strategic liquidity needs of the Group under both normal and stressed conditions. Liquidity management focuses on the overall balance sheet structure together with the control of risks arising from the mismatch in contracted maturities of assets and liabilities, undrawn commitments and other contingent liabilities.

Liquidity risk is measured on a daily basis using a range of metrics against the internally- as well as regulatory prescribed limit framework. The Group primarily monitors its liquidity position through the LCR. The objective of the LCR is to promote the short-term resilience of the liquidity risk profile of banks. It achieves this by ensuring that banks have an adequate stock of unencumbered high-quality liquid assets (HQLA) that can be

converted easily and immediately in private markets into cash in order to meet the liquidity needs for a 30-calendar day liquidity stress scenario.

NSFR and Liquidity Stress Survivability constitute additional core liquidity and funding metrics within the overarching Liquidity and Funding Risk Management Framework that are measured, monitored and reported within the Group.

The Group also actively monitors a comprehensive suite of Risk Appetite metrics consisting of Key Risk Indicators (KRIs) and Early Warning Indicators (EWIs) covering a range of market wide and Group specific events. The purpose of these metrics is to provide forewarning of any potential liquidity trigger events, ensuring the Group has sufficient time to intervene and mitigate any emerging risk.

The Contingency Funding Plan (CFP) outlines the strategy and action plan to address liquidity crisis events. The CFP identifies processes and actions incremental to the existing daily liquidity risk management and reporting framework to assist in making timely, well-informed decisions.

Stress testing forms a key pillar of the overall liquidity and funding risk framework and is conducted from both an economic and normative perspective (as guided by the EBA). Overall, the Group takes a prudent approach in setting the inflow and outflow parameters at a level which is appropriate for each stress scenario with due consideration of the Group's business model, liquidity and funding risk exposures and the liquidity risk drivers, including those outlined in the EBA SREP Guidelines. The stress testing framework is designed to reflect the liquidity and funding impact under idiosyncratic, systemic and combined stresses.

The full suite of liquidity and funding metrics and stress test results are regularly reported to the ALCo, the BRCC and the Board.

In addition, the Group Internal Liquidity Adequacy Assessment Process (ILAAP) provides a holistic view of the Group's liquidity adequacy. The ILAAP examines both the short and long term liquidity position relative to the internal and regulatory limits. Through the ILAAP, the Board attests to the adequacy of the Group's liquidity position and risk management processes on an annual basis.

Risk Management

(continued)

(iii) Liquidity Risk Management Framework

The exposure to liquidity and funding risk is governed by the Group's Liquidity and Funding Risk Management Framework and underlying policies, RAS and associated limits. The framework and policies are designed to comply with regulatory standards with the objective of ensuring the Group holds sufficient counterbalancing capacity to meet its obligations, including deposit withdrawals and funding commitments, as and when they fall due under both normal and stressed conditions. The process establishes quantitative rules and targets in relation to the measurement and monitoring of liquidity risk. The Liquidity and Funding Risk Management Framework is approved by the BRCC on the recommendation of the ALCo. The effective operation of liquidity policies are delegated to the ALCo, while Group Risk and GIA functions provide further oversight and challenge and ensure compliance with the Framework.

The Liquidity and Funding Risk Management Framework outlines the mechanisms by which liquidity and funding risk is managed within the Board approved Risk Appetite and is in line with the overarching liquidity and funding risk principles as follows:

- **Liquidity:** maintain a prudent liquid asset buffer above the internally determined or regulatory mandated (whichever is greater) liquidity requirement such that the Group can withstand a range of severe yet plausible stress events; and
- **Funding:** develop a stable, resilient and maturity-appropriate funding structure, with focus on customer deposits augmented by term wholesale funding sources.

(iv) Minimum Liquidity Levels

The Group maintains a sufficient liquidity buffer comprising both unencumbered HQLA and non-HQLA liquidity capacity to meet LCR and stress testing requirements.

The Group measures and monitors the NSFR which is designed to limit over-reliance on short-term funding and promote longer-term stable funding sources.

(v) Liquidity Risk Factors

Over-reliance and concentration on any one particular funding source can lead to a

heightened liquidity impact during a period of stress. The Group relies on customer deposits to fund its loan portfolio. The ongoing availability of these deposits may be subject to fluctuations due to factors such as the confidence of depositors in the Group, and other factors outside the Group's control including, for example, macroeconomic conditions in Ireland, confidence of depositors in the economy in general and the financial services industry, specifically the competition for deposits from other financial institutions.

The availability and extent of deposit guarantees are of particular importance especially for a Retail bank. The Irish Deposit Guarantee Scheme (DGS) protects deposits up to a balance of €100,000. The national DGS together with the establishment of the European Deposit Insurance Fund is designed to maintain depositor confidence and protect against a potential deposit run. A significant change to the operation of the DGS could adversely affect the Group's ability to retain deposits under a severe stress event.

The Group remains active in capital markets, be it secured or unsecured transactions, and any restrictions on the Group's access to capital markets could pose a threat to the overall funding position. The inability to adequately diversify the funding base could lead to over concentration on the remaining funding sources.

The Group maintains a significant liquidity buffer split between HQLA (sovereign and covered bonds), deposits placed with the Central Bank and ECB eligible retained securitisations which can be monetised quickly to safeguard against a liquidity event. While the quantum of the buffer is sufficient to provide capacity to withstand a significant liquidity stress event there is a concentration in Irish-based assets which could reduce overall capacity in the event of an idiosyncratic Irish stress event.

A clear and defined strategy has been developed to ensure an encumbrance level consistent with its economic plan is maintained by the Group. Disruption to unsecured funding sources and a requirement to revert to an overreliance on secured funding channels could potentially pose a threat to this ratio and unsecured creditors.

A series of liquidity and funding EWs are in place in order to alert the Group to any potential liquidity trigger event therefore allowing sufficient time for mitigating actions to be taken.

(vi) Credit Ratings

The Group's credit ratings have been subject to change and may change in the future, which could affect its cost or access to sources of financing and liquidity. In particular, any future reductions in long-term or short-term credit ratings could: further increase borrowing costs; adversely affect access to liquidity; require the Group to replace funding losses arising from a downgrade, which may include a loss of customer deposits; limit access to capital and money markets; and trigger additional collateral requirements in secured funding arrangements and derivatives contracts. These issues are factored into the Group's liquidity stress testing.

In May 2025, Fitch upgraded PTSB Group Holdings to 'BBB' and upgraded PTSB Plc to 'BBB+', assigning a 'Stable' outlook to both entities. The upgrades reflect Fitch's positive assessment of the Group's strong asset quality and risk profile, alongside stable deposit funding, capitalisation and profitability.

In September 2025, Moody's reaffirmed the existing ratings of 'Baa1' for PTSB Group Holdings and 'A1' for PTSB plc, and maintained a 'Stable' outlook for both. Moody's updated credit analysis highlighted the Group's low asset risk, significantly improving profitability, strong capitalisation and liquidity profile.

Together, this reinforces PTSB Group Holdings' and PTSB plc's firmly established investment grade status with both rating agencies. This is expected to have a continued benefit to the Bank's access to potential investor base and support the Bank in reducing the relative cost of future issuances.

The table below set out the Long-Term Credit Ratings for PTSB Group Holdings and PTSB plc.

Agency	PTSB Group Holdings	PTSB plc	Outlook
Moody's	'Baa1'	'A1'	Stable
Fitch	'BBB'	'BBB+'	Stable

3.3 Market Risk - audited

Market Risk can be defined as the risk of losses in on- and off-balance sheet positions arising from adverse movements in market prices. From the Group's perspective, market risk consists of three components being Interest Rate Risk, FX Risk, and Credit Spread Risk. Often market risk cannot be fully eliminated through diversification, though it can be mitigated via hedging.

The Group's RAS and the associated Market Risk Framework set out the Group's approach to management of market risk. The Framework is approved annually by the BRCC on the recommendation of the ALCo.

All market risks arising within the Group are subject to strict internal controls and reporting procedures and are monitored by the ALCo and the BRCC on a regular basis. Group Treasury is responsible for the management of the Group's market risk exposures. Group Risk and GIA provide further oversight and challenge of Group Treasury's compliance with the Market Risk framework and associated Policies.

(i) Interest rate risk

Interest rate risk is the risk to earnings or capital arising from a movement in the absolute level of interest rates, the spread between rates, the shape of the yield curve or in any other interest rate relationship. The risk may be subdivided into gap, option and basis risk. In line with regulatory standards, the approved Interest Rate Risk in the Banking Book (IRRBB) methodology determined that the Group's interest rate risk exposure must be derived from both an earnings (accrual) (Earnings at Risk (EaR)) and economic value of equity perspective (EVE).

The Group separately calculates the contractual Basis Risk exposure which is factored into the Pillar II ICAAP process. The Basis Risk position is added to the most severe of EVE or EaR risk levels in order to ensure all material sources of Interest Rate Risk are capitalised for.

The following information has not been subject to audit by the Group's independent auditor.

In defining the level of interest rate risk the Group applies the most severe of the six scenarios prescribed by the EBA Guidelines on the Management of IRRBB, for EVE and applies the most negative of a 200bps upwards or downwards shock for EAR models, with both calculations subject to interest rate flooring assumptions. The results are measured and reported against the Board approved risk limits.

The Group also monitors PV01 (impact of 0.01% movement in interest rates), duration mismatches and NII sensitivity when assessing interest rate risk.

The aim of modelling several types of interest rate shock scenarios is to measure the Group's vulnerability to loss under multiple stressed market conditions.

The 31 December 2025 interest rate risk level, based on the EBA's Supervisory Outlier Test (SOT) EVE calculation in the Parallel Up scenario (rates increase by 200bps across all tenors), was calculated as €105m (31 December 2024: €51m in the Short Up scenario).

The Bank's exposure to upward interest rate shocks increased during 2025 primarily due to the acquisition of €1.3bn in nominal terms of ECB-eligible bonds for the HQLA portfolio. The Bank reduced its interest rate swap positions by a net €0.7bn in 2025 as part of its ongoing interest rate risk management.

The following interest rate floors are applied in calculating EAR: 0% for the ECB Refinance Rate and Retail Deposits; -50bps for the ECB Deposit Rate.

(ii) Foreign Exchange Risk

Foreign currency exchange risk is the volatility in earnings resulting from the retranslation of foreign currency denominated assets and liabilities. Consistent with its business model as a domestically focused Retail bank, the Group is predominantly exposed to GBP and USD positions arising from customer deposits denominated in these currencies or branch bureau activities.

Derivatives (FX swaps and forwards) are executed to minimise the FX exposure. Overnight FX positions are monitored against approved notional limits. It is the responsibility of both Group Treasury and Group Risk to measure and monitor exchange rate risk and maintain the exposure within approved limits. The aggregate euro denominated 31 December 2025 FX position was €0.6m (31 December 2024 €3.0m).

(iii) Credit Spread Risk

Credit Spread Risk in the Banking Book (CSRBB) is the risk from market-wide changes to credit and liquidity spreads for a given credit quality on an institution's banking book. It excludes idiosyncratic credit spread risks.

In line with revised regulatory standards, the CSRBB methodology the Group's credit spread risk exposure is derived on both an earnings (Earnings at Risk (EaR)) and economic value of equity perspective (EVE). This risk is measured on the Group's bond portfolio and own debt issuances. The Group's CS01 (impact of 0.01% movement in credit spreads) as at 31 December 2025 was €1.9m.

For further details on market risk see note 36.

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Directors' Report

The Directors present their Annual Report and audited Group and Company Financial Statements to the shareholders for the year ended 31 December 2025.

Results

The Group's profit for the year was €114m (2024 profit: €162m) and was arrived at as presented in the consolidated income statement.

Dividends

There was no interim dividend paid for 2025 (2024 interim dividend: nil). The directors have proposed a final dividend of 1.835 cent per share which amounts to €10m (2024 final dividend: nil). This will, subject to the approval of the shareholders at the Company's Annual General Meeting (AGM), be paid on 19 May 2026.

Review of the Business and Likely Future Developments

A detailed review of the Group's business activities, assets, liabilities, financial position, performance for the year, together with an indication of likely future developments, including in the context of the ongoing Formal Sale Process of the Bank announced during the year, are set out in the Strategic Report. The initiation of the sale process may influence the Group's strategic priorities, outlook and future development depending on its progression and potential outcome. Information on the key performance indicators and principal risks and uncertainties of the business are provided as required by the Companies Act 2014. This includes both financial and non-financial key performance indicators which are set out in the Strategic Report, Financial Review and Sustainability Sections. The principal risks and uncertainties are outlined under "risk factors" in the Risk Management section and under "Longer Term Viability" within the Board Audit Committee section of the Corporate Governance Statement.

Accounting Policies

The material accounting policies, together with the basis of preparation of the Financial Statements are set out in note 1 to the Consolidated Financial Statements.

Corporate Governance

The Corporate Governance Statement, as outlined in the Corporate Governance section, forms part of the Directors' Report.

Principal Risks and Uncertainties

Information concerning the principal risks and uncertainties of the Group are set out in the risk management section of the Strategic Report on page 36 of the Annual Report.

Financial Instruments

The financial instruments and use thereof are outlined in the Risk Management section, financial risk management note 36 and Derivative financial instruments note 14.

Going Concern

The Group's Financial Statements have been prepared by the Directors on a going concern basis having considered that it is appropriate to do so. The going concern of the Group has been considered in note 1 of the financial statements and further information on the assessment of the going concern position is also set out in the Governance Statement on page 101 under the Board Audit Committee's 2025 significant financial reporting judgments and disclosures.

Longer Term Viability

Taking account of the Group's current position and principal risks, the Directors have assessed the prospects of the Group over the period 2026-2028. The Directors confirm that it is their reasonable expectation that the Group will be able to continue in operation and meet its liabilities as they fall due over this period. Further detail on the assessment of the Group's longer term viability is set out in the Corporate Governance Statement on page 101 under the Board Audit Committee's 2025 significant financial reporting judgements and disclosures.

Directors' Compliance Statement

As required by section 225(2) of the Companies Act 2014, the Directors acknowledge they are responsible for securing the Company's compliance with its relevant obligations (as defined in that legislation). The Directors have drawn up a compliance policy statement and have put in place arrangements and structures that

are, in the Directors' opinion, designed to secure material compliance with the relevant obligations. A review of these arrangements was conducted during the year.

Statement of Relevant Audit Information

In preparing and approving the 2025 Annual Report and in accordance with Section 330 (1) of the Companies Act 2014, each of the current Directors of the Company confirm that;

- So far as the Directors are aware, there is no relevant audit information of which the statutory auditors are unaware; and
- The Directors have taken all steps that they ought to have taken to make themselves aware of any relevant audit information and have established that the statutory auditors are aware of that information.

Audit Committee

In accordance with Section 167(3)(a) of the Companies Act 2014, the Directors confirm that the Board has established an Audit Committee.

Corporate Sustainability Reporting Regulations

In accordance with Part 28 of the Companies Act 2014, the Group has prepared a Sustainability Statement for the year ended 31 December 2025. The Sustainability Statement is set out on pages 137 to 277 and represents a dedicated section of the Directors' Report. Permanent TSB plc, a subsidiary of the Group, has availed of an exemption from preparing a Sustainability Statement pursuant to Section 1598 of the Companies Act 2014.

Board Diversity Report

The Board Diversity Report, as set out in the Corporate Governance Statement (see page 92) forms part of the Directors' Report.

Directors

The names of the Directors, together with a detailed description of the key strengths, skills, expertise and experience of each Director are set out in the Board of Directors section on pages 73 to 78 of the Annual Report. On the 25 February 2025, Barry D'Arcy joined the Board as an Executive Director following his appointment as Chief Financial Officer (Mr D'Arcy previously held the role of Chief Risk Officer at PTSB). Hugh O'Donnell

Directors' Report

(continued)

joined the Board as an Independent Non-Executive Director on the 8 April 2025. On the 30 July 2025, Ronan O'Neill retired as an Independent Non-Executive Director following completion of his term of office. Further details on the selection and suitability process for Board positions is set out in the report of the Nomination, Culture and Ethics Committee on page 104.

All directors in situ at the time of issue of the 2025 AGM notice stood for election and were re-appointed by election at the 2025 AGM. All of the current directors will stand for re-appointment by election at the Group's 2026 AGM.

Information on Directors' remuneration is detailed in the Directors' Report on Remuneration on pages 121 to 125 of the Annual Report and Directors' and Secretary interests in shares are outlined in note 42 to the financial statements.

Other than the Directors' and Secretary's interests as set out in note 42, there were no other interests disclosed to the Company in accordance with the market abuse regulations occurring between the period under review and up to 4 March 2026.

Share Capital and Shareholders

Under the terms of the Credit Institutions (Stabilisation) Act 2010 (the "Act") the Minister for Finance could, in certain circumstances, direct the Company to undertake actions that could impact on the pre-existing legal and contractual rights of shareholders. The Act had an original expiry date of 31 December 2012. However, the Act was subsequently extended to 31 December 2014 but has not since been extended. The expiry of the Act does not affect any order already made, or the variance, termination, enforcement, variation or revocation of any existing order nor does it affect the ability of the Minister to impose certain conditions on any financial support provided under or in connection with the Act.

Relationship Framework with the Minister for Finance

The Minister for Finance of Ireland owns and controls 57.5% (2024: 57.5%) of PTSBGH's issued ordinary share capital. Under the terms of the Relationship Framework entered into between the Minister for Finance and PTSBGH, the Minister for Finance expects the Board and Management team of the Group

to conduct the Group's commercial operations in a prudent and sustainable manner which seeks to create a commercially oriented credit institution that recognises the need to encourage and enforce implementation of lessons learned from the financial crisis.

The Minister for Finance recognises that the Group remains a separate economic unit with independent powers of decision-making and that its Board and Management team retain responsibility and authority for determining the Group's strategy and commercial policies (including business plans and budgets) and conducting its day-to-day operations. The Minister for Finance will ensure that the investment in the Group is managed on a commercial basis and will not intervene in day-to-day management decisions of the Group (including with respect to pricing and lending decisions).

Transactions and arrangements between the Group and the Minister for Finance or associates of the Minister for Finance will be conducted at arms-length and on normal commercial terms. The Minister will not, in his capacity as a shareholder of the PTSBGH, take any action that would have the effect of preventing the Group from complying with its obligations under applicable law and regulations, including, but not limited to, the Listing Rules and will not propose or procure the proposal of a shareholder resolution which is intended to circumvent the proper application of regulatory requirements.

The Minister engages with the Group, including with respect to the manner in which the Minister's voting rights are exercised in accordance with best institutional practice and in a manner proportionate to the shareholding interest of the State in the Group. The views of the Minister for Finance and the Department of Finance are expected to be appropriately considered by the Group as part of any consultation process under the Relationship Framework. However, the Board and Management team have full responsibility and authority for determining the Group's strategy and commercial policies.

The Relationship Framework also provides that the Minister for Finance and the Group will review the Relationship Framework from time to time when either party reasonably considers that changes to the Relationship Framework or to the

State Agreements (as defined therein) would be necessary or desirable to ensure that the Relationship Framework continues to reflect certain principles specified in the Relationship Framework and to enable the Group to continue to comply with its obligations under applicable law and regulations, including, but not limited to, the Listing Rules.

The Relationship Framework also imposes restrictions on the Group undertaking certain actions without, where specified, providing information to, consulting with, or obtaining the consent of the Minister for Finance. The principal restrictions are set out in the Relationship Framework, a copy of which is available on the Group website www.permanenttsbgroup.ie.

PTSBGH has complied with the relevant independent provisions set out in the Relationship Framework. The Board is also satisfied, in so far as it is aware, that the Minister for Finance has complied with the relevant independence provisions set out in the Relationship Framework.

Authorised Share Capital

The authorised share capital of the Company is €775,000,000 divided into 1,550,000,000 ordinary shares of €0.50 each.

Issued Ordinary Shares

At 31 December 2025, the Company had 544,996,176 ordinary shares of €0.50 each in issue (2024: 544,996,176). Ordinary shares represent 100% of the Company's issued share capital value. At 31 December 2025, the Company holds, through an employee benefit trust, 4,580 (2024: 4,580) ordinary shares of €0.50 each.

Additional Tier 1 Equity Securities

On 26 October 2022, the Company issued €250m of AT1 securities. On 25 November 2020, the Company issued €125m of AT1 securities. These AT1 Securities contain no conversion rights into ordinary shares of the Company. No new AT1 securities were issued in 2025 and on the 28 October 2025 the Group redeemed €125m of securities issued in 2020.

European Union Bank Recovery and Resolution Directive

The BRRD was implemented into Irish law by the EU (Bank Recovery and Resolution) Regulations 2015. BRRD provides European national resolution authorities with comprehensive and effective powers for dealing with failing banks and certain

investment firms. BRRD grants a set of early intervention powers to the Irish national resolution authority (CBI) that include the write-down or cancellation of equity and/or the conversion of certain eligible liabilities into equity. Further information on BRRD is available on the CBI website: <https://www.centralbank.ie/regulation/how-we-regulate/resolution-framework>.

Variation of Rights

Whenever the share capital is divided into different classes of shares, the rights attached to any class may be varied or abrogated with the consent in writing of the holders of three-quarters in nominal value of the issued shares of that class or with the sanction of a special resolution passed at a separate General Meeting of the holders of the shares of the class, and may be so varied or abrogated either whilst the Company is a going concern or during or in contemplation of a winding-up.

Allotment of Ordinary Shares

Subject to the provisions of the Articles of Association relating to new shares, the shares shall be at the disposal of the Directors and (subject to the provisions of the Articles and the Acts) they may allot, grant options over, or otherwise dispose of them to such persons on such terms and conditions and at such times as they may consider to be in the best interests of the Company and its shareholders, but so that no share shall be issued at a discount and so that, in the case of shares offered to the public for subscription, the amount payable on application of each share shall not be less than one-quarter of the nominal amount of the share and the whole of any premium thereon.

Holders of Ordinary Shares Resident in the USA

The Board may at its discretion give notice to Relevant US Holders calling for a disposal of their shares within 21 days or such longer period as the Board considers reasonable. Relevant US shareholders are those shareholders who hold less than 25,000 shares of any class in the capital of the Company (including, without limitation, shares at any time in the future represented by American depositary shares) in any manner described in Rule 12g-3-2(a)(1) of the Exchange Act or in any amendment to such rule or equivalent rule promulgated by the SEC under the Exchange Act (including directly or

through or as a nominee). The Board may extend the period within which any such notice is required to be complied with and may withdraw any such notice in any circumstances the Board sees fit. If the Board is not satisfied that a disposal has been made by the expiry of the 21 day period (as may be extended), no transfer of any of the shares to which the notice relates may be made or registered other than a transfer made pursuant to a procured disposal of the said shares by the Board, or unless such notice is withdrawn. As previously stated, the intention of the Board in any exercise of this power is, subject to legal, fiduciary and regulatory requirements and costs, to take account of the relative size of the holdings of the US resident persons and apply the power first to those smallest holdings of shares.

Refusal to Transfer

The Directors in their absolute discretion and without assigning any reason therefor may decline to register:

- any transfer of a share which is not fully paid save however, that in the case of such a share which is admitted to listing on London or Euronext Dublin Stock Exchanges, such restriction shall not operate so as to prevent dealings in such share of the Company from taking place on an open and proper basis;
- any transfer to or by a minor or person who is adjudged by any competent court or tribunal, or determined in accordance with the Company's Articles, not to possess an adequate decision-making capacity;
- any instrument of transfer that is not accompanied by the certificate of the shares to which it relates and such other evidence as the Directors may reasonably require to show the right of the transferor to make the transfer;
- the instrument of transfer, if the instrument of transfer is in respect of more than one class of share; and
- any transfer of shares in uncertificated form only in such circumstances as are permitted or required by Section 1086 of the Companies Act 2014.

General Meetings

Under the Articles of Association, the power to manage the business of the Company is generally delegated to the

Directors. However, the shareholders retain the power to pass resolutions at a general meeting of the Company which may give direction to the Directors as to the management of the Company.

The Company must hold a general meeting in each year as its AGM in addition to any other meetings in that year and no more than fifteen months may lapse between the date of one AGM and that of the next. The AGM will be held at such time and place as the Directors determine. All General Meetings, other than AGMs, are called Extraordinary General Meetings.

Extraordinary General Meetings shall be convened by the Directors or on the requisition of members holding, at the date of the requisition, not less than five per cent of the paid up capital carrying the right to vote at General Meetings and in default of the Directors acting within 21 days to convene such a meeting to be held within two months, the requisitionists (or more than half of them) may, but only within three months, themselves convene a meeting.

No business may be transacted at any General Meeting unless a quorum is present at the time when the meeting proceeds to business. Three members present in person or by proxy and entitled to vote at such meeting constitutes a quorum.

In the case of an AGM or of a meeting for the passing of a special resolution or the appointment of a director, a minimum of 21 clear days' notice, and in any other cases a minimum of 14 clear days' notice (assuming that the shareholders have passed a resolution to this effect at the previous year's AGM), needs to be given in writing in the manner provided for in the Company's Articles of Association to all the members (other than those who, under the provisions of the Articles of Association or the conditions of issue of the shares held by them, are not entitled to receive the notice) and to the Auditor for the time being of the Company. The Company's Articles of Association may be amended by special resolution passed at a General Meeting of shareholders. Special resolutions must be approved by not less than 75% of the votes cast by shareholders entitled to vote in person or by proxy.

Directors' Report

(continued)

Substantial Shareholdings

The Directors have been notified of the following substantial interests in the voting rights of Ordinary shares held:

Name	Interest	Date Notified
Minister for Finance of Ireland	57.4% 313,382,197 shares	6 June 2023
Sretaw Private Equity Unlimited Company	7.02% 38,294,197 shares	18 Oct 2023
Wellington Management Group LLP	6.02% 32,783,309 shares	04 Oct 2025
Goldman Sachs International	6.38% 34,783,206 shares	28 Jan 2026
FIL Ltd	3.54% 19,656,053 shares	26 Nov 2025

Note: Under EU Transparency Directive Rules, substantial interests (in voting rights) need only be notified to the Group when an interest passes through a full percentage point (with a minimum notifiable threshold of 3%). Therefore, a notifiable interest may differ from a current interest in shares (for example, disclosures made under the requirements of the Take Over Rules currently in force for the Group at 4 March 2026).

There were no other changes to substantial interests in the voting rights of ordinary shares reported to the Directors as at 3 March 2025.

Voting Rights of Ordinary Shares

No person holds securities carrying special rights. There are no particular restrictions on voting rights. The Company is not aware of any agreements between shareholders that may result in restrictions on the transfer of its shares or on voting rights.

Voting rights at General Meetings of the Company are exercised when the Chairperson puts the resolution at issue to the vote of the meeting. A vote may be decided on a show of hands or by poll. A vote taken on a poll for the election of the Chairperson or on a question of adjournment is also taken forthwith and a poll on any other question or resolution is taken either immediately, or at such time (not being more than 30 days from the date of the meeting at which the poll was demanded or directed) as the Chairperson of the meeting directs. Where a person is appointed to vote for a shareholder as proxy, the instrument of appointment must be received by the Company not less than 48 hours before the time appointed for holding the meeting or adjourned meeting at which the appointed proxy proposes to vote, or, in the case of a poll, not less than 48 hours before the time appointed for taking the poll.

Voting at any General Meeting is by a show of hands unless a poll is properly demanded. On a show of hands, every member who is present in person or by proxy has one vote regardless of the number of shares held. On a poll, every member who is present in person or by proxy has one vote for each share of which they are the holder. A poll may be demanded by the Chairperson of the meeting or by at least five members having the right to vote at the meeting or by a member or members representing not less than one-tenth of the total voting rights of all the members having the right to vote at the meeting or by a member or members holding shares in the Company conferring a right to vote at the meeting, being shares on which an aggregate sum has been paid up equal to not less than one-tenth of the total sum paid up on all the shares conferring that right. It is current standing practice at the AGM that voting is conducted on a poll.

The holders of the ordinary shares have the right to attend, speak, ask questions and vote at General Meetings of the Company. The Company, pursuant to Section 1105 of the Companies Act 2014 and Regulation 14 of the Companies Act 1990 (Uncertificated Securities) Regulations 1996 (S.I. 68/1996), specifies record dates for General Meetings, by which date shareholders must be

registered in the Register of Members of the Company to be entitled to attend and vote at the meeting.

Pursuant to Section 1104 of the Companies Act 2014, a shareholder, or a group of shareholders who together hold at least 3 per cent of the issued share capital of the Company, representing at least 3 per cent of the total voting rights of all the members who have a right to vote at the meeting to which the request for inclusion of the item relates, have the right to put an item on the agenda, or to modify an agenda which has been already communicated, of a general meeting. In order to exercise this right, written details of the item to be included in the general meeting agenda must be accompanied by stated grounds justifying its inclusion or a draft resolution to be adopted at the general meeting together with evidence of the shareholder or group of shareholders' shareholding must be received, by the Company, 42 days in advance of the meeting to which it relates.

The Company publishes the date of its AGM on its website www.permanenttsbgroup.ie on or before 31 December of the previous financial year or no later than 70 days before the date of the AGM.

Director Appointments

Save as set out below, the Group has no rules governing the appointment and replacement of Directors outside of the provisions thereto that are contained in the Articles of Association. Under the Relationship Framework entered into between the Company and the Minister for Finance, the Board must consult with the Minister for Finance for the appointment or re-appointment of the CEO, Chairperson or proposed appointments to the Board. Upon receipt of written notice from the Minister for Finance, the Board shall appoint up to two nominees of the Minister for Finance as Directors of the Company and the appointment(s) shall be deemed to take effect on the date of the next Board meeting following receipt of the aforementioned notice (and regulatory approval). In 2018, the Board received written notice from the Minister for Finance of his intention to appoint two Directors to the Board. In this regard Marian Corcoran was appointed to the Board on 24 September 2019 and Paul Doddrell was appointed to the Board on 26 November 2020.

Powers Granted to Directors at the AGM

The following is a description of the resolutions passed by members in connection with powers granted to the Directors:

Ordinary Remuneration of Directors

At the AGM held on 14 May 2019, shareholders authorised that the Directors may from time to time determine in accordance with the Articles of Association of the Company, the aggregate ordinary remuneration of the Directors for serving as Directors of the Company at an amount not exceeding €750,000. Ordinary remuneration represents the total of basic fees paid to Non-Executive Directors of the Company.

Allotment of Shares

At the 2025 AGM held on 9 May 2025, the Directors were generally and unconditionally authorised, pursuant to section 1021 of the Companies Act 2014, to exercise all of the powers of the Company to allot shares up to an aggregate nominal value of €179,848,738 (representing approximately 66.66% of the issued ordinary share capital of the Company (excluding treasury shares)) as at 6.00pm on 3 April 2024 of which any allotment in excess of €90,823,612 (representing 33.33% of the issued ordinary share capital of the Company (excluding treasury shares) as at 6.00pm on 1 April 2025 may be applied to allot shares pursuant to a pre-emptive offer. This authority will expire at the conclusion of the next annual general meeting of the Company or at midnight on the date which is 15 months after the passing of the resolution (whichever is earlier) unless previously varied, revoked or renewed.

Disapplication of Pre-emption Rights

The Companies Act 2014 sets out pre-emption rights for members where new equity securities (essentially ordinary shares in the case of the Company) are to be allotted for cash. The Companies Act 2014 also provides for these pre-emption rights to be modified or disapplied. The London based Pre-Emption Group has also issued guidelines for such modifications or disapplications (Pre-Emption Principles) with which the Group complies.

At the 2025 AGM held on 9 May 2025 shareholders renewed the Directors' authority to disapply the strict statutory

pre-emption provisions in certain circumstances being: (a) rights issues, open offers or other pre-emptive offers and subject thereto by way of placing or otherwise of any shares not taken up in such issue or offer; and/or (b) for allotments (other than by way of pre-emptive offers) up to an aggregate nominal value of €13,624,904 representing approximately 5% of the total nominal value of the Company's issued ordinary share capital (excluding treasury shares) as at 6.00pm on 1 April 2025.

Furthermore, shareholders authorised the Directors to dis-apply the strict statutory pre-emption provisions in additional circumstances, being for allotments (other than by way of pre-emptive offers) up to an additional aggregate nominal value of €13,624,904 which represents approximately a further 5% of the total nominal value of the Company's issued ordinary share capital (excluding treasury shares) as at 6.00pm on 1 April 2025. The Board has confirmed that any use of the authority in excess of 5% of the Company's issued ordinary share capital would be only in connection with an acquisition or specified capital investment within the meaning of the Pre-Emption Principles. For this purpose and reflecting the Pre-Emption Principles, an acquisition or specified capital investment means one that is announced contemporaneously with the issue of share capital, or that has taken place in the preceding six-month period and is disclosed in the announcement of the issue.

The above authorities will expire at the conclusion of the next annual general meeting of the Company or at midnight on the date which is 15 months after the passing of the resolution (whichever is earlier) unless previously varied, revoked or renewed.

Market purchases of own Shares

At the 2025 AGM held on 9 May 2025 members gave the Company (and its subsidiaries) the authority to make market purchases and overseas market purchases provided that the maximum number of ordinary shares authorised to be acquired would not exceed:

- 5% above the higher of the average of the closing prices of the Company's ordinary shares taken from the main market Euronext Dublin and the average of the closing prices of the Company's ordinary shares taken from the main market of the London Stock Exchange

in each case for the five business days (in Dublin and London, respectively, as the case may be) preceding the day the purchase is made (the Market Purchase Appropriate Price), or if on any such business day there shall be no dealing of ordinary shares on the trading venue where the purchase is carried out or a closing price is not otherwise available, the Market Purchase Appropriate Price shall be determined by such other method as the Directors shall determine, in their sole discretion, to be fair and reasonable; or, if lower,

- the amount stipulated by Article 3(2) of Commission Delegated Regulation (EU) 2016/1052 relating to regulatory technical standards for the conditions applicable to buy-backs and stabilisation (being the value of such an ordinary share calculated on the basis of the higher of the price quoted for: (i) the last independent trade; and (ii) the highest current independent purchase bid for any number of such ordinary shares on the trading venue(s) where the purchase pursuant to the authority conferred by this Resolution will be carried out).

This authority will expire at the conclusion of the next annual general meeting of the Company or at midnight on the date which is 15 months after the passing of the resolution (whichever is earlier) unless previously varied, revoked or renewed.

Re-Allot Treasury Shares

At the 2025 AGM held on 9 May 2025, members gave the Company (and its subsidiaries) the authority to re-allot treasury shares pursuant to Section 1078 of the Companies Act 2014 and the re-allotment price range at which treasury shares may be re-allotted is as follows: (a) the maximum price at which a treasury share may be re-allotted off-market shall be an amount equal to 120% of the Treasury Share Appropriate Price; and, (b) the minimum price at which a treasury share may be re-allotted off-market shall be an amount equal to 95% of the Treasury Share Appropriate Price (provided always that no treasury share shall be re-allotted at a price lower than its nominal value). This authority will expire at the conclusion of the next annual general meeting of the Company or at midnight (Irish Time) on the date which is 15 months after the passing of the resolution (whichever is earlier) unless previously varied, revoked or renewed.

Directors' Report

(continued)

Post Balance Sheet Events

Events after the reporting period are described in note 45 to the financial statements.

Accounting Records

The measures taken by the Directors to secure compliance with the Company's obligation to keep adequate accounting records are the use of appropriate systems and procedures and the employment of competent persons. The accounting records are kept at the Company's registered office, 56-59 St Stephen's Green, Dublin 2.

Disclosure Notice

The Company did not receive a disclosure notice under section 33AK of the Central Bank Act 1942 during 2024.

Key Intangible Resources

Information on key intangible resources as required under section 1589 of the Companies Act 2014 is set out Note 24 Intangible Assets on page 348.

Political Donations

The Directors have satisfied themselves that there were no political contributions during the year, which require disclosure under the Electoral Act 1997.

Location of Information required pursuant to Listing Rule 6.1.77

Listing Rule	Information Included*
LR 6.1.77 (12)	The Trustees of the Employee Benefit Trust have elected to waive dividend entitlements.
LR 6.1.77 (14)	As stated on page 41 the Minister for Finance has entered into a Relationship Framework with the Company. A copy of the Relationship Framework is available at www.permanenttsbgroup.ie

* No information is disclosable in respect of Listing Rules 6.1.77(1), (2), (3), (4), (5), (6), (7), (8), (9), (10), (11), and (13).

Subsidiary Undertakings

The principal subsidiary undertakings and the Company's interests therein are shown in note 43 to the financial statements.

Independent Auditor

KPMG Chartered Accountants and Statutory Audit Firm was appointed as external auditor at the Group's AGM on 19 May 2023. In accordance with section 383 (2) of the Companies Act 2014, the Auditor, KPMG Chartered Accountants and Statutory Audit Firm, will continue in office.

Non-Financial Statement

In compliance with the European Union (Disclosure of Non-Financial and Diversity Information by Certain Large Undertakings and Groups) Regulations 2017 (S.I. No. 360/2017), the company fulfils its non-financial reporting obligations through the Sustainability Statement included in this Annual Report.

On behalf of the Board:

Julie O'Neill
Chair

Eamonn Crowley
Chief Executive

Barry D'Arcy
Chief Financial Officer

Conor Ryan
Company Secretary

Corporate Governance Statement

Chair's Introduction

"A Transformative Year: Strengthening Performance, Resilience and Value as the Bank Positions for New Ownership and Future Growth"



Dear Reader,

2025 was a milestone year for the Bank. Building on the strong momentum achieved through the Ulster Bank integration and sustained commercial performance, the Board's focus in 2025 centred on driving further strategic progress while ensuring that the Bank continued to operate from a position of financial strength. Throughout the year, the Board oversaw notable growth across the Bank's core lending businesses, with mortgage lending increasing significantly year on year, continued expansion in SME and Asset Finance, and strong deposit inflows supporting balance sheet growth. Disciplined cost management kept the Bank on track to meet its full-year operating costs target, supported by the implementation of a voluntary severance scheme, which delivered structural efficiencies. The Board also ensured the effective use of the Bank's strong capital position, including progress on IRB and impairment model development and optimisation of Additional Tier 1 and Tier 2 capital.

Aligned with the Bank's "Altogether More Human" brand promise, the Board continued to prioritise enhanced customer experience through oversight of ongoing digital and payments transformation programmes. This included improvements to customer-facing and back-end systems, the rollout of innovative digital features such as PTSB Protect, Quick Balance, biometric authentication and enhancements across online and in-app journeys to enable greater customer self-service. Investments in customer service capabilities including the transformation of the contact centre, which received external industry recognition, further supported improved accessibility, inclusivity and operational efficiency.

The Board also maintained close oversight of broader technology modernisation and operational capability enhancements. Investments in platform resilience, payments innovation and fraud prevention contributed to improved

customer journeys and strengthened the Bank's competitive position. Ongoing developments in SME, Asset Finance and consumer digital lending propositions further deepened customer relationships and supported sustained commercial growth. The Bank continued to support customers' transition to more sustainable choices, including through expanded green mortgage offerings, which formed a significant proportion of new lending during the year.

Sustainability remained a core strategic priority for the Board. In 2025, the Bank advanced its climate-related commitments, strengthened its position in sustainable finance, supported by the successful issuance of the inaugural Green Tier 2 bond, and launched a refreshed Sustainability Strategy to guide long-term sustainable growth. The Board reviewed progress on climate disclosures, Science-Based Target setting, and preparations for CSRD-aligned reporting requirements. The Bank also continued to expand its sustainability-focused product suite, including participation in government-backed schemes such as the SBCI Growth & Sustainability Loan Scheme. Furthermore, the Board oversaw community initiatives that promoted inclusion and social impact, including the rollout of autism-friendly accreditation across the branch network.

Ensuring continued financial resilience and strong risk management remained a key area of oversight during the year. The Board monitored the Bank's capital and liquidity positions, noting sustained strength in the CET1 ratio and overall asset quality. The completion of a major supervisory review, which resulted in a reduction in the Bank's Pillar 2 requirement, reinforced the soundness of the Bank's risk governance framework. Preparations for the resumption of dividend payments, the first since 2008, has progressed in line with previous market guidance. Further enhancements to operational resilience, third-party risk management, cyber capability and model governance supported the Bank's overall risk posture.

During the year, the Board also initiated the commencement of a Formal Sale Process (FSP) as announced on 30 October 2025. Having undergone a significant transformation in recent years, the Board was of the view that the right time was right to seek a new long-term owner for the Company to support the next phase of the Bank's growth and strategic development. The Board is carefully governing the ongoing FSP to ensure regulatory compliance, confidentiality and continued business stability during the offer period.

A further priority for the Board in 2025 was supporting organisational capability and leadership continuity. The Board oversaw the induction of new directors and the planned transition arising from director retirements, ensuring continued strength, diversity and depth of experience at Board level. The voluntary severance scheme was closely monitored to ensure alignment with long-term strategic, operational and financial objectives, while protecting customer service continuity and supporting colleagues through change. Oversight of culture, people development and succession planning remained central to sustaining the Bank's future growth.

Diversifying income streams and enhancing competitiveness continued to guide the Board's oversight. Progress in SME and Asset Finance lending, improvements in digital lending capabilities, and investment in data and cyber resilience contributed to a more balanced and resilient business model. These initiatives form part of a broader programme to build a more agile and scalable operating model capable of supporting future growth opportunities.

Following the significant transformation of recent years, the Board continued to oversee the delivery of a forward-looking improvement plan designed to strengthen governance, operational resilience and core capabilities. Regular reviews

Corporate Governance Statement

Chair's Introduction (continued)

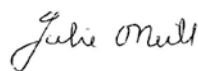
of strategic assumptions and risk frameworks ensured alignment with evolving regulatory, economic and societal expectations. The Board also supported the Bank in anticipating and adapting to long-term changes, including technological advances, shifts in customer behaviour, and climate-related risks.

Through these actions, the Board sought to ensure that the Bank continued to demonstrate strong operational discipline, commercial momentum and strategic clarity against a more challenging interest rate environment and ongoing macroeconomic and geopolitical uncertainty. Looking ahead, the Board will maintain a strong focus on delivering sustainable long-term value for all stakeholders, ensuring that the Bank remains well-capitalised, resilient and positioned to pursue future opportunities, whether under existing or new ownership structure.

Before concluding these introductory remarks, on behalf of the Board, I would like to express my sincere appreciation to Ronan O'Neill for his long-standing service and dedication following his retirement from the Board in 2025. Ronan's commitment and contribution to the work of the Board have been deeply valued. I am also pleased to welcome Hugh O'Donnell to the Board. Hugh brings extensive experience and insight that will support the Board in its continued oversight of the Bank's strategic direction.

The following report sets out the detail to our approach to corporate governance principles and practices, how we implement and endeavour to achieve compliance with the Irish and UK Corporate Governance Codes.

The reports from the Chairs of the Board Audit, Risk and Compliance, Nomination Culture and Ethics, and Remuneration Committees on pages 98, 108, 104 and 111 respectively highlight the key activities and areas of focus for each Committee.



Julie O'Neill
Chairperson

Central Bank of Ireland Corporate Governance Code

The 2015 Central Bank of Ireland Corporate Governance Requirements for Credit Institutions (the "CBI Code") establish statutory minimum core standards of governance for all credit institutions operating in Ireland, with additional and more stringent requirements applying to entities designated by the Central Bank of Ireland ("CBI") as *High Impact Institutions*. These statutory requirements apply to Permanent TSB plc, the Group's licensed retail banking subsidiary, and operate in parallel with the listing-related governance frameworks adopted by Permanent TSB Group Holdings plc under the Irish Corporate Governance Code and UK Corporate Governance Code.

Permanent TSB plc remained subject to the full provisions of the CBI Code during the reporting period and continues to be designated by the CBI as a High Impact Credit Institution, reflecting the scale, nature and systemic importance of its regulated activities. As a result, Permanent TSB plc is required to comply with the enhanced obligations set out in Appendix 1 of the CBI Code, which include heightened expectations in areas such as Board and committee composition, risk governance, control frameworks and fitness and probity.

In addition, Permanent TSB plc is classified as a 'significant institution' for the purposes of the Capital Requirements Directive (SI 158/2014). This classification results in a further suite of obligations under Appendix 2 of the CBI Code, including specific requirements related to Board oversight, risk management, governance structures and reporting.

The Board confirms that Permanent TSB plc continued to meet its obligations under the CBI Code during 2025. Governance arrangements, committee structures, control frameworks and reporting processes have been reviewed throughout the year to ensure ongoing alignment with the CBI's expectations and the Bank's regulatory responsibilities. A copy of the CBI Code is available on the Central Bank of Ireland's website at www.centralbank.ie.

Irish and UK Corporate Governance Codes

Introduction

In October 2024, the Board approved the adoption the newly introduced Irish Corporate Governance Code (2024) together with the revised UK Corporate Governance Code (2024) on a comply-or-explain basis, reflecting the Board's commitment to maintaining the highest standards of corporate governance across both its primary and secondary listing jurisdictions. This decision followed a comprehensive review of the updated UK Corporate Governance Code, the new Irish Corporate Governance Code and changes to the UK and Euronext Dublin Listing Rules, undertaken to ensure that the Company's governance structures remained robust, transparent and aligned with evolving regulatory expectations.

The Board will keep under review, through 2026, the extent to which the UK Corporate Governance Code continues to be applied on a voluntary basis, having regard to the Company's secondary listing on the London Stock Exchange, evolving regulatory and investor expectations, and the relevance and proportionality of UK Code provisions to the Bank's governance framework. The Irish Code introduces additional Irish specific corporate governance provisions relating to Board composition, diversity, stakeholder engagement, internal controls and risk management, and enhanced transparency expectations for Irish listed issuers. The Group will continue to monitor Irish regulatory and market developments and will align its governance practices accordingly.

Details of how the Group applied the main principles and supporting provisions of the Irish and UK Corporate Governance Codes are set out in this Corporate Governance Statement, the Business Model and Strategy section, the Risk Management section and in the Directors' Report on Remuneration. The Board confirms that the Company has complied with the detailed provisions of the Irish and UK Corporate Governance Codes save as set out in the following paragraphs which at this time are classified as indefinite in nature.

A copy of the UK Corporate Governance Code is available on the Financial Reporting Council's website at www.frc.org.uk. A copy of the Irish Corporate Governance Code is available on Euronext Dublin's website at www.euronext.com/en/markets/dublin.

Audit and Risk Committee Independence

Provision 25 of the Irish Corporate Governance Code

Provision 24 of the UK Corporate Governance Code

Provisions 24 requires both the audit and risk committee (where established) to consist of Independent Non-Executive Directors. Paul Doddrell and Marian Corcoran are members of the Board Risk and Compliance committee which is chaired by an Independent Non-Executive director and has a majority of independent non-executive directors within their membership. The Board believes it appropriate to ensure that the aforementioned committees consist of members with appropriate knowledge, experience and skills and, notwithstanding the basis of their appointment, can demonstrate effective contribution through an independent mind-set. The Board believes it is in the best interest of the Bank to utilise Mr Doddrell's and Ms Corcoran's considerable risk management experience on the Board Risk and Compliance Committee. The Board Audit Committee consists entirely of Independent Non-Executive Directors.

Authority of Remuneration Committee.

Provision 32 of the Irish Corporate Governance Code

Provision 33 of the UK Corporate Governance Code

Provision 34 of the Irish Code requires that the Remuneration Committee provides independent oversight of executive remuneration and ensures that remuneration policies support long-term sustainable success. Provision 33 requires that the Remuneration Committee should have delegated responsibility for setting the remuneration for all executive directors and the Chairperson. However, under EBA guidelines on sound remuneration practices, the Remuneration Committee is designated

as being responsible for the preparation of decisions to be taken by the Board regarding the remuneration for executive directors and other identified staff. The Board's view is that, from a regulatory perspective, the Group is compelled to comply with the EBA guidelines and therefore its remuneration policy reflects this position.

Pension Arrangements for Executive Directors

Provision 39 of the Irish Corporate Governance Code

Provision 39 of the UK Corporate Governance Code

These provisions each require that pension arrangements for executive directors should be aligned with those available to the workforce. Since 2019, the Board has approved certain enhancements to staff defined contribution pension schemes where, based on market benchmarking, the maximum employer contributions were increased up to 16% linked to increases in each employee's own contributions and subject to certain age-based eligibility criteria. In carrying out these reviews, the Remuneration Committee paid due cognisance to existing State Agreements relating to remuneration and the Group's ability to provide competitive reward arrangements to retain and motivate executive talent in an increasingly competitive marketplace. Given the particular challenges faced in attracting and recruiting the most senior talent, in 2022, the Board approved increases in the Executive Directors' maximum pension contribution to 16%, or 20% in the case of the CEO. Given the difficulties experienced in respect of senior talent acquisition and aligned with the current approach for members of the Bank's Executive Committee, it was also agreed to exempt the Executive Directors, including the CEO, from the age-related eligibility criteria. The Board acknowledges that Executive Director pension arrangements exceed the standard workforce offering. However, given the challenges in sourcing senior executive talent within the Irish banking sector and the need to maintain competitive remuneration structures, the Board considers these arrangements justified, appropriate and aligned with the long-term interests of the Group.

Corporate Governance Statement

Stakeholder Engagement

“How the Board ensures effective engagement with, and encourages participation from the Company’s Stakeholders”

Stakeholder Engagement

In line with our Purpose of working together to build trust with our customers and communities, effective and proactive engagement with key stakeholders is an integral part of the Group's Corporate Affairs & Communication strategy. The Bank's policy with respect to stakeholder engagement, overseen by the Sustainability & Corporate Affairs function, encompasses the Bank's overarching approach to stakeholder engagement. The Board Nomination, Culture and Ethics Committee receives quarterly reporting from the Bank's Chief Sustainability and Corporate Affairs Officer on matters related to the Group's reputation, stakeholder engagement and communication strategy.

In addition, stakeholder relationship owners across the Group interact with a variety of stakeholders at regular intervals throughout the year and provide updates to the Board on same. Key stakeholders for the group include shareholders, customers, colleagues, suppliers, society and the Bank's regulators.

Shareholder Engagement

Transparent and frequent communication with the Group's shareholders is a key priority. The Chairperson is available to meet with major shareholders on matters concerning the performance or operations of the Bank. During 2025, the Chairperson met with a number of major shareholders and communicated feedback from these meetings directly to the Board.

The Group has a dedicated Investor Relations team, led by the Head of Investor Relations and headed by the CFO. There is a comprehensive schedule of investor engagement in which the CEO and CFO participate in, on behalf of the Board, along with the Head of Investor Relations and selected Senior Executives. All engagements are structured in such a way as to ensure market sensitive information is not disclosed.

The Group also has an active market engagement programme in place, where it reports financial results live through a webcast twice a year, (typically in March and late July/early August) and updates the market on trading twice a year, (typically in May and October). The Group publishes all results, including the webcasts, to a dedicated Investor Relations section on its website. The Group also reports other relevant information to the market on a timely basis. Following the release of results, the CEO and CFO facilitate a roadshow which provides an opportunity for institutional shareholders to provide feedback directly. Investor conferences are also a valuable tool, and during 2025, Senior Executives attended equity conferences in Dublin, London and New York.

The Head of Investor Relations, together with the CEO and the CFO, provide regular updates to the Board on the types of activities mentioned above, along with market reactions, in order to

ensure that the members of the Board are aware of the views of the investment community and are considered in their decision making. During the year, the CEO, CFO and Chairperson sought regular engagement with major shareholders and reported on these engagements to the Board. Following on from the announcement of the Formal Sale Process, the Group actively sought to communicate with shareholders to explain the rationale for the Board's decision. To note, interaction with shareholders since the announcement has been subject to Takeover Rules, which impose certain obligations and restrictions.

Customer Engagement

The Board believes delivering fair customer outcomes is a central tenet to its work. The Board is committed to understanding its customers and delivering what matters most to them through every stage of their financial journey. The Board receives feedback from customers through the Bank's 'Voice of the Customer programme', focus groups and surveys all of which are reported on in detail to the Board via a customer strategy and experience report. The Board receives regular updates from the Bank's Chief Customer and People Office and Head of Retail Banking who chairs the Bank's Customer Committee (see page 32 for further details on the activity of this committee). The Board Risk and Compliance Committee also supports the Board in delivering a customer centric focus through its oversight on conduct risk, providing oversight to ensure the Bank's systems and operations support fair customer outcomes.

Workforce Engagement

The UK Corporate Governance Code places an obligation on boards to keep workforce engagement mechanisms under review so that they remain effective. The Irish Corporate Governance Code requires the Board to explain the arrangements for engagement with the workforce and why it considers them to be effective. Furthermore, the UK Corporate Governance Code also states that where the Board chooses to implement alternative arrangements to those set out in the UK Corporate Governance Code, it should explain in its Annual Report what alternative arrangements are in place, and why it considers that they are effective.

There are currently a number of ways the Board engages with the Group's workforce and hears the employee 'Voice', on an on-going basis, through the following arrangements:

Mechanism	Detail
Board and Committee Meetings	During 2025 the Board met in total on 21 occasions and this facilitated regular Board engagement with subject matter experts from across the Bank.

Mechanism	Detail
Nomination, Culture and Ethics Committee	Dedicated Board Committee with accountability for culture, behaviour, ethics and reputation management oversight in the Bank. Bi-annual review of employee 'Speak Freely' concerns raised through a Colleague Conduct Report. Insight on senior leader exit interview feedback.
Employee Events	Attendance at, and participation in, employee events on an on-going basis. Examples include the Employee Resource Group initiatives such as the DiCE 2025 Intercultural Competence Event, a Memorial Service for the Families of Deceased Colleagues, Non-Executive Director attendance at the 2025 'Values in Practice' Awards and selected townhalls, and Director participation in a variety of diversity and wellbeing events for colleagues (such as the Irish Centre for Diversity re-accreditation)
Employee Representative Bodies	CFO engagements with Employee Representative Bodies, to update them on the organisational trading position, the Bank's Purpose and Business Strategy, together with opportunities and challenges being faced.
Employee Surveys	The Employee collective voice is shared with the Board Nomination, Culture and Ethics Committee through a variety of employee surveys that are run throughout the year. Examples include the 'Every Voice Counts' annual survey and 'Every Voice Counts' Micro-pulse surveys.
Employee Engagement Group	The Nomination, Culture and Ethics Committee met with the Bank's People Experience Council in December 2025.

The People Experience Council is made up of colleagues from all areas of the business, representing a diverse group of employees at all levels. The Council functions to champion organisational engagements and supports the embedding of culture in the Bank. A key focus for the Council is to support development of plans to address findings from the Bank's Every Voice Counts survey. The Nomination, Culture and Ethics Committee meet annually with the People Experience Council to be updated on employee sentiment and mood on the ground. As part of meeting the Council, Board members not only gain a deeper understanding of the drivers behind the employee engagement survey results, they also gain diverse perspectives on what actions will address the areas for development and any emerging areas of discontent from employees. It is intended that attendance by members of the Nomination Culture and Ethics Committee will continue indefinitely.

All material organisational changes are discussed and consulted on in advance with employee representative bodies. It is important in the context of these discussions that colleagues understand the financial and strategic position of the Bank over its five-year planning period and where appropriate, aligned to engagement protocols, provide member representations. During 2025, the CFO attended engagement sessions with Employee representative bodies to explain and provide context to the Bank's current and medium-term outlook as part of negotiations on reward.

Having reviewed the series of employee engagement during 2025, the Nomination, Culture and Ethics Committee was satisfied that this engagement was effective and in compliance with Irish and UK Corporate Governance Codes.

Supplier Engagement

The Bank is supported by a network of suppliers that enable the smooth delivery of services to our customers. The Bank has in place a centralised third-party management team with responsibility for managing and overseeing the third-party management process. The team works closely with colleagues across the Bank, including supplier relationship owners, to ensure compliance with standards, processes, procedures and governance requirements, as well as ensuring that new or renewal of critical outsourcing arrangements are brought to the Board Audit Committee for approval. The Board Audit Committee has responsibility for oversight of third-party management and receives regular reports on the Bank's engagement activity in that regard.

Corporate Governance Statement

Stakeholder Engagement (continued)

Societal Engagement

The Board is committed to overseeing a sustainable business and to support communities by having a positive and meaningful impact. The Bank engages with a number of stakeholders across Irish society, including Community Partners, Charities and NGOs, Media and Government Officials. The Bank also engages at an industry level across a number of forums, including the Banking and Payments Federation of Ireland and Irish Banking Culture Board. The Nomination, Culture and Ethics Committee is updated by the Sustainability & Corporate Affairs function on a quarterly basis on key matters relating to the Bank's Corporate Affairs & Communication strategy, including reputation, media, social media, public affairs, community engagement and internal communication and engagement.

Regulatory Engagement

Led by the Chief Risk Officer, the Board and Management maintain regular engagements with regulatory authorities, including with the Central Bank of Ireland ('CBI'). These engagements are in the form of; one to one meetings with Board members and Management, onsite inspections and thematic reviews, and regular engagements with the Bank's Regulatory Affairs Team. Meetings between the CBI, the Board, the Chairperson and Management involve open discussion on a wide range of topics including, business strategy and performance, consumer protection, risk management, capital and liquidity, upstream regulation and challenges facing the banking industry. The Board are also kept up to date on regulatory engagements and correspondence, ensuring the Board are aware of feedback from the CBI along with key areas of focus. The wide-ranging constructive engagement with the CBI is recognised by the Board as an enabler for the Bank in understanding regulatory expectations and meeting regulatory obligations.

Sustainability Double Materiality Assessment

The Board recognises that building strong relationships with the Bank's stakeholders and ensuring effective engagement plays a fundamental role in informing Business Strategy. This engagement guides reporting, allowing the Bank to identify risk and emerging trends, while helping to prioritise investment and resourcing - ultimately, enabling the Board to conduct and oversee all areas of its business in a more sustainable way.

During 2024, the Bank engaged a sample of stakeholders to complete an exercise in double materiality, in line with the requirements to comply with Part 28 of the Companies Act 2014, which came into effect for reporting dates on or after the 1 January 2024. The exercise assessed both the stakeholder impact, and the financial materiality, of identified Impacts, Risks and Opportunities (IROs), to determine those that were most material to our business, and important to our stakeholders.

The findings from the double materiality assessment (DMA) played an integral role in guiding the Bank's first Sustainability Statement and informed the development of PTSB's Sustainability Strategy 2025-2027.

Members of the Board took part in the DMA process and progress made in relation to the disclosure was reported to both the Board and Board Audit Committee. The Bank's DMA was reviewed during 2025. The review confirmed that there was no material change to the identified sustainability-related IROs from the 2024 cycle.

For more on the Bank's Sustainability Statement, which includes a detailed overview of the DMA process, please refer to page 137.

Board Decision Making

The Board has a clear understanding of the Bank's key stakeholders and how the operations of the Bank effect the environment and communities in which it operates. The Bank's Stakeholder Engagement Programmes facilitate a clear and unfettered information flow to and from the Board. This allows the Board to make informed decisions that are both in the best interest of the Company and facilitate a clear understanding of how decisions impact on the Bank's stakeholders, wider community and environment.

A key focus for the Nomination, Culture and Ethics Committee is to ensure that Directors are able to make a positive contribution to the long-term sustainable success of the Company. Directors are more likely to make good decisions and maximise the opportunities for the Company's success if the right skillsets and breadth of perspectives are present on the Board. The Nomination, Culture and Ethics Committee, aligned with the Bank's Purpose and Ambition, considers the appropriate skillsets and perspectives and sets them out in a Board-approved Suitability Matrix. Appointments to the Board are recommended in accordance with the Suitability Matrix. The key skillsets and experience that each of the Directors bring to the Board are set out in the Board Biographies section.

Focus for 2026

The Bank is committed to building on the progress achieved to date, and continuing its established proactive engagements with key stakeholders in 2026. This will enable the Bank to make continued progress in cultivating and strengthening relationships, building trust and further enhancing the reputation of the Bank. Overseen by the Chief Sustainability & Corporate Affairs Officer, the Bank will continue to ensure that feedback from all key stakeholders is monitored and measured effectively in line with the Bank's Purpose and that key insights are brought to the Nomination, Culture and Ethics Committee, or relevant Committee, on a regular basis.

Corporate Governance Statement

Board of Directors

A key focus for the Board is to ensure that directors are able to make a positive contribution to the long term sustainable success of the Company. Directors are more likely to make good decisions and maximise the opportunities for the Company's success if the right skillsets and breadth of perspectives are present on the Board. The Nomination Culture and Ethics Committee, aligned to the Group's Purpose and Ambition, considers the optimal knowledge, experience and skills requirements of the Board and sets them out in a Board approved Suitability Matrix. Appointments to the Board are guided by the Board Assessment and Suitability Policy, Board Diversity Policy and Board Suitability Matrix. The key knowledge and experience that each of the Directors bring to the Board is set out in the Biographies below.

JULIE O'NEILL (70) INDEPENDENT NON-EXECUTIVE DIRECTOR CHAIR	Appointed to Board: 17 January 2023 Nationality: Irish Committee Membership: Remuneration Committee Nomination, Culture and Ethics Committee (Chair) Principal External Appointments: Director at XL Insurance Company SE and Architas Multi-Manager Europe.	Key Strengths, Skills and Experience Julie is an accomplished business leader with extensive executive and board experience, having held a number of public service positions, including Secretary General of both the Department of Transport and the Department of Marine and Natural Resources. Julie has also previously held a number of other prominent Non-Executive Director roles, including Chairperson of the Convention Centre Dublin and Non-Executive Director, AXA Life Europe and Ryanair Group plc. Julie previously served a six-year term on this Board (2014 to 2020) as an Independent Non-Executive Director, the latter 4 years as the Board's Senior Independent Director. During this period, she played a significant role as a Board member in guiding positive transformation of the Bank. Julie has extensive business and leadership experience and brings an in-depth knowledge of the Bank and wider banking/insurance industry to the Board. • Certified Bank Director • Bachelor of Commerce • MSc Policy Analysis
EAMONN CROWLEY (56) CHIEF EXECUTIVE OFFICER	Appointed to Board: 10 May 2017 Nationality: Irish Committee Membership: None Principal External Appointments: PTSB nominee director of Banking & Payments Federation Ireland CLG.	Key Strengths, Skills and Experience Eamonn brings to the Board extensive international banking, accounting, corporate treasury and leadership experience with a significant customer focus reflected in the Bank's Purpose, Ambition and Strategy. Eamonn has 30 years+ banking experience. In addition to his tenure at PTSB since 2017, Eamonn's experience encompasses the management of a significant retail banking growth agenda during his tenure as CFO in Santander Bank in Poland and as a member of the management board there for more than 10 years. Eamonn has extensive relevant stakeholder management experience with particular focus of building effective relationships with colleagues, regulators, government and markets (shareholders, investors, analysts). In addition to his financial management credentials, Eamonn is an accomplished business leader manager who takes a broad perspective and has a deep commitment to both organisational culture and operational transformation for the benefit of key stakeholders such as shareholders, customers, colleagues and the long-term sustainable interests of the Bank. • MBA Smurfit Business School • Certified Accountant (FCCA) and Member of Association of Corporate Treasurers • Certified Bank Director • Harvard Business School – Advanced Management Programme

Corporate Governance Statement

Board of Directors (continued)

BARRY D'ARCY (52) **CHIEF FINANCIAL OFFICER**



Appointed to Board:
25 February 2025

Nationality:
Irish

Committee Membership:
None

Principal External Appointments:
Irish Banking Culture Board CLG

Key Strengths, Skills and Experience

Barry is a CIMA Fellow and Chartered Global Management Accountant (FCMA, CGMA), a finance and risk professional with significant banking and leadership experience having worked in the Commercial and Retail Banking sector in Ireland for more than 15 years. Barry brings a wealth of financial, risk, commercial, strategic, operational and regulatory knowledge to the Bank together with experience in delivering large complex programmes successfully.

Barry was appointed CFO in February 2025, having joined the Bank as CRO in October 2023. Prior to joining PTSB, Barry was Chief Risk Officer and an Executive Director at KBC Bank (Ireland).

- FCMA, CGMA
- Bachelor of Business Studies
- Certified Bank Director

DR. RUTH WANDHÖFER (50) **INDEPENDENT NON-EXECUTIVE DIRECTOR**



Appointed to Board:
30 October 2018

Nationality:
German/British

Committee Membership:
Board Audit Committee
Remuneration Committee

Principal External Appointments:
Director Leximar Ltd (personal consultancy company).

Key Strengths, Skills and Experience

Ruth has substantial banking and leadership experience with extensive knowledge of both regulatory and market strategy, and together with her insight on regulatory and financial technology and cyber security innovation provides invaluable insight for the Board as it provides oversight for the Group's digital and payments transformation programmes.

Ruth was MD and Global Head of Regulatory and Market Strategy at Citi from 2007 to 2018 where she drove regulatory and industry dialogue in addition to developing product/market strategy in line with the evolving regulatory and innovation landscape. Prior to joining Citi, Ruth was Policy Advisor for Securities Services and Payments at the European Banking Federation.

- MA in Financial Economics (UK)
- MA in International Politics (FR)
- LLM in International Economic Law (UK)
- PhD Finance
- Certified Bank Director

MARIAN CORCORAN (61) **NON-EXECUTIVE DIRECTOR**



Appointed to Board:
24 September 2019

Nationality:
Irish

Committee Membership:
Board Risk and Compliance Committee
Nomination, Culture and Ethics Committee

Principal External Appointments:
Director HP International Bank DAC, Director of IDA Ireland, Chair DCU Educational Support Services DAC, and Director of MC2 Change Limited (personal consultancy company)

Key Strengths, Skills and Experience

Marian has extensive board and executive experience. Marian brings to the Board wide-ranging experience in advising on strategy development and transformation. Marian's experience of risk management brings invaluable experience to the Board Risk and Compliance Committee. Her cross-industry strategic insight and skills in stakeholder management, risk management, corporate governance and technology-enabled transformation benefit the Board as the Group's strategy and change programmes evolve at an ever-increasing pace.

Marian is a former executive director and partner in Accenture Ireland. Marian has extensive experience in strategy delivery, delivery of technology-enabled change and business transformation both locally and internationally. Marian is a member of the Governing Authority at Dublin City University (DCU) and was also a member of the Irish Public Service Pay Commission.

- Certificate - Artificial Intelligence: Implications for Business Strategy, MIT Sloan + CSAIL
- Business Sustainability Management, University of Cambridge
- Chartered Director
- Certified Bank Director
- Professional Certificate in Leadership Coaching
- BSc Biotechnology

PAUL DODDRELL (58)
**NON-EXECUTIVE
 DIRECTOR**



Appointed to Board:
 26 November 2020

Nationality:
 British

Committee Membership:
 Nomination, Culture and Ethics
 Committee
 Board Risk and Compliance
 Committee

**Principal External
 Appointments:**
 Director at Cabot Financial
 (Ireland) Ltd, 3 to 48 Ltd (personal
 consultancy company), and Chair
 of CCE Trustee Ltd

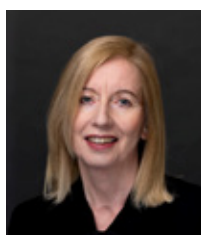
Key Strengths, Skills and Experience

Paul has significant executive leadership experience spanning finance, asset servicing, lending, operations, sales with specific management expertise in business strategy development and execution; risk management and change management. Paul's strategic insights and experience particularly in the area of mortgage servicing and credit provide core skills which the Board requires.

Paul is a highly experienced financial services executive and Board member who has successfully operated at executive management level in a number of organisations globally. Paul served as Pepper Group's Managing Director for Shared Services, and led the successful establishment and growth of Pepper's financial services operations in Ireland. Previously Paul held a number of key executive roles at GE Capital. Paul is currently a Non-executive Director and chair of the Audit and Risk committees at Cabot Financial Ireland.

- Chartered Management Accountant – ACMA, CGMA
- Certified Six Sigma Master
- BA(Hons) Business Studies
- Certified Bank Director

**CELINE FITZGERALD
 (63)**
**INDEPENDENT NON-
 EXECUTIVE DIRECTOR**



Appointed to Board:
 30th March 2021

Nationality:
 Irish

Committee Membership:
 Nomination, Culture and Ethics
 Committee
 Remuneration Committee (Chair)

**Principal External
 Appointments:**
 Chair, Pieta House CLG and
 CEO (interim) Research Ireland

Key Strengths, Skills and Experience

Celine is a former Non-Executive Director at the commercial semi-state company Ervia and has previous senior executive experience in the telecommunications (senior executive at Vodafone 1999 – 2007) and the managed services (CEO of Rigney Dolphin 2007 – 2012) industries. Celine was a Non-Executive Director on the VHI Main Board between 2010 and 2020 and was General Manager at the charity Goal between 2016 and 2018. Celine has also contributed her time to many other charitable foundations including Chair of the charity Pieta House.

Celine is an experienced senior executive and Independent Non-Executive Director and has led culture transformation in challenging environments. Celine has had practical experience of handling ethical challenges in the charity sector during her time as Managing Director of Goal. Celine has an in-depth understanding of strategic differentiation to deliver customer value. Celine's knowledge and experience is of significant benefit for the Board in its role to lead on evolving an open ethical, risk aware and inclusive culture which is focussed on building trust with customers, colleagues and communities.

- BA Management
- Chartered Director
- Certified Bank Director

Corporate Governance Statement

Board of Directors (continued)

ANNE BRADLEY (66) INDEPENDENT NON- EXECUTIVE DIRECTOR



Appointed to Board:
30th March 2021

Nationality:
Irish

Committee Membership:
Board Audit Committee
Nomination, Culture and Ethics
Committee

**Principal External
Appointments:**
Director at Northern Trust
International Fund Administration
Services Ireland Ltd, Director of
AirNav Ireland and Trustee of
Pieta House CLG.

Key Strengths, Skills and Experience

Anne's experience is centred on transformation and business change and her cross industry knowledge and experience supports the Board as the Bank evolves its digital transformation strategy while maintaining resilient and reliable technology systems. Anne has extensive experience in technology and has operated at senior levels, leading on IT resilience, emergency response, technology evaluation, crisis management, operational efficiency and IT infrastructure.

Anne worked with Aer Lingus/IAG Group until 2020 where, during a 40 year career she held a number of senior executive roles. Between 2015 and 2018 and is a current member of the Board of Northern Trust International Fund Administration Services Ireland Ltd. and Chair of the Risk and Compliance Committee, a member of the Audit Committee and Nominations Committee, and is a Trustee of Pieta House. In 2025 Anne joined the Board of AirNav Ireland and is a member of the Audit and Risk Committee and the Safety and Compliance Committee.

- Fellow of the BCS, The Chartered Institute for IT
- Certified Bank Director
- Member of Institute of Directors

CATHERINE MORONEY (63) INDEPENDENT NON- EXECUTIVE DIRECTOR



Appointed to Board:
12th December 2023

Nationality:
Irish

Committee Membership:
Remuneration Committee
Board Risk and Compliance
Committee

**Principal External
Appointments:**
Director at Cynergy Bank
(UK) Limited, Intact Insurance
Corporation, and Saburai
Consulting Limited (personal
consultancy company)

Key Strengths, Skills and Experience

Catherine brings extensive experience in retail, corporate and business banking to the Board as the Bank further develops its business banking proposition. Catherine has deep experience at senior executive level in leading customer-facing businesses with a focus on strategic planning, business growth, innovation, transformation and sustainability. Catherine has also held a number of non-executive board positions across Ireland and the UK, including Chair of the Board and of audit, risk and remuneration committees in the Banking, Insurance, Corporate Finance and Not-For-Profit Sectors.

Catherine is an accomplished business leader who has spent a large portion of her career at senior executive level in the Irish financial services sector (AIB Bank) with a deep involvement in the business community, including in her role as former President and Chair of Dublin Chamber of Commerce

- Bachelor of Commerce, Banking & Finance, UCD
- Chartered Director, Institute of Directors
- Fellow, Institute of Bankers in Ireland
- Certified Bank Director

RICK GILDEA (73)
INDEPENDENT NON-EXECUTIVE DIRECTOR



Appointed to Board:
12th December 2023

Nationality:
American/British

Committee Membership:
Board Risk and Compliance Committee (Chair)
Board Audit Committee

Principal External Appointments:
Chair of the Finance Committee and member of the Board of Advisors, The Johns Hopkins University School of Advanced International Studies.

Key Strengths, Skills and Experience

Rick Gildea's background in corporate banking (JP Morgan Chase) brings deep experience of client coverage and risk management together with capital markets expertise to the Board.

Rick spent a large portion of his career at senior executive level in investment and corporate banking roles in London and New York, prior to pursuing a non-executive career. Rick was an independent Non-Executive director at Alpha Bank (a domestic and international bank listed on the Stock Exchange in Athens) between 2016 and 2023 where he chaired the remuneration committee and was a member of the risk committee with a particular focus on non-performing loan risk management.

- BA History
- MA in International Relations/Economics
- Certified Bank Director

HUGH O'DONNELL (55)
INDEPENDENT NON-EXECUTIVE DIRECTOR



Appointed to Board:
8th April 2025

Nationality:
Irish

Committee Membership:
Board Audit Committee (Chair)
Board Risk and Compliance Committee

Principal External Appointments:
Director, Bon Secours Hospital System CLG

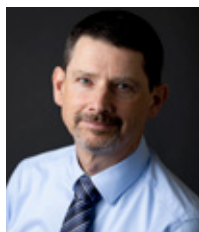
Key Strengths, Skills and Experience

Hugh brings extensive knowledge of retail and business banking to the role on the Board together with expertise in financial accounting, regulatory reporting, risk management, strategic planning, governance and oversight. Hugh also has extensive experience in leading complex financial transactions, mergers and acquisitions, and strategic transformation projects.

Hugh is an experienced leader and chartered accountant who spent a large portion of his career in senior finance roles at AIB Group, including as Executive Director and Chief Financial Officer (CFO) of their UK division. Most recently, Hugh was Managing Director of Dell Bank International having previously served as its CFO.

- Bachelor of Commerce (UCD)
- Masters of Accounting (UCD Smurfit School)
- Fellow, Institute of Chartered Accountants in Ireland
- Certified Bank Director

CONOR RYAN (54)
COMPANY SECRETARY



Conor was appointed Company Secretary in 2017. As Company Secretary and Head of Corporate Governance, Conor is responsible for advising the Board, through the Chairperson, on all governance related matters. Conor's role is to align the interests of different parties around the boardroom table, facilitate dialogue, gather and assimilate relevant information, and support effective decision-making. Conor is a fellow and past president the Chartered Governance Institute in Ireland (ICSA) and a Certified Bank Director.

Corporate Governance Statement

Board of Directors (continued)

2025 Board Meeting Attendance and Directorships

Member	Appointed	Ceased	Number of Years on Board	2025 meetings attended	No of Directorships held
Current Directors					
Julie O'Neill	17 Jan 2023	-	3.0	21/21	4/3
Ruth Wandhöfer	30 Oct 2018	-	7.3	19/21	3/1
Marian Corcoran	24 Sep 2019	-	6.4	21/21	6/3
Paul Doddrell	26 Nov 2020	-	5.1	21/21	5/3
Anne Bradley	30 Mar 2021	-	4.8	21/21	5/3
Celine Fitzgerald	30 Mar 2021	-	4.8	21/21	2/1
Rick Gildea	12 Dec 2023	-	2.0	19/21	3/1
Catherine Moroney	12 Dec 2023	-	2.0	20/21	5/3
Hugh O'Donnell	08 Apr 2025	-	0.7	17/17	3/1
Eamonn Crowley	10 May 2017	-	8.7	21/21	8/1
Barry D'Arcy	25 Feb 2025	-	0.8	19/19	2/1
Former Directors					
Ronan O'Neill	26 Jul 2016	30 July 2025	9.0	9/10	2/1

Notes:

PTSB is the sole direct subsidiary of PTSBGH. During 2025, the composition of the Boards of PTSBGH and PTSB were identical. Meetings of the Boards of PTSB and PTSBGH run concurrently. Concurrent Board meetings or consecutive Board meetings of PTSB or PTSBGH held on the same day are counted as a single attendance above.

Directors' age is calculated as of 4 March 2026. Number of Directorships: the first number stated is the total number of directorships held and the second number is the number of directorships as counted under Article 91(3) and (4) of Directive 2013/36/EU (for the purposes of calculating these directorships, multiple directorships within a group are counted as a single directorship and directorships in organisations which do not predominantly pursue commercial objectives are also not included). Directorships are those held at 31 December 2025 or at time of cessation from the Board. A full listing of each Board member's external directorships is available in the Group's Pillar 3 Disclosures Report available at <https://www.permanenttsbgroup.ie/investors/result-centre/2025>.

Eamonn Crowley's directorships consist of seven group entity directorships and one company on which he is a representative for PTSBGH.

Corporate Governance Statement

Leadership and Effectiveness

Division of Responsibilities

The roles and responsibilities of the Board collectively, the Executive and Non-Executive Directors, the Chairperson, Senior Independent Director and Company Secretary, are clearly laid out and documented in a Board Manual, which is reviewed and updated on a regular basis by the Board and at least annually.

The Chairperson

Julie O'Neill's responsibility as Board Chairperson is to ensure the efficient and effective working of the Board. Her role is to lead and manage the business of the Board, promoting the highest standards of corporate governance, ensuring accurate, timely and clear information for the Board, and to lead the process for the annual performance evaluation of the Board, its Committees, and the Non-Executive Directors. The Chair fosters a culture of openness and debate by facilitating the effective contribution of Non-Executive Directors in particular and ensuring constructive relations between Executive and Non-Executive Directors. The Chair has a strong working relationship with the CEO, Eamonn Crowley, and acts as a confidential sounding board for the Directors. Julie O'Neill is also Chair of the Nomination Culture and Ethics Committee.

The Senior Independent Director

Rick Gildea is the Board's Senior Independent Director whose primary role is to support the Chairperson on all governance related matters. In addition, he specifically leads the annual appraisal of the Chairperson's performance, acts as an intermediary for other Directors, and ensures that the views of the Non-Executive Directors are heard. He is available to shareholders, should they wish to raise any matter directly.

The CEO

The Board delegates executive responsibility to Eamonn Crowley, the CEO, for the Bank's operations, compliance, and performance. The role of the CEO is to select and lead an effective team to manage the Bank. The executive management team is called the Executive Committee (ExCo), details of which are set out on pages 80 to 81. The CEO is responsible for the formulation of the Group's strategic, operating and financial plans, for review and presentation to the Board, and for the implementation of these plans. The CEO is also required to provide information and insight to the Board that is reliable, relevant, timely, clear and balanced, in order to assist the Board in monitoring the performance of the Group and in making well-informed and sound decisions.

The Company Secretary

Conor Ryan, Company Secretary and Head of Corporate Governance, assists the Chairperson in promoting the highest standards of corporate governance. The Company Secretary supports the Chairperson in ensuring Directors receive timely and clear information so they are appropriately equipped for constructive debate and informed decision making. The Company Secretary is a central source of guidance and advice on Board policy, procedure and governance. All Directors have access to the advice and services of the Company Secretary and Head of Corporate Governance.

Corporate Governance Statement

Leadership and Effectiveness (continued)

Executive Committee

EAMONN CROWLEY
CHIEF EXECUTIVE



BARRY D'ARCY
CHIEF FINANCIAL OFFICER



FIONA MCMAHON
CHIEF RISK OFFICER



Fiona joined PTSB in January 2025 as Head of Risk and was appointed Chief Risk Officer later that year. As Chief Risk Officer, she is a member of the Bank's Executive Committee and is responsible for the leadership of Group Risk and the independent oversight of the Bank's enterprise-wide risk management activities across all risk types. In this capacity, Fiona reports to the Chief Executive Officer and, independently, to the Chair of the Board Risk and Compliance Committee, ensuring robust governance, a strong risk culture and adherence to the Bank's risk appetite and regulatory obligations.

Prior to joining PTSB, Fiona served as Chief Risk Officer and Director of Compliance at Ulster Bank Ireland DAC. Earlier in her career, she spent 17 years at the Central Bank of Ireland (2001–2018), where she held a number of senior roles and ultimately served as Head of Division – Banking Supervision. A Fellow of Chartered Accountants Ireland and a Certified Bank Director, Fiona brings extensive risk, regulatory, financial services, strategic and operational expertise to the role, with over two decades of experience in financial services.

GER MITCHELL
CHIEF CUSTOMER &
PEOPLE OFFICER



A former Retail Branch Manager and Regional Director, Ger has been a member of the Executive Committee since 2012. Ger is a senior commercial leader with over 30 years' experience in banking and has held a number of Executive roles across the Bank including: Retail Banking, Product Management, Human Resources, Sustainability, Brand and Marketing.

In 2024, Ger was appointed to an expanded role: Chief Customer & People Officer, with responsibility for Bank Product Management and Pricing Strategy, Human Resources, Brand and Marketing, Customer Propositions, Customer Base Management and Customer Experience, bringing colleague and customer outcomes together under a single executive remit.

Ger brings deep experience in governance, conduct and regulatory engagement, with a strong track record of leading customer- and people-focused change within a highly regulated environment. A strong culture champion, Ger is committed to developing talent and embedding diversity, equity and inclusion across the organisation. Ger is a Certified Bank Director (IOB), holds an MSc in Business (UCC) and has been awarded the INSEAD Global Business Certificate.

ANDREW WALSH
CHIEF LEGAL OFFICER



Andrew has extensive legal advisory experience, in both private practice and in-house roles. Andrew joined the Bank in 2014 and became a member of the Executive Committee in 2015. Prior to joining the Bank, Andrew was a partner in a leading corporate Irish law firm, where he worked for over 10 years. While in private practice, Andrew advised a number of Irish and international banks and financial services institutions.

In his role as Legal Counsel, Andrew leads the Bank's Legal function as well as playing a key role in Bank-wide strategic projects. The Legal function is responsible for overseeing all legal aspects of the Bank's business, as well as contributing to the Bank's strategic decisions and identified growth opportunities. The Legal function also provides support to ensure that the Bank's operations, products and service strategies are designed to consistently adhere to legislative/regulatory requirements and best practices.

CLAIRE HEELEY
HEAD OF INTERNAL
AUDIT



Claire, a Chartered Accountant with over 20 years' experience, joined the Bank in 2021 as the Bank's Head of Group Internal Audit from KPMG, where her most recent role was Managing Director, Risk & Regulatory Consulting. In this role Claire led major risk transformation projects and the delivery of internal audit services to a portfolio of financial services clients for over six years. Prior to her role as Managing Director, Risk & Regulatory Consulting, Claire held a number of senior roles including: Retail Division Audit Partner in the Group Internal Audit division of Bank of Ireland and Deputy Group Secretary of Bank of Ireland.

Internal Audit provides independent assurance to the Board over the adequacy and effectiveness of the governance, risk management and control processes in operation across the Bank. Claire is a regular attendee at Group Executive Committee meetings but, in accordance with good governance practices, has no voting rights. Claire has a direct reporting line to the Chairperson of the Board Audit Committee.

TOM HAYES
CHIEF TECHNOLOGY
OFFICER



Tom is an experienced business transformation and technology leader with deep experience in leading Digital change and operational resilience. Tom joined the Bank in 2017 from AIB where he had most recently held the role of Head of Digital Transformation Delivery. Tom had held various senior technology leadership roles at AIB including: Head of Customer Engagement Technology, AIB Digital and Group Head of IT Infrastructure & Operations.

PTSB Group Technology has responsibility for the development and implementation of the Bank's Technology strategy, the implementation of the Digital Transformation roadmap and the full portfolio of IT Change Delivery. This involves close collaboration across the Bank and especially with the Retail Banking and Group Operations teams to design and implement the Bank's Digital Transformation. The Division also has responsibility for the day-to-day critical technology operations, resilience and protection of technology-enabled customer services.

PATRICK FARRELL
CHIEF RETAIL BANKING
OFFICER



Patrick has over 25 years' experience across the banking industry. Patrick joined the Bank in December 2018 as Retail Banking Director, moving to his new role as Chief Retail Banking Officer in August 2024. Patrick has previously held senior management roles in Strategy, Product and Proposition Development, Marketing, Private Banking and, Retail Sales and Service Distribution.

The Retail Banking Division is responsible for all sales and service channels and delivery of the Bank's commercial performance. The Function has multi-channel oversight across sales and service with a focus on improving customer experience, meeting customer needs and wants, enabling income growth and delivery. The division closely collaborates with the Customer and People Team on customer propositions and experience.

PETER VANCE
CHIEF OPERATING
OFFICER



Peter joined the Bank as Chief Operating Officer (COO) in 2021 with 25 years' of experience in financial services. As COO, Peter is responsible for Group Change & Transformation, Enterprise Service Delivery including Payments, Financial Crime, Collections & Recoveries as well as other key functions.

Prior to joining PTSB, Peter held senior positions as Head of Group Operations and Executive Head of Direct Sales & Service Channels in AIB. In this role, Peter was responsible for leading multiple activities in both Ireland and the UK including; Payments, Treasury services, Financial Crime, SME Lending and the Customer Service Centre.

LEONTIA FANNIN
CHIEF SUSTAINABILITY
& CORPORATE AFFAIRS
OFFICER



Leontia joined the Bank's Executive Committee in August 2024 and is responsible for leading the Bank's Sustainability and Corporate Affairs Strategies. The role of Chief Sustainability & Corporate Affairs Officer was created to reflect the Bank's commitment to sustainability as a key driver of its corporate strategy and the value it places on corporate affairs as an enabler of internal and external stakeholder engagement.

Leontia joined the Bank in 2018 as Head of Corporate Affairs and Communications and has led out on a number of the Bank's key strategic initiatives, including PTSB's Reputation Management, Sponsorship and Sustainability Programmes. Leontia has over 20 years' experience in Corporate Affairs, Reputation Management, Colleague Communications, Sponsorships, Corporate Social Responsibility and Sustainability.

Corporate Governance Statement

Governance Structure, Roles and Responsibilities



Board

The Board retains accountability for corporate governance within the Group at all times. The Board has reserved for itself a documented schedule of matters for its own approval. The Board delegates executive responsibility to the CEO for the Group's operations, compliance, and performance. The CEO is the principal executive accountable to the Board for the day-to-day management of the Group. The CEO has established the Executive Committee whose terms of reference are approved by the Board.

Without prejudice to the powers delegated to it, the Board, directly or through its Committees, has exclusive powers regarding a number of matters including acting on behalf of the shareholders to oversee the day-to-day affairs of the business, ensuring the Group's sustainability by collectively directing the company's affairs, whilst meeting the appropriate interests of its shareholders, customers, colleagues and other key stakeholders. In addition to business and financial issues, the Board determines the business strategies and plans that underpin corporate strategy, whilst ensuring the Group's organisational structure and capability are appropriate for implementing the chosen strategies. The Board deals with challenges and issues relating to corporate governance, sustainability and corporate ethics.

Board

- Sets and oversees performance against strategy.
- Sets and oversees delivery of the Group's Sustainability strategy (and drives integration with business strategy).
- Ensures business activity aligns with the Company's stated Purpose, Ambition, Values, and Culture.
- Sets and oversees all risk, financial, compliance and performance standards.
- Demonstrates leadership (sets the tone from the top)

In line with its legal and regulatory obligations, the Board has established Audit, Risk, Remuneration, and Nomination committees as described below. Being composed of the same members and in managing a common agenda, Board Committee meetings of the Company and PTSB run concurrently.

Nomination, Culture and Ethics Committee

Julie O'Neill (C)
Marian Corcoran
Celine Fitzgerald
Anne Bradley
Paul Doddrell

- Reviews structure, effectiveness, and composition of the Board.
- Reviews all new Director and senior management appointments.
- Oversees succession planning and performance for directors and senior management.
- Review/monitors the design, implementation and effectiveness of the Company's Purpose, Ambition, and Values.
- Oversees the Company's Culture, Ethics, Diversity, Workforce Engagement and Reputation.

Audit Committee

Hugh O'Donnell (C)
Anne Bradley
Ruth Wandhöfer
Rick Gildea

- Oversees internal financial controls.
- Reviews and recommends approval of the Annual Report and Financial Statements to the Board.
- Oversees all relevant matters pertaining to the external auditors.
- Monitors the output of internal audit findings.
- Monitors the effectiveness of the Internal Audit Function.
- Reviews discoveries of fraud and violations of laws and regulations as raised by the head of GIA.
- Monitors the Bank's operational and IT resilience with particular focus on cyber defence strategy, third party management and data integrity.

Risk and Compliance Committee

Rick Gildea (C)
Marian Corcoran
Paul Doddrell
Hugh O'Donnell
Catherine Moroney

- Oversees financial and non-financial risks.
- Monitors and makes recommendations to the Board on the Company's appetite for risk.
- Oversees credit, funding and liquidity policies.
- Reviews the Company's regulatory obligations and treatment of customers.
- Review and provide guidance to the Board on the Company's capital and liquidity position for use in strategic decision making.
- Oversight and guidance to the Board on Recovery and Resolution Planning.
- Assesses the impact of Climate and Environmental Risk on the Group's overall Risk Profile.
- Supports the Board on assessing risk to delivery of the Group's Integrated Strategic Plan.

Remuneration Committee

Celine Fitzgerald (C)
Julie O'Neill
Ruth Wandhöfer
Catherine Moroney

- Oversees remuneration and reward strategies.
- Ensures remuneration strategy is aligned with the Company's appetite for risk.
- Oversees senior management reward.
- Monitoring relevant external benchmarks for posts within the scope of Committee.

Executive Committee

The Executive Committee reports through the CEO to the Board. The Executive Committee advises the Board on matters ranging from business performance, strategy, planning, policy, people and culture, investment and risk. The Executive Committee is accountable for the operations, compliance and performance of the Group. It is responsible for delivery of all delegated governance commitments. The terms of reference of the Executive Committee are approved by the Board.

The Executive Committee has established a number of sub-committees made up of senior management with relevant expertise to address the delegated functions of each sub-committee. The duties of these sub-committees are based on providing organisational direction on behalf of the Executive Committee. Each Executive Committee member provides relevant leadership to the sub-committees, making sure objectives are met. The relevant Executive Committee member ensures the Executive Committee is updated on all material matters considered by the sub-committees. The Group Risk Committee has responsibility for oversight of bank-wide risk management and internal control issues and all members of the Executive Committee are members of the Group Risk Committee.

Executive Committee

- Developing and implementing (as approved by the Board) the Group's Integrated Strategic Plan (ISP).
- Allocating the Group's resources (financial and people) to ensure that ISP commitments are executed and delivered.
- Accountable for the Group's operations, compliance and performance.
- Oversees day-to-day management of the Group.
- Forum for Group-wide functional issues.
- Oversight and leadership of the implementation of the Bank's Sustainability Strategy.
- Setting tone on culture and alignment to Bank values, leads on customer centric decision making.

Risk Committee	Assets and Liabilities Committee	Credit Committee	Operational Risk Management Committee	Customer Committee	Sustainability Committee	Resilience Committee
• Monitors and enforces adherence to the Enterprise Risk Management Framework (ERMF). It is the guardian of the Risk Register and Risk Appetite, as well as responsible for monitoring the total risk position of the Bank. It maintains oversight of all key Risk Categories excluding those which fall directly under the remit of the Group Assets and Liabilities Committee ("ALCO") • Measure and monitor the total risk position of the Bank and to maintain a risk register of the top risks facing the Bank, together with an assessment of the probability and severity of those risks	• Manages assets and liabilities, treasury investments, capital management and asset allocation • Manages risks, hedging, and ALM systems • Reviews a number of Treasury and Liquidity related Policies • Reviews the ongoing capital adequacy for the Group • Reviews the output from internal capital stress testing programmes • Oversees the Capital Risk related activities and supporting Policies	• Recommends relevant Portfolio Credit Risk elements of the Group's RAS for approval by the Board • Monitors adherence to the Group's Credit Policy and Framework • Monitors the portfolio Credit risks to which the Group is exposed • Escalation point for customer lending decisions • Maintains and assesses the portfolio Credit Risk profile against set limits and approves (within governance) remediation plans to restore Risk Appetite where required • Reports any breaches of approved limits in accordance with the agreed protocol	• Supports the Risk Committee on oversight of Operational and IT risk matters. • Monitors Operational and ICT risks and oversees risk mitigation performance and prioritisation. • Oversees the implementation of Operational and the ICT Risk Management Framework. • Reviews qualitative and quantitative Operational and ICT risk appetite metrics and limits or thresholds. • Appraises material operational and ICT risk events, identification and reporting on underlying root causes and consideration of actions against lessons learned.	• Ensures customer interests are embedded in the Bank's governance and decision-making. • Oversees the delivery of the Bank's commercial growth ambition and its impact on customers. • Ensures securing customers interests are prioritised and embedded within the Bank's governance model • Provides strategic oversight on commercial performance and oversees product governance throughout the lifecycle. • Reviews significant business initiatives impacting customers. • Approves key frameworks and policies, and acts as the authority for regulatory reporting on conduct and customer risk.	• Leads on implementation of Sustainability Strategy and associated performance. • Ensures sustainability activity is embedded into the Bank's Business Strategy and Integrated Strategic Plan. • Provides guidance and support to sustainability activities across the Bank. • Engages key stakeholders as needed to ensure organisational alignment on key risks and issues. • Monitors and report progress on execution of Sustainability Strategy to the Board and Executive Committee.	• Monitors and reports on operational, digital and third-party resilience activities and risk profile. • Oversees the development and implementation of the Bank's Resilience strategy and Digital Operational Resilience Strategy and related activities • Oversight of third party and outsourcing relationships, including performance, issues management and risks.

Corporate Governance Statement

Board Leadership and Effectiveness

“The Board has overall governance responsibility for the operations of the Group”

Board Role and Responsibilities

The Board as a whole is collectively responsible for the leadership, strategic direction and policy, operational performance, financial matters, risk management and compliance of the Group. The Board exercises leadership, integrity and judgement in directing the Group, based on transparency, accountability and responsibility. The Board is also the focal point for the implementation of best practice corporate governance within the Group. All Directors must take decisions objectively in the interests of the Company. The key responsibilities of the Board as a whole are to:

Key Responsibilities of the Board	
Customers	Ensure the Bank's culture, systems and practices build trust and promote the fair and transparent treatment of customers, both existing and new. Deliver a positive customer-focused culture that is both embedded through adherence to the Bank's purpose, ambition and values and can be effectively demonstrated through regular updates from Management.
Culture and Diversity	Setting the Bank's purpose, ambition and values, and monitoring culture and alignment to the Bank's purpose and values. Embedding the Bank's Organisational Culture and Diversity, Equity and Inclusion Programmes.
Strategy	Question, challenge, assist in the development of, and approve the strategic, financial and operating plans proposed for the Bank by Management. Ensure that an appropriate level of balance exists between its strategic contribution and that of its monitoring and policing activity. Oversight of the ESG factors considered material to the business and ensuring they are monitored and managed as part of the Bank's strategic formulation.
Stakeholders	Ensuring regular engagement and effective communication with stakeholders in order to understand their views on governance and performance against strategy.
Shareholders	Ensuring directors develop a clear understanding on the views of shareholders.
Sustainability	Ensuring the Bank enables support for customers, colleagues and communities while it conducts and manages all areas of its business in a responsible way through integrating sustainability within strategic planning.
Risk Appetite and Risk Management	Define the strategy for the ongoing management of material risks and ensure that the Board is sufficiently briefed on major risk factors (both current and emerging) by ensuring there is a robust and effective internal control framework that includes well-functioning risk management, compliance and internal audit functions as well as an appropriate financial reporting and accounting framework. Provide leadership for the Bank within a framework of prudent, ethical and effective controls which enable risk and compliance to be assessed and managed.
Capital Structure	Set and oversee the amounts, types and distribution of both internal capital and own funds adequate to cover the risks of the Bank. Be accountable, particularly to those who provide the Bank's capital.
People and Reward Strategy	Ensure there is a remuneration framework that is in line with the risk strategies of the Bank. Ensure there is a robust and transparent organisational structure with effective communication and reporting channels. Ensure that Management create and develop a performance culture that drives sustainable value creation and not expose the Bank to excessive risk of value destruction. Ensure that workforce policies and practices are consistent with the Company's values and support its long-term sustainable success and that the workforce is able to raise any matters of concern.
Oversight	Make well informed and high-quality decisions based on a clear line of sight into the business. Ensure that the Bank has a robust finance function responsible for accounting and financial data.
Governance Arrangements	Review regularly the appropriateness of its own governance arrangements and conduct internal as well as external evaluation of the Board's effectiveness. Review corporate governance matters such as Group Frameworks, terms of reference and succession plans.

Directors must act in a way they consider, in good faith, would promote the success of the Company for the benefit of shareholders as a whole and, in doing so, have regard (amongst other matters) to the likely consequences of any decision in the long-term; the need to foster the Bank's business relationships with customers, suppliers and others; interests of the Bank's employees; impact of the Bank's operations on the community, environment and taxpayers; and desirability of the Bank maintaining a reputation for high standards of business conduct.

Board Decisions

There is an effective Board to lead and control the Bank with members who have diverse expertise in various aspects of the Bank's business. The Board has reserved to itself for decision, a formal schedule of matters pertaining to the Bank and its future direction, such as the Bank's business strategy, major acquisitions and disposals, Board membership, the appointment and removal of senior executives, executive remuneration, trading and capital budgets, risk management and compliance frameworks. This schedule is updated on a regular basis and at least annually. On an annual basis, the Board approves a Risk Appetite Statement ('RAS') together with its strategic, operating and financial plans (Integrated Strategic Plan). The RAS is a description of the level and types of risk the Bank is willing to accept or to avoid, in order to achieve its business objectives.

The Board delegates day-to-day management of the Bank to the CEO. The Board relies on the Risk Appetite and the delivery of the Integrated Strategic Plan to be implemented by the CEO, the Bank's Executive Management Committee and their Management sub-committees. All strategic decisions are referred to the Board. Documented rules on management authority levels and on matters to be notified to the Board are in place, supported by an organisational structure with clearly defined authority levels and reporting responsibilities. For further information on 2025 focus areas and priorities for the Board, please refer to the Chair's Introduction to Governance on page 67.

Strategy Development

The Board is responsible for setting the strategic direction of the Bank. In 2024, the Board approved a refreshed business strategy and associated 3-year Integrated Strategic Plan (2025-2027) for the Bank following significant engagement with the Executive Team. Throughout 2025, progress against this plan was monitored and tracked as part of the Bank's strategic planning cycle. Following further Board engagement that included two full-day strategy review sessions with the executive team, an updated Integrated Strategic Plan (2026-2028) was approved by the Board in December 2025. The refreshed plan sets out the specific strategic priorities of the Bank and the initiatives required to deliver them over the next 3 years. The plan also outlined the human, financial and technical resources that will be allocated to each priority. The annual strategic planning process integrates strategic, financial, workforce, sustainability and change delivery plans, ensuring alignment with the Bank's Risk Appetite Statement, Recovery Plan, Resolution Plan and tested through ICAAP and ILAAP. Approval of the Integrated Strategic Plan is subject to robust risk assessment, and the Board is supported by the Board Risk and Compliance Committee in this regard.

The role of the Non-Executive Directors is to help the executive team develop, constructively challenge and critically review proposals on strategy, oversee and monitor strategy implementation and address any weaknesses identified regarding its implementation. While there is a formalised strategy development and approval process, there is also regular and ongoing discussion and challenge of strategy development and execution at Board meetings. The effectiveness of the strategy development process is a key element of the annual Board review where feedback is sought on the process' effectiveness during the year in review.

The Board is responsible for overseeing the implementation of the Integrated Strategic Plan and has agreed a set of Key Performance Indicators to monitor achievement of the plan and to enable

corrective action to be taken where required. On an ongoing basis throughout the year, the Board receives management updates on key strategic programmes of work and on progress against Key Performance Indicators.

Independence

The independence status of each Director on appointment is considered by the Board. In addition, the independence status of each Director is reviewed on an annual basis to ensure that the determination regarding independence remains appropriate. In determining independence, the Board will consider guidance on independence provided within the Irish and UK Corporate Governance Codes.

The Board has carried out its annual evaluation of the independence of each of its Non-Executive Directors, taking account of the relevant provisions of the Irish and UK Corporate Governance Codes, namely whether the Directors are independent in character and judgment and free from relationships or circumstances which are likely to affect, or could appear to affect the Directors' judgment.

With the exception of Marian Corcoran and Paul Doddrell, who were each nominated for appointment to the Board under the terms of a Relationship Framework with the Minister for Finance of Ireland, the Board is satisfied that each of the current Non-Executive Directors fulfil the independence requirements of the Irish and UK Corporate Governance Codes. The Chairperson meets the Irish and UK Corporate Governance Codes requirement to be independent on appointment. Notwithstanding the independence requirements of the Irish and UK Corporate Governance Codes, the Board was satisfied that in 2025, each of the Non-Executive Directors brought independent challenge and judgement to the deliberations of the Board through their character, objectivity and integrity.

Corporate Governance Statement

Board Leadership and Effectiveness (continued)

Board Size and Composition

The composition of the Board and its Committees is reviewed by the Nomination, Culture and Ethics Committee and the Board annually to ensure there is an appropriate mix of knowledge, experience and skills. This detailed assessment considers tenure, succession planning, Board diversity and the continued collective suitability of the Board. In addition to having Directors with a broad range of knowledge, experience and skills, a principal consideration used to determine the size of the Board is the ability to effectively resource all of the Board's Committees with Non-Executive Directors and without need for over reliance on any one Director or small group of Directors. As set out in the report of the Nomination Culture and Ethics Committee on page 104, the Board currently consists of eleven Directors with Board recruitment paused until the Formal Sale Process for the Group has concluded.

Save where a Director is nominated for appointment by the Minister for Finance under the Relationship Framework, the Board requires that all Non-Executive Directors are Independent Non-Executive Directors. The Board believes there is an appropriate combination of Executive and Non-Executive Directors such there is sufficient independent challenge and oversight of management and that no individual or small group of individuals can dominate Board decision making.

At 31 December 2025, the Board comprised eleven Directors: the Chairperson, who was independent on appointment, the CEO, CFO and eight Non-Executive Directors, six of whom have been determined by the Board to be independent Non-Executive Directors under the requirements of the Irish and UK Corporate Governance Codes. Changes to the Board during 2025 are set out in the Directors' Report on page 61 of the annual report. Biographies of each of the Directors are set out in the Board of Directors section on pages 73 to 77. The wide range of knowledge, experience and skills encapsulated in the biographies are harnessed to the maximum possible effect in the deliberations of the Board. Having Directors with diverse backgrounds

in areas such as risk management, banking, digital/IT, strategy, finance, culture evolution, change management and auditing provides both subject matter expertise and facilitates a broad spectrum of review and challenge at Board meetings, particularly when addressing major issues affecting the Bank.

Decisions on Board membership are taken by the Board upon receipt of recommendations from the Nomination, Culture and Ethics Committee. All members of the Board are required to seek re-appointment by election at the Group's AGM.

Term of Office

The term of office of Non-Executive Directors is three years, (with an option for a further three years) and is subject to satisfactory performance that is reviewed annually. Non-Executive Directors will automatically retire from the Board after six years. It is always at the discretion of the Board to invite a Non-Executive Director to continue for a further 3 year period and any term beyond this will only be exercised in exceptional circumstances.

The Chair is proposed for re-appointment by the Directors on an annual basis. The term of office of the Chair is six years. Julie O'Neill joined the Board on 17 January 2023.

Executive Directors' service contracts are reviewed by the Remuneration Committee and approved by the Board. Holders of Executive office in the Company will vacate the office of Director on notice (given or received) of ceasing to hold Executive office, though it is at the discretion of the Board to extend Board membership until such time as the Executive office has ceased. Directors who hold any directorship in a subsidiary of the Company will vacate said directorship on ceasing to be a Director of the Company and no Director will receive compensation for loss of office as a Director of a subsidiary of the Company.

2025 Board Performance Review

The Board is committed to enhancing its performance and the effectiveness of its activities on an ongoing basis. Regular Board and Committee assessments play a vital role in fostering continuous improvement and ensuring effective governance. These assessments provide valuable insights into how the Board operates, how directors collaborate, and areas for development.

In compliance with the Irish and UK Corporate Governance Codes, the Bank conducts an annual review of Board performance, with an externally facilitated review required every three years. The last external performance review of the Board was conducted in 2024 and facilitated by Korn Ferry. Supported by the Company Secretary, the Chair designed and led the 2025 performance review process which was endorsed by the Nomination, Culture and Ethics Committee.

The 2025 review assessed the balance of skills, experience, independence, and knowledge within the Board, as well as its diversity, including gender balance, and how effectively the Board functioned as a cohesive unit. It also assessed whether Board committees possessed the expertise necessary to discharge their responsibilities effectively. These reviews are a cornerstone of the Bank's commitment to maintaining high standards of governance and accountability.

2025 Board Performance Process

The Board review process which commenced in September 2025 and concluded in February 2026 comprised a number of activities as set out in the table below:

Stage 1. Approach agreed with the Chairperson and endorsed by the Nomination, Culture and Ethics Committee.	• A review of the existing board review process (qualitative and quantitative) was carried out by the Company Secretary, with proposed amendments presented to the Chairperson. • An updated approach was thereafter set out and approved by the Board Nomination, Culture and Ethics Committee.
Stage 2. Gather information and insights from internal questionnaires and meetings.	• A self-assessment governance questionnaire was issued by the Company Secretary to the Board/Board Committees and a more focussed questionnaire to ExCo to assess ExCo perceptions on Board governance. • One-to-one meetings were held between the Chairperson and Non-Executive Directors. These meetings also assessed the training requirements for individual directors and collectively for the Board. • The Senior Independent Director ('SID') engaged with Directors to seek feedback on the Chairperson's Performance. • A workshop for Board Committee Chairs was held, focusing on gathering insights, sharing experiences, enhancing the effectiveness of committees, and strengthening alignment across Board committees. • The Chairperson completed the annual performance evaluation of the CEO and reported on same to Nomination, Culture and Ethics Committee. • An internal review of governance obligations was undertaken incorporating a review of Director Independence; Board and Committee tenure; attendance schedule for 2025 Board and Board Committee meetings; assessment of external directorships and time commitments; review of conflicts of interest and, certification of director fitness and probity requirements.
Stage 3. Individual Board Committees reviewed the results of their Committee questionnaire.	• During February 2026, each Board Committee considered the results of their individual Committee assessments. Feedback and resulting actions informed the overall Board Evaluation and the development of measures to enhance Board and Committee effectiveness.
Stage 4. At the February 2026 Nomination, Culture and Ethics Committee and Board meetings, all the internal assessments were considered.	• All feedback from Stage 2 and 3 was analysed and assessed with a report presented to the Nomination, Culture and Ethics Committee and Board for consideration. • Alignment was agreed on the key themes arising from the 2025 Board Review (set out below) with an action plan to be agreed and executed in 2026.

Outcomes and Actions of 2025 Board Performance Evaluation

The review found that the Board continued to operate effectively and had provided strong strategic leadership during a period defined by commencement of a Formal Sale Process, ongoing business evolution, a more uncertain macro-economic environment and a clear focus on future growth and efficiency. It was noted that the Chairperson had guided Board

evolution to ensure the Board possessed the breadth of experience and capability required to oversee the Bank's strategic priorities, including income diversification and the expansion of the asset finance and SME businesses.

Board meetings were observed to function efficiently, with structured agendas, well-prepared participants, timely deliberations and consistent completion of scheduled matters.

As part of the review, the Board agreed a set of priority focus areas to strengthen governance and support the organisation's next phase of development, with actions to be agreed and implemented throughout 2026 and beyond.

Corporate Governance Statement

Board Leadership and Effectiveness (continued)

2025 Board Performance Themes and 2026 Focus Areas

Theme	Focus Area
Strategic Transformation	Successfully oversee the management of the Group's Formal Sale Process and support any potential transition to new ownership, ensuring continuity of direction and clarity of purpose throughout the change process.
Execution of Strategy	Maintain strong oversight of the execution of the Bank's strategic priorities, with continued focus on the risks that could impede delivery, including growth in asset finance and SME, and the development of diversified income streams.
Cost Discipline & Efficiency	Drive a balanced approach to cost management, ensuring efficiencies are realised while enabling the Bank to invest appropriately in areas essential for long-term growth.
Future Readiness	Ensure the Bank's organisational design, capabilities and governance structures remain fit for purpose as the business evolves, grows and responds to a changing operating environment.
Technology, AI and Resilience	Oversight of the Bank's investment in technology, data and AI, with a focus on cyber security, operational resilience, and preventative risk measures.
Stakeholder & Regulatory Awareness	Remain vigilant to the needs and expectations of stakeholders, ongoing regulatory developments, and shifts in the external environment to ensure the Bank adapts proactively.
Board Composition & Capability	Monitor the evolving needs of the Board in light of the Bank's future direction, recognising that Board recruitment activity is paused pending the conclusion of the Formal Sale Process and will need to resume at the appropriate time.
Meeting Effectiveness	Oversee implementation of Board approved meeting standards to drive efficiency and effectiveness at all levels of decision making in the organisation focus with a focus on agenda volumes, decision touch points and quality of information and insight provided to governance bodies.

Director Induction and On-Going Business Awareness

On appointment to the Board, all Directors receive a comprehensive induction training schedule tailored to their individual requirements. The induction, which is designed and arranged by the Company Secretary in consultation with the Chairperson (and approved by the Board Nomination, Culture and Ethics Committee), will include meetings with

Directors, Senior Management and key external advisors, to assist Directors in building a detailed understanding of the Group's operations, management and governance structures, including the functioning of the Board and the role of Board Committees and key issues facing the Group. Directors are also encouraged, where appropriate, to make site visits to see the Group's operations first hand. Where appropriate, additional business awareness briefing sessions and updates on particular issues identified

in consultation with the Chairperson and Non-Executive Directors will be arranged by the Company Secretary. These will be held regularly to ensure that Non-Executive Directors have the knowledge and understanding of the business to enable them to contribute effectively at Board meetings. The business awareness and development needs of each Non-Executive Director will be reviewed annually as part of the performance evaluation process.

2025 Board Training and On-Going Business Awareness

Board Training Sessions

A number of Board training sessions were facilitated during 2025 to support on-going business awareness and Director development. Topics for Board training sessions are recommended by the Board Nomination, Culture and Ethics Committee and include a balance of technical, governance and professional development. Training delivered during 2025 included: Operational & Digital Resilience; CSRD (BAC specific session, extended to Board); Capital Models deep-dive (IRRBB, PD & LGD Models); IT & Cyber resilience; Individual Accountability Framework; Recovery Plan and Liquidity Dry Run Simulation; Market Abuse and Annual Legal and Regulatory Update; AML/CFT, Sanctions and Anti-Bribery & Corruption Training; and Sustainability/ESG Risk Management, incorporating CSRD, Science Based Targets and associated regulatory expectations.

Board Briefings

In addition to formal Board training sessions, a number of Board briefings were presented to the Board during 2025. The purpose of these briefings is to ensure Directors have the knowledge and understanding of the business to enable them to contribute effectively to meetings, by providing insight into impending changes which may impact on the Board's responsibilities, the Bank's progress in implementing such changes, or to present industry updates. Board briefings presented during 2025 included: macro-economic environment and market outlook; capital and liquidity planning; ICAAP and ILAAP development and scenario analysis; risk appetite and operational resilience; sustainability strategy and CSRD-related developments; technology, digital and cyber resilience (including DDoS, SEPA 2 and platform resilience); customer behaviour and digital trends; investor relations, market sentiment and shareholder perspectives; strategic initiatives; payments strategy and regulatory developments; non-performing loan; AI and data strategy; distribution and business model evolution; and broader organisational, cultural and people-related developments.

Individual Director Development

An individual training plan is developed for each Director on appointment. The purpose of individual training plans is to support individual Director development. Each Director is required to undertake the Institute of Banking in Ireland Certified Bank Director programme. Directors are also offered the option of attending suitable external educational courses, events or conferences designed to provide an overview of current issues of relevance to their work on the Board.

Board Meetings

The table on page 78 shows Board membership and directors' meeting attendance during 2025. There were 10 scheduled meetings in 2025 (which included 2 all day strategy sessions). All scheduled Board meetings were held in-person. In addition to scheduled meetings, additional meetings of the Board, and some of its committees (detailed in each Committee report) were held throughout the year to receive updates and/or deal with time-sensitive matters. There were 11 such additional Board meetings held in 2025.

Agendas and papers are circulated to Directors electronically via a secure online Board portal in sufficient time to facilitate review by the Directors.

At each of the scheduled Board meetings, the directors received reports from the Chairperson, Board Committee Chairpersons, the Chief Executive Officer, the Chief Financial Officer, the Chief Risk Officer and other members of the executive management team, as appropriate. Other senior executives attended Board meetings throughout the year to present reports to the Board. This provided the Board with an opportunity to engage directly with management on key issues. The Board is particularly focussed on strategy, customer outcomes, sustainability, commercial/financial performance and risk/compliance matters at each of its meetings. The minutes of Board committees are made available to all Directors through a designated reading room in the Board portal. The Board portal also contains an extensive document repository and is the primary method of communication with Directors.

The Board, Board Committees and the Bank's Executive Committee operating rhythm supports a proactive and focused agenda planning and paper preparation process. This process includes pre-meetings of the Board between the Chairperson, CEO and Company Secretary to ensure the Board and Executive Management are aligned on Board agendas.

Board Committees

The Board has established four permanent Committees to assist in the execution of its responsibilities. These Committees are:

- Audit
- Risk & Compliance
- Nomination, Culture & Ethics
- Remuneration

During 2025, the Board Audit and Remuneration committees were composed of Independent Non-Executive Directors. The Board Risk and Compliance and Nomination Culture and Ethics committees were composed of a majority of Independent Non-Executive Directors. The Membership and the Chairpersonship of each committee are reviewed annually. On the 6 February 2025, the Board established the Business Transformation Oversight Committee to support the Board in monitoring and providing feedback on strategic business transformation initiatives and to ensure the Bank is meeting its value realisation targets therein. The committee will remain constituted until the end of 2027 at which point its purpose and remit will be further reviewed.

Each of the Board Committees has a Terms of Reference, under which authority is delegated by the Board, and which are reviewed annually. The Terms of Reference of each Committee are available on the Bank's website <https://www.permanenttsbgroup.ie/document-centre>. The Board Committee Chairpersons are expected to attend the AGM and be available to answer questions from shareholders.

Corporate Governance Statement

Risk Management and Internal Control

Board responsibilities

The Board has overall responsibility for maintaining a system of risk management and internal control which provides reasonable assurance of effective and efficient operations, internal financial and operational control, and compliance with laws and regulations.

The Group's business involves the acceptance and management of a range of risks, consistent with its corporate purpose. The Group's system of risk management and internal control is designed to ensure the delegation of responsibility for risk oversight and management is appropriate to the nature and type of risk faced by the Group.

The Board annually reviews the effectiveness of the Group's system of risk management and internal control. This requires a review to cover all material controls including financial, operational and compliance controls.

The Board has conducted a robust assessment of the Group's emerging and principal risks. This assessment is integrated into the Group's systems of risk management and internal control ensuring that risks are continuously identified, monitored, and mitigated effectively.

The Group has a well-established internal control framework underpinned by an enterprise risk management framework, divisional operational frameworks and has risk frameworks and policies in place for each of the Group's material risk categories. The Group has a well-defined approach to setting and monitoring its appetite for risk, operates a 'Three Lines of Defence' model and has the required resources and governance structures in place to support this model.

Monitoring of risk management and internal control is an ongoing part of the governance process at Board Audit and Board Risk and Compliance Committee meetings. The Board Audit Committee reviews an internal control statement environment report twice yearly which provides a holistic perspective of the control environment within the Group. The Board Audit Committee also receives reporting at each meeting from the Head of Group Internal Audit ('GIA'), on the effectiveness of the control environment through reporting on findings that arise from internal audit activity. On a bi-annual basis, the Board Audit Committee

reviews the interim and final Audit Opinion prepared by the Head of GIA. The Audit Opinion considers the adequacy and effectiveness of the governance, risk and control environment within the Group and specifically, how they relate to individual business areas, it also takes into account the strategies, objectives and risks of the organisation. The Board Audit Committee reviews the internal controls in place over financial reporting in order to provide reasonable assurance the half-year and full-year accounts materially present a true and fair view of the Group's financial position and performance. The Board Audit Committee undertakes oversight on certain matters which are deemed to have a material impact on the effectiveness of the Bank's internal control environment in the areas of operational and IT resilience and third party management. The Board Risk and Compliance Committee receive updates at each meeting from the Bank's Chief Risk Officer and Head of Compliance concerning the Bank's operational and compliance controls. The Board Risk and Compliance also review performance against the Bank's Risk Appetite Statement and in 2025 reviewed a combined assurance map which provided insight on a 'Three Lines of Defence' coverage of the Bank's risk and sub-risk categories.

The Chairs of the Board Audit Committee and Board Risk and Compliance Committee report on all material risk and control related matters to the Board at each scheduled meeting, as does the Chief Risk Officer who attends a material portion of each Board meeting.

The Board has a particular focus on ensuring that appropriate governance structures are in place to address issues raised through internal review and through feedback from stakeholders, including regulators. There was no significant failure of the Group's system of risk management and internal control during 2025 leading to a material financial loss.

Internal Control Procedures

The Group's internal control procedures are designed to safeguard the Group's net assets, support effective management of the Group's resources, and provide reliable and timely financial and operational reporting both internally, to Management and those charged with governance, and externally to other stakeholders. They include the following:

- An organisational structure with formally defined lines of responsibility and delegation of authority;
- As set out in the Risk Management Section, a 'Three Lines of Defence' model has been adopted by the Group for the effective oversight and management of risks across the Group, with GIA being the Third Line of Defence;
- A corporate governance structure has been defined showing the key governance and decision making bodies of the Group; each governance body has a terms of reference that to sets set out its key areas of responsibility;
- The preparation and issue of financial reports, including the consolidated Annual Report, is managed by Group Finance with oversight from the Board Audit Committee. The Group's financial reporting process is controlled using documented accounting policies and reporting formats issued by Group Finance to all reporting entities, (including subsidiaries), within the Group, in advance of each reporting period end. Group Finance supports all reporting entities in the preparation of financial information. Its quality is underpinned by arrangements for segregation of duties to facilitate independent checks on the integrity of financial data. The financial information for each entity is subject to review at reporting entity and Group level by Senior Management. In addition to reviewing and approving the full year Annual Report, the Interim and Annual Report are also reviewed by the Board Audit Committee in advance of being presented to the Board for their review and approval;
- Comprehensive budgeting systems are in place, with annual financial budgets and a five year medium term financial plan, prepared and considered by the Board. Actual results are monitored and there is monthly consideration by the Board of progress against budgets and forecasts;
- Clearly defined capital investment control guidelines and procedures set by the Board;
- Responsibilities for the management of credit, investment and treasury activities which are delegated within limits to line management. In addition, Group and Divisional Management

have been given responsibility to set operational procedures and standards in the areas of finance, tax, legal and regulatory compliance, human resources and information technology systems and operations;

- GIA's responsibility for the independent assessment of the Group's corporate governance, risk management and internal control processes. The Head of GIA reports directly to the Chairperson of the BAC;
- The reviews completed by the Board Audit Committee on the scope, nature and independence of the work of undertaken by GIA;
- The reviews completed by the Board Audit Committee of progress with the internal audit programme of work. The Head of GIA reports regularly to the BAC in private session. The BAC also reviews the Interim and Annual Report and the nature and extent of the external audit. There are formal procedures in place for the external auditors to report findings and recommendations to the Audit Committee. Any significant findings or identified risks are examined so that appropriate action can be taken;
- Under the Group's Internal Control Framework, there are divisional control frameworks in place within each business unit under which Executive Management reviews and monitors, on an on-going basis, the controls in place, both financial and non-financial, to manage the risks facing that business;
- The monitoring of regulatory compliance within the Group by the Head of Regulatory Compliance who reports to the CRO and who also provides regular updates to the Board Risk and Compliance Committee; and,
- Established systems and procedures to identify, control and report on key risks. Exposure to these risks is monitored at Board level by the Board Risk and Compliance Committee. As a standing item on both Board Risk and Compliance Committee and Board agendas, the CRO regularly reports on all material issues related to activity within the Group's risk and control environment. The CRO is a member of ExCo, Chairs the Group Risk Committee and has reporting lines to the CEO and Chairperson of Board Risk and Compliance Committee.

The Board Risk and Compliance Committee reviews the compliance and risk management programmes and monitors the risk profile of the Group. The Board Risk and Compliance Committee supports the Board in carrying out its responsibilities for ensuring that risks are properly identified, reported, assessed and controlled, and that the Group's strategy is consistent with the Group's Risk Appetite.

The Remuneration Committee is responsible for oversight of the Group's remuneration and reward strategies. It ensures the remuneration strategy is aligned with the Group's appetite for risk, business strategy, values, culture and ambitions, and oversees Senior Management reward.

The Nomination, Culture and Ethics Committee is responsible for the culture, behaviour, ethics and reputation management oversight in the Group.

The Board is committed to nurturing a 'Speak Freely' culture where it is safe and acceptable for all to raise any concerns that they may have about practices, processes or behaviours that do not meet these standards or align with the Group's Ambition, Purpose and Values. The Group's 'Speak Freely' Procedure protects colleagues who wish to raise a concern, or to make a protected disclosure, relating to an actual or potential wrongdoing in the workplace. 'Speak Freely' focuses on encouraging colleagues to raise a concern via a number of different channels by creating a psychologically safe environment in which to do so. In addition, the Group also has in place a Colleague Conduct Policy, which outlines the standards of responsibility and ethical behaviour to be observed by all the Group's employees. The Board Nomination, Culture and Ethics Committee receives regulator reporting on key themes and issues reported through the 'Speak Freely' process.

Internal Control over Financial Reporting

The Group operates a Group Finance Divisional Control Framework (a divisional framework of the Group's Internal Control Framework) over financial reporting to support the preparation of the consolidated financial statements. The effectiveness of the Group's systems of control over financial reporting is reported on to the Board Audit Committee on a

semi-annual basis. The main features are as follows:

- User access to the general ledger and related financial reporting system(s) is restricted to individuals that require it for their assigned roles and responsibilities;
- Standard policies and procedures are in place that facilitate accurate processing and recording of the financial information;
- A comprehensive set of accounting policies are in place relating to the preparation of the interim and annual financial statements in line with IFRS, as adopted by the EU;
- A control process is followed as part of the interim and annual financial statements preparation, involving the appropriate level of Management review of the significant account line items, and where judgments and estimates are made, they are independently reviewed to ensure that they are reasonable and appropriate. This ensures that the consolidated financial information required for the interim and annual financial statements is presented fairly and disclosed appropriately;
- The Interim and Annual Report are subject to detailed review and approval through a process involving Senior and Executive finance personnel;
- Summary and detailed Board papers are prepared for review and approval by the BAC covering all significant judgmental and technical accounting issues together with any significant presentation and disclosure matters; and
- A GIA function is responsible for providing independent, reasonable assurance to key internal committees and Senior Management, and to external stakeholders (regulators and external auditors), on the effectiveness of the Group's risk management and Internal Control Framework.

Corporate Governance Statement

Board Diversity Report

PTSB recognises the value of maintaining a diverse and inclusive Board that promotes innovation, engagement and collaboration to effectively oversee implementation of the Bank's Integrated Strategic Plan.

Diversity

A diverse, inclusive culture is central to PTSB's long-term success helping the Group to meet customer and stakeholder needs while delivering sustainable growth. The Group values diversity throughout the organisation, recognising the unique perspectives each Board member and employee contributes to the business, community and stakeholders. The Board also recognises how diversity strengthens governance and decision-making. Further details on the Group's Organisational Culture, Diversity, Equal Opportunity and Inclusion Programmes are set out on page 206.

Board Diversity Policy

The Board has a Diversity Policy which is reviewed annually. The Board Diversity Policy sets the target for gender diversity and also sets guidance on the appropriate mix of financial versus non-financial knowledge and experience on the Board as well as the geographic

location/background of Directors. The Policy also describes how the Board will consider other key metrics when carrying out succession planning activities or Board recruitment/refreshment. The Board Diversity Policy is published on the Group's website: <https://www.permanenttsbgroup.ie/document-centre>.

The Group recognises the benefits of having a diverse and inclusive Board whose members reflect a broad spectrum of relevant knowledge, skills and experience with differences in educational and professional background, ethnicity, gender, age, cognitive and personal strengths, and other qualities. This enables the Board to fulfil its duties and responsibilities effectively and supports a diverse senior leadership and executive management succession pipeline. The Group considers diversity at Board level essential to achieving the Bank's strategic objectives.

The Board also recognises how diversity of thought is a key driver for robust discussions, improved collective decision-making, talent development and the cultivation of trust among colleagues, customers and shareholders. A diverse Board utilises differences in the knowledge, experience and skills (in particular those identified as pertinent to PTSB's business and culture) as detailed in the Board Suitability Matrix which outlines the desired mix of knowledge, experience and skills, including regional and industry experience, education and professional experience, together with other aspects of Director diversity. These factors are carefully considered in determining the optimal composition of the Board and are balanced appropriately where feasible.

In December 2025, the Board Diversity Policy was reviewed and updated to reflect the broad range of relevant skills, knowledge and experience required for the Board in line with the Board Suitability Matrix and reflects the following target and guidance principles for 2026:

Area of Diversity	Rationale	Guidance or Target
Knowledge Experience and Skills	The Board aims to engage a broad set of qualities and competencies when recruiting Board members to achieve a variety of views and experiences and to facilitate independent opinions and sound decision-making within the Board.	Target: A majority of Non-Executive Directors, the Board Chairperson together with the Chairpersons of the Audit and Risk and Compliance Committee are required to have core relevant banking and/or financial services knowledge and experience (obtained working for a financial institution or through the provision of services to a financial institution).

Area of Diversity	Rationale	Guidance or Target
Board Suitability Matrix	The Board regularly reviews the knowledge, experience and skills of the Board to ensure they are aligned with the current, emerging and future needs of the Bank. Note: Knowledge examines achievement in education, training and practice. Experience looks at the practical and professional experience gained. Skills focus on personal attributes, how the person is capable of behaving and acting.	Knowledge and Experience: • Core Retail Personal and/or Business Banking • Accounting, Auditing and Financial Interpretation • Risk Management • Governance, Oversight and Internal Control • Technology (IT and Cyber/Resilience) • Innovation (Platforms/Artificial Intelligence/Digital Evolution/ Fintech) • Organisational Change • Transformation/Resilience • Strategy Development/Execution • Legal/Regulatory Compliance • Customer Advocacy/Experience • Culture and Ethics • Capital Markets/Treasury/Investor Relations • ESG/Sustainability/Climate • Data and Analytics • Workforce capability and strategy • Model Governance • AML/CTF Skills: • Authenticity • Decisiveness • Communication • Judgement • Customer and Quality Orientated • Leadership • Loyalty • External Awareness • Persuasive • Teamwork • Sense of Responsibility • Integrity • Independence of Mind • Innovative • Neurodiversity
Gender	The Board understands that gender is an essential component of Board diversity facilitating a more independent mindset at Board bringing together richer more informed debate and challenge. Cognisant of its role model ambitions for the rest of the Bank, the Board ensures that gender diversity is extended to Senior Board positions within the Bank.	Target 1: The Board aims to achieve and maintain gender balance. Target 2: At least one of the Chairperson, Chief Executive Officer, Senior Independent Director or Chief Financial Officer positions will be held by a female (including those self-identifying as a female).
Geographic Location	The Board is comprised of directors who understand the social, economic, business and cultural environment in which the Group operates. However, the Board also understands the benefit of having an 'external' perspective, to draw learnings and insights from other jurisdictions and cultures to support independent and effective decision making.	Target: Between 20% - 30% of the Non-Executive Directors should be in a position to draw on current or recent knowledge and experience obtained from having lived or worked outside of Ireland.

Corporate Governance Statement

Board Diversity Report (continued)

Area of Diversity	Rationale	Guidance or Target
Age and Ethnicity	The Board recognises that in addition to tenure of knowledge and experience, value should also be placed on the timing of when knowledge and experience is acquired. This is ever more relevant where rapidly evolving developments in technology, innovation and customer behaviour will play an ever-greater role in delivering the Group's Ambition. The Board also recognises the importance that diversity on the Board brings particularly given the diverse age and ethnic profile of the Group's customer and colleague base.	Guidance: For each Director appointment, the Board will consider age, ethnicity and other demographics of the Group's customer and colleague base together with relevant Board composition benchmarking data to inform the design of any role profiles. While relevant industry experience remains a priority for appointments, the Board will also have regard to the expectations set out in the UK Listing Rules and the Parker Review regarding ethnic diversity on boards. The Board will take these considerations into account on a "comply or explain" basis, recognising the value of both experience and diversity in achieving effective Board composition.

Objective of Board Diversity Policy

The Board is mindful of its commitment to having a diverse and inclusive Board and recognises the importance of age, ethnicity and other demographics of the Group's customer and colleague base which inform the design of the role profile for each Director appointment, in addition to gender, relevant knowledge, experience and skills. The Nomination, Culture and Ethics Committee discuss and agree annually all measurable objectives for achieving diversity on the Board and recommend them to the Board for adoption. When setting diversity objectives, the Nomination, Culture and Ethics Committee considers relevant Board diversity benchmarking data published by competent authorities including the Central Bank of Ireland and the European Banking Authority, national census data and other relevant international bodies and organisations. At any given time, the Board may seek to improve one or more aspects of its diversity and measure progress accordingly.

How the Board Diversity Policy was implemented during 2025

All Board appointments are made on merit against objective criteria, in the context of the relevant knowledge, experience and skills that the Board as a whole requires to be effective to deliver the Bank's strategic objectives and having regard to the Diversity Policy. The balance and mix of appropriate and relevant knowledge, experience and skills of Non-Executive Directors is taken into account when considering a proposed appointment and is reviewed at least annually by the Board.

The Board Nomination Culture and Ethics Committee carries out a review of Board performance annually. Part of that review considers the succession planning, composition and diversity needs of the Board. In 2025, the Committee carried out a detailed analysis of Board and Committee composition, Board Independence levels, Board diversity analysis, review of the Board Suitability Matrix and potential retirements over the following two-year period in light of planned departures from the Board in 2025 and 2026. This comprehensive assessment allows the Board to recognise strengths and address weaknesses,

plan for relevant knowledge, experience, skills and other diversity needs of the enlarged Group for the future in line with its strategic priorities and evolving risk profile, in addition to developing a diverse pipeline and effective succession planning for departures from the Board.

The behaviours likely to be demonstrated by potential Non-Executive Directors are also considered when interviewing for new appointments to ensure an environment in which a range of perspective, insight and challenge which enhances collective decision-making and reflects positive conduct and culture of the Board is expected, achieved and maintained in the Boardroom and beyond. In reviewing Board composition, the Nomination, Culture and Ethics Committee considers the benefits of diversity, including gender and other attributes, and looks to ensure there is appropriate representation from other industry sectors. In addition to core financial services knowledge and experience, the Board also can draw from expertise in technology, change and risk management, customer advocacy, transport, healthcare, ESG/sustainability and climate risk, workforce planning and remuneration, communications and the charities sector strategy development and governance.

The Board considers the skills, experience and expertise, including education and professional background, in areas relevant to the operation of the Board. All candidates for appointment need to demonstrate the financial literacy required for a proper understanding of the Group's activities and associated risks. The Nomination, Culture and Ethics Committee seeks to ensure a proportion of the Board has a deep understanding of financial products and has established guidelines to ensure Board candidates are selected on merit and objective criteria, based on their relevant skills, competencies, qualifications and ability to commit sufficient time to the role, and in line with the Board Diversity Policy.

2025 Board Diversity Progress

At 31 December 2025 the Board female/male ratio stood at 55:45 (67:33 for Non-Executive Directors) against a gender diversity target to maintain gender balance (50:50). This exceeds the UK Listing Rules target to have at least 40% female representation on the Board.

The Board has also met its diversity target of having at least one senior Board position held by a female, being the Chairperson position, throughout the full year which is also in line with the role model ambitions of the Board to further strengthen diversity and inclusion across the rest of the Group. The Board continues to review and monitor progress on diversity of the Executive Committee, the Senior Leadership team and throughout the wider Group as part of its commitment to improve gender diversity and other wider diversity aspects of the workforce.

The Board broadly achieved gender balance with regard to its Committee composition (with the exception of the Board Nomination, Culture and Ethics Committee and Board Remuneration Committees which were composed in favour of females at year-end) and has regard to wider diversity aspects among the members of the Board Committees.

The Board has not set a target for having at least one member of the Board from a non-white ethnic minority background in its Diversity Policy as expected under the UK Listing Rules as the Board recognises the challenges in setting diversity targets that it may not be in a position to achieve in the medium term. In this context, the Board continued to prioritise the appointment of Directors

based on relevant skills, experience and expertise required to support the current and future needs of the Company while strengthening governance and decision-making. The Board will keep this position under review having regard to ensuring the Board has the appropriate balance of relevant knowledge, experience and skills to deliver the Group's strategic objectives, and having regard to the latest benchmarking data on non-white ethnic minorities in Ireland being the geographical provenance of the Group's customer and colleague base. Furthermore, when considering future Board appointments, the Board will have regard to the expectations set out in the UK Listing Rules and the Parker Review regarding ethnic diversity on boards. The Group is committed to having a diverse Board, to achieving the targets and guidance set out in its Diversity Policy and to ensuring an open and fair recruitment and selection process that reflects relevant metrics of diversity for each Director appointment in the best interests of the Group and its stakeholders.

The Board exceeded its objective of requiring a majority of Non-Executive Directors, the Board Chairperson together with the Chairpersons of the Audit and Risk and Compliance Committees to have relevant banking and/or financial experience and is satisfied that all Directors have attained the required financial literacy threshold. The Board diversity ratio of Non-Executive Directors with experience gained from living or working outside of Ireland to bring an external perspective and insights from other jurisdictions and cultures stood at 33% in line with the target range of between 20-30%. The other diversity aspects including age, nationality and independence are displayed in line with the guidance for Board appointments as set out in the Board Diversity Policy.

2025 Board Diversity Measures

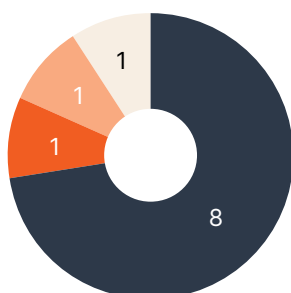
This section outlines the key diversity and inclusion metrics for Board and Executive Management at 31 December 2025, being the chosen reference date within the accounting period as required by the UK Listing Rules LR14.3.30-14.3.33. This section also includes detail of tenure, age, skills and experience. All information on the Board and Executive Management's gender identity and ethnic background was manually gathered.

“At 31 December 2025 the Board female/male ratio stood at 55:45 (67:33 for Non-Executive Directors) against a gender diversity target to maintain gender balance (50:50).”

Corporate Governance Statement

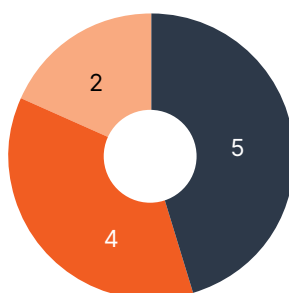
Board Diversity Report (continued)

Nationality



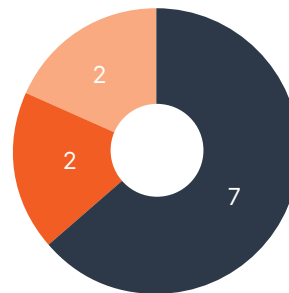
● Irish
● British
● German
● US

Age Profile



● 50-59
● 60-69
● 70+

Independence



● Independent Non-Executive Directors
● Non-Executive Directors
● Executive Directors

Gender Identity

	Number of board members	Percentage of the board	Number of senior positions on the board (CEO, CFO, SID and Chair)	Number in executive management	% of executive management
Men	5	45%	3	8	73%
Women	6	55%	1	3	27%
Other categories	-	-	-	-	-
Not specified/prefer not to say	-	-	-	-	-

Note: Executive Directors are counted in both Board and Executive Management disclosures. Company Secretary included in Executive Management disclosure.
 ^ Executive Management refers to the Group Executive Committee.

Ethnic Background

	Number of board members	% of the board	Number of senior positions on the board (CEO, CFO, SID and Chair)	Number in executive management	Percentage of executive management
White British/Irish or other White (including minority-white groups)	11	100%	4	11	100%
Mixed/Multiple Ethnic Groups	-	-	-	-	-
Asian/Asian British/Irish	-	-	-	-	-
Black/African/Caribbean/Black British/Irish	-	-	-	-	-
Other ethnic group, including Arab	-	-	-	-	-
Not specified/ prefer not to say	-	-	-	-	-

Note: Executive Directors are counted in both Board and Executive Management disclosures. Company Secretary included in Executive Management disclosure.

2026 Board Diversity Priorities

Area of Diversity	Board Objective	2026 Board Action
Gender	The Board remains committed to maintaining gender diversity on the Board.	- Board Gender Diversity Target aims to achieve and maintain gender balance and, - Encourage initiatives that promote broader inclusive gender diversity across the Group, in line with the Organisational Culture, Diversity, Equal Opportunity and Inclusion Programmes.
Alignment to customer and colleague base	The Board acknowledges the Group has a diverse customer and colleague base and should take account of same in considering the diversity requirements of the Board.	- The Board Diversity Policy recognises the importance of ensuring the Board has a clear line of sight on the diverse makeup of the Group's colleague and customer base when considering appointments to the Board; - Customer diversity metrics such as age, ethnicity and gender will influence how the Board thinks about its own construct; and, - Receive reports on actions taken by the Bank to promote a more inclusive, equitable and diverse organisation including colleague surveys and customer experiences.
Board Diversity Policy	The Board recognises there are many aspects of diversity such as age, social and ethnic backgrounds, gender, cognitive and personal strength, skills and experience, and the importance of ensuring wider diversity is considered for Board appointments.	- Consider the aspects of diversity relevant to the current and future operations of the Group, such as gender, age, cognitive, social/ethnic background, personal strengths, education and professional background; - Ongoing review of the Board Diversity Policy to ensure all relevant aspects of diversity are included in the Policy; - Ongoing review of the Board Suitability Matrix to ensure that the diverse range of relevant knowledge, skills and experience required by the Group is represented at Board level; and - Promote initiatives that further advance diversity at Board level, in addition to fostering a diverse and inclusive Senior Leadership and Executive Management succession pipeline.
Board Recruitment and Selection and Suitability	The Board remains committed to having a diverse range of relevant knowledge, experience and skills, including education and professional background, in areas relevant to the current and future operations of the Board, while ensuring that the recruitment and selection process for members of the Board is an open and fair process.	- Maintain a majority of Non-Executive Directors, including the Board Chairperson, together with the Chairpersons of the Audit and Risk Committees, with core banking and/or financial experience. This will be taken into account when recommending appointments; - Between 20% - 30% of the Non-Executive Directors should be in a position to draw on current or recent knowledge and experience obtained from having lived or worked outside of Ireland in light of the Bank's strategic priorities and evolving risk profile; - Retain the requirement that all candidates for appointment need to demonstrate the financial competency required for a full understanding of the Group's activities and associated risks; - Ensure that a proportion of the Board has a deep understanding of financial products; - Review Board recruitment and selection procedures, to ensure Board candidates are selected on merit and objective criteria, based on their relevant knowledge, experience and skills, and having the ability to commit sufficient time to the role, with due regard to relevant aspects of diversity; and - Undertake an assessment of individual and collective suitability, taking into account relevant aspects of diversity to determine the continued individual and collective suitability of members of the Board.
Board Succession Planning	The Board is responsible for overseeing succession plans for the Board and Senior Executives.	- Review Succession Plans of the Board and Senior Executives ensuring they are sufficiently robust; that talent management and development plans remain in place with live talent maps to ensure a diverse pipeline of successors at Senior Leadership team level; - Ensure pipeline of successors takes account of the Group's diversity and inclusion measures and ambitions; - Ensure the results of the Board Performance Review inform the Board appointment and succession planning process, and that it continues to reflect the requisite time for the selection, recruitment and appointment process, and - Where the requisite skills and expertise are not available on the Board, ensure that it has access to such expertise and skills.

Corporate Governance Statement

Board Audit Committee

The Audit Committee ensures that the financial and internal control policies, practices and decisions of the Group are carried out appropriately and are properly aligned to strategy and the interests of its Shareholders.



Dear Reader,

I am pleased to present my report as Chairperson of the Board Audit Committee (the 'Committee' or 'BAC'). The Committee oversees implementation of the Group's financial and internal control policies, practices and decisions. The Committee aims to ensure its oversight activities support Group strategy, is aligned with shareholder interests and supports a culture of regulatory and legal compliance.

This marks my first report as Chairperson of the Committee having taken up the position on 31 July 2025. I would like to express my gratitude to my predecessor Ronan O'Neill, fellow Committee members, the executive team, and all stakeholders for their welcome and support during my initial tenure. I would like to acknowledge the leadership and commitment shown by Ronan to the Bank throughout his tenure and his support in ensuring a smooth transition to enable continued effective oversight of the Committee's responsibilities.

In 2025, we were delighted to welcome Barry D'Arcy to the role of Chief Financial Officer, succeeding Nicola O'Brien. Barry D'Arcy is an experienced finance leader and Board Executive Director. Looking ahead, ensuring that both the Finance Function and Group Internal Audit ('GIA') continue to have the necessary skills and resources, remains a key priority for 2026. The Committee will work closely with management to support recruitment, development, and capacity building within these critical functions.

2025 saw KPMG's third audit as the Group's External Auditors. I am pleased with the thoroughness and challenge they brought to the audit process, which reflects their commitment to providing a fresh perspective on the Group's control environment. Their detailed reviews continue to enhance the integrity of the Group's financial reporting.

The Committee continued to support enhanced collaboration with the Board Risk and Compliance Committee ("BRCC") to align on key priorities and to ensure each Committee's time is utilised to maximum effect while aligned to its own legal and regulatory obligations. Whilst continuing to ensure responsibility for risk oversight was centre to the remit of BRCC, the role of the Audit Committee was expanded to undertake oversight responsibilities on certain matters which were deemed to have a material impact on the effectiveness of the Bank's internal control environment in the areas of operational and IT resilience and third party management.

Oversight on the design and implementation of the Internal Audit Plan is a key responsibility of the Committee. A notable development in 2025 was increased Board expectation for internal audit assurance coverage over Supervisory Review and Evaluation Process ('SREP') deliverables, which are of material importance to the Committee and the Bank. Additionally, there has been an increase in First-Line attendance at BAC meetings to discuss significant audit findings to further embed a culture of accountability and reflecting a deeper engagement with the Committee's work.

The Committee maintained a strong focus on the effectiveness of the Bank's control environment, with significant progress made on evolving a 'Three Lines of Defence' combined assurance process. This effort has included close review of the Bank's internal audit opinion, (provided by the Head of Group Internal Audit), and an ongoing assessment of key performance measures tracking the status of the Bank's control environment. Linked to this point, the Committee closely monitored all key controls over financial reporting to ensure the Bank's published accounts provide a true and fair view on the financial position of the Group.

For 2025, the Committee conducted a comprehensive review of the Group's compliance with the provisions of the Irish and UK Corporate Governance Codes. This review reaffirmed the Bank's commitment to maintaining the highest standards of governance and accountability. Further key developments in 2025 included the Group's inaugural disclosure under the Corporate Sustainability Reporting Directive ('CSRD'), reflecting our commitment to transparency and compliance with evolving regulatory standards; and, jointly with the BRCC, the review and approval of the Group's Capital Model Programme for Retail Mortgages, ensuring these models are robust, compliant, and aligned with regulatory expectations which is critical to supporting the Group's growth and resilience.

Looking ahead, the Committee remains focused on supporting the Board in delivering strong governance and financial resilience. Succession planning and continuous improvement in assurance processes will remain priorities as we navigate an evolving regulatory landscape.

In closing, I would like to reiterate my thanks to the BAC members, management, and staff for their hard work and dedication. I am confident the Committee's continued focus on governance, assurance, and oversight will position the Bank for ongoing success.

Hugh O'Donnell

Chairperson, Board Audit Committee

Composition and Operation

The Board Audit Committee ('BAC') comprises of four Independent Non-Executive Directors, each bringing significant expertise and experience to their role. Detailed biographical information for each member is provided on pages 73 to 77 of this report. Neither the Board Chairperson nor the CEO is a member of the BAC, ensuring the Committee's independence and objectivity.

To enhance the Committee's effectiveness, the Board mandates that the Chairperson of the BAC must possess recent and relevant financial experience, ensuring robust oversight of the Group's financial reporting and internal controls. The Chairperson is responsible for providing strong leadership to the Committee, setting meeting agendas, facilitating open and productive discussions, and ensuring the Committee operates efficiently and in alignment with its Terms of Reference. Collectively, the members of the BAC bring a diverse and complementary range of skills, including financial expertise, risk management, technological and operational skills, and industry-specific knowledge, all of which contribute to the effectiveness of the Committee and the overall governance of the Group.

The BAC meets at least six times a year with additional meetings convened as necessary. Each scheduled meeting begins with a private session attended exclusively by Committee members, fostering candid discussions and an opportunity to review key matters on the agenda. Following this, the Head of GIA is invited to join the meeting, allowing the Committee to engage directly on the scope, findings, and progress of internal audit activities while ensuring independence from senior management. Senior management, External Auditors, and other invitees participate only by invitation. This structured approach safeguards the independence and integrity of the BAC's deliberations and decisions.

To promote cross-committee collaboration and alignment, the Board requires that at least two members of the BAC also serve on the Board Risk and Compliance Committee. This ensures a seamless flow of information between the Committees, enhancing the organization's overall risk management and governance framework. Hugh O'Donnell and Richard Gildea are members of both Committees. The BAC and BRCC also meet in joint session at least twice annually.

2025 Committee Meeting Attendance

Member	Appointed	Ceased	Number of Years on the Committee	2025 Meeting Attendance
Ronan O'Neill*	02 Nov 2021	30 Jul 2025	3.74	6/6
Hugh O'Donnell^	08 Apr 2025	-	0.73	6/6
Anne Bradley	30 Mar 2021	-	4.76	8/9
Ruth Wandhöfer	31 Dec 2023	-	2.0	9/9
Catherine Moroney	12 Dec 2023	31 Jul 2025	1.64	6/6
Richard Gildea	1 Oct 2024		1.25	9/9

* Chairperson up to 30 July 2025

^ Chairperson from 31 July 2025

Role and Responsibilities

The BAC monitors the effectiveness and adequacy of internal control, internal audit, IT systems and operational resilience framework and reviews the effectiveness of risk management procedures, in addition to reviewing the integrity of the Company's internal financial controls. The BAC monitors and reviews the effectiveness of the Group's

Internal Audit function and also considers the External Auditor's independence and objectivity and the effectiveness of the audit process. The BAC also reviews discoveries of fraud and violations of laws and regulations as raised by the Head of GIA.

The BAC monitors the integrity of the Financial Statements of the Company, reviewing significant financial reporting judgements contained therein, to ensure that they give a 'true and fair' view of the financial status of the Group and to recommend to the Board whether to approve the Annual and Interim Reports and also to recommend to the Board that it believes that the Annual Report, taken as a whole, is fair, balanced and understandable and provides the necessary information for shareholders to assess the Group's position, performance, business model and strategy.

In considering whether the Annual Report is fair, balanced and understandable, the Committee reviewed the Annual Report and considered whether the Financial Statements were consistent with the financial review elsewhere herein. The Committee also reviewed governance and approval processes in place within the Group as they were relevant to the Financial Statements. These included the completion by Management of disclosure checklists to ensure all required disclosures required by applicable company law, listing requirements and accounting standards are included in the draft Annual Report which was reviewed by various Executives and Management of the Group.

The Committee also had regard to the significant judgements relating to the Financial Statements that are set out in this report. Each of these significant issues were addressed in papers received by the Committee from Management and in the report received by the Committee from the External Auditors and were discussed in the Committee's meeting with the External Auditors.

The BAC also had regard to the assessment of internal control over financial reporting, details of which are outlined in the Risk Management and Internal Control section of the Corporate Governance Statement.

Matters considered by the Committee in 2025

During 2025, the Committee spent a significant amount of time considering those issues set out in the Significant Financial Reporting Judgments and Disclosures and recommending for approval to the Board, the Annual Report and Interim Report.

Corporate Governance Statement

Board Audit Committee (continued)

During 2025, the Committee also:

- Reviewed GIA activity throughout the year, including a review of performance against the 2025 internal audit plan;
- Prepared for and considered disclosures under CSRD Regulations;
- Reviewed the Group's Pillar 3 Policy and associated disclosures;
- Approved the GIA Charter, resourcing model and considered the effectiveness of the function;
- Reviewed External Auditor independence and effectiveness;
- Approved the TCFD Report included in the 2025 Annual Report;
- Reviewed the continued recognition of a Deferred Tax Asset ('DTA') on tax losses carried forward;
- Approved changes in accordance with International Financial Reporting Standards ('IFRS') and International Accounting Standards ('IAS');
- Reviewed impairment provisions;
- Reviewed control environment reports;
- Reviewed Technology updates with focus on IT incidents impacting customers;
- Approved critical Third Party Outsourced Service Provider contracts.
- Reviewed the effectiveness of internal control over financial reporting;
- Approved the Internal Audit Plan for 2026;
- Reviewed a Report on recurring themes, findings and trends from audit reports issued between 01 September 2024 and 31 July 2025.
- Reviewed the governance and approval arrangements underlying the fair, balanced and understandable assessment of the Annual Report;
- Assessed the Longer Term Viability and Going Concern Statements;
- Reviewed and approved changes to the depreciation and provision costs on right-of-use lease assets;
- Reviewed and approved revisions to the useful economic life of certain intangible assets;
- Reviewed and approved updates to Exceptional Items;
- Reviewed the disclosures on compliance with the Irish and UK Corporate Governance Codes;

- Reviewed and approved changes to the Committee's Terms of Reference with updates to reflect the interplay of responsibilities with the BRCC.
- Reviewed non-impairment provisions including legacy, legal and compliance liabilities; and
- Reviewed the basis, background and level of Non-Audit fees paid to KPMG.

The Committee also considered the effectiveness its own performance supported by feedback received via a committee governance questionnaire and review of Committee activity mapped against responsibilities set out in its terms of reference.

Financial Reporting and Significant Financial Judgments and Disclosures

During the year, the BAC reviewed the External Auditors' findings, and the following significant financial judgments made, the related disclosures for the 2025 Financial Statements as set out on the current and the following page.

Expected Credit Loss Provisions

The Committee considered the Group's methodology including assumptions and parameters for generating the Group's allowance for Expected Credit Loss ('ECL') for its portfolios. The Committee discussed with Management in detail any changes and revisions made to the Group's IFRS 9 ECL models, macro-economic scenarios, significant increase in credit risk, and Management judgement.

Multiple scenarios

The Committee reviewed and approved the macro-economic scenarios for use in IFRS 9 ECL estimation, which included the central scenario used for financial planning purposes, a more favourable scenario, and an adverse scenario.

Expert credit judgements

At 31 December 2025, the impairment provisions included €79m of Management's judgement in impairment model parameters (€21m) and overlay adjustments to modelled ECL outcomes (€58m), see note 2 for further information. A key focus of the Committee during the year was an assessment of the level and rationale for such adjustments.

The Committee concluded that a robust governance framework existed to monitor provisioning adequacy and that the assumptions and judgements applied by Management were appropriate. The Committee was satisfied that the provision and related disclosures in the financial statements were appropriate.

Recognition and Recoverability of Deferred Tax Assets

The Committee considered the extent of DTAs recognised by the Group in respect of unutilised tax losses, and in particular, the future profits of PTSB against which losses may be utilised in future years. The Committee noted that the Group's performance and strategic outlook had improved, as outlined in more detail under "Going Concern" and "Longer Term Viability" below.

Accordingly, in line with the requirements of IAS 12 "Income Taxes", Management have formed the view that the carried forward tax losses within PTSB could be utilised against future profits which will be generated by PTSB. This requires significant judgments to be made about the projection of long-term profitability because of the period over which recovery extends.

Having considered the above, the Committee agreed with Management's assessment that it was probable that the level of DTAs recognised in the Financial Statements at 31 December 2025 would be recovered. The Committee noted that IFRS does not allow for the DTA recognised to be discounted notwithstanding that it will likely take a significant number of years to be fully recovered.

Impairment review of the Group's subsidiary undertaking

The Company carries its investment in its subsidiary undertaking at cost less impairment and reviews whether there is any indication of impairment at each reporting date. Impairment testing involves comparing the carrying value of the investment to its recoverable amount. The recoverable amount is the higher of the investment's fair value or its value in use ('VIU'). An impairment charge arises if the carrying value exceeds the recoverable amount.

Management provided the Committee with a paper that detailed the recoverable amount of the investment. The Committee reviewed the paper and calculations and approved an impairment charge for the year of €263m due to the recoverable amount based on the Value in Use calculation being in excess of the carrying value.

IT Access

Certain matters relating to IT access controls were communicated to the Committee through the external audit process. The Committee reviewed these matters and was satisfied sufficient mitigating controls were in place from a financial reporting perspective.

Going Concern

Note 1 of the financial statements includes details of the going concern of the Group and Company, which outlines the Directors' view that the Group will continue as a going concern for a period of 12 months following the signing of this report.

In making the judgement, the Committee was provided with detailed papers containing Management's considerations of the risks and uncertainties as they may pertain to going concern. The Committee reviewed these judgements and agreed with Management's view that the Group continues on a going concern basis and that there are no material uncertainties.

Longer Term Viability

In accordance with the requirements of the Irish and UK Corporate Governance Code, the Directors are required to issue a viability statement of the prospects of the Groups taking in account Group's current and projected financial position taking in account the principal risks facing the Group.

The period over which we consider longer-term viability

The Directors have assessed the viability of the Group over the three-year term which falls within the time horizons considered for the Group's strategic planning and the regulatory stress testing frameworks employed by the Group. The Directors are satisfied that this is an appropriate period of assessment.

Assessing the governance and prospects of the Company and Group

In making this assessment, the Directors have assessed the key factors that are likely to affect the Group's business model and Medium Term Plan which have been stress tested and sensitised for a downside scenario to reflect the challenges that the Group is facing, primarily on the Group's capital, solvency and liquidity position while taking into account other principal and emerging risks.

The Board has reviewed the Medium Term Plan ('MTP') and the outputs from stress testing of capital and liquidity positions both pre and post management actions. The Directors have carried out a robust assessment of the emerging and principal risks facing the Group, including those that would threaten its business model, future performance, solvency or liquidity.

The stress testing is designed to explore the resilience of the Group to the potential impact of principal risks set out in the Annual Report, including in particular funding and liquidity, capital adequacy, the economic environment, regulatory risks and or a combination of these risks. A description of the Group and Company's principal risks together with the approach to risk identification and control are set out in the Risk Management section.

The Medium Term Plan is reviewed annually and with increased frequency when necessitated by significant changes in the external environment and is approved by the Board each year.

The Medium Term Plan closely aligns to Group's Risk Appetite Statement and Risk Management Framework and details the Group's future profitability, cash flow projections, capital requirements and the Group's key performance measures. Management's performance against the Medium Term Plan is reviewed on an ongoing basis by the Board.

The Group made a profit for the 2025 financial year. While the Group remains strongly capitalised and has significant liquidity at the year-end, the future projections in the Medium Term Plan which, were sensitised for a downside scenario, indicate no breaches in either regulatory capital or liquidity positions in the viability period of assessment to December 2028 after management intervention.

The assumptions underpinning the stress testing to determine the resilience of the Group's balance sheet, profitability and robustness of the business model were significantly conservative.

There are certain key assumptions that are critical to the viability of the Group and these are outlined below:

Funding & Liquidity

The Group continued to have sufficient liquidity throughout 2025, and its liquidity position remains strong at 31 December 2025 with the Group holding a significant liquidity buffer. The Group has no reliance on ECB funding and is 92% deposit funded with plans to diversify its funding profile over the horizon of the next three years.

A key assumption in determining the longer-term viability is that the Group will continue to be able to access the required liquidity and funding across all channels during the period of assessment.

The Group continues to undertake a number of initiatives to improve its liquidity position in the areas of deposits, collateral optimisation, and wholesale markets activity.

The Directors and Management are aware that the Group's ability to monetise its contingent counterbalancing capacity is dependent on the underlying collateral remaining eligible.

Our funding plans assume, based on our interaction with wholesale markets and deposit trends, that the required liquidity and funding will be available to the Group over the medium term.

Capital Adequacy

The Group made a profit for the year ended 31 December 2025. Directors and Management have reviewed the MTP and based on this, the Directors and Management are satisfied that the Group is well positioned to continue to deliver profits in future years.

Directors and Management have considered the forecast sufficiency of this capital base, and its ability to withstand additional stress scenarios such as the economic environment in Ireland deteriorating. The Group is confident that all regulatory requirements will be met over the period to 2028.

Corporate Governance Statement

Board Audit Committee (continued)

Reasonable Expectation of longer-term viability

Based upon the above assessment, the Directors have a reasonable expectation that the Group and Company will be able to continue in operation and meet its liabilities as they fall due over the three-year period of their assessment to 31 December 2028.

Provisions for Liabilities

The Committee considered the provisions made in the Financial Statements in order to assess the appropriateness of the underlying liabilities.

Management presented a paper outlining the requirements of IAS 37 and the basis of the provisions proposed. The Committee is satisfied that the provisions represent the best estimate of the potential liabilities at 31 December 2025.

Corporate Sustainability Reporting (CSRD)

The CSRD came into effect for Irish companies on 1 January 2024, and this year marks the Bank's second year of reporting in accordance with the Directive. During the year, the Bank continued to strengthen its sustainability reporting framework in line with the requirements of European Union (EU) and the European Sustainability Reporting Standards (ESRS).

Building on the inaugural CSRD disclosure published in last year's Annual Report, the Bank has further enhanced the quality, scope, and reliability of its reporting. The Bank's CSRD disclosure for the year ended 31 December 2025 is included within this Annual Report. It can be found in the Sustainability Statements beginning on page 137.

The Bank's External Auditor provided limited assurance of the CSRD disclosure in line with the recommendations set out within the Directive. Their assurance opinion can be found on page 134.

Throughout the year, regular updates on CSRD implementation and reporting progress were brought to the BAC, with the Committee being responsible for ensuring an integrated approach to disclosure preparation and delivery, providing a link between the Board and the External Auditors providing the assurance, and ultimately, signing off the disclosure.

Relationship with External Auditors

The Group's External Auditors are KPMG who were appointed by shareholders in 2023. The BAC provides a link between the Board and the External Auditors, independent of the Company's Management. The External Auditors regularly attend BAC meetings and the Committee meets with the External Auditor at least once a year without Management present to discuss their remit and any issues arising from the audit.

The BAC reviewed the external audit plan prior to the commencement of the 2025 audit. The BAC met with the External Auditor to review the findings from the audit of the Group financial statements. The BAC has an approved policy on the provision of non-audit services by the External Auditor. The policy seeks to ensure that processes are in place to make sure that the independence and objectivity of the external audit process is not compromised. This includes monitoring the nature and extent of the services provided by the External Auditor through its quarterly review of fees paid to the External Auditor for audit and non-audit work, seeking confirmation from the external auditor that they are in compliance with relevant ethical and professional guidance and that, in their professional judgment, they are independent of the Group.

The BAC reviews all fee arrangements with the External Auditor. Fees paid in respect of audit, other assurance services, tax advisory services and non-audit services are outlined in note 7 to the financial statements.

Other assurance services are services carried out by the auditors by virtue of their role as auditors and include assurance related work, reporting to the regulator and other assurance services. In line with best practice, the auditors do not provide services such as system design and valuation work which could be considered inconsistent with the audit role.

The amount of fees payable to External Auditors for their audit services for the year 2025 was €2.2m (excluding VAT) payable to KPMG Ireland. €0.5m (excluding VAT) was paid in respect of non-audit services, which relate to various assurance works. The Company's External Auditor generally performs these services.

The External Auditor is required to rotate audit partner every five years. The current audit partner is Frank Gannon who was appointed in 2023. The Committee also reviews the effectiveness, independence, and objectivity of the External Auditor. The Committee also considered a paper by Management regarding auditor's efficiency and effectiveness.

The BAC reviews the effectiveness of the External Auditor through discussion and assessment of its performance. The BAC has concluded that it was satisfied with the External Auditor's performance.

Review of Group Internal Audit

As set out in the Risk Management Section a 'Three Lines of Defence' model has been adopted by the Group for the effective oversight and management of risks across the Group, with Group Internal Audit ('GIA') being the Third Line of Defence. GIA's purpose is to strengthen the organisation's ability to create, protect, and sustain value by providing the board and management with independent, risk-based, and objective reasonable assurance, advice, insight, and foresight.

The Head of Internal Audit has a direct reporting line to the Chairperson of the BAC and the BAC meets with the Head of Internal Audit on a regular basis without the presence of Management. The BAC receives regular reports from GIA, which include summaries of the key findings of each audit in the period. The BAC ensures co-ordination between GIA and the External Auditor.

GIA's mandate allows for full and unrestricted access to all functions, records, and personnel. The GIA authority, roles, and responsibilities are set out in the GIA Charter which is approved by the BAC annually. The primary role of GIA is to develop an annual risk-based audit plan that assesses independently, the effectiveness and efficiency of internal controls, risk management and governance systems and processes and provides assurance on these systems and processes, including the reporting of overall findings and any areas of concern resulting from such assurance activities.

GIA provide the BAC with an annual resourcing assessment. The 2025 resourcing assessment included a review of the current GIA resource model and skills, with an emphasis on ensuring adequate resources and skills are in place to provide assurance in relation to the current and emerging risk profile of the Group. The BAC is satisfied that the quality, experience, and expertise of the function is appropriate to the needs of the Group.

In line with the Global Internal Audit Standards, the Head of GIA is required to develop and maintain a quality assurance and improvement programme that covers all aspects of internal audit activity. An internal quality assessment must be completed on an annual basis, with an independent external assessment undertaken every five years to evaluate

the Internal Audit Function's conformance with Global Internal Audit Standards.

The results of the latest internal quality assessment, completed by the Chartered Institute of Internal Auditors ('CIIA'), with an overall rating of 'Generally Conforms' was presented to the BAC in Q1 2024.

The last external quality assessment was completed by the CIIA in 2021 and was rated as 'Generally Conforms' against the CIIA Standards. The Audit Committee was satisfied that during 2025, GIA demonstrated flexibility and responsiveness to enable the function to focus on current and emerging risks, inclusive of audit requirements driven by both legislation and regulation, auditable processes within the Group and alignment with the Global Internal Audit Standards. Through these measures the Audit Committee has assessed the effectiveness of the internal audit function and is satisfied that the function is appropriate to the needs of the Group.

Corporate Governance Statement

Nomination, Culture and Ethics Committee

The Board Nomination, Culture and Ethics Committee is committed to supporting the Board and Group in achieving its strategic objectives, maintaining high standards of governance and fostering a culture of integrity, inclusivity and accountability through effective leadership.



Dear Reader,

As Chairperson of the Board Nomination, Culture and Ethics Committee (the "Committee"), I am pleased to present this report on activity of the Committee for 2025. The report aims to provide further context and insight into the role and responsibilities of the Committee together with a description of the work undertaken during 2025 as set out below.

Throughout 2025, the Committee maintained close oversight of Board and Executive succession planning and capability, the Group's culture evolution, organisational development and workforce planning, and the embedding of governance and accountability frameworks in line with the Central Bank Individual Accountability Framework (IAF). The work undertaken in 2025 was conducted in alignment with the Group's Integrated Strategic Plan and has further strengthened the Group's resilience and readiness for future challenges.

A key area of focus for the Committee was Board composition and succession planning, to ensure the Board maintained the appropriate balance of skills, experience and independence to oversee delivery of the Group's strategic objectives. The Committee oversaw the appointment of Hugh O'Donnell as an Independent Non-Executive Director and Chair of the Board Audit Committee during the year. The Committee is satisfied the appointment strengthened the Board's financial and governance capability. Richard Gildea was nominated Senior Independent Director with effect from 1 June 2025 arising from the planned retirement of Ronan O'Neill.

During 2025, the Committee continued to oversee Board succession planning with a focus on ensuring the collective knowledge, experience and skills on the Board were aligned with the current and future strategic direction of the Group. While the Committee will continue to monitor and assess the ongoing need for Board refreshment, future Board appointments will be paused until the

conclusion of the Formal Sale Process for the Group.

During 2025, the Committee oversaw the selection process for a number of senior executive roles that included the appointment of a new Chief Financial Officer, Chief Risk Officer and Head of Compliance. It is a testament to the strength of the Bank's succession planning capabilities that internal candidates were successful in the rigorous selection and recruitment processes that were held for each role. The Committee also approved and oversaw implementation of the comprehensive induction training programmes that were put in place for each of these roles.

The Committee continued to oversee the implementation of succession plans for business-critical roles together with the integration of succession planning into Strategic Workforce Planning and the future state Organisational Design to maintain resilience, safeguard delivery of strategic priorities, grow talent within the organisation and ensure robustness of mitigation plans in place for unplanned vacancies. The Committee is satisfied the Group's enhanced approach to talent management, succession planning and leadership development supports continuous improvement in effectiveness, governance and oversight. Further detail on the succession planning arrangements and appointments implemented during the year are set out in this report.

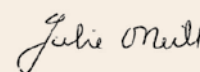
The Committee maintained a strong focus on culture, ethics and conduct recognising their importance in supporting the Group's purpose, values and long-term sustainability. The Committee considered the results of the annual 'Every Voice Counts' (EVC) colleague engagement survey which explored the behaviours and activities across the Bank measuring critical success factors for delivering a strong customer centric risk culture. The Committee met with colleagues from the People Experience Council (employee representative group on culture evolution and colleague wellbeing) during the year and received updates on actions identified

to address feedback from the EVC survey and overall measures to enhance the colleague and customer experience. The Committee also oversaw an independent Culture Assessment to support the Bank's future strategy. This confirmed the Bank's strong culture underpinned by robust frameworks, governance, accountability and leadership arrangements which continued to support the delivery of fair outcomes for customers, colleagues and other stakeholders.

A key programme of work during 2025 was the continued implementation of the Individual Accountability Framework, with particular focus on the extension of the Senior Executive Accountability Regime (SEAR) to Non-Executive Directors. The Committee oversaw preparations to support effective implementation, including role clarity, responsibility mapping, training and ongoing embedding of the framework into existing governance arrangements.

The Committee considered the outcomes of an externally facilitated Board evaluation undertaken during 2024. The evaluation assessed Board and Committee effectiveness, dynamics, skills and information flows. The Committee reviewed the findings and agreed a series of actions to support continued effectiveness and development of the Board throughout 2025.

The Committee also considered the output from the 2025 Board Evaluation approach which was internally facilitated by the Chairperson with support from the Company Secretary further details of which are set out on page 87 of the annual report.



Julie O'Neill

Chairperson, Board Nomination, Culture and Ethics Committee

Composition and Operation

The Committee is composed of a majority of Independent Non-Executive Directors. The Board requires that the Board Chairperson and the Senior Independent Director (SID) are members of the Committee. The Committee holds a member only session at the start of each meeting following which the Committee may invite members of the executive team to join, this may include the Chief Executive Officer, Chief Customer and People Officer and Head of Talent.

2025 Committee Meeting Attendance

Member	Appointed	Ceased	Number of Years on the Committee	2025 Meeting Attendance
Julie O'Neill*	17 Jan 2023	-	3.0	9/9
Ronan O'Neill**	26 Jul 2016	30 Jul 2025	9.0	4/6
Marian Corcoran	30 Mar 2021	-	4.8	9/9
Celine Fitzgerald	30 Mar 2021	-	4.8	9/9
Paul Doddrell	31 Dec 2023	-	2.0	9/9
Anne Bradley***	1 Aug 2025	-	0.4	2/2

* Chairperson from 31 March 2023

** Retired from the Board on 30 July 2025

*** Appointed to the Committee on 1 August 2025

Responsibilities of the Committee

The Board Nomination, Culture and Ethics Committee is responsible for bringing recommendations to the Board regarding the appointment of new Directors and Chairperson. The Board Chairperson does not attend the Committee when it is dealing with the appointment of a successor to the Board Chairperson. Decisions on Board appointments are taken by the full Board. All Directors are subject to re-appointment by election by the shareholders at the first practical opportunity following appointment. The Committee keeps under review the leadership needs of the Group, both Executive and Non-Executive, with a view to ensuring the continued ability of the Group to compete effectively in the marketplace. The Committee is also responsible for reviewing the effectiveness of the Board's operations and composition of Board Committees. The Committee also has responsibilities for supporting the Board on oversight on culture, ethics, reputation management and employee engagement.

Succession Planning

The Committee undertook regular reviews of Board and Board Committee composition and ensured a comprehensive and planned approach to the refreshment of Board and Board Committee membership. Arising from these succession planning reviews, the Committee oversaw the appointment of Hugh O'Donnell as Independent Non-Executive Director and Chair of the Board Audit Committee, following the retirement of Independent Non-Executive Director Ronan O'Neill. The Committee also oversaw an assessment of Board Committee composition resulting in a number of changes to committee membership including the appointment of Hugh O'Donnell to the Board Audit and Board Risk and Compliance Committees, Catherine Moroney's appointment to the Remuneration Committee (leaves Audit Committee) and Anne Bradley's appointment to the Nomination Culture and Ethics Committee (leaves the Board Risk and Compliance Committee). Rick Gildea stepped down from the Remuneration Committee to bring his committee representation back to two committee memberships. These changes were made following a comprehensive review of the knowledge, experience and skills requirements of each committee.

The Committee maintained its focus on the Executive Committee (ExCo) and Senior Leadership talent management and succession planning arrangements reflecting the Board's responsibility to ensure appropriate plans are in place for both planned and unplanned departures. The Committee oversaw development of robust talent management and succession plans for ExCo members which included the development of a diverse pipeline of successors at Senior Leadership team level in line with the talent management, development and succession planning programmes within the Group which reflect the DE&I ambitions. This included talent mapping individuals to identify strengths, development needs (both experiential and formal training programmes) and future potential of identified successors internally together with talent maps for potential external successors identified for certain ExCo and Senior Leadership roles.

Senior Executive Appointments

During 2025, the Committee continued to oversee leadership capability at Executive Committee and Senior Leadership level with a focus on maintaining strong governance, effective risk management and regulatory compliance. Arising from the appointment of Barry D'Arcy as Chief Financial Officer on 25 February 2025 (see next section), and, following a comprehensive recruitment and selection process, the Committee oversaw the appointment of Fiona McMahon as Chief Risk Officer on 11 August 2025. Fiona McMahon brings extensive risk, regulatory, financial services, strategic and operational knowledge to the role, with over two decades of experience in financial services. As Chief Risk Officer, Fiona McMahon is responsible for the leadership of Group Risk and oversight of the Bank risk management activities across all risk types. The Committee is satisfied the appointment further strengthens the Bank's risk leadership and supports the ongoing development of the Group's risk management framework.

The Committee also oversaw the appointment of Mairead Kirwan as Head of Compliance on 11 August 2025 following the retirement of her predecessor from the role. Mairead Kirwan brings extensive knowledge and

Corporate Governance Statement

Nomination, Culture and Ethics Committee (continued)

experience to the role having worked with the Group for over 10 years in senior leadership roles including Head of Financial Crime Compliance and Deputy Head of Compliance and Regulatory Affairs. Mairead Kirwan is responsible for leading the Regulatory Compliance function and is the primary point of contact with the Group's Regulatory Authorities. The Committee is satisfied the induction and handover arrangements in place for both roles reflect the robust systems implemented in line with the IAF.

Board Composition

A key function of the Committee is succession planning for the Board. During 2025, the Committee oversaw two new Board appointments: Barry D'Arcy as Chief Financial Officer and Executive Director and Hugh O'Donnell as Independent Non-Executive Director and Chair of the Board Audit Committee (who acceded to the role following the planned retirement of Ronan O'Neill on 30 July 2025).

Chief Financial Officer

Following the resignation of the CFO in August 2024, the Committee invoked succession planning arrangements and, with the support of recruitment specialists Odgers Berndtson (Odgers) oversaw a selection and recruitment process which led to the appointment of Barry D'Arcy as CFO and Executive Board Director on the 25 February 2025. Barry D'Arcy was selected as the preferred candidate following a competitive selection process involving both internal and external candidates. The Committee oversaw the implementation of a comprehensive handover, training and induction plan for Barry and is satisfied with the robustness of the handover arrangements in line with IAF. In this role, Barry is responsible for leading, managing and overseeing all Finance related matters of the Group and growing the Bank's financial planning and analysis function to enhance the commercial and operational value, build a culture of transparency and accountability, and support the CEO in directing the business of Bank and delivering upon its strategic objectives.

Independent Non-Executive Directors

The Committee's Board succession planning arrangements in 2025 focussed on the retirements of Donal Courtney from the Board in October 2024 and Ronan O'Neill in July 2025. As reported in this section of the 2024 Annual Report, the Committee assisted by Odgers undertook a competitive recruitment and selection process for the two Board positions. Arising from this selection process, two preferred candidates were identified who fully met the requirements of the respective role profiles and, at the date of publication of the 2024 Annual Report were at an advanced stage in the approval and appointment process. Once of these candidates, Hugh O'Donnell was appointed to the Board on 8 April 2025 as an Independent Non-Executive Director. Hugh O'Donnell was also appointed to the Chair of the Board Audit Committee role on 31 July 2025 following the retirement of Ronan O'Neill. The Committee is satisfied the appointment strengthened the Board's financial, audit and governance capability and supported effective Board and Committee succession.

Regrettably, due to personal circumstances, the second identified candidate had to withdraw from the appointment process midway through 2025. As set out in the Chairperson's introduction, the Committee and Board have agreed further Board appointments will be paused until the conclusion of the Formal Sale Process for the Group and, in light of this, the term of office for Ruth Wandhöfer has been extended to the end of 2026 (appointed in October 2018) to ensure the Board retains effective coverage of its governance responsibilities.

Note: Neither the Company nor any of the Directors have any commercial relationship with Odgers outside of recruitment services that are provided from time to time to fill designated Board and Senior Management positions.

Induction, Training and Professional Development

The Board recognises the high calibre and the varied level of knowledge, skills and experience of the Board. The Committee reviewed and enhanced the approach to induction, training and professional development of the Board members with a view to aligning the Board skills with the strategic direction and risk profile of the Group to enhance the collective knowledge of the Board. It aims to achieve this by prioritising training topics around the risks and opportunities from emerging themes, tailoring individual training and development plans for Board members to enhance the core skills identified following the Collective Suitability Assessment by building on the education and professional development opportunities through externally facilitated professional programmes. It will also seek to deepen the Board's knowledge of the business through increased exposure to subject-matter experts both internally and externally through the Board approved training programme. The Committee oversaw the implementation of comprehensive induction, training and development plans for new Board members, in addition to induction and handover arrangements for the transition of the Board Audit Committee Chair role. The Committee also oversaw the implementation of refreshed training and development plans for Executive Committee and Senior Leadership appointments to further strengthen leadership capability, organisational resilience and readiness for both planned and unplanned scenarios.

Board Performance Reviews

- In 2025, led by the Chairperson, the Committee oversaw the annual performance review of the Board, its committees and individual Directors. Enhancements have been made to the process undertaken for the 2025 annual Board performance review reflecting actions identified to enhance Board and Board Committee effectiveness and the resulting recommendations are set out in page 86 of this report. The Committee also provided oversight of the implementation of the 2024 Board Performance Review Action Plan. In accordance with the Irish and UK Corporate Governance Codes, the 2025 Board Performance Review was internally facilitated (having been externally facilitated in 2024).
- Other Matters considered by the Committee in 2025
- Review of the work undertaken throughout the year to implement actions identified to strengthen the foundations, capabilities and build resilience within the Group;
- Review of its own performance and effectiveness, including a review of its Terms of Reference;
- Review of the CEO Contract in line with the requirements of the Central Bank of Ireland Corporate Governance Code for Credit Institutions (to review every five years);
- Approval of the design, nomination and appointment process of Senior Management positions;
- Review and oversight of the evolution of the Group's culture following the external Culture Review,
- Review and approval of the Group's Wellbeing Strategy;
- Review and approval of Board Policies (Diversity, Conflict of Interest, Assessment and Suitability, Induction, Training and Professional Development, Succession Planning);
- Review and approval of the Management Responsibilities Map (IAF)
- Review and approval of the Group's Fitness and Probity Policy;
- Review and approval of updates to the Policies and Procedures including the Code of Ethics; Equality through Diversity & Inclusion Charter, Colleague Conduct Policy, Conflict of Interest Policy, Speak Freely Procedures, Protected Disclosures Procedures, IAF Conduct Standards Policy, IAF Conduct Standards Handbook and Senior Executive Accountability Regime (SEAR) Policy;
- Review of Colleague Conduct related activity within the Group;
- Consideration of workforce engagement mechanisms under the UK Code;
- Review of Colleague Survey updates;
- Reviewed feedback on the implementation of the enhanced Learning & Development Programme which improved the colleague experience and learning outcomes with strong focus on business skills training;
- Reviewed progress on the Group's Diversity, Equity and Inclusion programmes of work as aligned to the Irish Centre for Diversity Gold Accreditation for which the Bank was re-accredited in 2025;
- Reviewed the proposed enhancements to the Bank's Hybrid & Flexible Working arrangements;
- Review of Corporate Affairs, Reputation Management and Communication (including Stakeholder Engagement) updates, and review of the Public Affairs Strategy 2025-27; and
- Review and oversight of the implementation of the Bank's 'Our Customer Yes Checks' to support decision-making in the Bank and approval of a new 'Customer Focus' Value.

Corporate Governance Statement

Risk and Compliance Committee

The Committee supports the Board in ensuring risks are properly identified, reported, assessed, and controlled, and that the Bank's strategy is consistent with risk appetite.



Dear Reader,

As Chairperson of the Board Risk and Compliance Committee (the "Committee" or "BRCC"), I am pleased to report on the Committee's activities for the year ended 31 December 2025.

As 2025 marked my first full year as Chairperson of the Committee, having taken up the position in October 2024, I would like to express my gratitude to my fellow Committee members, the executive team, and all stakeholders for their support and collaboration throughout the year.

In April 2025, we welcomed Hugh O'Donnell to the Committee. Hugh brings extensive knowledge of retail and business banking to the Committee, together with expertise in financial accounting, regulatory reporting, risk management, strategic planning, governance and oversight. In 2025, we also welcomed Fiona McMahon to the role of Chief Risk Officer ('CRO'), succeeding Barry D'Arcy, following his appointment to the role of Chief Financial Officer. Fiona brings a wealth of experience to the role, having previously held positions as Director of Compliance and Chief Risk Officer at Ulster Bank Ireland DAC, and Head of Banking Supervision in the Central Bank of Ireland.

2025 was a year of significant progress and challenge for the Group, as we continued to strengthen our risk management framework and support the Board in navigating an evolving risk landscape. The Committee's work this year was shaped by a continued focus on operational resilience, regulatory change, and the delivery of key strategic programmes, all underpinned by our commitment to strong governance and customer-centric decision-making.

A key area of focus for BRCC is the role of the Committee in assisting and providing assurance to the Board on the Bank's appetite for risk (Risk Appetite Statement or 'RAS'), capital and liquidity management (ICAAP/ILAAP), Resolution

and Recovery Planning. In particular, the Committee has ensured that these assessments inform and underpin strategic decision-making. Advising and supporting the Board in ensuring there is effective risk management and risk governance across the Group is a key priority for the Committee. The Committee supported delivery of an enhanced control environment through a number of key initiatives including the embedding of a revised approach to the Risk Control Self-Assessment and Internal Control Statement processes and the evolution of a combined assurance model with enhanced alignment and collaboration across the three lines of defence. The Committee continues to work closely with the Board Audit Committee to oversee the internal control environment.

A particular area of focus for the Committee in 2025 was the redevelopment of the Bank's Internal Ratings Based ('IRB') Mortgage models which sought to achieve Regulatory approval to utilise a suite of redeveloped IRB models underpinning the Risk Weighted Asset calculation for the Bank's Capital (CET1). The Group announced approval of these models on the 21 January 2026 coming into effect on the 30 January 2026. The Committee also provided oversight and challenge in terms of the design, validation, and implementation of new IFRS 9 models for Probability of Default (PD) and Loss Given Default (LGD), ensuring the models were developed in line with regulatory expectations, industry best practice, and the Bank's own risk appetite. The successful delivery of both model programmes will materially strengthen the Bank's ability to assess and manage credit risk, improve the alignment of expected credit loss outcomes with underlying portfolio performance, and position the Group to respond proactively to changes in the economic environment and regulatory expectations. The Committee will continue to monitor the performance of these models and ensure they remain resilient and responsive as the external environment evolves.

Throughout 2025, the Committee played a central role in overseeing the Bank's response to the annual Supervisory Review and Evaluation Process (SREP) and the associated Risk Mitigation Plans (RMPs) issued by the Central Bank of Ireland by examining and supporting management's progress in addressing SREP findings, and ensuring that remediation plans were robust, appropriately resourced, and aligned with regulatory expectations. The Committee received regular updates on the status of all open RMPs, with a particular focus on the timely closure of actions relating to operational resilience, liquidity risk management, and model risk. In addition, the Committee challenged management to provide clear evidence of the embeddedness of completed actions, recognising that sustainable risk management requires not only procedural compliance but also demonstrable changes in behaviours and business practices. The Committee will continue to monitor the implementation and effectiveness of RMPs, and to engage proactively with management and internal audit to ensure that all regulatory obligations are met in full.

During 2025, the Committee provided close oversight of the Bank's SEPA Payments Transformation Programme, a multi-year initiative designed to modernise the Bank's payments infrastructure, enhance operational resilience, and ensure compliance with evolving regulatory requirements. The Committee reviewed management's approach to sequencing deliverables, balancing the need to prioritise high-volume, customer-impacting payment channels with the imperative to reduce reliance on third-party providers. The Committee challenged management to ensure the transformation programme was focused on both regulatory compliance and on delivering tangible improvements in customer experience and fraud prevention. Particular attention was paid to the implementation of real-time fraud monitoring and the introduction of

Verification of Payee (VoP) functionality, both of which are critical to safeguarding customers in an instant payment environment. The Committee will continue to monitor the programme's progress, with a focus on the timely delivery of remaining regulatory requirements and the ongoing enhancement of the Bank's payments capability.

The Committee provided detailed oversight of the Glas 3.1 transaction, which involved the sale of a portfolio of non-performing loans. The Committee reviewed the risk assessment, customer impact analysis, and conduct risk considerations associated with the transaction. Particular attention was given to the identification and treatment of vulnerable customers, ensuring that appropriate exclusions and protections were in place. The Committee also scrutinised the communication strategy, pricing, and regulatory compliance aspects of the transaction, and monitored the execution and post-transaction review to ensure fair outcomes for all customers and alignment with the Bank's risk appetite and strategic objectives.

The Committee maintained a strong focus on the Bank's Interest Rate Risk in the Banking Book (IRRBB) Category 1 Programme, a comprehensive initiative to enhance the Bank's risk measurement and management capabilities in line with heightened regulatory expectations for systemically important institutions. The successful delivery of the IRRBB Category 1 Programme has materially strengthened the Bank's ability to assess and manage interest rate risk, and the Committee will continue to oversee the embedding of these enhancements into business-as-usual processes.

In conclusion, the Committee played a key role in supporting the Board's consideration and approval of the Bank's Integrated Strategic Plan (ISP) through review of the Bank's funding plan, capital/liquidity stress scenarios and ISP risk assessment.

Looking ahead, the Committee will continue to support the Board in overseeing the execution of the Bank's ISP with a particular focus on managing the risks associated with growth, transformation, and the evolving regulatory environment. The Committee is committed to maintaining a strong risk culture, supporting management in the

delivery of key strategic initiatives, and ensuring that the Bank's risk management framework remains fit for purpose in a dynamic and challenging environment.

On behalf of the Committee, I would like to thank management and colleagues across the Bank for their ongoing commitment to effective risk management and governance.



Rick Gildea

Chairperson, Board Risk & Compliance Committee

Composition and Operation

The BRCC is composed of a majority of Independent Non-Executive Directors. Neither the Board Chairperson nor the CEO is a member of the BRCC. The Board ensures that the Chairperson of the Committee has relevant risk management and/or compliance experience. The Board requires that at least two members of the Committee are common to the Board Audit Committee (Rick Gildea and Hugh O'Donnell) and at least one member is common to the Board Remuneration Committee (Catherine Moroney). The Committee holds a member only session at the start of each meeting. The Committee invites the CRO and Head of Regulatory Compliance for a private session with members at least annually and as required. Thereafter other members of Senior Management are invited to attend, as required.

2025 Committee Meeting Attendance

Member	Appointed	Ceased	Number of Years on the Committee	2025 Meeting Attendance
Rick Gildea*	12 Dec 2023	-	2.05	14/14
Catherine Moroney	12 Dec 2023	-	2.05	14/14
Marian Corcoran	29 Oct 2019	-	6.18	12/14
Paul Doddrell	26 Nov 2020	-	5.1	13/14
Anne Bradley	30 Mar 2021	31 Jul 2025^	4.34	8/9
Hugh O'Donnell	08 Apr 2025		0.73	10/10

* Chairperson from October 2024

^ Joined the Board Nomination Culture and Ethics committee.

Responsibilities of the Committee

The Committee is responsible for monitoring adherence to the RAS. Where exposures exceed levels established in the RAS, the Committee is responsible for ensuring that appropriate remediation plans are developed and implemented. This is facilitated by the periodic review of a key risk indicators report calibrated to the RAS.

The Committee is responsible for monitoring compliance with relevant laws, regulatory obligations and codes of conduct. This is facilitated by regular reporting on compliance risks to the Committee. The Committee reviews the regulatory agenda and receives

updates on activities to implement new and updated regulation together with monitoring engagement with the Group's Regulators.

The Committee is responsible for oversight and advice to the Board on risk governance, current risk exposures, future risk strategy, including strategy for capital and liquidity management, setting of compliance policies and principles and the embedding of a supportive culture in relation to the management of risk and compliance. BRCC supports the Board in carrying out its responsibilities for ensuring risks are properly identified, reported, assessed and controlled, and that the Group's strategy is consistent with the RAS. The Committee seeks to

Corporate Governance Statement

Risk and Compliance Committee (continued)

review key aspects of the Group's risk profile and provide appropriate challenge on the adequacy of their management. The Committee continues to focus on the operational resilience of the Group, the incidence and management of material risk events and the importance of having automated processes, where practical and of effective controls.

The Committee independently monitors the extent to which the Group complies with relevant rules and procedures. This includes raising and maintaining awareness of, for example, financial regulations, compliance procedures and fraud and anti-corruption measures. The Company has internal policies, rules and procedures which provide assurance that Management complies with relevant laws and regulations regarding customers and business partners. The Committee remain focused on its oversight responsibilities for Anti-Money Laundering and Counter-Terrorist Finance activities.

In addition to meeting legal requirements, the Committee reviews its own Terms of Reference annually, recommending any changes considered necessary to the Board. The BAC and BRCC meet in joint session at least twice annually.

Matters considered by the Committee in 2025

During 2025, the Committee continued to focus considerable attention on the Group's systems of risk management and internal control and in addition to the monthly reporting from the CRO and Head of Regulatory Compliance, the Committee also considered a wide range of risk related frameworks and reports. Among the matters considered by the Committee during 2025 were:

- Review of risk appetite with focus on climate and environmental risk alignment and alignment with strategic planning processes;
- Review of the Payments Transformation Programme and SEPA Instant Payments rollout;
- Oversight on successful execution of capital optimising actions (calls made on a AT1 and Tier 2 debt instruments and a Green Tier 2 issuance);
- Key divisional and business frameworks under the Internal Control Framework;
- Review of OSII Prudential Compliance Obligations and regulatory changes;
- Review of IRRBB Strategy;
- Monitoring of conduct risk with a focus on evolving support for vulnerable customers;
- Reviews of the Bank's Resolution Planning work programme;
- Oversight for the remediation of SREP related Risk Mitigation Plans;
- Spotlights on key product portfolios (e.g. Deposit Strategy, Home Loans, Asset Finance);
- Reporting on Compliance Monitoring and Assurance;
- MLRO Reports (AML/CFT and Anti Bribery and Corruption);
- Monitoring of upstream Regulatory developments;
- Oversight and approval of the Bank's Non-Performing Asset Strategy;
- Recovery Planning Preparedness and Scenario Planning;
- Spotlights on Fraud, Complaints and Customer Impacting Errors;
- Climate and Environment Risk Management;
- Complaints Framework and regular updates on complaint levels/plans to address;
- ICAAP and ILAAP approach, design and recommendation of approval to the Board;
- ICAAP and ILAAP utilisation in strategy formulation and decision-making;
- Reviews of the Bank's provision models and expected credit loss outcomes;
- Updates on embedding of the Bank's Risk and Control Self-Assessment process;
- Addressing Risk Appetite breaches and approving remediation plans;
- Consideration of Data Protection Officer's Reporting;
- Reviews of obligations and activity under the Central Bank of Ireland Code on Lending to Related Parties;
- Recommending approval of the Bank's Internal Control Framework (to Board) and approval of the Bank's Enterprise Risk Management Framework and key divisional, business and risk frameworks therein; and,

The Committee also considered the effectiveness its own performance supported by feedback received via a committee governance questionnaire and review of Committee activity mapped against responsibilities set out in its terms of reference.

Corporate Governance Statement

Remuneration Committee

The Board Remuneration Committee ensures that PTSB's remuneration policies, practices and decisions serve to align the interests of its employees with those of its shareholders; operate within the applicable regulatory and legal requirements; and are free from any form of bias relating to gender, age or social or ethnic background.



Dear Shareholder,

On behalf of the Remuneration Committee, I am pleased to present the Directors' Remuneration Report for the year ended 31 December 2025, which has been prepared by the Committee and approved by the Board.

The Committee's report contains certain regulatory information required under the applicable legislation in respect of the Bank's status as a listed company and credit institution, as well as under the EBA Guidelines on Internal Governance, the amended EU Directive on the encouragement of long-term shareholder engagement, as transposed in Ireland (the "Shareholder Rights Directive", or the "Directive"), and the Irish Corporate Governance Code and the UK Corporate Governance Code.

Remuneration Committee Focus in 2025

Our Directors' Remuneration Report also provides further detail on the composition of the Committee and its role and responsibilities and a description of the work undertaken by the Committee during the year. We also include details of the Remuneration Policy criteria and the components of the Bank's reward offering, with a focus on the Bank's Directors (Executive and Non-Executive).

In 2025, the Committee continued to oversee the way in which our current Remuneration Policy which was approved at the 2024 AGM, and its implementation, serving to reward individual performance (what our colleagues achieve but also how they achieve their objectives) to the extent possible within the restrictions remaining in place as a result of the agreements and commitments in place with the Irish State. As a Committee, we also reviewed how our approach to pay and benefits contributes to the strengthening of our culture, including our risk culture. We also considered how we reward the delivery of the long-term sustainability of our business by aligning

remuneration with the long-term interests of stakeholders, as well ensuring fulfilment of our regulatory obligations.

In line with its responsibilities under the terms of the Shareholder Rights Directive, the Bank publishes its effective Directors' Remuneration Policy (the "Policy"), as applicable to the Board of Directors. The current Policy is published in full on the Bank's website: www.permanentstsbgroup.ie. During 2025, our Directors' remuneration was implemented in accordance with the approved Policy, and no derogations from the Policy were availed of during the year. The Remuneration Committee also undertook a review in the year of the Policy and the remuneration arrangements currently in place (details below).

It remains the policy of the Bank to reward our colleagues appropriately as we work together to build a valuable and sustainable business, operating within the Bank's Risk Appetite and underpinned by a strong culture which manifests itself in responsible and accountable behaviours in our day-to-day interactions and decision making with our customers and each other.

In 2025, the Bank engaged in comprehensive negotiations with Staff Representative Bodies which were mediated by an independent third party. Arising from those negotiations, the Bank reached agreement with all three Unions on outstanding issues relating to the 2024 annual pay review. Agreement on 2024 Pay and the revised 'Ways of Working' engagement protocols that formed part thereof, provided a platform for subsequent negotiations on 2025 Pay. In July 2025, agreement was reached on a comprehensive 2025 Pay Agreement and average salary increases of 4% were processed in July 2025 and backdated to January 1st, 2025. As part of the 2025 Agreement, the Bank and Group of Unions agreed to a significant reset of our Pay system and supporting processes based on delivering enhanced levels of

'Simplicity', 'Equity' and 'Transparency'. Subsequently, in November 2025, agreement was reached on a 2026 Pay Agreement which involves a 4% Pay Pot and is scheduled to be processed in the first quarter of 2026.

As part of the 2026 Pay Agreement, the Bank and its Group of Unions committed to engaging on a new Variable Pay Scheme for all staff. The new scheme is intended to enable us to reward colleagues at all levels, including Senior Management and Executive Directors for their contribution to the achievement of our long term strategic goals, the sustainability of our business and delivery for our customers. We look forward to the launch of the Scheme subject to Union engagement in 2026.

Throughout 2025, the Committee was also involved in overseeing aspects of PTSB's response to emerging legislation that will impact how we remunerate our colleagues. In particular, the EU Pay Transparency Directive is due to be transposed into Irish legislation by 7th of June 2026 and more details of the Bank's compliance with same will be provided in the 2026 Annual Report. The Government's Pension Auto Enrolment Scheme, "My Future Fund" went live on the 1st of January 2026 and the Bank has introduced new processes to ensure compliance whilst also taking the opportunity to remind colleagues of the significant value represented by the Bank's pre-existing Staff Pension arrangements.

The Bank also appointed a new CFO, Mr Barry D'Arcy, on 25 February 2025 and the Committee was involved in the assessment of the remuneration package to apply to his appointment and the approval of an annual salary of €430,000.

In June 2025, the Minister for Finance agreed further changes to the State Agreements on remuneration, and specifically the removal of the 'Pay Cap' which had restricted an individual's annual aggregate remuneration to €500,000 per annum (excluding the employer's pension contribution).

Corporate Governance Statement

Remuneration Committee (continued)

On foot of these changes, Mr Eamonn Crowley (CEO) received an increase in his base salary to €695,000 part-way through the year, effective 21 July 2025. This represents the first salary increase awarded to Mr Eamonn Crowley since he was appointed as CEO on 22 June 2020, when his salary was set at €480,000. In determining the increase, the Committee considered his performance to date, as well as an assessment informed by independently sourced market benchmarks for equivalent roles in comparable organisations in the Republic of Ireland, the UK and the EU. In that context, it is of note that the market information used to inform pay decisions included data relating to organisations which – unlike the Bank – operated variable pay arrangements for Executive Directors. Following this increase, the CEO's total remuneration remains below levels in peer organisations and this is an issue that the Bank will continue to keep under review.

In light of the above changes to the State Agreements on remuneration the Committee undertook a full review of the Directors' Remuneration Policy in 2025 to ensure it supports the retention and incentivisation of our Executive team. Although the Committee considered a number of adjustments to the manner in which we remunerate our most senior colleagues, in light of the Formal Sales Process announced by the Bank in October 2025, it was ultimately determined for now to keep the structure of Executive Director remuneration broadly the same as before, with the exception of the harmonisation of notice periods to 11.5 months for both Executive Directors. This notice period is important to ensure ongoing stability at the executive level for maintaining strategic continuity and facilitating effective succession planning. This is also in line with majority market practice at this level.

The proposed minor amendments to the Directors' Remuneration Policy are set out on pages 116 to 118 of this Annual Report. We look forward to your support at the AGM on 8th May 2026.

The fee structure for Non-Executive Directors remained unchanged in 2025.

Finally, Richard Gildea ceased as a member of the Committee on the 31st of July 2025 and I would like to thank him for his contribution. I would also like to take the opportunity to acknowledge and welcome Catherine Moroney who joined the Committee on the 1st of August 2025.

On behalf of the Board Remuneration Committee:



Celine Fitzgerald

Chair of the Remuneration Committee.

Annual Report on Remuneration - 2025

Remuneration Committee Composition and Operation

The members of the Board Remuneration Committee are experienced in the management and oversight of large organisations where the remuneration and motivation of staff and executives is of crucial importance.

The Committee had nine meetings during 2025.

2025 Committee Meeting Attendance

Member	Appointed	Ceased	Number of Full Years on the Committee	2025 Meeting Attendance (of which eligible to attend)
Celine Fitzgerald	30-Mar-21	-	4.8	9/9
Julie O'Neill	01-Feb-23	-	2.9	9/9
Ruth Wandhöfer	01-Feb-19	-	6.9	9/9
Richard Gildea	12-Dec-23	31-Jul-25	1.6	6/6
Catherine Moroney	01-Aug-25	-	0.4	3/3

Remuneration Committee Role and Responsibilities

The purpose, duties and membership of the Committee are set out in the Committee's Terms of Reference, which can be found on the Bank's website www.permanenttsbgroup.ie. The Terms of Reference are reviewed by the Committee on an annual basis. No material changes were enacted following a review of the Committee's Terms of Reference in 2025.

The main roles and responsibilities of the Committee include:

- Recommending the Bank's remuneration policies, including that applicable to the Board of Directors, to the Board for approval on an annual basis and ensuring they comply with applicable regulatory and legal requirements and remain free from any form of bias relating to gender, age or social or ethnic background;

- Supporting the Board in overseeing remuneration policies, practices and processes and compliance with the Bank's Remuneration Policy (both as applicable to the Directors and the wider population);
- Ensuring the remuneration policies and procedures do not promote excessive risk taking and are aligned with the Company's overall corporate governance framework, corporate culture, risk culture and attitude to and appetite for risk and related governance processes, and takes into account the need to maintain all capital and liquidity ratios including buffer requirements;
- Recommending the design, eligibility and performance measures for any incentive schemes to the Board for approval;
- Setting and assessing performance targets for any incentive schemes;

- Recommending remuneration proposals (including joining and termination arrangements) in respect of the Chairperson, CEO, Executive Directors, Company Secretary, Executive Committee, Group Treasurer, Chief Credit Officer, and Heads of Control Functions for approval by the Board;
- Overseeing remuneration proposals in respect of any other identified staff (Material Risk Takers) as defined under the fifth Capital Requirements Directive (CRD V); and,
- Overseeing the annual review of the implementation of the Remuneration Policy applicable across the Bank.

Remuneration Committee Advisers

During 2025, the Committee used the services of its external consultant, Deloitte LLP, for advice in relation to executive director and senior management remuneration, components of pay, Remuneration Policy, trends in the external market, and for perspective on regulatory compliance with a strong emphasis on ensuring compliance with CRD V, and in the context of the Bank's plans to introduce a new variable pay scheme. During the year, Deloitte also provided advisory services to the Bank in the technology area as well as certain risk related topics.

During 2025, the Committee also employed the services of Willis Towers Watson who provided market benchmarking data and remuneration trend analysis and support in relation to the Bank's planning for compliance with the EU Pay Transparency Directive once implemented in 2026.

In addition to the use of external advice, in designing its approach to remuneration the Committee also takes account of appropriate input from the Bank's HR, Risk, Compliance, Finance and Internal Audit functions to ensure that the decision-making process is aligned with the Bank's financial performance, risk appetite, regulatory guidelines and stakeholder interests.

Matters considered by the Committee in 2025

The Committee performed an annual review of its own Terms of Reference, as well as reviewing its own effectiveness, and recommended the output of that review to the Board.

During 2025, and within the terms of State agreements, the Remuneration Committee kept the impact of the Bank's Directors' Remuneration Policy (including that applicable to the Directors), and movements in the external market, under review. As part of this process, the Committee reviewed the Bank's Remuneration Policy and strategy to assess the appropriateness of the approach to reward and the competitiveness of current arrangements, and future direction, to take account of market developments including amongst the Bank's peer group.

The Committee also considered whether the Directors' Remuneration Policy operated as intended in terms of company performance and quantum. The Committee also kept under review all aspects of remuneration for the CEO, Executive Directors, members of the Executive Committee and the wider employee population.

In determining remuneration arrangements for Executive Directors, the Committee takes account of the pay and employment conditions of the wider workforce to ensure consistency. Wider workforce engagement on pay arrangements at the Bank took place with the Bank's Staff Representative Bodies during 2025.

It remains the policy of the Bank to reward our colleagues appropriately as we work together to build a valuable and sustainable business, operating within the Bank's Risk Appetite and underpinned by a strong culture which manifests itself in responsible and accountable behaviours in our day-to-day interactions and decision making with our customers and each other. To this end, the Policy has been designed to ensure that the Bank's offering is sufficiently competitive to attract and retain the required talent and skills to deliver the return of value to the Company's shareholders.

In 2025, the Committee reviewed the Bank's approach to remuneration from the perspective of ensuring that all employees, regardless of gender, age or social or ethnic background are remunerated fairly. In that regard, it is of note that 2025 was the sixth year in which the Bank published details of its gender pay gap; and the fourth year in which the Bank reported in line with Irish legislation introduced in 2022. The Bank's gender pay gap stood at 18.1% at our chosen snapshot date of 30th June 2025, which represented an increase in the 16.9% gap reported for 2024. The gap persists primarily because of a gender imbalance at senior levels, and we continue to design and implement strategies designed to eliminate the gap over time. Further details of the gap and our commitment to reducing same are provided in the separate section of the Bank's Annual Report which details the Bank's Diversity, Equality and Inclusion strategy.

In 2025, following comprehensive engagements with Staff Representative Bodies which were mediated by an independent third party, the Bank reached agreement with all three Unions on outstanding issues relating to the 2024 annual pay review. That agreement - and the revised 'Ways of Working' engagement protocols that formed part thereof - provided a platform for an agreement on 2025 Pay and average salary increases of 4% were processed in July 2025 and backdated to January 1st, 2025. Subsequently, in November 2025, agreement was reached on a 2026 Pay Agreement. The 2026 Pay Review involves a 4% Pay Pot and is scheduled to be processed in the first quarter of 2026.

As reported in last year's disclosures, in 2024, the Committee oversaw the launch of a Voluntary Redundancy scheme in line with the terms of the Bank's Remuneration Policy. That scheme was open to colleagues at all levels and, in 2025, 200 colleagues took the decision to leave the Bank as a result of the scheme.

Corporate Governance Statement

Remuneration Committee (continued)

During the year, the Committee also maintained significant oversight to ensure compliance with the Irish and UK Corporate Governance Codes, CRD V related regulations and guidelines, including focusing on reviewing the remuneration arrangements in place for Material Risk Takers. The Committee re-approved the process and approach for the identification of Material Risk Takers in line with these requirements.

The Committee also reviewed the Bank's established variable commission scheme referred to as the 'Branch Based Commission Scheme', as well as principles and practices to ensure full alignment with regulatory requirements. We considered the requirements of CRD V, the EBA's Guidelines on sound remuneration policies and practices related to the sale and provision of retail banking products and services, the Central Bank of Ireland's Guidelines on Variable Remuneration Arrangements for Sales Staff, and relevant market practice. Following that review, the Committee agreed to extend the operation of the scheme for a further year, subject to management maintaining

strong control over customer and conduct management and robust governance of scheme-related performance data.

The Committee also reviewed the new all-colleague, enterprise-wide Variable Pay Scheme which will be the subject of engagement with Staff Representative Bodies in 2026. The Committee remains satisfied with the scheme design which incorporates appropriate metrics, weightings and targets to assess the Bank's performance (including its ability to pay variable remuneration), individual performance and lastly, a risk adjustment methodology including the use of clawbacks.

The Remuneration Committee, supported by management, continued to monitor closely ongoing engagements with key stakeholders including shareholders and employee representative bodies and the insights gained were used to inform decision-making relating to remuneration throughout 2025.

The Bank's Directors' Remuneration Policy was approved by our shareholders on an advisory basis at our 2024 AGM. The Committee is satisfied that in 2025 the Bank has continued to operate within its Remuneration Policy (both as applicable to the Directors and the wider population) and in line with the remuneration requirements of the framework agreement between the Minister for Finance and the Bank, and that the Directors' Remuneration Policy operated as intended in terms of company performance and quantum.

Other than as set out elsewhere in the Annual Report, the Committee is satisfied that the Bank is in compliance with the provisions of the Companies Act 2014, the Irish and UK Corporate Governance Codes and the Shareholder Rights Directive. The table below sets out how the Remuneration Committee has applied the principles of clarity, simplicity, predictability, risk, proportionality, and alignment to culture, in line with the Bank's approach to corporate governance. Additional regulatory disclosures in relation to Remuneration Policy and strategy are set out in the Bank's Pillar 3 Report.

Principles	Approach
Clarity Remuneration arrangements should be transparent and promote effective engagement with shareholders and the workforce.	The Committee regularly engages and consults with key stakeholders to take feedback into account and to ensure that our approach to Executive Remuneration is as transparent, simple and clear as is possible. Our employees are informed about our approach to remuneration. Our Remuneration Policy, applicable throughout the Bank and which includes details of the approach to Director remuneration, is published internally for all staff to view and our approved Directors' Remuneration Policy is published in full on the Bank's website www.permanenttsbgroup.ie. Further details on the engagement model in place with Representative Bodies is included in the Workforce Engagement Section of the Corporate Governance Statement that forms part of this report.
Simplicity and predictability Remuneration structures should avoid complexity and their rationale and operation should be easy to understand.	The Bank currently only operates fixed remuneration among Executive Directors, consisting of basic salary, pension and benefits. As a result, the Committee's ability to apply discretion with respect to outcomes for this population was limited. However, the simplicity of our approach enhances its predictability. Our approach to the new variable remuneration will involve a review of Executive Director remuneration arrangements from the perspective of ensuring that our approach continues to avoid complexity, and is predictable in its nature, as well as providing the Remuneration Committee with discretion over remuneration outcomes.
The range of possible values of rewards to individual directors and any other limits or discretions should be identified and explained at the time of approving the Policy.	

Principles	Approach
Risk Remuneration arrangements should ensure reputational and other risks from excessive rewards, and behavioural risks that can arise from target-based incentive plans, are identified and mitigated.	Remuneration arrangements are designed to align pay with the Bank's risk culture, attitude to and appetite for risk and our governance and regulatory framework. The launch of variable remuneration schemes will factor in robust linkages between pay and performance with controls in place to ensure variable pay outcomes are appropriate, including the use of risk adjustments as appropriate. The Committee has been assigned the discretion to adjust formulaic outcomes for Executive Directors and members of the Executive Committee to ensure appropriate consideration of risk factors when determining variable pay outcomes.
Proportionality and alignment to culture The link between individual awards, the delivery of strategy and the long-term performance of the company should be clear. Outcomes should not reward poor performance. Incentive schemes should drive behaviours consistent with company purpose, values and strategy.	While the Bank currently only operates fixed remuneration among the Executive Directors, it is committed to ensuring the ongoing alignment of remuneration with strategy and long-term sustainable performance and the recognition of positive behaviours. In future years, where variable remuneration is likely to form a component of our reward proposition, the Committee has been provided with the ability to adjust formulaic outcomes to ensure they remain proportionate in the context of the Bank's achievement of its financial or non-financial performance objectives and to promote the achievement of our long-term strategic ambitions while driving behaviours consistent with our purpose, values and strategy including our commitment to our Sustainability agenda.

Components of Executive Director Remuneration - 2025

Basic salary

As in previous years, pay increases to eligible staff in our wider workforce were based on each individual staff member's performance and salary position versus the relevant market median. The increases ranged from 0% up to 5% with an average increase of 4% and all increases were effective from 1 January 2025. In 2025, the Minister for Finance agreed certain changes to the State Agreements on remuneration, and specifically the removal of the 'Pay Cap' which had restricted an individual's annual aggregate remuneration to €500,000 per annum (excluding the employer's pension contribution). On foot of those changes, Mr Eamonn Crowley (CEO) received an increase in his base salary to €695,000 effective from 21 July 2025 taking into consideration that this was his first salary increase since appointment in 2020 as well as independently sourced market benchmarks. Following this increase, the CEO's total remuneration remains significantly below that of his peers.

Mr Barry D'Arcy (CFO) was appointed to the role in February 2025 at an annual

salary of €430,000 and no further increases were awarded in this financial year.

Pensions

The current Executive Directors are members of the PTSB Defined Contribution Pension Scheme. During 2025, the Bank contributed up to 20% of basic salary in the case of the CEO and 16% in the case of the CFO.

Since 2019, the Board has approved certain enhancements to staff defined contribution pension schemes where, based on market benchmarking, the maximum employer contributions were increased up to 16% linked to increases in each employee's own contributions and subject to certain age-based eligibility criteria. While the CFO has been aligned to this maximum, given the particular challenges faced in attracting and recruiting the most senior talent, in 2022, the Board approved an exceptional maximum pension contribution of 20% in the case of the CEO. Given the difficulties experienced in respect of senior talent acquisition and aligned with the current approach for members of the Bank's Executive Committee, it was also agreed

to exempt the Executive Directors, including the CEO, from the age-related eligibility criteria.

Other than basic salary, there are no other elements of Director's remuneration which are pensionable.

Benefits

During 2025, Executive Directors received benefits in line with the Policy. This included an allowance of up to €20,000 in lieu of a company car and eligibility for subsidised house purchase loans provided on the same terms and conditions as loans to other eligible PTSB employees.

Bonus and Long-term Incentive Plans

No bonus schemes were in place for Executive Directors and no bonus payments were made to Executive Directors during 2025 or 2024. Neither were there any long term incentive arrangements in place for Executive Directors in 2025 or 2024.

In December 2024, the Remuneration Committee and the Board approved the

Corporate Governance Statement

Remuneration Committee (continued)

launch of a new enterprise wide Variable Pay scheme, subject to Industrial Relations (IR) engagement. While noting that the IR process is not without significant risk, a successful outcome of the engagement should allow for the Scheme's launch in H1 2026 and then allow for payments in 2027 based on 2026 performance. The Variable Pay Scheme covers all staff – including Executive Directors – and forms part of the current Directors' Remuneration Policy. While the scheme remains subject to implementation, all variable remuneration arrangements are designed in a way that promotes the interests of our stakeholders and fully complies with applicable regulatory requirements and State Agreements on remuneration. The Variable Pay scheme will be based on company and individual performance creating pathway by which such awards (capped at €20k p.a.) to all staff including Executive Directors can be launched. Future variable awards will be based on a performance period of one financial year and awards will be assessed with reference to both financial and non-financial performance metrics. Awards will be payable following the end of the performance period in cash or – where practical – in shares or a combination of shares and cash. The Remuneration Committee will hold the discretion to review the level of awards and adjust the formulaic outcomes, including down to zero, to take account of risk adjustments where appropriate. Variable Pay awards will be subject to malus and clawback (where applicable). Subject to the outcome of the IR process, details of performance metrics, weightings and targets will be disclosed in the 2026 annual report.

Share option schemes

No share options were granted in 2025 or 2024. There were no share options in existence at the end of the period and the Bank's sole remaining share option scheme is now closed.

PTSB is assessing the introduction of an Approved Profit Sharing Scheme as part of the broader Variable Pay framework. Subject to the outcome of the IR process, further details will be provided in a future annual report once design and governance processes are complete.

Loss of Office Payments

The Remuneration Policy requires that any payments on termination of employment are made in accordance with the provisions of CRD V and applicable Irish legislation. Any payments in relation to termination reflect performance achieved over time and will not reward failure or misconduct. Leavers will receive any payments required under the terms of their contract.

Ms. O'Brien stepped down from the Board effective 28th August 2024, and remained in receipt of her salary, benefits and pension until 28th February 2025, in line with the six-month notice period as agreed in the 2023 Director's Remuneration Policy. The amount Ms. O'Brien received for the period 29 August 2024 to 28 February 2025 was disclosed in the 2024 Directors' Remuneration Report and no further payments were awarded.

Payments to Former Directors

Other than the payments to Ms O'Brien referenced above, no such payments were made to former Executive Directors during 2025.

Directors' Fees from another Company

The Bank operates established policies, practices and procedures that are designed to identify, document and manage conflicts of interest. It is the policy of the Bank that where an Executive Director of the Bank is remunerated for service as a Non-Executive Director of a non-Bank company and retains such remuneration, the amount of this remuneration is disclosed. No Executive Director was in receipt of fees from external appointments during the period.

Directors' Remuneration Policy

In this section, we set out the updated Directors' Remuneration Policy ("Policy") for our Executive Directors and Non-Executive Directors as reviewed by the Remuneration Committee and approved by the Board of Directors which will be put to an advisory shareholder vote at the 2026 AGM.

The Directors' Remuneration Policy was last approved by our shareholders at the 2024 AGM and incorporated certain amendments to the Policy to support the launch of a Variable Pay scheme.

In 2025 the Committee undertook a further review of our remuneration policy and it was proposed to reinstate the 11.5 month notice period for all Executive Director roles to ensure ongoing stability at the executive level for maintaining strategic continuity and facilitating effective succession planning. The change is intended to apply to new hires from 1 January 2026 as well as current incumbents, subject to shareholder approval at the 2026 AGM.

The amended Policy is intended to apply to the period up to the Group's AGM in 2029. However, the Board may seek earlier shareholder approval for a new Policy during the period depending on regulatory developments, changes to strategy or competitive pressures.

The current Policy as approved at the 2024 AGM is published in full on the Bank's website: www.permanenttsbgroup.ie while the proposed amendments to the Policy are outlined in full below.

The Policy, in alignment with the Remuneration Policy applicable across the Bank, is based on a set of agreed basic principles which are applied to all employees:

- Aligning remuneration with the Bank's risk appetite, approaches and governance framework;
- Ensuring our approach is in compliance with all applicable regulatory requirements;
- Aligning remuneration with our business strategy, objectives, purpose and values, and promoting the achievement of long-term Bank and stakeholder objectives and interests;
- Focusing on the attraction, engagement and retention of key talent of the calibre required;
- Ensuring that our Policy and each element of Directors' remuneration is as transparent, simple and clear as is possible.

Remuneration Components

Executive Director Remuneration:

The following are the key components of the Bank's reward proposition as it relates to the Executive Directors, based on the current Policy:

Remuneration Component	Remuneration Policy
Basic Salary	Basic salaries are set so as to attract and retain key talent of the calibre required to develop, lead and deliver the Bank's long-term strategy. Basic salaries are normally reviewed by the Remuneration Committee annually, taking into consideration: • the individual's skills, responsibilities and experience; • the scope of the role; • pay and employment conditions of colleagues elsewhere in the Group; • overall business performance and affordability; and • market competitiveness by reference to relevant comparator groups. Increases to basic salary may not necessarily be provided at each review. Whilst there is no maximum base salary, any increases for Executive Directors will normally be in line with the range of increases for other employees in the wider Group.
Benefits	Benefits are provided to ensure the overall package is competitive and in accordance with local market practice. The Committee's policy is to provide Executive Directors with a market competitive level of benefits, taking into consideration benefits offered to other employees in the Group, the individual's circumstances and market practice at similar companies. Benefits may include, but are not limited to, the provision of a car (or cash allowance in lieu) and subsidised house purchase loans provided on the same terms and conditions as loans to other eligible PTSB employees. Taxable or other expenses incurred in performing the role may also be reimbursed, as well as any related tax cost on such reimbursement.
Pensions	Pension arrangements are intended to provide competitive post-retirement benefits aligned with market practice. Executive Directors are eligible to participate in the PTSB Defined Contribution Pension Scheme. Executive Directors may receive a maximum allowance of 16% of basic salary, or 20% of basic salary in the case of the Chief Executive Officer. Maximum contribution rates are generally consistent across the Bank. However, in recognition of the remuneration restrictions remaining in place, in order to ensure a competitive overall package, Executive Directors are not subject to certain age-related eligible criteria which apply to the availability of the maximum contribution rate for the wider workforce.

Corporate Governance Statement

Remuneration Committee (continued)

Remuneration Component	Remuneration Policy
Short Term Incentive Plans	Variable pay will help support the further development of PTSB's high performance culture and will do so in way that promotes sustainable outcomes for our stakeholders. The scheme criteria will support full compliance with applicable regulatory requirements and State Agreements on remuneration. A maximum limit of €20,000 per annum on any award or combination of awards per individual colleague will apply. For Executive Directors, awards will be based on a performance period of one financial year. Awards will be assessed with reference to a suite of financial and non-financial performance metrics and will be paid in cash, shares (where practical) or a combination of both. Variable pay awards will be subject to malus and clawback (i.e. repayment or recoupment of paid/vested awards) for a period of three years from the date of award. Malus and clawback may be applied in circumstances including: • Evidence of misconduct or serious error by the individual (e.g. breach of conduct standards and other internal rules, especially concerning risks); • Whether PTSB and/or the business unit subsequently suffers a significant downturn in its financial performance; • Whether PTSB and/or the business unit in which the identified staff member works suffers a significant failure of risk management; • Significant increases in PTSB's or the business unit's economic or regulatory capital base; or • Any regulatory sanctions where the conduct of the individual contributed to the sanction. Also if the individual: • Participated in or was responsible for conduct which resulted in significant losses to PTSB; or • Failed to meet appropriate standards of fitness and propriety. PTSB intends to implement an Approved Profit Share Scheme (APSS) to facilitate the delivery of shares under the scheme.

Recruitment approach for new Executive Directors

In determining the remuneration arrangements of a new Executive Director recruited or appointed to the Board, the Remuneration Committee's approach is to pay no more than is necessary to attract the best candidates to the role, and the following principles will be applied:

- The Remuneration Committee will take into account all relevant factors including the calibre of the individual and local market practice;
- Remuneration packages must meet any applicable local regulatory requirements;
- Remuneration arrangements for new recruits will be appropriately competitive and aligned with the remuneration policy table set out above; and

- In the case of an internal appointment, any existing commitments will be honoured.
- The Policy does not, other than by exception, allow for buy-out of remuneration terms forfeited by new recruits on leaving a previous employer. Any such award would be structured in line with applicable regulatory requirements, be subject to the terms of agreements in place with the Minister for Finance and will be structured in order that the terms and amount of any replacement award will not be more generous than the award forfeited on departure from the former employer. Any such buy-outs will be minimised wherever possible.

Non-Executive Director Remuneration

Non-Executive members of the Board of Directors receive a base fee. Additional fees may be paid for those individuals that perform additional duties; including, but not limited to, the role of Senior Independent Director and for chairing or being a member of specific Board Committees. The Chairperson receives an inclusive fee for the role.

Taxable or other expenses incurred in performing the role may also be reimbursed, as well as any related tax cost on such reimbursement.

The Chairperson's and Non-Executive Directors' fees are reviewed regularly to ensure they are consistent with market practice and are market competitive, reflective of the time commitment and responsibilities of the role (subject to any limits set by the Bank's shareholders).

The Remuneration Committee recommends the Chairperson's fee to the Board for approval. In respect of the review of remuneration decisions relating to Non-Executive Directors, a forum consisting of the Chairperson, Company Secretary and CEO has been authorised by the Board to review Non-Executive Director remuneration and to approve any changes thereto. No individual is involved in decisions in respect of their own remuneration.

Newly appointed Non-Executive Directors are remunerated in line with the principles above, on a time-apportioned basis in the first year as necessary.

For the avoidance of doubt, Non-Executive Board members are not eligible to participate in variable remuneration schemes or receive any pension benefits. Buy-out awards are not offered to Non-Executive Board members.

Relative proportion of fixed and variable remuneration

In line with the amendments to the State Agreement, the Committee has introduced the ability to pay bonuses to our Executive Directors to enable us to provide an element of pay for performance within our overall reward framework, albeit on a very limited basis. Any awards paid will be in line with the framework agreement between the Minister for Finance and the Bank, which currently permits annual bonuses in any 12-month period not exceeding €20,000 in the aggregate per individual.

Service contracts and letters of appointment and payments for loss of office

Executive Directors

Executive Directors' service contracts are reviewed by the Remuneration Committee and approved by the Board.

Executive Directors' contracts will provide for a rolling 11.5 month notice period for all incumbent Executive Directors and incoming Executive Director appointments from 1 January 2026.

The contractual arrangements in place with Executive Directors do not typically contain a predetermined contract end date, other than that date as set with reference to the Bank's retirement policy age criteria (i.e. age 65). The Bank

reserves the right to require an Executive Director to take any remaining leave entitlement they may have during notice period.

Executive Directors may be required to work during the notice period, take a period of 'garden leave' or may be provided with pay in lieu of notice if not required to work the full notice period.

Executive Director contracts will not normally contain any provisions for predetermined compensation on termination which exceeds basic salary, pension and benefits payable in respect of the applicable notice period. Accrued but untaken holiday entitlement may also be paid. Any statutory requirements will be observed.

If an Executive Director ceases employment due to ill-health, retirement or death, the individual or his/her estate may be eligible for a payment under the scheme. The HR Director may approve any payments pro-rated for the period worked by the individual, provided it is aligned with performance during that time and subject RemCo oversight. Any payment made in these circumstances will only be paid on the date on which a payment becomes due under the rules of the scheme, apart from the death of the employee when a payment to the estate of the deceased employee may be made earlier, subject to the assessment of performance.

If an Executive Director ceases employment for any other reason, the default position is that the individual is not eligible for a payment under the scheme. However, in exceptional circumstances, the HR Director may approve a payment pro-rated for the period worked by the individual, provided it is aligned with performance during that time and subject to RemCo oversight. Any payment made in these circumstances will only be paid on the date on which a payment ordinarily becomes due under the rules of the scheme.

Any payments in relation to termination of employment are made in accordance with the provisions of all applicable regulatory requirements and Irish legislation and will reflect performance achieved over time and will not reward failure or misconduct.

Non-Executive Directors

The term of appointment of Non-Executive Directors is three years and is subject to satisfactory performance that is reviewed annually. Non-executive Directors do not have service contracts but are bound by letters of appointment.

All Directors are required to seek reappointment by election at the Annual General Meeting. Non-Executive Directors will automatically retire from the Board after six years. It is always at the discretion of the Board to invite a Non-Executive Director to continue for a further period but this discretion will only be exercised in exceptional circumstances.

The Chairperson is proposed for reappointment by the Directors on an annual basis. The term of office of the Chairperson is normally six years.

The Non-Executive Directors' letter of appointment specifies a one-month notice period. There are no additional obligations in the Non-Executive Directors' letters of appointment that could give rise to remuneration payments or payments for loss of office.

Statement of consideration of employment conditions elsewhere in the Bank

The Committee takes account of the pay and employment conditions of the wider PTSB employee base when it considers the remuneration of the Executive Directors. As stated above, the Policy is in alignment with the Remuneration Policy applicable across the Group and which is made available to all staff members on the Group's internal communications website and is based on a set of agreed basic principles which are applied to all employees.

In determining remuneration arrangements for the Executive Directors, the Committee is presented with information in relation to the remuneration of the wider workforce, including aggregate pay outcomes in order to ensure decisions are made in the context of a detailed understanding of remuneration for the wider employee base and to ensure consistency throughout the Group.

Corporate Governance Statement

Remuneration Committee (continued)

Decision making process for Policy determination, review and implementation

The Board of Directors is responsible for (i) designing the Directors' Remuneration Policy and proposing the Policy for shareholder approval at the Annual General Meeting; and (ii) implementing and evaluating the adopted Policy, including determining the remuneration and other terms and conditions of appointment of the Executive Directors.

The Remuneration Committee is responsible for annually reviewing the Policy and submitting a clear and understandable proposal to the Board concerning the Policy. In the performance of this task the Remuneration Committee receives input and support from the other Board committees and control functions as appropriate.

Non-Executive members of the Board act independently of the Executive Directors, and therefore no conflicts of interest should arise. No Director is involved in deciding their own remuneration outcome.

Derogation

Minor changes

The Board may make minor amendments to the Directors' Remuneration Policy set out above for regulatory, exchange control, tax or administrative purposes or to take account of a change in legislation without obtaining shareholder approval for that amendment. In the performance of this task the Committee may receive input and support from the other Board committees.

Exceptional circumstances

In exceptional circumstances, and to facilitate recruitment and termination, the Committee may, with approval from the Board, award minor additional benefits as appropriate. Any such award would be structured in line with applicable regulatory requirements and be subject to the terms of agreements in place with the Minister for Finance. Any such awards will be minimised wherever possible.

Grandfathering

Executive Directors may be eligible to receive any payments from any remuneration arrangements in effect prior to the approval of this Remuneration Policy. Details of any such payments will be set out in the applicable annual remuneration report as they arise.

Director's Report on Remuneration

Executive Directors' Remuneration and Pension Benefits

2025 remuneration for Executive Directors who held office for any part of the 2025 financial year was entirely fixed in nature, consisting of basic salary, certain benefits and defined contribution pension entitlements as follows:

Name of Executive Director, Position	2025									
	Note	1. Fixed Remuneration			2. Variable Remuneration		3. Extraordinary items	4. Pension Expense	5. Total Remuneration	6. Proportion of Fixed and Variable Remuneration
		Base Salary	Fees	Fringe Benefits	One-year variable	Multi-year variable				
Eamonn Crowley, CEO	1	€575,941	€0	€21,806	€0	€0	€0	€115,188	€712,935	100% Fixed
Barry D'Arcy, CFO	2	€362,957	€0	€16,882	€0	€0	€0	€47,184	€427,023	100% Fixed

Notes:

1. Fringe Benefits consist of Car Allowance Benefit and expenses.

2. Mr D'Arcy was appointed as Chief Financial Officer and as a member of the Board of Directors on 25th February 2025. Fringe Benefits consist of Car Allowance Benefit.

For comparison, 2024 Remuneration for Executive Directors who held office for any part of the 2024 financial year was entirely fixed in nature, consisting of basic salary, certain benefits and defined contribution pension entitlements as follows:

Name of Executive Director, Position	2024										
	Note	1. Fixed Remuneration			2. Variable Remuneration			3. Extraordinary items	4. Pension Expense	5. Total Remuneration	6. Proportion of Fixed and Variable Remuneration
		Base Salary	Fees	Fringe Benefits	Loss of Office Payments	One-year variable	Multi-year variable				
Eamonn Crowley, CEO	1	€480,000	€0	€20,000		€0	€0	€0	€96,000	€596,000	100% Fixed
Nicola O'Brien, CFO	2	€275,296	€0	€13,497	€172,365	€0	€0	€0	€44,047	€505,205	100% Fixed

Notes:

1. Fringe Benefits consist of Car Allowance Benefit.

2. Ms. O'Brien stepped down from the Board effective 29th August 2024. The remuneration disclosed above relates only to that period as an Executive Director. Fringe Benefits consist of Car Allowance and Benefit in Kind relating to the payment of professional body subscriptions.

Aggregate Executive Director Compensation stood at €1,139,958 in 2025 compared to €1,101,205 in 2024.

No Executive Director was in receipt of any remuneration from any undertaking within the Group other than PTSB Group Holdings plc.

Director's Report on Remuneration

Non-Executive Director Remuneration

The basic fee structure in place for the Chairperson and Non-Executive Directors in 2025 remained unchanged versus the prior year and is outlined in the table below.

Aggregate fees paid to Non-Executive Directors decreased from €1,041,523 in 2024 to €1,012,260 in 2025.

Name of Director, Position	Note	2025									
		1. Fixed Remuneration			2. Variable Remuneration			3. Extraordinary items	4. Pension Expense	5. Total Remuneration	6. Proportion of Fixed and Variable Remuneration
		Base Salary	Basic Fees	Fees Paid	Fringe Benefits	One-year variable	Multi-year variable				
Julie O'Neill	1	€0	€320,000	€320,000	€451	€0	€0	€0	€0	€320,451	100% Fixed
Ronan O'Neill	2	€0	€60,000	€63,167	€375	€0	€0	€0	€0	€63,542	100% Fixed
Ruth Wandhöfer	3	€0	€60,000	€73,750	€465	€0	€0	€0	€0	€74,215	100% Fixed
Marian Corcoran	4	€0	€60,000	€73,750	€2,125	€0	€0	€0	€0	€75,875	100% Fixed
Paul Doddrell	5	€0	€60,000	€73,750	€465	€0	€0	€0	€0	€74,215	100% Fixed
Celine Fitzgerald	6	€0	€60,000	€76,500	€465	€0	€0	€0	€0	€76,965	100% Fixed
Anne Bradley	7	€0	€60,000	€75,354	€375	€0	€0	€0	€0	€75,729	100% Fixed
Catherine Moroney	8	€0	€60,000	€75,354	€0	€0	€0	€0	€0	€75,354	100% Fixed
Richard Gildea	9	€0	€60,000	€111,792	€110	€0	€0	€0	€0	€111,902	100% Fixed
Hugh O'Donnell	10	€0	€60,000	€64,012	€0	€0	€0	€0	€0	€64,012	100% Fixed

Notes:

1. Fringe benefits comprise Benefit in Kind relating to the payment of professional body subscriptions and expenses.

2. Ceased as Non-Executive Director on 31st July 2025. Additional fees paid as Chairperson of the Board Audit Committee, member of the Board Nomination, Culture and Ethics Committee and Senior Independent Director. Fringe benefits comprise Benefit in Kind relating to the payment of professional body subscriptions.

3. Additional fees paid as member of the Board Audit Committee and the Remuneration Committee. Fringe benefits comprise Benefit in Kind relating to the payment of professional body subscriptions.

4. Additional fees paid as member of the Board Risk and Compliance Committee and the Board Nomination, Culture and Ethics Committee. Fringe benefits

comprise Benefit in Kind relating to the payment of professional body subscriptions and expenses.

5. Additional fees paid as member of the Board Risk and Compliance Committee and the Board Nomination, Culture and Ethics Committee. Fringe benefits comprise Benefit in Kind relating to the payment of professional body subscriptions.

6. Additional fees paid as Chair of the Remuneration Committee and member of the Nomination, Culture and Ethics Committee. Fringe benefits comprise of Benefit

in Kind relating to the payment of professional body subscriptions and expenses.

7. Additional fees paid as member of the Board Audit Committee, Board Risk and Compliance Committee, and Nomination, Culture and Ethics Committee. Ceased as a member of the Board Risk and Compliance Committee on 31st July 2025 and was appointed to Nominations, Culture and Ethics Committee on 1st August 2025. Fringe benefits comprise of Benefit in Kind relating to the payment of professional body subscriptions.

8. Additional Fees paid as member of the Board Risk and Compliance Committee, Board Audit Committee and Remuneration Committee. Ceased as a member of

the Board Audit Committee on 31st July 2025 and was appointed to Remuneration Committee on 1st August 2025.

9. Additional Fees paid as Chair of the Board Risk and Compliance Committee, member of the Board Remuneration and Board Audit Committees. Was appointed

Senior Independent Director on 1st June 2025 and ceased as a member of the Remuneration Committee on 31st July 2025.

10. Appointed as Non-Executive Director on 8th April 2025. Additional Fees paid as Chair of Board Audit Committee, and member of Board Risk and Compliance

Committee.

Director's Report on Remuneration

For comparison, the level of fees paid to the Chairperson and Non-Executive Directors in 2024 is outlined in the table below.

Name of Director, Position	Note	2024									
		1. Fixed Remuneration			2. Variable Remuneration			3. Extraordinary items	4. Pension Expense	5. Total Remuneration	6. Proportion of Fixed and Variable Remuneration
		Base Salary	Basic Fees	Fees Paid	Fringe Benefits	One-year variable	Multi-year variable				
Julie O'Neill	1	€0	€320,000	€320,000	€420	€0	€0	€0	€0	€320,420	100% Fixed
Ronan O'Neill	2	€0	€60,000	€115,000	€375	€0	€0	€0	€0	€115,375	100% Fixed
Donal Courtney	3	€0	€60,000	€72,070	€590	€0	€0	€0	€0	€72,660	100% Fixed
Ruth Wandhöfer	4	€0	€60,000	€73,750	€110	€0	€0	€0	€0	€73,860	100% Fixed
Marian Corcoran	5	€0	€60,000	€73,750	€465	€0	€0	€0	€0	€74,215	100% Fixed
Paul Doddrell	6	€0	€60,000	€73,750	€543	€0	€0	€0	€0	€74,293	100% Fixed
Celine Fitzgerald	7	€0	€60,000	€76,500	€465	€0	€0	€0	€0	€76,965	100% Fixed
Anne Bradley	8	€0	€60,000	€76,500	€110	€0	€0	€0	€0	€76,610	100% Fixed
Catherine Moroney	9	€0	€60,000	€76,500	€0	€0	€0	€0	€0	€76,500	100% Fixed
Richard Gildea	10	€0	€60,000	€80,625	€0	€0	€0	€0	€0	€80,625	100% Fixed

Notes:

- Ms O'Neill was appointed as a member of the Board on 17 January 2023 and on the 1 February 2023 became a member of the Remuneration Committee and Board Nomination, Culture and Ethics Committee. She does not receive additional fees in these roles. Ms O'Neill was appointed as Board Chairperson on 31 March 2023. Fringe benefits comprise Benefit in Kind relating to the payment of professional body subscriptions and expenses.
- Additional fees paid as Chairperson of the Board Audit Committee, member of the Board Nomination, Culture and Ethics Committee and Senior Independent Director. Fringe benefits comprise Benefit in Kind relating to the payment of professional body subscriptions.
- Ceased as Non-Executive Director on 1 October 2024. Additional fees paid as Chairperson of the Board Risk and Compliance Committee, and member of Board Audit Committee. Fringe benefits comprise Benefit in Kind relating to the payment of professional body subscriptions.
- Additional fees paid as member of the Board Audit Committee and the Remuneration Committee. Fringe benefits comprise Benefit in Kind relating to the payment of professional body subscriptions.
- Additional fees paid as member of the Board Risk and Compliance Committee and the Board Nomination, Culture and Ethics Committee. Fringe benefits comprise Benefit in Kind relating to the payment of professional body subscriptions.
- Additional fees paid as member of the Board Risk and Compliance Committee and the Board Nomination, Culture and Ethics Committee. Fringe benefits comprise Benefit in Kind relating to the payment of professional body subscriptions and expenses.
- Additional fees paid as Chair of the Remuneration Committee and member of the Nomination, Culture and Ethics Committee. Fringe benefits comprise of Benefit in Kind relating to the payment of professional body subscriptions.
- Additional fees paid as member of the Board Audit Committee and Board Risk and Compliance Committee. Fringe benefits comprise of Benefit in Kind relating to the payment of professional body subscriptions.
- Additional Fees paid as member of the Board Risk and Compliance Committee and the Board Audit Committee.
- Additional Fees paid as Chair of the Board Risk and Compliance Committee and member of the Remuneration and Board Audit Committees.

The table below outlines the level of fees paid to the Chairman and Non-Executive Directors, including base fees and further fees for additional Board duties such as chairmanship or membership of a committee. The fee structure remained unchanged in 2025. The 2026 review for Non-Executive Director fees has not yet concluded and further details of any increases granted will be included within next year's report.

Position:	2024 Fees	2025 Fees
Board Chairperson	€320,000	€320,000
Non-Executive Director (Base Fee)	€60,000	€60,000
Senior Independent Director	€22,000	€22,000
Board Audit Committee and Board Risk & Compliance Committee	Chairperson	€27,500
	Member	€8,250
Remuneration Committee	Chairperson	€11,000
Remuneration Committee and Nomination, Culture & Ethics Committee	Member	€5,500

Director's Report on Remuneration

Comparison of Directors' and Employees' pay

The following table provides information regarding the annual change in the total remuneration of members of the Bank's Board of Directors, as well the average change in remuneration, on a full-time equivalent basis, of our employees as compared with our Company performance between 2020 and 2025.

Changes in Remuneration	Note	Percentage change between 2020 and 2021	Percentage change between 2021 and 2022	Percentage change between 2022 and 2023	Percentage change between 2023 and 2024	Percentage change between 2024 and 2025
Directors' Remuneration – Executive Directors						
Eamonn Crowley, CEO	1	5.10%	0.00%	4.20%	0.00%	19.6%
Barry D'Arcy	2	N/A	N/A	N/A	N/A	N/A
Directors' Remuneration – Non-Executive Directors (NEDs)						
Robert Elliott, Chairperson	3	0.00%	5.20%	0.00%	N/A	N/A
Julie O'Neill, Chairperson	4	N/A	N/A	N/A	22.99%	1.0%
Ken Slattery, Independent NED	5	2.30%	1.70%	4.10%	N/A	N/A
Andrew Power, Independent NED	6	0.00%	4.90%	4.70%	N/A	N/A
Ronan O'Neill, Independent NED	7	21.30%	7.60%	2.90%	-5.09%	N/A
Donal Courtney, Independent NED	8	1.10%	6.60%	2.70%	-5.57%	N/A
Ruth Wandhöfer, Independent NED	9	0.60%	4.20%	4.70%	-0.45%	0.5%
Marian Corcoran, NED	10	7.00%	8.90%	2.00%	-7.67%	2.2%
Paul Doddrell, NED	11	1.80%	14.20%	2.10%	-10.63%	-0.1%
Celine Fitzgerald, Independent NED	12	N/A	4.10%	5.70%	7.30%	0.0%
Anne Bradley, Independent NED	13	N/A	6.50%	2.70%	-7.85%	-1.2%
Catherine Moroney, Independent NED	14	N/A	N/A	N/A	0.00%	-1.5%
Richard Gildea, Independent NED	15	N/A	N/A	N/A	9.32%	28.0%
Hugh O'Donnell, Independent NED	16	N/A	N/A	N/A	N/A	N/A
Average remuneration on a full-time equivalent basis of employees						
Employees of the company	17	1.70%	-0.80%	2.80%	3.40%	5.1%
Company performance	Note	2021	2022	2023	2024	2025
Underlying profit/loss	18	€17m	€45m	€166m	€180m	€175m
Adjusted Cost to Income Ratio	19	82%	83%	64%	74%	75%

Notes:

1. Mr Crowley served as CFO up to 1st July 2020 at which point he was appointed as CEO. The year on year increase in 2021 reflects this appointment to CEO. The increase in 2023 results from certain changes to pension arrangements. The increase in 2025 is linked to the Board's approval of a salary review following the removal of the restriction on an individual's annual aggregate remuneration Executive Pay to €500,000 per annum (excluding the employer's pension contribution).
2. Mr Barry D'Arcy was appointed to the Board on 25th February 2025 and therefore no previous data is available for comparative purposes.
3. Mr Elliott resigned from the Board on 31st March 2023. Mr. Elliott's increase in 2022 is reflective of the increase in board remuneration fees which were approved in July 2022.
4. Ms O'Neill was appointed as member of the Board on 17th January 2023, and as Chairperson to the Board on 31st March 2023 and therefore no data is available for comparative purposes prior to this. The year on year increase reflects her appointment as Chairperson during 2023.
5. Mr. Slattery resigned from the Board on the 14 December 2023. Mr Slattery was appointed as Chair of Remuneration Committee on 8th September 2020. The year on year increase in 2021 reflects this appointment and the payment of fringe benefits during 2021. The year on year increases in 2022 and 2023 respectively are reflective of the increase in board remuneration fees which were approved in July 2022.
6. Mr Power resigned from the Board on 19th May 2023. The year on year increases in 2022 and 2023 respectively are reflective of the increase in board remuneration fees which were approved in July 2022 and which have been annualised for the purposes of the 2023 analysis.

Director's Report on Remuneration

7. Mr O'Neill resigned from the Board on 31st July 2025. Mr O'Neill was appointed as Senior Independent Director on 6th August 2020. The year on year increase in 2021 reflects this appointment, and other committee membership changes during 2021. The year on year increases in 2022 and 2023 respectively are reflective of the increase in board remuneration fees which were approved in July 2022. The year on year decrease in 2024 is reflective of the windup of the Project Sun Oversight Committee at the end of 2023, of which Mr O'Neill was a member.
8. Mr. Courtney resigned from the Board on 1st October 2024. The year on year increases in 2022 and 2023 respectively are reflective of the increase in board remuneration fees which were approved in July 2022. The year on year decrease in 2024 is reflective of the windup of the Project Sun Oversight Committee at the end of 2023, of which Mr Courtney was a member.
9. Ms Wandhöfer was appointed as a member of the Board on 1st February 2019. Remuneration for 2019 was annualised for the purposes of the above. Her year on year increase in 2021 reflects payment of fringe benefits during 2021. The year on year increases in 2022 and 2023 respectively are reflective of the increase in board remuneration fees which were approved in July 2022. The year on year decrease in 2024 is reflective of committee changes.
10. Ms Corcoran was appointed as a member of the Board on 24th September 2019. Remuneration for 2019 was annualised for the purposes of the above. Her year on year increase in 2021 reflects committee membership changes during 2021. The year on year increases in 2022 and 2023 respectively are reflective of the increase in board remuneration fees which were approved in July 2022. The year on year decrease in 2024 is reflective of the windup of the Project Sun Oversight Committee at the end of 2023, of which Ms Corcoran was a member.
11. Mr Doddrell was appointed as a member of the Board on 26th November 2020 and therefore no pre-2020 data is available for comparative purposes. Remuneration for 2020 was annualised for the purposes of the above. The year on year increase in 2021 reflects committee membership changes during 2021. The year on year increases in 2022 and 2023 respectively are reflective of the increase in board remuneration fees which were approved in July 2022. The year on year decrease in 2024 is reflective of the windup of the Project Sun Oversight Committee at the end of 2023, of which Mr Doddrell was a member.
12. Ms. Fitzgerald was appointed as a member of the Board on 30th March 2021 and therefore no pre-2021 data is available for comparative purposes. Remuneration for 2021 was annualised for the purposes of the above. The year on year increases in 2022 and 2023 respectively are reflective of the increase in board remuneration fees which were approved in July 2022. The year on year increases in 2024 is reflective of committee membership changes during the year.
13. Ms. Bradley was appointed as a member of the Board on 30th March 2021 and therefore no pre-2021 data is available for comparative purposes. Remuneration for 2021 was annualised for the purposes of the above. The year on year increases in 2022 and 2023 respectively are reflective of the increase in board remuneration fees which were approved in July 2022. The year on year decrease in 2024 is reflective of the windup of the Project Sun Oversight Committee at the end of 2023, of which Ms Bradley was a member.
14. Ms Moroney was appointed as a member of the Board on 12th December 2023 and therefore no data is available for comparative purposes.
15. Mr Gildea was appointed as a member of the Board on 12th December 2023 and therefore no data is available for comparative purposes prior to that. The year on year increases in 2024 is reflective of committee membership changes during the year. The year on year increase in 2025 is reflective of committee membership and his appointment as Senior Independent Director on 1st June 2025.
16. Mr O'Donnell was appointed as a member of the Board on 08th April 2025 and therefore no data is available for comparative purposes.
17. The change in average remuneration is based on the annual employee costs (excluding social welfare and directors' remuneration) divided by the average number of employees.
18. Operating profit/loss before exceptional items. See page 405 for a reconciliation of underlying profit to operating profit on an IFRS basis.
19. Defined as total operating expenses (excluding exceptional, other non-recurring items, bank levy, and regulatory charges) divided by total operating income.

Voting Results from the Annual General Meeting

At the 2025 AGM, held on 9 May 2025, shareholder approval on an advisory basis was sought for the 2024 Directors' Report on Remuneration. At the AGM in 2025, 99.8% of votes cast were in favour of the resolution.

Also, in accordance with the Shareholder Rights Directive, every four years, shareholder approval on an advisory basis is sought on the Directors' Remuneration Policy. Shareholder approval for the Directors' Remuneration Policy was last granted at the AGM in 2024 which was approved by 99.7% of shareholders at that time.

The Bank takes the views of shareholders on our approach to remuneration into account on an ongoing basis and welcomed the strong support received for both resolutions.

Statement of Directors' Responsibilities

The Directors are responsible for preparing the Annual Report and the financial statements in accordance with International Financial Reporting Standards (IFRS) adopted by the European Union (EU) and with those parts of the Companies Act 2014 applicable to companies reporting under IFRS and in respect of the consolidated financial statements, Article 4 of the IAS Regulation.

Under Irish law the Directors shall not approve the Group's and Company's financial statements unless they are satisfied that they give a true and fair view of the Group's and the Company's assets, liabilities and financial position as at the end of the financial year and of the profit or loss of the Group for the financial year.

In preparing these financial statements, the Directors are required to:

- select suitable accounting policies and then apply them consistently;
- make judgements and estimates that are reasonable and prudent;
- state whether the financial statements have been prepared in accordance with IFRS adopted by the EU and ensure that they contain the additional information required by the Companies Act 2014; and
- prepare the financial statements on the going concern basis unless it is inappropriate to presume that the Group and Company will continue in business.

The Directors are responsible for keeping adequate accounting records that are sufficient to:

- correctly record and explain the transactions of the Company;
- enable, at any time, the assets, liabilities, financial position of the Company to be determined with reasonable accuracy; and
- enable the Directors to ensure that the financial statements comply with the Companies Act 2014, and as regards the Group financial statements, article 4 of the IAS Regulation and enable those financial statements to be audited.

The Directors are also responsible for safeguarding the assets of the Group and the Company and hence for taking reasonable steps for the prevention and detection of fraud and other irregularities.

Under applicable law and the requirements of the Listing Rules issued by the Irish and London Stock Exchanges, the Directors are also responsible for preparing a Directors' Report and reports relating to Directors' remuneration and Corporate Governance. The Directors are also required by the Transparency (Directive 2004/109/EC) Regulations 2007 and the Transparency Rules to include a management report containing a fair review of the business and a description of the Principal Risks and Uncertainties facing the Group.

The Directors are responsible for the maintenance and integrity of the corporate and financial information included on the Company's website www.permanenttsb.ie. Legislation in the Republic of Ireland governing the preparation and dissemination of financial statements may differ from legislation in other jurisdictions.

The Directors confirm that, to the best of each Director's knowledge and belief:

- they have complied with the above requirements in preparing the financial statements;
- the financial statements, prepared in accordance with IFRS as adopted by the European Union, give a true and fair view of the assets, liabilities, financial position of the Group and the Company and of the loss of the Group;
- the Group's Chairperson Statement, the Group's Chief Executives Review and the Operating and Financial Review set out in the Strategic Report includes a fair review of the development and performance of the business and the position of the Group and the Company, together with a description of the Principal Risks and Uncertainties that they face as set out in the Risk Management Section of the Strategic Report; and

- the Annual Report and the financial statements, taken as a whole, is fair, balanced, understandable and provides the information necessary for shareholders to assess the Group and Company's position and performance, business model and strategy.

On behalf of the Board

Julie O'Neill
Chairperson

Eamonn Crowley
Chief Executive

Barry D'Arcy
Chief Financial
Officer

Conor Ryan
Company Secretary

4 March 2026

Sustainability

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Sustainability

Our Commitment to Building a Sustainable Business

'At PTSB, our purpose is to work together to build trust with our customers and communities. Our Sustainability Strategy 2025-2027 gives us an opportunity to put that purpose into action by channelling investment and directing our impact towards areas that enhance societal wellbeing.'

By delivering this strategy, we are committed to fully integrating sustainability into our business and developing an impact-driven, long-term approach that reflects stakeholder needs and supports sustainable business growth.'



Leontia Fannin

Leontia Fannin
Chief Sustainability and
Corporate Affairs Officer

Sustainability Strategy 2025-2027

During 2025, PTSB refreshed its Sustainability Strategy in response to evolving market conditions and to reinforce its commitment to long-term sustainable growth.

The new Sustainability Strategy 2025-2027 is focused on channelling investment and directing our impact towards areas that enhance societal wellbeing and is built upon three pillars – Investing for Impact, Protecting our Planet and Shaping an Inclusive Future.

The Strategy has been developed aligned to the United Nations' Sustainable Development Goals.



United Nations' Sustainable Development Goals

The United Nations' Sustainable Development Goals (SDGs) were launched in 2015 to provide a plan of action for people, planet and prosperity. The 17 goals act as an urgent call for action for countries to work together to develop strategies to tackle some of the world's most critical issues.

We recognise that while we may contribute to all 17 SDGs in some way, the following 7 have been identified as being core to our Strategy.

The following is a summary of progress made under each of the pillars of the Bank's Sustainability Strategy 2025-2027 during 2025.



End poverty in all its forms everywhere



Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all.



Achieve gender equality and empower all women and girls



Promote inclusive and sustainable economic growth, employment and decent work for all



Reduce inequality within and among countries



Make cities inclusive, safe, resilient and sustainable



Take urgent action to combat climate change and its impacts

Impact in Action

Investing for Impact

- Participation in the SBCI's Home Energy Upgrade Loan Scheme, offering a €100m lending fund. In early 2026 the Bank announced a reduction to its variable interest rates for the SBCI's Home Energy Upgrade Loans by up to 0.56%, including a new market-leading rate of 2.99% for loans of €50,000 to €75,000
- Introduction of a market-leading Home Upgrade Tool in early 2026, an online tool that enables homeowners to plan the specific home energy upgrade options suitable for their home based on their Building Energy Rating (BER)
- Participation in the SBCI's Growth and Sustainability Loan Scheme, offering a €70m lending fund to Small and Medium-sized Enterprises (SMEs)
- Partnership with Irish modular building company BuildWright to provide mortgages for new innovative modular homes
- Issuance of a €300m Green Tier 2 instrument through the Bank's Green Bond Framework (11.5 times oversubscribed)
- €1.26 billion in Green Mortgage Lending during 2025 (+44% YoY, accounting for 44% of New Mortgage Lending)
- c. €56m in Impact Lending during 2025 (+16% YoY), channelling finance into key SME green and social sectors
- c. €20.7 million in low-cost funding provided to the Social Finance Foundation since 2009*

* The Social Finance Foundation was established in 2007 by the Irish Government to address the needs of community organisations and social enterprises for loan funding which was difficult to obtain from mainstream financial institutions. Acting as a 'wholesaler', it provides funding to its lending partners Clann Credo and Community Finance Ireland.

Protecting our Planet

- Disclosing the Bank's carbon impact across Scope 1, 2 and 3 (including financed emissions)
- Developing Science-based Targets (SBTs) and receiving validation from the Science Based Target initiative (SBTi). Targets include:
 - Scope 1: Reduce absolute scope 1 GHG emissions 42% by 2030 from a 2023 base year
 - Scope 2: Continue active annual sourcing of 100% renewable electricity** from 2023 through 2030
 - Scope 3: Reduce all in-use operational GHG emissions from the Bank's Mortgage Loan Portfolio*** 51.5% per square meter by 2030 from a 2023 base year
- Completion of a gap analysis of the EBA's Guidelines on the Management of ESG Risk and the development of a bankwide ESG Risk Action Plan
- Commencing the development of an ESG Risk Definition, ESG Risk Policy and Qualitative Social Risk Materiality Assessment
- Refreshing the Bank's Climate-related and Environmental (CR&E) Risk Materiality Assessment to include a focus on Nature-related risk
- Delivering ESG risk training to stakeholders around the Bank, including the Board and Executive Committee
- A MSCI ESG Rating of 'A', upgraded from the Bank's previous score of 'BBB', recognising that PTSB has strong management measures relative to its ESG risks and opportunities
- A CDP (formerly, the Carbon Disclosure Project) rating of 'B', acknowledging that the Bank is actively managing its environmental impacts in relation to climate change and is demonstrating a commitment to sustainability
- Continuing to embed our Sustainable Supplier Charter aligned to the ISO 20400 Sustainable Procurement Guidelines

** 100% renewable energy denote the use of renewable energy certificates supplied by the energy provider, recognising that under the structure of the Irish gross pool electricity market, suppliers cannot procure electricity that is physically sourced exclusively from renewable generation.

*** Targets set on Bank's Residential Mortgage Loan Portfolio only

Shaping an Inclusive Future

- €270,000 in financial giving through PTSB Community (the Bank's community funding programme), which includes matched funding by the Bank
- More than c.2500 volunteering hours provided on the ground last year, equating to c.€80,000 of in-kind giving
- Multi-year partnership with AsIAm, Ireland's Autism Charity, and the Bank's 98 branches nationwide being certified as Autism Friendly
- Introduction of a Financial Wellbeing Strategy 2026-2028
- c.10,000 financial reviews completed last year, supporting customers in taking control of their financial future
- c.600 students completing LIFT Ireland's 'Minding Our Futures' Schools Programme, with Financial Wellbeing and Sustainability modules proudly supported by PTSB
- A Diversity, Equity, and Inclusion Strategy supported by the Unity Network (our 5 Employee Resource Groups) – LiveWell, PRISM, DiCE, Adapt and Balance
- 55:45 Board Gender Ratio (female to male) and 38% of Senior Leadership positions filled by Women
- A Mean Gender Pay Gap of 18.1% and a Median Gender Pay Gap of 12%
- Reaccreditation to the Irish Centre for Diversity's Investors in Diversity Gold Accreditation
- Introduction of a Wellbeing Strategy 2025-2028 for the Bank
- Awarded The KeepWell Mark™, the Irish Business and Employer's Confederation's (IBEC) industry accreditation standard that recognises commitment to employee wellbeing and workplace health
- c.120,000 hours of training delivered through the Bank's eLearning platform COMPASS in 2025
- More than 3000 nominations received to our Values in Practice (VIP) Awards, the Bank's Colleague Recognition Programme

Awards, Recognition and Pledges

Awards and Recognition in 2025

- Winner – 2025 Financial Services Loyalty Programme/Initiative of the year, Irish Loyalty and CX Awards, 2025
- Winner – Best Cashback Loyalty Initiative in Europe, European Loyalty Awards, 2025
- Winner – Best European Loyalty Program/Initiative – Financial Services, European Loyalty Awards, 2025
- Winner – Best Mortgage for Switchers, Bonkers, 2025
- Winner – Private Sector Procurement Project of the Year, National Procurement Awards, 2025
- Winner – Procurement Team of the Year, National Procurement Awards, 2025
- Winner – Transformation in Finance Award, Financial Services Awards, 2025
- Winner – Best Leadership Development Initiative, Excellence in Learning Awards, 2025
- Winner – People Team of the Year, Chartered Institute of Personnel and Development (CIPD) Awards, 2025
- Winner – Best use of Sponsorship, Public Relations Consultants Association (PCRA) Awards, 2025

Disclosures and ESG Ratings

Sustainability Statement and Double Materiality Assessment

The objective of the Corporate Sustainability Reporting Directive (CSRD) is to improve the existing requirements of the European Union's (EU) Non-Financial Reporting Directive, to better harness the potential of the EU in the transition to a fully sustainable and inclusive economic and financial system, in accordance with the European Green Deal and the United Nations' Sustainable Development Goals.

The CSRD introduced new mandatory reporting standards, the European Sustainability Reporting Standards (ESRS), which include 2 cross cutting and 10 topical standards. Materiality determined which of the topical standards, or elements within, were applicable to the Bank and must be disclosed.

During 2024, PTSB completed an exercise in double materiality in line with the expectations set out within the Directive. The exercise assessed both stakeholder impact and financial

materiality of identified Impacts, Risks and Opportunities (IROs), to determine those that were most material to our business, and important to our stakeholders. The findings highlighted E1-Climate Change, S1-Own Workforce, S4-Consumers and End-Users and G1-Business Conduct as topical standards that are material to PTSB.

The Bank has disclosed against these four material topics within our Sustainability Statement and has also disclosed against ESRS 2 General Disclosures, which is mandatory for all in-scope companies.

The Bank's Double Materiality Statement (DMA) was reviewed during 2025. The review confirmed that there was no material change to the identified sustainability-related IROs from the 2024 cycle.

To read PTSB's Sustainability Statement, which includes a detailed overview of the Bank's DMA process, please refer to page 149.

EU Taxonomy

In accordance with Article 8 of the EU Taxonomy Regulation and the underlying Disclosures Delegated Act, PTSB is required to disclose KPIs related to the proportion of taxonomy-eligible (across all six environmental objectives) and taxonomy-aligned activities (for climate change mitigation, and climate change adaptation) for year-end 2025.

You can view PTSB's 2025 EU Taxonomy disclosure on page 240.

Task Force on Climate-related Financial Disclosures

In 2021, PTSB became a supporter of the Task Force on Climate-related Financial Disclosures (TCFD). The TCFD is a climate-related financial disclosure framework designed to promote more informed investment, credit, and insurance underwriting decisions and, in turn, enable stakeholders to better understand the concentrations of carbon-related assets in the financial sector and the financial system's exposures to climate-related risks.

The disclosure recommendations are structured around four thematic areas that represent core elements of how an organisation operates, including: governance, strategy, risk management and metrics and targets.

For more on PTSB's TCFD disclosure, please refer to the table below.

Pillar	TCFD Requirement	Recommended Disclosure	Disclosure Section Reference	
			Sustainability Statement	Pillar 3
Governance	Disclose the organisation's governance around climate-related risks and opportunities.	Describe the Board's oversight of climate-related risks and opportunities	ESRS 2-GOV-1	Table 1(e)
		Describe Management's role in assessing and managing climate-related risks and opportunities.	ESRS 2-GOV-1	Table 1(e)
Strategy	Disclose the actual and potential impacts of climate-related risks and opportunities on the organisation's businesses, strategy, and financial planning where such information is material.	Describe the climate-related risks and opportunities the organisation has identified over the short, medium, and long term.	E1-MDRA-4, E1-1. E1-6	Table 1(a), (b), (e)
		Describe the impact of climate-related risks and opportunities on the organisation's businesses, strategy, and financial planning.	ESRS 2 IRO-1, E1 MDR-3, MDR-4, E1-3 S4-MDR1-A	Table 1(a)
		Describe the resilience of the organisation's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.	E1-1	Table 1(l)
Risk Management	Disclose how the organisation identifies, assesses, and manages climate-related risks.	Describe the organisation's processes for identifying and assessing climate-related risks.	ESRS 2-GOV-1	Table 1(a)
		Describe the organisation's processes for managing climate-related risks.	E1, E1-MDR2-P ESRS 2 Policies,	Table 1(g)
		Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organisation's overall risk management.	E1-1	Table 1(l)
Metrics and Targets	Disclose the metrics and targets used to assess and manage relevant climate-related risks and opportunities where such information is material.	Disclose the metrics used by the organisation to assess climate-related risks and opportunities in line with its strategy and risk management process.	E1-MDR1-M,	Table 1(g), (q),
		Disclose Scope 1, Scope 2 and, if appropriate, Scope 3 greenhouse gas (GHG) emissions and the related risks.	E1-4	Table 1(a), (b)
		Describe the targets used by the organisation to manage climate-related risks and opportunities and performance against targets.	E1-4. ESRS 2-GOV-3	Table 1(a), (b)

Sustainability

(continued)

CDP

In 2025, we continued to further our commitment to environmental transparency by disclosing the Bank's environmental impact through CDP (formerly the Carbon Disclosure Project), the non-profit that runs the world's leading environmental disclosure platform. PTSB achieved a CDP rating of 'B' during the 2025 disclosure cycle, acknowledging that the Bank is actively managing its environmental impacts in relation to climate change and is demonstrating a commitment to sustainability.

By completing CDP's annual request for disclosure on climate change, the Bank is demonstrating the transparency and accountability vital to tracking progress toward a thriving, sustainable future.

An ESG Rating Through MSCI

MSCI's ESG Ratings are designed to measure companies' resilience to financially relevant, industry-specific sustainability risks and opportunities. They use a rules-based methodology to identify industry leaders and laggards, assigning each company an industry-relative letter rating from 'AAA' to 'CCC' based on how well they manage these risks and opportunities relative to peers.

Following the most recent cycle, MSCI has upgraded PTSB's ESG Rating to 'A', from our previous rating of 'BBB', recognising that the Bank has strong management measures relative to its ESG risks.

The Business Working Responsibly Mark

Following a comprehensive programme of work, the Bank was proud to recertify to the Business Working Responsibly Mark (The Mark) from Business in the Community Ireland (BITCI) in 2023. The Mark is an external accreditation recognising best in class Responsible Business Programmes in Ireland and as such, the Bank joins a prestigious group of only 36 other companies who have achieved this accolade. As part of this accreditation, our CEO, Eamonn Crowley sits alongside the CEOs of other member companies as part of the Leaders Group on Sustainability – a collaborative group who work with key stakeholders to drive ESG change across the country.

The Bank first received the Mark in 2020. We will continue to work alongside BITCI as we continue to embed our Sustainability Strategy in the years that lie ahead.

Gender Pay Gap

We believe in being transparent about our gender pay gap and the journey we are on. As a purpose driven organisation, Diversity, Equity, and Inclusion (DEI) is a core pillar of our culture. For the 6th year in a row, we published our gender pay gap. This forms part of our commitment to hold ourselves accountable by tracking our progress against our action plan which we put in place as part of our Board approved DEI Strategy.

Our 2025 Gender Pay Gap is as follows:

- Mean Gender Pay Gap 2025 – 18.1%
- Median Gender Pay Gap 2025 – 12% For more on the Bank's Gender Pay Gap, please refer to our Sustainability Statement beginning on page 203.

Science-based Targets

The Science-based Target initiative (SBTi) provide a pathway for companies to reduce greenhouse gas emissions, aiming to mitigate the severe impacts of climate change while ensuring sustainable business growth. Targets are deemed 'science-based' when they align with the latest climate science necessary to limit global warming to 1.5°C above pre-industrial levels, as outlined in the Paris Agreement.

The Bank developed our science-based targets (SBTs) in line with the SBTi's Version 2 Guidance for Financial Institutions. The work included the development of a corresponding Carbon Reduction Plan to support us in achieving our targets.

PTSB's targets were validated by the SBTi during 2025 and include:

- Scope 1: Reduce absolute scope 1 GHG emissions 42% by 2030 from a 2023 base year.
- Scope 2: Continue active annual sourcing of 100% renewable electricity** from 2023 through 2030.
- Scope 3: Reduce all in-use operational GHG emissions from the Bank's Mortgage Loan Portfolio*** 51.5% per square meter by 2030 from a 2023 base year.

** 100% renewable energy denote the use of renewable energy certificates supplied by the energy provider, recognising that under the structure of the Irish gross pool electricity market, suppliers cannot procure electricity that is physically sourced exclusively from renewable generation.

*** Targets set on Residential Mortgage Loan Portfolio only.

For more on the Bank's SBTs, including performance against targets, please refer to our Sustainability Statement beginning on page 137

Pledges

Business in the Community Ireland's (BITCI) Elevate Inclusive Workplace Pledge:

PTSB has added our signature to BITCI's Elevate Pledge in 2021, committing to building inclusive workplaces that are representative of all members of our society. Workplaces have become more diverse, incorporating a multiplicity of backgrounds, experiences and identities. This has brought huge benefits to Irish business. However, diversity alone is not enough. Workplace inclusion is about creating a culture where everyone feels welcome, has access to opportunities and is supported to thrive.

Statement of Directors' Sustainability Responsibilities

The Directors of the Entity are responsible for: preparing the Sustainability Statement in accordance with the relevant criteria, contained in the applicable sustainability reporting framework being Part 28 of the Companies Act 2014, the ESRS; the Taxonomy Regulations; and any additional criteria used by the Entity to supplement and/or interpret the sustainability reporting framework criteria; and including the Sustainability Statement in a clearly identifiable dedicated section of the Directors' Report. This responsibility includes:

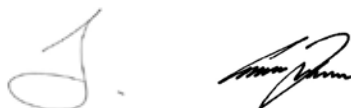
- appropriately referring to and describing the applicable criteria used;
- understanding the context in which the Entity's activities and business relationships take place and developing an understanding of its affected stakeholders;
- the identification of the actual and potential impacts (both negative and positive) related to sustainability matters, as well as risks and opportunities that affect, or could reasonably be expected to affect, the entity's financial position, financial performance, cash flows, access to finance or cost of capital over the short, medium, or long-term;
- the assessment of the materiality of the identified impacts, risks and opportunities related to sustainability matters by selecting and applying appropriate thresholds;
- disclosing and reporting our double materiality assessment process in the Sustainability Statement in accordance with ESRS;
- disclosing that the scope of consolidation for the Sustainability Statement is the same as for the financial statements and disclosing to what extent the Sustainability Statement covers the Company's upstream and downstream value chain ("the reporting boundary");
- including material value chain information that meets the qualitative characteristics set out in ESRS in the Sustainability Statement when required by ESRS;
- identifying the quantitative metrics and monetary amounts disclosed in the Sustainability Statement that are subject to a high level of measurement uncertainty;
- disclosing established targets, goals and other performance measures, and implementing actions to achieve such targets, goals and performance measures;
- describing the implemented due diligence process in respect of sustainability matters of the Entity;
- when relevant, using reasonable assumptions and estimates in preparing the Sustainability Statement. This includes the selection of different but acceptable estimation, approximation or forecasting techniques about forward-looking information;
- reporting and preparing forward-looking information, when applicable, on the basis of disclosed assumptions about events that may occur in the future and possible future actions by the Entity;
- ensuring the Entity maintains adequate records in relation to the preparation of the Sustainability Statement; and,
- the Directors are also responsible for designing, implementing and maintaining such internal controls that they determine are relevant to enable the preparation of the Sustainability Statement in accordance with Part 28 of the Companies Act 2014 that is free from material misstatement, whether due to fraud or error.

On behalf of the Board



Julie O'Neill
Chairperson

Eamonn Crowley
Chief Executive



Barry D'Arcy
Chief Financial Officer

Conor Ryan
Company Secretary

4 March 2026

Independent Practitioner's Limited Assurance Report

to the Directors of Permanent TSB Group Holdings Plc

Our limited assurance conclusion

We have performed a limited assurance engagement on the sustainability reporting included in the Sustainability Statement (the 'Sustainability Statement') of Permanent TSB Group Holdings Plc ("Entity"), for the year ended 31 December 2025 prepared in accordance with Part 28 of the Companies Act 2014 and set out on pages 137 to 277, which is a dedicated section of the Directors' Report.

Based on the procedures performed and evidence obtained, nothing has come to our attention to cause us to believe that the Entity's Sustainability Statement for the year ended 31 December 2025 is not prepared, in all material respects, in accordance with Part 28 of the Companies Act 2014, including:

- the compliance of the Sustainability Statement with the European Sustainability Reporting Standards (ESRS);
- the process carried out by the Entity to identify material sustainability related impacts, risks, and opportunities in accordance with ESRS;
- the compliance with the reporting requirements of Article 8 of Regulation (EU) 2020/852 (the "Taxonomy Regulations"); and
- compliance with the requirement to mark up the Sustainability Statement in accordance with Section 1600 of the Companies Act 2014.

Basis for our conclusion

We conducted our limited assurance engagement in accordance with International Standard on Assurance Engagements (ISAE) (Ireland) 3000, as adopted by the Irish Auditing and Accounting Supervisory Authority (IAASA). Our responsibilities under this standard are further described in the section titled 'Our responsibilities' in this report.

The procedures in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Any internal control structure, no matter how effective, cannot eliminate the possibility that fraud, errors or irregularities may occur and remain undetected and because we use selective testing in our engagement, we cannot guarantee that all errors or irregularities, if present, will be detected.

The Sustainability Statement includes prospective information such as ambitions, strategy, plans, expectations and estimates. Prospective information relates to events and actions that have not yet occurred and may never occur. We do not provide any assurance on the assumptions and achievability of this prospective information.

Our responsibilities under this standard are further described in the section titled 'Our responsibilities' in this report.

We have fulfilled our ethical responsibilities under, and we remained independent of the Entity in accordance with, ethical requirements applicable in Ireland, including the International Code of Ethics for Professional Accountants (including International Independence Standards) issued by the International Ethics Standards Board for Accountants (IESBA Code), the independence requirements of the Companies Act 2014 and the Code of Ethics issued by Chartered Accountants Ireland that are relevant to our limited assurance engagement of the Sustainability Statement in Ireland.

Our firm applies International Standard on Quality Management (ISQM) (Ireland) 1, *Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements*, issued by the IAASA. This standard requires the firm to design, implement and operate a system of quality management, including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Other matter – Compliance with the requirement to mark-up the Sustainability Statement

We note that Section 1613(3)(c) of the Companies Act 2014 requires us to report on the compliance by the Entity with the requirement to mark-up the Sustainability Statement in accordance with Section 1600 of that Act. Section 1600 of the Companies Act 2014 requires that the Directors' Report is prepared in the electronic reporting format specified in Article 3 of Delegated Regulation (EU) 2019/815 and shall mark-up the Sustainability Statement. However, at the time of issuing our limited assurance report, the electronic reporting format has not been specified nor become effective by Delegated Regulation. Consequently, the Entity is not required to mark-up the Sustainability Statement. Our conclusion is not modified in respect of this matter.

Other information

The directors are responsible for the other information. The other information comprises the information included in the unassured parts of the Strategic report on pages 2 to 59, Corporate Governance on pages 60 to 126, Annual Financial Statement on pages 278 to 403 and General Information on pages 404 to 415 but does not include the Sustainability Statement and our Limited Assurance Report thereon.

Our limited assurance conclusion on the Sustainability Statement does not cover the other information and we do not express any form of assurance conclusion thereon.

Responsibilities for the Sustainability Statement

As explained more fully in the Statement of Directors' Responsibilities for the Sustainability Statement, the directors of the Entity are responsible for:

- preparing, measuring, presenting and reporting the Sustainability Statement in accordance with the relevant criteria, contained in the applicable sustainability reporting framework being the ESRS, Part 28 of the Companies Act 2014; the Taxonomy Regulations; the requirement to mark up the Sustainability Statement in accordance with Section 1600 of the Companies Act 2014; and any additional criteria used by the Entity to supplement and/or interpret the sustainability reporting framework criteria; and

- developing, implementing and reporting its double materiality assessment process to identify the information reported in the Sustainability Statement in accordance with ESRS and for disclosing this process in the Sustainability Statement. This responsibility includes identifying and engaging with the Entity's stakeholders as identified in the Entity's double materiality assessment process (stakeholders) to understand their information needs.

Inherent limitations in preparing the Sustainability Statement

We obtained limited assurance over the preparation of the Sustainability Statement in accordance with the Companies Act 2014. Inherent limitations exist in all assurance engagements.

- Estimates, approximations and/or forecasts used by the Entity in preparing and presenting their Sustainability Statement are subject to significant inherent uncertainty. The extent to which the Sustainability Statement contains, qualitative, quantitative, objective, subjective, historical and prospective disclosures, also represents a significant degree of uncertainty. The selection by management of different but acceptable estimation, approximation or forecasting techniques, could have resulted in materially different amounts or disclosures being reported. For the avoidance of doubt, the scope of our engagement and our responsibilities did not involve us performing work necessary for any assurance on the reliability, proper compilation, or accuracy of the prospective information.
- Where estimated, approximated or forecast information is provided by management in respect of value chain information, the verification or benchmarking of this information is subject to a high degree of uncertainty and the actual value chain information may be different to the estimated, approximated or forecast value chain information provided by management.
- When applicable, as described in your disclosures relating to ESRS E1 Climate Change, GHG emissions quantification is subject to significant inherent measurement uncertainty because of incomplete scientific knowledge used to determine emissions factors and the values to combine emissions of different gases. Greenhouse gas quantification is unavoidably subject to significant inherent uncertainty as a result of both scientific and estimation uncertainty. Estimation uncertainty can arise because of:
 - the inherent uncertainty in quantifying inputs, such as activity data and emission factors, that are used in mathematical models to estimate emissions (measurement uncertainty);
 - the inability of such models to precisely and accurately characterise under all circumstances the relationships between various inputs and the resultant emissions (model uncertainty); and
 - the fact that uncertainty can increase as emission quantities with different levels of measurement and calculation uncertainty are aggregated (aggregation uncertainty).
- The Entity developed additional criteria used to supplement and/or interpret the sustainability reporting framework criteria set out in the Basis of Preparation, the nature of the sustainability matters, and absence of consistent external standards allow for different, but acceptable, measurement methodologies to be adopted which may result in variances between entities. The adopted measurement methodologies may also impact the comparability of sustainability matters reported by different organizations and from year to year within an organization as methodologies develop.

Our responsibilities

Our objectives are to plan and perform the assurance engagement to obtain limited assurance about whether the Sustainability Statement in scope of our conclusion, is free from material misstatement, whether due to fraud or error, and to issue a Limited Assurance Report that includes our conclusion. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence decisions of users on the basis of the Sustainability Statement.

As part of a limited assurance engagement in accordance with ISAE (Ireland) 3000, we exercise professional judgment and maintain professional

skepticism throughout the engagement. We also:

- Perform risk assessment procedures, including obtaining an understanding of internal controls relevant to the engagement, to identify disclosures where material misstatements are likely to arise, whether due to fraud or error, but not for the purpose of providing a conclusion on the effectiveness of the Entity's internal control.
- Design and perform procedures responsive to where material misstatements are likely to arise in the Sustainability Statement. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Design and perform procedures to evaluate whether the Sustainability Statement has been prepared in accordance with the ESRS, which includes the process carried out by the Entity to identify material sustainability related impacts, risks and opportunities.
- Design and perform procedures to evaluate whether the Sustainability Statement has been prepared in compliance with the Taxonomy Regulations.
- With respect to our conclusion in respect to the Entity's reporting obligations and responsibility to mark up the Sustainability Statement in accordance with Section 1600 of the Companies Act 2014, we assess whether we have become aware of anything to suggest that the Sustainability Statement has not been prepared, in all material respects in this specified format. However, as explained in the 'Other matter- Compliance with the requirement to mark-up the Sustainability Statement' section of our assurance report, the Entity is not currently required to mark-up the Sustainability Statement.

Summary of the work performed

A limited assurance engagement involves performing procedures to obtain evidence about the Sustainability Statement. The nature, timing and extent of procedures selected depend on professional judgment, including the identification of disclosures where material misstatements are likely to arise, whether due to fraud or error, in the Sustainability Statement.

Independent Practitioner's Limited Assurance Report

to the Directors of Permanent TSB Group Holdings Plc (continued)

The procedures in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement and depend on professional judgment, including the identification of disclosures where material misstatements are likely to arise, whether due to fraud or error, in the Sustainability Statement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

In conducting our limited assurance engagement, the procedures we have performed included the following:

- Obtaining an understanding of the Sustainability Statement reporting process performed by the Entity, including the preparation of the Sustainability Statement.
- Obtaining an understanding of the Entity's double materiality assessment process for 2025 by performing inquiries to understand the sources of the information used by management and reviewing the Entity's internal documentation of this process; and evaluating whether the evidence obtained from our procedures about the Entity's process is consistent with the description of the process set out in the Sustainability Statement;
- Performing risk assessment procedures to understand the Entity and its environment, including the Entity's reporting boundary, its value chain information and identify risks of material misstatement;
- Designing and performing further assurance procedures which included inquiries, analytical and substantive procedures, to respond to the identified risks of material misstatement;
- Obtaining an understanding of the Entity's process for calculating Financed Emissions and performing tests of detail;

- Obtaining an understanding of the Entity's process to identify taxonomy eligible and taxonomy-aligned economic activities and the corresponding disclosures in the Sustainability Statement;
- Performing substantive limited assurance procedures on selected information with respect to the EU taxonomy disclosures; and
- Evaluating the overall presentation of the Sustainability Statement, and considering whether the Sustainability Statement as a whole, including the sustainability matters and disclosures, is disclosed in accordance with the applicable criteria.

The purpose of our limited assurance work and to whom we owe our responsibilities.

Our report is made solely in accordance with Section 1613 of the Companies Act 2014 to the Directors of the Entity.

Our assurance work has been undertaken so that we might state to the Directors those matters we are required to state to them in a limited assurance report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Entity and its Directors, as a body, for our limited assurance work, for this report, or for the conclusions we have formed.



For and on behalf of

KPMG

Chartered Accountants, Statutory Audit Firm
1 Stokes Place
St. Stephen's Green
Dublin 2
Ireland

4 March 2026

Sustainability Statement



In accordance with Section 1592 Part 28 of the companies Act 2014, the Group has prepared a Sustainability Statement for the year ended 31 December 2024. This Sustainability Statement is set out on pages 137 to 277 and represents a dedicated section of the Director's Report. The following abbreviations are used throughout the statements to support navigation of the disclosure.

BP	Basis for Preparation
E1	ESRS E1 - Climate Change
ESRS	European Sustainability Reporting Standards
G1	ESRS G1 - Business Conduct
GOV	Governance
IRO	Impacts, Risks and Opportunities
MDR	Minimum Disclosure Requirements
MD-A	Minimum Disclosure Requirements (Actions)
MDR-P	Minimum Disclosure Requirements (Policies)
MDR-M	Minimum Disclosure Requirements (Metrics)
MDR-T	Minimum Disclosure Requirements (Targets)
S1	ESRS S1 - Own Workforce
S4	ESRS S4 - Consumers and End-Users
SBM	Strategy and Business Model

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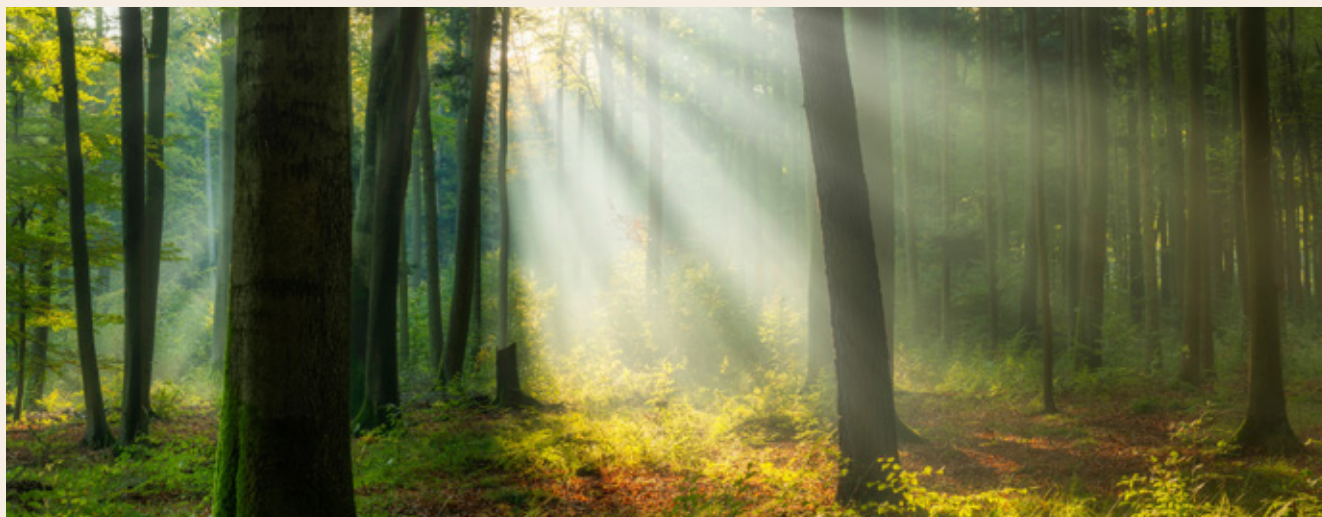
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ESRS 2 General Disclosures



Basis for preparation BP-1 General basis for preparation of Sustainability Statements

This disclosure has been prepared on a consolidated basis, incorporating Permanent TSB Group Holdings plc and its subsidiary undertakings (herein 'PTSB' or 'the Bank'). The scope of consolidation for this disclosure is the same as for the financial statements. The Sustainability Statement has been prepared in accordance with Part 28 of the Companies Act 2014. The Sustainability Statement is a dedicated section of the Directors' Report on pages 137 to 277.

As part of the Bank's Double Materiality Assessment (DMA) that was performed to assess sustainability-related Impacts, Risks and Opportunities (IROs), PTSB considered its value chain, beyond its own operational footprint. This included upstream actors (for example, Investors and Suppliers), downstream actors (for example, Customers and the Environment), and the Bank's own operations.

The Bank recognises the importance of its relationship with actors across its value chain and has developed a range of policies that support us in engaging with them in an effective way, as outlined at ESRS 2-MDR-P. The details related to

any associated actions and targets are disclosed within the Minimum Disclosure Requirement (MDR) sections of the Sustainability Statement.

PTSB has not omitted any information corresponding to intellectual property, know-how or the results of innovation. Similarly, the Bank has not omitted impending developments or matters in the course of negotiation.

BP-2 Disclosures in relation to specific circumstances

In preparation of PTSB's DMA, the Bank used the time horizons as defined in ESRS 1.

We recognise that the time horizons that we use for CR&E risk are not aligned to the DMA time horizons disclosed within the Sustainability Statement.

The time horizons utilised in our assessments are outlined below:

As part of our ongoing focus on Environmental Social & Governance (ESG) Risk Management, the Bank will review the opportunity to align time horizons into the future in line with regulatory expectation.

As part of this disclosure, the value chain-related metrics include Scope 3 emissions. The basis of preparation for these metrics, as well as the associated caveats, are outlined in E1-4.

The only quantitative metrics subject to estimation relate to the Bank's Scope 3 Financed Carbon Emissions. The details of the methodology applied are referenced in section E1-4.

PTSB has not included any voluntary disclosures within this Sustainability Statement.

PTSB has not incorporated any disclosures by reference within this Sustainability Statement.

Assessment Time Horizon	Short-term	Medium-term	Long-term
Double Materiality Assessment (Sustainability Statement)	0-1 years	1-5 years	5+ years
Climate-related and Environmental Risk*	0-3 years	3-5 years	5+ years

* The time horizons are not aligned given that the timelines set out by regulation are different. The Bank will review the opportunity to align time horizons as part of future risk review cycles, in line with regulation and as appropriate.

Governance

GOV-1 The role of the administrative, management and supervisory bodies

PTSB defines its administrative, management, and supervisory (AMS) bodies as the Board, the Executive Committee, and their respective sub-committees. The Board's sub-committees include the Audit Committee, Risk and Compliance Committee, Remuneration Committee, and the Nomination, Culture, and Ethics Committee. The Executive Committee's sub-committees include the Sustainability Committee which is responsible for the delivery of the Bank's Sustainability Strategy by ensuring that there is sufficient oversight, alignment, governance and challenge of activity across key areas of focus for the Bank's overall sustainability programming. For more details, please refer to SBM-1 Strategy, business model and value chain.

PTSB's Board of Directors (Board) is comprised of 11 members: two Executive Directors and nine Non-Executive Directors (of which seven are Independent)

	Board	Executive Committee	Board Audit Committee	Risk and Compliance Committee	Remuneration Committee	Nomination, Culture and Ethics Committee	Sustainability Committee
Number of Executive Directors	2	2	-	-	-	-	2
Number of Non-Executive Directors	9	-	4	5	4	5	-
Total	11	10	4	5	4	5	15
Male	5	7	2	3	-	1	11
Female	6	3	2	2	4	4	4

Note: Representation of employees and other workers occurs on an ad-hoc basis.

PTSB's Board's Gender Diversity Ratio is 55:45 (2024: 60:40) Female to Male Ratio.

The Board is responsible for setting, approving and overseeing the implementation of the overall business strategy and the key policies/frameworks of the Bank within the applicable regulatory and legal requirements, taking into account the Bank's long-term financial interests and solvency. The Board will set, approve and oversee implementation of the Bank's Risk Strategy, including the Risk Appetite and Enterprise Risk Management Framework, and monitor the implementation of risk culture within the Bank. The Board consider the impact of risk culture on the financial stability, risk profile and robust governance of the Bank and recommend amendments where necessary. The relevant experience of each Board member in relation to the Bank's sectors, products and geographical location is outlined below.

Name	Role	Relevant Sector, Product and Geographical Experience
Julie O'Neill	Chair/ Independent Non-Executive Director	- An accomplished business leader with extensive Executive and Board experience, having held a number of senior government positions. - Extensive business and leadership experience and brings an in-depth knowledge of the Bank and wider banking/insurance industry to the Board.
Eamonn Crowley	Chief Executive Officer (CEO) Executive Director	- Extensive international banking, accounting, corporate treasury and leadership experience with a significant customer focus which is reflected in the Bank's purpose, ambition and strategy to build trust and grow a sustainable organisation for the longer-term. - Stakeholder management experience with particular focus of building effective relationships with colleagues, regulators, government and markets (shareholders, investors and analysts). - An accomplished business leader who takes a broad perspective and has a deep commitment to both organisational culture and operational transformation for the benefit of key stakeholders such as shareholders, customers, colleagues.
Barry D'Arcy	Chief Financial Officer (CFO) Executive Director	- A CIMA Fellow and qualified Chartered Global Management Accountant (FCMA, CGMA). - A finance and risk professional with significant banking and leadership experience having worked in the Commercial and Retail Banking sector in Ireland for more than 15 years. - Brings a wealth of financial, risk, commercial, strategic, operational and regulatory knowledge to the Bank. - Experience in delivering large complex programmes successfully. Barry was appointed CFO in February 2025, having joined the Bank as CRO in October 2023.

Sustainability Statement

ESRS 2 General Disclosures(continued)

Name	Role	Relevant Sector, Product and Geographical Experience
Dr Ruth Wandhöfer	Independent Non-Executive Director	- Substantial banking and leadership experience with extensive knowledge of both regulatory and market strategy. - Insight on regulatory and financial technology innovation providing invaluable insight for the Board as it provides oversight for the Bank's digital and payments transformation programmes.
Anne Bradley	Independent Non-Executive Director	- Broad Executive and Non-Executive leadership and advisory experience having led strategy development in technology and business transformations, Executive leadership and strategy development. - Experience centered on transformation and business change, resilience, emergency response, technology evaluation, crisis management, operational efficiency, and IT infrastructure. - Cross-industry skills in stakeholder management, risk management, corporate governance and technology-enabled transformation benefits the Board as the Bank's strategy and change programmes evolves at an ever increasing pace.
Celine Fitzgerald	Independent Non-Executive Director	- Led culture transformation in challenging environments. - Practical experience of handling ethical challenges in the charity sector during her time as Managing Director of Goal. - In-depth understanding of strategic differentiation to deliver customer value.
Catherine Moroney	Independent Non-Executive Director	- Extensive experience in retail, corporate and business banking and an accomplished business leader who has spent a large portion of her career at Senior Executive level in the Irish financial services sector. - Expertise in leading customer-facing businesses with a focus on strategic planning, business growth, innovation, transformation and sustainability.
Richard Gildea	Independent Non-Executive Director	- Former Independent Non-Executive Director at Alpha Bank (a domestic and international bank listed on the Stock Exchange in Athens) where he chaired the Remuneration Committee and was a member of the Risk Committee, with a particular focus on non-performing loan risk management. - Deep experience of client coverage and risk management together with capital markets.
Paul Doddrell	Independent Non-Executive Director	- Significant Executive leadership experience spanning finance, asset servicing, lending, operations, and sales with specific management expertise in business strategy development and execution, risk management and change management. - Provides strategic insights and experience particularly in the area of mortgage servicing and credit provide core skills which the Board requires. - Experience operating at Executive Management level in a number of organisations globally.
Marian Corcoran	Independent Non-Executive Director	- Broad Executive and Non-Executive leadership and advisory experience having led strategy development in technology and business transformations, executive leadership and strategy development. - Wide-ranging experience in advising and leading transformational programmes across multiple industries, including banking. - Cross-industry skills in stakeholder management, risk management, corporate governance and technology-enabled transformation benefits the Board as the Bank's strategy and change programmes evolves at an ever increasing pace.
Hugh O'Donnell	Independent Non-Executive Director	- A Chartered Accountant with extensive leadership experience in Retail and Business Banking. - Brings deep expertise in financial accounting, regulatory reporting, risk management and strategic planning, with a strong track record in governance, oversight, and leading complex financial transactions and transformation programmes.
Conor Ryan	Company Secretary	- Responsible for advising the Board, through the Chairperson, on all governance matters. - Aligns the interests of different parties around the boardroom table, facilitates dialogue, gathers and assimilates relevant information, and supports effective decision-making.

For more on how the Board oversees and monitors progress of the Sustainability Strategy, please refer to SBM-1.

PTSB's Governance Structure

The IROs that were identified through PTSB's DMA process all relate to topics that the Bank is familiar with, and many are covered by existing policies as outlined in the respective MDR sections.

The Bank's DMA was reviewed during 2025. The review confirmed that there was no material change to the identified sustainability-related IROs from the previous cycle.

The Committees that monitor Risks and Opportunities are outlined below. The Bank considers the important role it plays in the society in the development and delivery of its strategy, as well as the mitigation of both financial and non-financial risk. Based on the outputs of the DMA, the Bank has reviewed and incorporated sustainability-related impacts into the relevant governance structures, including updating the Terms of Reference for relevant committees, where required.

This continues to be supported by the ongoing delivery of 'Our Customer 'Yes' Checks', which are designed to help us weigh up the impact of our decisions and consider the consequences before we make them. 'Our Customer 'Yes' Checks' encourage the Bank to reflect on the impact of a proposal or delivery of an initiative through various lenses, including sustainability.

The Board is collectively responsible for the governance of the Bank. Various Committees assist the Board and Executive Committee in managing and monitoring the risks and opportunities that sustainability present.

Within the Bank, sustainability is coordinated and managed at an enterprise-level via a central Sustainability Function, with the wider Bank functions being responsible for managing different sustainability risks and opportunities.

The PTSB Group Governance Structure

The Board Committees with sustainability oversight responsibility can be found below.

Board Audit Committee (BAC)

The BAC is responsible for overseeing the process of disclosure and communication with external stakeholders and competent authorities, which includes sustainability disclosures.

Board Risk and Compliance Committee (BRCC)

The BRCC is responsible for monitoring adherence to Risk Appetite Statement (RAS) and compliance with relevant laws, regulatory obligations and codes of conduct laws. The BRCC supports the Board on risk management and that the Bank's Strategy is consistent with the Bank's Risk Appetite. The Board has delegated responsibility to the BRCC to assess the impact of CR&E risk on the Bank's overall Risk Profile and to provide oversight on the execution of a bankwide ESG Risk Action Plan.

The Board has approved a bankwide ESG Risk Action Plan and has delegated responsibility to the BRCC to provide oversight on its execution.

Nomination, Culture and Ethics Committee (NomCo)

The NomCo is a dedicated Board Committee with accountability for culture, behaviour, ethics and reputation management oversight within the Bank.

Directors must act in a way they consider, in good faith, would promote the success of the Bank for the benefit of shareholders as a whole and, in doing so, have regard (amongst other matters) to the likely consequences of any decision in the long-term. Directors must foster the Bank's business relationships with customers, suppliers and others, interests of the Bank's employees, impact of the Bank's operations on the community, environment and taxpayers, and desirability of the Bank maintaining a reputation for high standards of business conduct.

The NomCo receives regular updates on key themes and issues reported through the Bank's Speak Freely process.

Executive Management Oversight

The Executive Committee (ExCo) is the Senior Management Committee of PTSB with authority to operate and make decisions within limits set by the Board. This includes consideration of the Bank's sustainability-related IROs.

The ExCo is the custodian of the Bank's collective Strategic Portfolio, Medium Term Plan (MTP) and Risk Management, as developed through the annual Strategic Planning Process (SPP). The ExCo is the accountable body for the Bank's operations, compliance and performance; defining the organisation's organisational structure; ensuring the adoption, application and maintenance of all standards set by the Board; and a forum for bank-wide colleagues and other functional issues and ensuring that a robust and resilient operating framework exists within which PTSB's activities are undertaken. The ExCo is the ultimate management committee responsible for the development and implementation of the Bank's Sustainability Strategy and the management of ESG risk.

The ExCo meets frequently to discuss business strategy, planning, change management, financial planning, risk management, operations, and performance. During 2025, the ExCo met at regular intervals to receive updates in relation to sustainability. Meetings took place at least once per quarter, and more often as required with updates being provided as part of scheduled ExCo sessions.

The management level roles and responsibilities are outlined below, as is the detail on the management committees with sustainability-related responsibilities.

The Chief Executive Officer (CEO) is responsible for championing PTSB's Sustainability Strategy 2025-2027, which includes a focus on ESG risk management. The CEO sits on the Board and is Chair of the ExCo. The CEO is responsible for assessing and managing CR&E risks and opportunities and is a member of the Sustainability Committee (SusCo).

The Chief Financial Officer (CFO) is responsible for the Bank's financial planning including capital management and all external reporting and disclosures for PTSB. The CFO is responsible for oversight and reporting of sustainability disclosures. The CFO reports directly to the CEO and sits on the ExCo and the Board of PTSB. The CFO is also an attendee of the BAC, the Committee who oversee material sustainability disclosures. The CFO is a member of the SusCo.

Sustainability Statement

ESRS 2 General Disclosures(continued)

The Chief Risk Officer (CRO) is responsible for assessing the impact of CR&E risk on the Bank's overall Risk Profile and supports the CEO in overseeing PTSB's Sustainability Strategy and climate action agenda. The CRO attends the Board to present their monthly CRO Report, which includes an update on CR&E risk as required, is a member of the ExCo and attends the BRCC, which has delegated responsibility from the Board to assess the impact of CR&E risk on the Bank's overall Risk Profile. The CRO is a member of the SusCo.

The Chief Sustainability and Corporate Affairs Officer (CSCAO) is responsible for leading the development and implementation of the Bank's Sustainability Strategy 2025-2027 in line with regulation and supervisory expectation, while ensuring all activity is aligned with the Bank's overarching Business Strategy and Purpose. The CSCAO sits on the ExCo of the Bank and reports directly to the CEO. The CSCAO chairs the SusCo.

The Chief Customer and People Officer (CCPO) is responsible for developing and implementing key elements outlined in the Bank's Sustainability Strategy 2025-2027, for example the delivery of sustainable finance products and propositions that support the Bank's customers in transition. The CCPO is a member of the Bank's ExCo.

PTSB's Corporate Governance Structure - Sustainability

The Bank's DMA identified the sustainability-related IROs that were material to the Bank.

The findings from the DMA played an integral role in guiding and informing the Bank's Board approved Sustainability Strategy 2025-2027. For each area of focus of the Bank's Sustainability Strategy 2025-2027 we have outlined our objectives, how we will deliver on these objectives and our measures of success as monitored and managed through Key Performance Indicators (KPIs). These KPIs aim to enhance the monitoring and oversight capacity of the Board in relation to Sustainability factors.

For more on the Bank's Sustainability Strategy 2025-2027, please refer to Sustainability Chapter of the Annual Report on page 127.

The Bank's DMA was reviewed during 2025. The review confirmed that there was no material change to the identified sustainability-related IROs from the previous cycle

PTSB's Sustainability Governance Structure is outlined below:

In addition to the development of PTSB's Sustainability Strategy 2025-2027, consideration for the outputs of the DMA into internal functions and controls followed the Bank's Three Lines of Defence Model as outlined below.

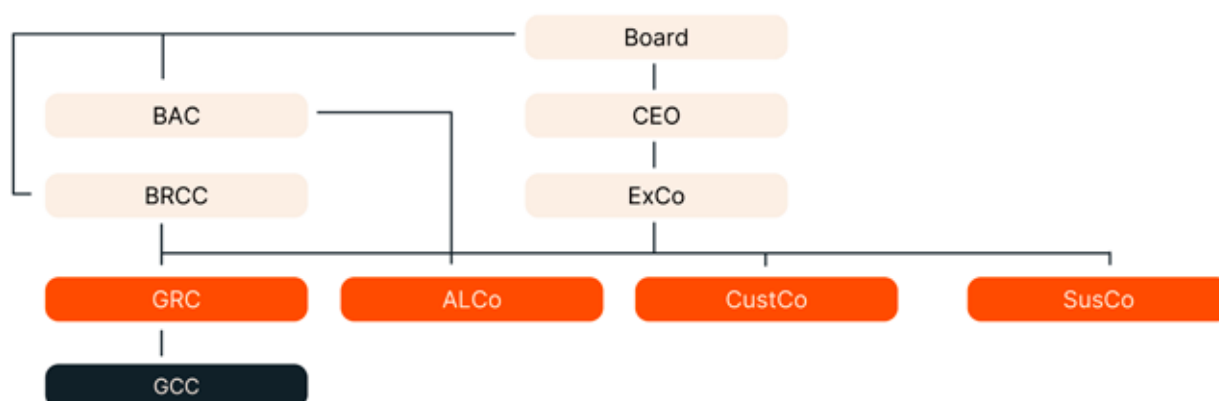
Each Line of Defence performs its duties by identifying and assessing sustainability matters, analysing the relevance of risks, evaluating the impact on the Bank's operations and business and formulating control measures and response strategies.

The First Line of Defence (1LOD Business Units and Functions), undertake frontline commercial and operational activities and their support function is responsible for identifying, owning, managing, monitoring, and mitigating against sustainability-related risk.

The Second Line of Defence (2LOD Risk and Compliance Function), ensure that all sustainability matters are identified, assessed, measured, monitored, managed, and properly reported on by the relevant business units from across the Bank.

As the Third Line of Defence (3LOD), Group Internal Audit provide independent assurance to the Board over the adequacy, effectiveness and sustainability of the Bank's internal control, risk

PTSB's Corporate Governance Structure - Sustainability



management and governance systems and processes, thereby supporting both the Board and Senior Management in promoting effective and sound risk management and governance across the Bank, in relation to its sustainability matters.

The composition of the Board and its sub-committees is reviewed by the NomCo and the Board annually to ensure there is an appropriate mix of knowledge, experience, and skills. This detailed assessment considers tenure, succession planning, Board diversity and assessment of the continued collective suitability of the Board.

The wide range of knowledge, experience and skills encapsulated in the biographies are harnessed to the maximum possible effect in the deliberations of the Board. Having Directors with diverse backgrounds in areas such as risk management, banking, change management, digital/information technology (IT), strategy, finance, culture evolution, change management and auditing provides both subject matter expertise and facilitates a broad spectrum of review and challenge at Board meetings, particularly when addressing major challenges affecting the Bank.

The Board has a formal and rigorous performance review process to assess the effectiveness of the Board, its Committees, the Chairperson and individual Directors. The performance evaluation is conducted internally on an annual basis and is externally facilitated every three years.

The Board regularly reviews the knowledge, experience and skills of its membership to ensure they are aligned with the current, emerging and future needs of the Bank. Knowledge of sustainability is one of the lenses considered and as such, has been included as part of Board training sessions during 2025.

Board and ExCo Training Sessions

To support ongoing business awareness and Director induction, as well as training and development requirements, a number of training sessions were delivered to the Board during 2025. Topics for training sessions are recommended by the NomCo and include a balance of technical, governance and professional development themes.

Training delivered during 2025 includes:

- Cyber Security
- Operational and Digital Resilience
- External Reporting: Corporate Sustainability Reporting Directive (CSRD)
- Capital Model Programme
- Anti-money Laundering, Anti-Bribery and Anti-Corruption Training (AML and CTF)
- Recovery Plan Dry Run Training and Simulation Exercise
- IAF Conduct Standards
- Annual Legal and Regulatory Update including Market Abuse Training
- ESG Risk Management.

In addition to the training delivered, the Bank engages an external third-party advisory firm to support ongoing sustainability upskilling across all management levels, while providing insight into market trends and guidance on impending regulation.

From an ESRS reporting perspective, the Bank's material IROs cover E1-Climate Change Mitigation, S1-Own Workforce, S4-Consumers and End-Users and G-1 Business Conduct. The cumulative experience of the Board covers all aspects of these topics.

GOV-2 Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

The Bank's DMA was reviewed during 2025. The review confirmed that there was no material change to the identified sustainability-related IROs from the previous cycle.

The Board, ExCo and members of their associated sub-committees were engaged in the initial DMA process as outlined in ESRS 2 IRO-1. The 2025 review of the IROs was validated by the Bank's SusCo and was formally signed off as part of the finalisation of the Bank's Sustainability Statement. The Bank will continue to review its sustainability-related policies and corresponding implementation activity as part of its policy review cycle, as appropriate.

For more on how the Board oversees and monitors progress of the Sustainability Strategy, please refer to SBM-1.

GOV-3 Integration of sustainability-related performance in incentive schemes

At present, the Bank does not have in place a Variable Pay Scheme (outside of a commission-based scheme in place in our Retail Banking Network) and therefore does not currently have a mechanism to directly link Executive pay to sustainability outcomes.

Under the leadership of the Chief Sustainability and Corporate Affairs Officer, a Head of Sustainability and supporting team are in place to manage and deliver the Bank's Sustainability Strategy. Similarly, under the leadership of the Chief Risk Officer, an Enterprise Risk Management Team and a Climate Risk Manager are in place to manage and deliver all CR&E risk programming.

Specific objectives aligned to the Bank's overall Sustainability Strategy are included within team member objectives, depending on their role within the function. Delivery of objectives is assessed through a formal performance review process that occurs at regular intervals throughout the year. Delivering on strategy, as well as the overall performance in the role, impacts the level of monetary base pay increase achieved.

The Bank continues to progress conversations regarding the introduction of an enterprise-wide Variable Pay Scheme. Sustainability metrics, alongside other relevant financial and non-financial metrics, will be included in any future Variable Pay Scheme. Further information on the structure of the Scheme will be included in the Bank's future disclosures as it becomes available.

Sustainability Statement

ESRS 2 General Disclosures(continued)

GOV-4 – Statement on due diligence

PTSB's approach to due diligence is embedded across the Bank's governance structures, strategy development processes and day-to-day operations. The below table provides an overview of how due diligence is considered within the relevant sections of PTSB's Sustainability Statement.

Core Elements of Due Diligence	Paragraphs in the sustainability statements	
a) Embedding due diligence in governance, strategy and business model	ESRS 2-GOV2ESRS 2-GOV-3 ESRS 2-SBM-3	
b) Engaging with affected stakeholders in all key steps of the due diligence	ESRS 2-GOV-2 ESRS 2-SBM-2	ESRS 2-IRO-1 ESRS 2-MDR-P
c) Identifying and assessing adverse impacts	ESRS 2- IRO-1 ESRS 2- SBM-3	
d) Taking actions to address those adverse impacts	ESRS 2-MDR-A E1-MDR1-A E1-MDR2-A E1-MDR3-A E1-MDR4-A S1-MDR1-A	S4-MDR1-A S4-MDR2-A G1-MDR1-A G1-MDR2-A G1-MDR3-A
e) Tracking the effectiveness of these efforts and communicating	ESRS 2-MDR-M ESRS 2-MDR-T E1-MDR1-T E1-MDR2-T E1-MDR3-T E1-MDR4-T	S1-MDR1-T S4-MDR1-T S4-MDR2-T G1-MDR1-T G1-MDR2-T G1-MDR3-T

GOV-5 Risk management and internal controls over sustainability reporting

The Board Audit Committee (BAC) oversees the implementation of the Bank's financial and internal control policies, practices and decisions. It aims to align these with the Bank's Strategy and shareholder interests, while operating within applicable regulatory and legal requirements. Key responsibilities include:

- Monitoring the effectiveness and adequacy of internal control, internal audit, and IT systems, including those that deal with sustainability-related matters;
- Reviewing the effectiveness of risk management procedures;
- Reviewing the integrity of the PTSB's internal financial controls (including those related to sustainability), monitoring the integrity of the financial statements and sustainability reporting of the Bank, and recommending approval of the Annual and Interim Reports to the Board;

- Considering the independence of the external auditors, and objectivity and effectiveness of the audit process;
- Monitoring and reviewing the effectiveness of the Internal Audit Function, safeguarding the independence of the Internal Audit Function and providing oversight of the function alongside the Head of Internal Audit;
- Reviewing instances of fraud, violations of laws and regulations as raised by the Head of Internal Audit; and,
- Ensuring an integrated approach to sustainability-related disclosure preparation and delivery and providing a link between the Board and the external auditors who provide limited assurance on disclosures, where it's required.

3. Strategy

SBM-1 Strategy, business model and value chain

Permanent TSB Group Holdings plc is a company whose shares are listed on the Main Market Stock Exchanges in Dublin and London. Permanent TSB plc, trading as PTSB, is a licensed bank regulated by the Central Bank of Ireland.

PTSB is one of Ireland's longest serving financial services institutions, tracing its operations back more than 200 years through the savings bank and building society movements. Throughout this time, the Bank's focus has been on delivering exceptional customer service and connecting with local communities.

Today, PTSB is a leading provider of personal and business banking services focused exclusively in the Irish market. The Bank serves more than 1.3 million customers through its voice and digital channels, as well as in-person through its nationwide network of 98 branches in communities across Ireland. As of the 31 December 2025, PTSB employed 3,099 employees (total Headcount as of 31st Dec 2025) and recorded revenues of €989m.

Our services are available in the Republic of Ireland and serve two main customer segments, Retail Banking and Business Banking:

1. Our Retail Banking business is focused on meeting the daily needs of our personal customers, and on developing compelling, innovative and appropriate products for our customers. We offer 'Everyday Banking' products which include Current Accounts, Deposits, Credit Cards and Overdrafts as well as saving and investment solutions. We provide an extensive range of insurance products, personal term lending, as well as multiple mortgage solutions (including green mortgages). To support more vulnerable and underrepresented customers, PTSB also provides Basic Bank Accounts.
2. Business Banking includes everyday business banking services, business lending products, and business support to SMEs. PTSB continues to support our customers and their businesses through developing digital capabilities that best suit their needs.

In March 2025, PTSB launched a refreshed three-year Bank Strategy which will see it deepen customer relationships, diversify its income, and differentiate through customer experience. The Bank will do this while driving continuous operational efficiencies and prudent cost management so it can continue to grow and generate sustainable returns for shareholders. Delivering sustainable profitability and integrating consideration for sustainability into its business practices and strategic decision making remains a key priority for the Bank.

In addition, during 2025 PTSB refreshed its Sustainability Strategy in response to evolving market conditions and to reinforce its commitment to long-term sustainable growth. The new Sustainability Strategy 2025-2027 focuses on channelling investment and directing impact towards areas that enhance societal wellbeing and was informed by the findings of the Bank's DMA.

PTSB has an overarching Integrated Strategic Plan (ISP), which brings together the Bank's three-year strategic direction, financial plan and change delivery roadmaps. The ISP sets out the Bank's core priorities over a medium-term time horizon and considers the needs of all our stakeholders. Through the ISP, PTSB channels its investment and resources into the initiatives that will support and accelerate delivery of the Bank's strategy in a safe and compliant manner.

During 2025, the Bank made progress in further embedding sustainability into strategy delivery and execution. The implementation of a new strategy performance review process on a bi-annual basis ensures that sustainability-related key performance indicators (KPIs), within our broader suite of Business Strategy KPIs are reviewed, challenged and progress and/or interventions are reported at Board level. In addition, members of our Sustainability team play an active role in the Bank's Strategic Planning Process (the process through which the ISP is developed and refreshed) to ensure that due consideration is being given to sustainability-related issues during the strategy development process and the resulting change delivery portfolio.

Our Value Chain

As part of preparing PTSB's Sustainability Statement, the Bank completed an exercise in double materiality to assess sustainability-related Impacts, Risks and Opportunities (IROs) and identify those that were material to the Bank. As part of the process, PTSB considered its value chain beyond its own operational footprint. This included upstream actors (for example, Investors and Suppliers), downstream actors (for example, Customers and the Environment), and the Bank's own operations.

The Bank's value chain encompasses a wide range of banking products and financial services which enables us to grow our customer base including Current Accounts, Deposits, Residential Mortgages, Term Lending (Personal and Business), Credit Cards and Overdrafts.

Our upstream value chain includes Regulators, Investors and Shareholders. Colleagues and Suppliers are core to our operations, while Customers and wider society are significant actors downstream. Our sustainability-related IROs have considered these value chain actors. For more on the approach that we took to stakeholder engagement throughout the DMA process, please refer to IRO-1.

PTSB employees are all based in Ireland.

In line with our Strategy, the Bank's Business Lending Credit Policy states that finance must not be provided to Borrowers that engage in Excluded Business Activities which the Bank deem to contribute to irreversible environmental and/or social harm to society, including non-renewable energy extraction (for example, gas, oil or coal). For more on our Business Lending Policy, please refer to ESRs 2- MDR-P.

The Bank does not derive any revenue from the following sectors: fossil fuel (coal, oil and gas); coal; oil; gas; Taxonomy-aligned economic activities related to fossil gas; chemicals production; controversial weapons; or, the cultivation and production of tobacco.

The Bank reports one operating segment which is in accordance with IFRS 8 'Operating Segments'.

A representation of PTSB's value chain was identified through a series of workshops with Senior Leaders representing Business Units from across the Bank. The final output of this exercise captured the key activities of the Bank, namely, products and propositions, customer fulfilment management and funding activities. It also identified key value chain actors related to each activity, as well as those that were cross cutting (for example, colleagues and customers). Each value chain actor was considered in light of their potential to be a 'hotspot' (an actor exposed to the likelihood of actual and potential impacts) or a 'key dependency' (an actor who generates risks and opportunities for the undertaking which may be financially material).

We understand the importance of our role in Irish society, and as one of Ireland's three Pillar Banks, the responsibility that we have in enabling the financial wellbeing of our customers and communities.

Table for presenting information on employee Headcount

Employee Headcount 2025	Number of employees (Headcount) as of 31st December 2025	Average number of employees (Headcount) for 2025
Total employees*	3,099	3,310

* For the purposes of the Sustainability Statement, total employee figures are based on Headcount. The Bank reports a Full Time Equivalent (FTE) figure of 3,026 which includes seasonal workers and staff on maternity leave, career breaks, or long-term absence.

Sustainability Statement

ESRS 2 General Disclosures(continued)

Our Value Chain



	Products and Propositions	Customer Management	Funding Activities	Investments
Primary Activities	PTSB offers products and propositions through three primary channels: Personal, Business Banking & Asset Finance	Onboarding and managing customer journeys, including enhanced support for vulnerable consumers.	Activities include deposit gathering and issuing debt in the capital markets.	Includes managing cash investments, bonds, pension assets, strategic investments, and joint ventures.
Value Chain Actors	Includes our people, suppliers, and partners who deliver products and propositions through our primary channels.	This includes colleagues working in contact centres (covering fraud, arrears, bereavement support), relationship managers, and branch staff, as well as technology platforms and third-party suppliers.	Deposit gatherers, investors, structuring banks, rating agencies (credit and ESG) and settlement platforms.	The asset liability management team, financial risk team, investors, investees, rating agencies, structuring banks, and settlement platforms.
Supporting Activities	Colleagues and third parties that underpin and enable the bank's primary operations.			
	Colleagues across the bank who enable effective customer management and ensure regulatory and operational standards are met			
	Colleagues and third parties that ensure secure, compliant, and efficient funding operations			
	Colleagues and third parties that ensure sound investment decisions, compliance, and operational effectiveness.			
Institutional Framework: Regulatory bodies, government, and policy-makers responsible for creating the rules and regulations under which PTSB is licensed to operate				

Our own operations are centered around our branch network, our colleagues and third-party suppliers who provide specific support and services.

In addition to our product offerings outlined above, we recognise and embrace the role we play in the community at both a local and national level. We are committed to creating a positive social impact through strong community partnerships and continuing to support local communities through PTSB Community programming.

SBM-2 Interests and views of stakeholders

We recognise that building strong relationships with our stakeholders, and ensuring that we engage with them regularly, plays a fundamental role in the delivery of our Business Strategy. It guides our reporting, allows us to identify risks and emerging trends, while helping us to prioritise investment and resourcing – ultimately, enabling us to conduct and manage all areas of our business in a more sustainable way.

As part of the development of this Sustainability Statement, the Bank engaged its stakeholders through the DMA process. This process ensured that stakeholders' views were considered in identifying the ESG issues that are not only material to our business, but important to our stakeholders.

As part of the DMA the Bank engaged with the stakeholder groups listed below.

Internal

- Board
- Executive Committee
- Colleagues (including members of the Senior Leadership Team)

External

- Shareholders
- Brokers
- Retail Customers
- Business Banking Customers
- Asset Finance Customers
- Community Partners
- Oireachtas Members
- Industry Influencers
- Media
- Suppliers (including Third Party Advisory Firms)

For more information, please refer to IRO-1. The findings of the DMA were insightful and played an important role in informing the development of a refreshed Sustainability Strategy 2025-2027 for the Bank.

Outside of the materiality exercise, we interact with our stakeholders at regular intervals through the following:

- Customers – Voice of the Customer Programme, focus groups, surveys, in person through the branch network and through the Bank's online digital channels (website, app, customer contact centres etc.).
- Colleagues – Every Voice Counts Employee Engagement Survey, regular Micro-pulse Surveys, team meetings, virtual and in-person networking forums, internal intranet platform, a bank-wide communications platform and app, in-house digital screens, Employee Resources Groups, People Experience Council and other channels as appropriate.
- Investors/Shareholders – AGM and shareholder services, financial reporting, roadshows, industry conferences and other channels as appropriate.
- Suppliers – Regular supplier engagement processes and procedures, supplier on-boarding and contracting and other channels as appropriate.
- Society – Political engagement and communications with the media through the Corporate Affairs Team, community partnership and charity engagement through the Bank's PTSB Community Programme and sponsorship rights engagement through the Bank's Brand and Marketing Team.
- Regulators – Regular engagement including regulatory reporting and other channels as appropriate.

Nomination, Culture and Ethics Committee (NomCo)

A key role of the NomCo is to ensure there is effective engagement with and participation from the Bank's key stakeholders. Stakeholder relationship owners across the Bank interact with a variety of stakeholders at regular intervals throughout the year and provide regular updates to the NomCo. Key stakeholders for the group include Shareholders, Customers, Colleagues, Suppliers, Society and the Bank's Regulators. These updates include information related to the views and interest of affected stakeholders, as appropriate.

Voice of the Customer (VOC)

VOC feedback is reviewed weekly with key stakeholders covering Business Units across the Bank, including our customer facing teams. On a quarterly basis, this is reported to Senior Leadership and the Executive Committee via the Quarterly Strategy and Experience Report.

Speak Freely

The Bank has in place procedures to deal with any protected disclosures that may arise as part of Speak Freely and reports to the Board and Executive Committee on a half-yearly basis. For more on Speak Freely, please refer to G1-1.

UK Corporate Governance Code

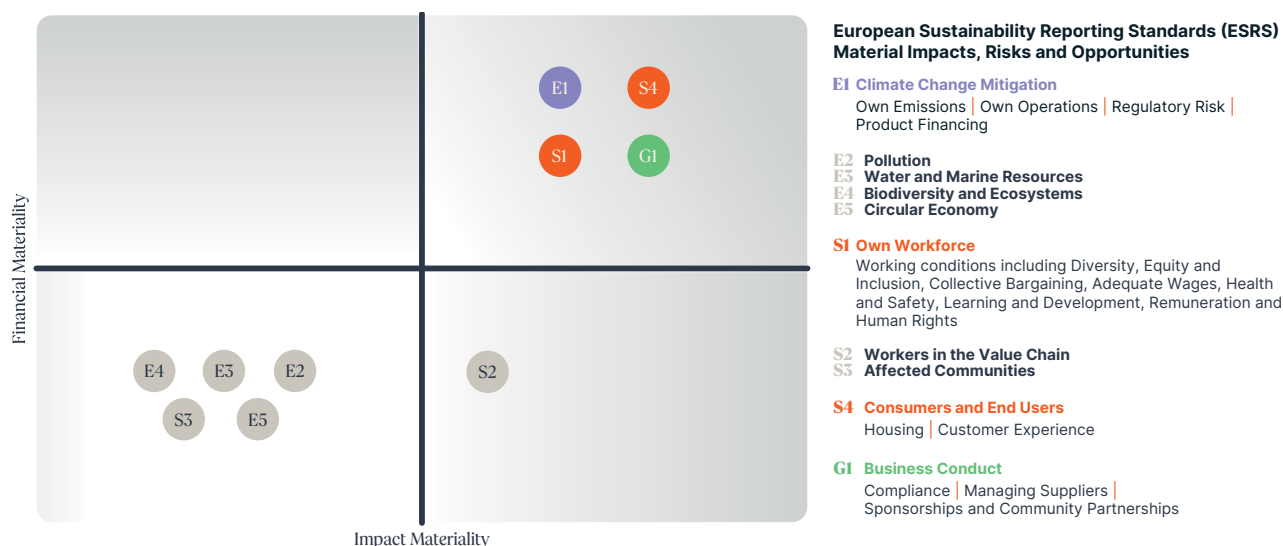
The UK Corporate Governance Code places an obligation on Boards to keep workforce engagement mechanisms under review so that they remain effective. The Code also states that where the Board chooses to implement alternative arrangements to those set out in the Code, it should explain in its Annual Report what alternative arrangements are in place and why it considers that they are effective. There are currently a number of ways the Board engages with the Bank's workforce and hears the employee 'voice' through alternative arrangements to those set out in the UK Code. For more on how the Board engages with the Bank's workforce, please refer to S1-2.

Sustainability Statement

ESRS 2 General Disclosures(continued)

SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

PTSB's material IROs cross several themes as outlined below and are aligned to areas that we have prioritised as part of our wider Business Strategy.



Note: The position of a topical standard does not denote significance of a standard relative to another in the same quadrant.

Materiality Threshold Indicator A sustainability topic that is considered important to PTSB but has not been deemed material based on the outputs of the double materiality assessment.

IRO-Ref	IRO	Upstream/Downstream	Description	Short (0-1yr)	Medium (1-5yrs)	Long (5+yrs)	Positive or Negative	Potential or Actual	E	S	G	MDR Reference
I-1	Impact	Downstream	The impact PTSB has on the environment by considering climate change and energy use when financing projects.	✓	✓	✓	Both	Both	E1			E1-MDR4 (Product Financing)
I-2	Impact	Own Operations	The impact PTSB has on the environment by reducing emissions across its business operations.	✓	✓	✓	Positive	Both	E1			E1-MDR1 (Own Emissions)
I-3	Impact	Own Operations	The impact PTSB has on its employees by ensuring adequate working conditions, equal opportunities for all, and protection of workers' rights.	✓	✓	✓	Both	Both		S1		S1-MDR1 (Working Conditions)
I-4	Impact	Downstream	The impact PTSB has on society and Consumers and End-Users from failing to implement appropriate measures to protect customer information and ensure consumers in vulnerable circumstances may avail of the Bank's services.	✓	✓	✓	Negative	Potential		S4		S4-MDR2 (Customer Experience)
I-5	Impact	Downstream	The impact PTSB has on society and Consumers and End-Users by encouraging financial wellbeing and providing customer supports.	✓	✓	✓	Positive	Both		S4		S4-MDR2 (Customer Experience)

IRO-Ref	IRO	Upstream/ Downstream	Description	Short (0-1yr)	Medium (1-5yrs)	Long (5+yrs)	Positive or Negative	Potential or Actual	E	S	G	MDR Reference
I-6	Impact	Downstream	The impact PTSB has on society and the environment due to the financing of criminal activity.	✓	✓	✓	Negative	Potential			G1	G1-MDR1 (Compliance)
I-7	Impact	Upstream	The impact PTSB has on society and the environment by ensuring suppliers are appropriately managed.	✓	✓	✓	Positive	Both			G1	G1-MDR2 (Managing Suppliers)
I-8	Impact	Downstream	The impact PTSB has on society and local communities through building community partnerships, providing charitable donations and engaging in volunteering activity.	✓	✓	✓	Positive	Both			G1	G1-MDR3 (Community Partnerships)
O-1	Opportunity	Downstream	Providing sustainable products, propositions and funding activities that integrate environmental considerations help to meet customer demand, may provide PTSB with a competitive advantage and helps to reduce the Bank's impact on the environment.	✓	✓	✓	n/a	n/a	E1			E1-MDR4 (Product Financing)
O-2	Opportunity	Own Operations	The opportunity for PTSB to reduce operational costs and improve its reputation by making internal investments/decisions that are considerate of the environment.	✓	✓	✓	n/a	n/a	E1			E1-MDR1 (Own Emissions)
O-3	Opportunity	Own Operations	A working environment that has appropriate working conditions, protects worker's rights, promotes inclusion and offers adequate training and innovation opportunities may lead to increased productivity, reduced costs and enhanced brand and reputation.	✓	✓	✓	n/a	n/a		S1		S1-MDR1 (Working Conditions)
O-4	Opportunity	Downstream	The opportunity for the Bank to enhance its brand and reputation by providing exceptional customer experience.	✓	✓	✓	n/a	n/a		S4		S4-MDR2 (Customer Experience)
O-5	Opportunity	Downstream	Providing adequate housing via mortgage financing for customers across Ireland can lead to an enhanced reputation and increased market share.	✓	✓	✓	n/a	n/a		S4		S4-MDR1 (Housing)

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ESRS 2 General Disclosures(continued)

IRO-Ref	IRO	Upstream/Downstream	Description	Short (0-1yr)	Medium (1-5yrs)	Long (5+yrs)	Positive or Negative	Potential or Actual	E	S	G	MDR Reference
R-1	Risk	Own Operations	Change Management: The risk arising from inability of the Bank to manage projects and changes to a high quality standard and in a timely and controlled manner, in particular for large and complex change programmes will not achieve the desired outcomes, will have a negative impact on resource levels of the Bank or in case of regulatory based requirements may result in fines or sanctions.	✓			n/a	n/a	G1			E1-MDR3 (Regulatory Risk)
R-2	Risk	Downstream	Climate-related and Environmental (CR&E) Risk: The risk of financial loss or an adverse outcome arising from the consequences, likelihoods and a lack of inadequate response to the impacts of climate change.	ü	✓	ü	n/a	n/a	E1			E1-MDR3 (Regulatory Risk) & E1-MDR4 (Product Financing)
R-3	Risk	Downstream	Credit Risk: The risk of financial loss due to the failure of a customer, or counterparty, to meet their financial obligations to the Bank as they fall due.		✓	✓	n/a	n/a	E1			E1-MDR3 (Regulatory Risk)
R-4	Risk	Own Operations	Cyber Security Risk: The risk of unauthorised access, modification, malicious disruption or use of IT systems and data from within or outside the Bank (for example, cyber-attacks).	✓	✓		n/a	n/a		S4	G1	S4-MDR2 (Customer Experience) & G1-MDR1 (Compliance)
R-5	Risk	Upstream/ Own Operations / Downstream	Fraud Risk: The risk of losses or unplanned gains arising from acts intended to defraud, misappropriate property, circumvent regulations, the law or company Policy by either an internal party or external parties or a combination of both.	✓			n/a	n/a			G1	G1-MDR1 (Compliance)
R-6	Risk	Upstream	Outsourcing and Third-Party Risk: The risk of current or prospective loss or reputational damage connected with the engagement and management of third parties contracted internally or externally (for example, for the purposes of customer engagement, data processing, systems development, cloud services or Information and Communications Technology (ICT) systems), including lack of third party diversification, inadequate business continuity plans or insufficient monitoring and oversight of the engagement.	✓			n/a	n/a			G1	G1-MDR2 (Managing Suppliers)

IRO-Ref	IRO	Upstream/Downstream	Description	Short (0-1yr)	Medium (1-5yrs)	Long (5+yrs)	Positive or Negative	Potential or Actual	E	S	G	MDR Reference
R-7	Risk	Own Operations	People Risk: The risk of financial, operational or reputational damage to the Bank arising from failure of the Bank to meet its employment obligations and duty of care to staff or the failure to ensure adequate resources and skills are in place, that succession planning is not effective or that the operation of the Bank may be impacted by labour disputes.	✓			n/a	n/a		S1	G1	S1-MDR1 (Working Conditions) & G1-MDR1 (Compliance)
R-8	Risk	Own Operations	Process and Ability to Execute Risk: Process and execution risk can significantly impact PTSB's operational risk, leading to higher loss risk, impacting operational resilience, customer dissatisfaction, a loss of trust and limits the ability to realise stated ambition (especially against the risk of optimistic bias in forecasting). Risk is linked with internal complexity, a high volume of change, increasing collaboration with third parties and outsourcing providers, people risk and transition speed. Making end to end processes more digitally straight forward is necessary to reduce complexity and embed/automate controls, and consistent customer service quality.		✓		n/a	n/a			G1	G1-MDR1 (Compliance)
R-9	Risk	Own Operations	Regulatory Compliance Risk: The risk of material financial loss or liability, legal or regulatory sanctions, or brand damage arising from the failure to comply with or adequately plan for change to, official sector policy, laws, regulations, major industry standards, compliance policies and procedures or the expectations of customers and stakeholders.	✓	✓	✓	n/a	n/a	E1	S1	G1	E1-MDR4 (Product Financing) & E1-MDR3 (Regulatory Risk) & G1-MDR1 (Compliance) & S4-MDR2 (Customer Experience)

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ESRS 2 General Disclosures(continued)

IRO-Ref	IRO	Upstream/Downstream	Description	Short (0-1yr)	Medium (1-5yrs)	Long (5+yrs)	Positive or Negative	Potential or Actual	E	S	G	MDR Reference
R-10	Risk	Own Operations	Reputational and Conduct Risk: The risk of material financial loss or liability, legal or regulatory sanctions, or brand damage arising from the failure to comply with or adequately plan for change to, official sector policy, laws, regulations, major industry standards, compliance policies and procedures or the expectations of customers and stakeholders.		✓	✓	n/a	n/a	E1			E1-MDR4 (Product Financing)
R-11	Risk	Own Operations / Upstream	Service Availability Risk: The risk that the performance and availability of IT systems and data are adversely impacted (for example, customer experience or business processes), including the inability to recover the Bank's services in a timely manner, due to a failure of IT hardware or software components; weaknesses in IT system management; or any other event.			✓	n/a	n/a	E1		G1	E1-MDR2 (Own Operations) & G1-MDR2 (Managing Suppliers)
R-12	Risk	Upstream / Own Operations	Business Risk: The risk that volumes may decline, margins may shrink, or management costs may increase, arising from an underperforming Business Model and/or failure in the Bank's strategic ambitions.		✓	✓	n/a	n/a	E1			E1-MDR4 (Product Financing)

* The time horizons outlined in the table above align to the time horizons in the DMA, as outlined in ESRS 2-BP2.

The Bank is involved in the identified material impacts through its business relationships, funding activity and through our role as a large-scale employer.

We do not expect that the Bank's identified sustainability-related risks will result in a material adjustment to the Bank's financial position including carrying amounts of assets and liabilities.

At present, the Bank does not yet formally use climate-related scenario analysis to assess business strategy resilience.

In 2025, the Bank's CR&E Risk Materiality Assessment was reviewed. The review included a detailed assessment of the

potential impacts of CR&E risk upon the Gross Risk Profile of the Bank across the Key Risk Categories defined in the ERMF. Building on the foundations set in previous cycles, the approach used a blend of qualitative and quantitative information by reviewing the risk identified and applying a more granular lens to materiality ratings to understand the potential impact for the organisation. It included detailed descriptions of the relevant transmission channels between Physical and Transition Risk drivers and Risk Categories as defined in the ERMF. In addition, CR&E risk was measured as part of the Bank's Internal Capital Adequacy Assessment (ICAAP).

For more information on the outputs of the Bank's CR&E Risk Materiality Assessment and the ICAAP, please refer to E1-1.

All material IROs that have been identified are disclosed under the ESRS standards. There are no entity-specific disclosures included within this Sustainability Statement.

4. Impact, risk and opportunity management

4.1 Disclosures on the materiality assessment process

IRO-1 Description of the process to identify and assess material impacts, risks and opportunities

In 2024, the Bank's DMA was facilitated by an independent Third Party to ensure confidentiality and impartiality. PTSB's DMA was reviewed during 2025, with the review confirming that there was no material change to the identified sustainability-related IROs from the previous cycle.

The process followed during the 2024 cycle included:

A sectoral review was completed to identify potential material sustainability topics. This review included an industry benchmarking exercise, as well as an analysis of regulatory and supervisory expectations aligned to the ESRS topics and sub-topics. In addition, a value chain was developed, challenged, and validated through a workshop process with representatives of functions from across the Bank. Potential 'hotspots' and 'key dependencies' were highlighted as part of value chain workshop process, which informed the value chain actors engaged as part of the wider DMA.

The outputs of the sectoral review, together with value chain 'hot spots' and 'key dependencies', formed the basis for an initial longlist of IROs. The assessment of PTSB's impacts were primarily informed by a sectoral review, which highlighted the actual and potential impacts on customers, colleagues and the environment as a result of the Bank's financing activities. Considerations of geography and specific business relationships were not identified as likely contributors. This longlist also incorporated existing resources (for example, enterprise risk management registers, strategic roadmaps and customer insights). Workshops with subject matter experts -from across the Bank were held to draft, validate and produce a shortlist of sustainability related IROs. This shortlist of IROs formed the basis for stakeholder engagement.

Fourteen stakeholder cohorts were engaged through a combination of surveys, workshops and 1:1 interviews in order to gain an understanding of the importance of the shortlisted sustainability-related topics to each cohort and provide an opportunity to seek feedback regarding potential topics that may have been omitted. Internal stakeholders were engaged through 1:1 interviews, workshops and a bankwide survey, while external stakeholders were engaged exclusively through a survey.

The nature of each engagement is outlined below.

	Stakeholder	Engagement Method
Internal Stakeholders	Board	Survey
	ExCo	Interview
	Colleagues	Survey, Workshops
External Stakeholders	Shareholders	Survey
	Brokers	Survey
	Asset Finance Customers	Survey
	Personal Customers	Survey
	Business Customers	Survey
	Community Partners	Survey
	Industry Partnerships	Survey
	Oireachtas	Survey
	Industry Influencers	Survey
	Media	Survey
	Suppliers	Survey
	External Experts	Incorporated as part of advisory services

It is important to note, that stakeholder engagement took place as part of the Bank's full DMA process in 2024 and that the process was not repeated during the 2025 disclosure cycle.

The results of this stakeholder engagement exercise were then integrated with internal stakeholder views to rank and ultimately set thresholds to establish the Bank's material IROs and related sustainability topics. Assessment of sustainability-related matters (including impacts) sits within the remit of the Bank's External Reporting Working Group within the established governance structures. The Bank's Sustainability Committee is responsible for final oversight.

Where possible, IROs were assessed by the Bank's SMEs using existing criteria. The IROs were reassessed by PTSB's SMEs in 2025 as part of review of the Bank's DMA, with no material changes identified.

Risks

Sustainability-related risks were deemed material if they mapped to an enterprise level risk, an emerging risk or a material ESG risk. The threshold for shortlisting the material sustainability-related risks was developed based on this mapping. Where a longlist sustainability-related risk was sufficiently related to an enterprise level risk, an emerging risk or a material CR&E risk it was deemed material. This was validated through work with SMEs. No other thresholds were applied. The Bank views sustainability-risks as drivers

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ESRS 2 General Disclosures(continued)

of its current identified risks, and as such the assessment of sustainability-related matters falls within the Bank's Enterprise Risk Management (ERM) process. In addition, the Bank conducted a CR&E Risk Materiality Assessment which has also been considered through the process.

At this time, we don't expect that the Bank's identified sustainability-related risks will result in a material adjustment to the Bank's financial position including carrying amounts of assets and liabilities.

Impacts and Opportunities

Opportunities were assessed by SMEs leveraging elements of the Bank's internal opportunity evaluation framework. Impacts were also assessed by SMEs. Negative impacts were rated and ranked by considering their relative severity (scale, scope and remediation) and likelihood, while the prioritisation of positive impacts considered scale, scope and likelihood using a scoring matrix developed as part of the DMA process. During a workshop with SMEs, a threshold was established based on this scoring matrix.

Once potential and actual impacts were ranked, thresholds were applied by the Bank in order to determine materiality. The threshold setting process for Impacts and Opportunities considered the themes that were deemed to be potentially financially material taking into account the Bank's Enterprise Risk Management Framework, regulatory expectation, stakeholder feedback and Risk Appetite. Impacts and Opportunities were discussed by selected SMEs within the Bank during facilitated workshops to determine a final list of material Impacts and Opportunities.

The process to identify, assess and manage Opportunities is integrated into overall management processes through the Bank's established governance structures (please refer to ESRS 2-GOV-1) and through its annual strategic and financial planning cycle.

PTSB has in place an overarching Integrated Strategic Plan (ISP), which incorporates elements such as our three-year strategic direction, our financial plan and change delivery roadmaps. The ISP sets out the core priorities of the Bank over a medium-term time horizon and considers the needs of all our stakeholders. PTSB channels its

investment and efforts into the initiatives that will support and accelerate delivery of our strategy in a safe and compliant manner.

During 2025, the Bank has made progress in further embedding sustainability into strategy delivery and execution. The implementation of a new strategy performance review process on a bi-annual basis ensures that sustainability-related key performance indicators (KPIs) (within our broader suite of Business Strategy KPIs) are reviewed, challenged and progress and/or interventions are reported at Board level. In addition, members of our Sustainability team play an active role within the Bank's Strategic Planning Process (the process through which the ISP is developed and refreshed) to ensure that due consideration is being given to sustainability-related issues during the strategy development process and the resulting change delivery portfolio. PTSB's DMA was reviewed during 2025, with the review confirming that there was no material change to the identified sustainability-related IROs from the previous cycle.

MDR-P Policies adopted to manage material sustainability matters

The below table contains the full list and descriptions of the Bank's policies and frameworks that are referenced throughout the Sustainability Statement. All policies and frameworks are available on the Bank's Internal Website.

Policy	Description	Accountable for Implementation	Reference
Adverse Weather Protocol	PTSB is committed to the support and promotion of Health and Safety for all our colleagues. In accordance with the Safety, Health and Welfare at Work Act, 2005 ('the Act'), PTSB ensures, in so far as is reasonably practicable, a safe and healthy work environment for our colleagues. The Bank recognises that there may be times when adverse, and deteriorating weather conditions can affect the ability to open for business as well as impacting on the ability of colleagues to travel to work safely. The Bank makes every effort to maintain normal working hours during these periods of adverse weather and facilitate working from home where appropriate. Although such events will be rare, the policy has been written to provide guidance should such circumstances arise.	Head of Shared Services	ESRS-2-MDR-P E1-MDR2
Anti-Bribery and Corruption Policy	The Bank's Anti-Bribery and Corruption Policy is in place to support PTSB in effectively managing the risks associated with bribery and corruption. The policy aligns with the Bank's Code of Ethics which states that 'Bribery and corruption are unacceptable, and everyone involved in or dealing with the Group is expected to act honestly and with integrity at all times. PTSB's Anti-bribery and Corruption Policy complies with the Criminal Justice (Corruption Offences) Act 2018, which has in turn been informed by The United Nations Convention against Corruption.	Head of Financial Crime Compliance and Money Laundering Reporting Officer	ESRS-2-MDR-P S1-MDR1 G1-1 G1-1 G1-MDR1

Policy	Description	Accountable for Implementation	Reference
Anti-Money Laundering and Countering the Financing of Terrorism Policy	The Bank's Anti-Money Laundering and Countering the Financing of Terrorism Policy sets out the guidelines and controls adopted by PTSB to ensure appropriate AML compliance and effective management of money laundering or terrorist financing risk within the business in line with Bank policy.	Head of Financial Crime Compliance and Money Laundering Reporting Officer	ESRS-2-MDR-P S1-MDR1 G1-1 G1-1 G1-MDR1
Operational Resilience and Continuity Risk Policy	The Bank's Operational Resilience and Continuity Risk Policy defines the minimum requirements, accountabilities and approach that the Bank must follow with respect to Operational Resilience and Continuity Risk and PTSB's ability to identify and prepare for, respond and adapt to, recover and learn from operational disruption. The policy sets out minimum standards, key roles and responsibilities and governance arrangements for the consistent and continuous management of Operational Resilience and Continuity Risk across the Bank, with a focus on protecting the Bank's customers, employees, business and shareholders. The policy defines the actions that will ensure the highest possible level of service availability should an incident occur, while minimising harm to customers, market participants, and the economy.	Head of Operational and IT Risk	ESRS-2-MDR-P E1-2 E1-MDR1 E1-MDR2
Business Lending Credit Policy	The Business Lending Credit Policy provides guidance on minimum standards that must be met and applied to all aspects of Business Lending. This includes the consideration of ESG factors and exposure to Physical and Transition CR&E risk. The Business Lending Policy states that finance must not be provided to Borrowers that engage in a list of Excluded Business Activities which the Bank deem to contribute to irreversible environmental and/or social harm to society, this includes areas such as non-renewable energy extraction (for example, gas, oil or coal), unnecessary deforestation or the sale of weapons. Meeting the requirements set out in the policy is a condition of doing business with PTSB. The Business Lending Policy is approved by the Board and is delivered via the Bank's Credit Committee and delegated authority structures. In addition, PTSB's Business Lending Policy requires that all credit applications include commentary on how ESG factors are likely to impact the applicant's future business performance. Governance arrangements are considered with reference to items such as compliance with industry standards and tax records.	Chief Credit Officer	ESRS-2-SBM-1 E1-2 E1-MDR3 S4-MDR2
Change Framework	The purpose of the document is to: - Provide a standard to support a consistent approach for the delivery of Change across the Bank including the initiation process for new projects; - Document the definition of change and categories of change prioritised as part of the Strategic Planning Process (SPP); and, - Outline the Change Governance Process and define clear roles, responsibilities, and accountabilities for managing Change projects. Provide an overview of the Stage Gate Process. The framework supports the management of change in PTSB as well as the details of relevant and supporting policies, guidelines, and standards.	Head of Change	ESRS-2-MDR-P E1-MDR3-P
Change Risk Policy	The purpose of this policy is to set out, at a high level, the minimum requirements and approach for the consistent, continuous, and effective identification and mitigation of Change risk, including Information Technology (IT) Change across the Bank. The policy also sets out clear accountability and roles and responsibilities including how Risk Appetite is overseen and controlled.	Head of Operational and IT Risk	ESRS-2-MDR-P E1-MDR3-P

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ESRS 2 General Disclosures(continued)

Policy	Description	Accountable for Implementation	Reference
Climate-related & Environmental Risk Management Framework	The CR&E Risk Management Framework, which sits under the overarching Enterprise Risk Management Framework (ERMF), describes PTSB's approach to the management of CR&E risk including setting out the Bank's approach to CR&E risk identification, assessment, measurement, monitoring, mitigation and reporting. CR&E risk, which is defined as a Key Risk Category within the ERMF, is a cross-cutting risk that may manifest through other relevant Key Risk Categories, the management of which is maintained through the individual Risk Management Frameworks under the ERMF.	Chief Risk Officer	ESRS-2-MDR-P E1-2 E1-MDR3 E1-MDR1
Code of Ethics	The Bank has in place a Code of Ethics that provides a general framework for expected behavior and guides our workforce in doing the right thing. It codifies how best to interact with our stakeholders and provides standards that colleagues must follow in both their professional life, and in conducting their own personal financial affairs. It is there to protect us from unacceptable behavior and minimise opportunities for misconduct. Complying with the requirements and principles of the Code is a condition of employment for our colleagues. Aligned to the introduction of the Individual Accountability Framework (IAF), from 31st December 2023 it is also a regulatory requirement of the Central Bank of Ireland as it sets out the behaviors expected of all colleagues in relation to the Business Standards, and for those in Control Function and PCF roles the Common and Additional Standards expected. The Board supports a zero-risk appetite for deliberate and/or repeated poor or unfair customer outcomes (financial or non-financial), or any market impact which arises through inappropriate actions, or inactions in the execution of our business. Any instances of breaches are reported throughout the year.	Chief Customer and People Officer	ESRS-2-MDR-P S1-MDR1 G1-1 G1-3 G1-MDR 3
Collateral Valuations Policy	This policy relates to the Valuation of both Residential Properties and Commercial Properties for both New Lending and Back Book management. It has been designed to ensure that the Bank's valuation standards are: • Independent, accurate and reflect current market conditions; • Comply with best practice international valuation standards; • Include details of the terms of engagement with a valuer; and, • Comply with the Capital Requirements Directive (CRD). Valuation reports are considered key to the lending process, reviewed and evaluated in a similar manner to other key credit risk and financial documentation inputs. The Valuation Report captures Building Energy Rating (BER) and Eircode data to aid the assessment of the mortgage portfolio for CR&E risk.	Chief Credit Officer	ESRS-2-MDR-P E1-MDR3 E1-MDR4

Policy	Description	Accountable for Implementation	Reference
Colleague Conduct Policy	The Bank has in place a Colleague Conduct Policy, an overarching colleague framework which includes the policies and procedures that are integral to upholding high standards of colleague conduct across the organisation. The policy sets out the behaviours expected of our people and lays out the requirements for the effective management of those behaviours within the Bank to ensure that our customers and colleagues are treated in the right way. PTSB has a zero-tolerance for inappropriate colleague conduct. A colleague conduct paper is produced and presented to the Board on a bi-annual basis. The paper gives qualitative and quantitative updates on key colleague-related policies and procedures over the period, in line with our Colleague Conduct Policy. The Colleague Conduct Policy takes into consideration several other documents that encourage appropriate colleague conduct and behaviour, including our Code of Ethics and Speak Freely. The Colleague Conduct Policy is reflected within the overarching IAF Conduct Standards Policy. In addition, the Colleague Conduct Policy considers our Dignity and Respect Code and our Equality through Diversity and Inclusion Charter, recognising the responsibility we have to respect and protect the human rights of every individual that works for us.	Head of People	ESRS-2-MDR-P S1-MDR1 S4-MDR 1 G1-1 G1-3 G1-MDR1
Community Fund Constitution	The Bank's Community Fund Constitution describes the principles and practices that the Bank applies when engaging with charitable organisations. The Constitution sets out the expectations of all colleagues and provides details of how PTSB engages in charitable giving, including an overview of the processes that are in place, governance structures and appropriate due diligence procedures.	Community Fund Committee Chair	ESRS 2-MDR-P G1-MDR3
Community Policy	PTSB's Community Policy describes the principles and practices the Bank applies to engage with our community and charity partners in the most effective way, ensuring that we support local communities across the country by having a positive and meaningful impact.	Chief Sustainability and Corporate Affairs Officer	ESRS 2-MDR-P G1-MDR3
Complaints Charter	The Bank's Complaints Charter outlines how complaints are managed within PTSB. It provides an overview of: • Our promise – that customers can be sure that we will deal with their complaint fairly, courteously and promptly. We will log and investigate their complaint as quickly and efficiently as possible. We will look at all the facts of their complaint and all issues raised on the basis of all the evidence available to us and determine a fair and reasonable outcome; • How customers can make a complaint (through contacting our Open24 Team, utilising our online complaint form, written correspondence, or visiting a local branch); • What happens next (how complaints are registered, investigated and responded to); and, • What happens if the customer is still not satisfied (what customers can do if they remain dissatisfied with our response).	Head of Customer Complaints and Resolution	ESRS 2-MDR-P S4-3

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ESRS 2 General Disclosures(continued)

Policy	Description	Accountable for Implementation	Reference
Complaints Management Policy	The Complaints Management Policy consists of two principal components: • The process for managing the lifecycle of a complaint from the initial complaint by a complainant through to resolution; and, • Analysis of complaints from complainants to identify trends and improve customer experience and outcomes. The Complaints Management Policy does not address the Legal Departments arrangements to respond to legal action or engage with Court proceedings. The objectives of the Complaints Management Policy is to: • Ensure complaints are handled in a speedy, efficient and fair manner; • Manage complaints effectively within the governance structure set out in the Complaints Management Framework; • Deliver the fair outcomes for customers by embedding a customer focused culture; • Ensure complaint trends are identified and root cause undertaken in order to identify emerging and potential Compliance, Conduct Risk and Operational risk; • Incorporate lessons learnt from Complaints Management into the Group (including incorporating into product reviews, product approvals and design); • Support RCSA in embedding an enhanced internal control environment and reduce unnecessary operational losses; and, • Ensures the Group meets its regulatory obligations with respect to complaint handling. The objectives have been developed in accordance with the Bank's customer centric strategy, which is to ensure that consideration of the customers' best interests is placed at the centre of the organisation's decision-making. This focus should highlight the patterns of unfair customer outcomes and enable proactive steps to prevent these outcomes from recurring, thereby reducing the number of complaints.	Head of Customer Complaints and Resolution	ESRS 2-MDR-P S4-MDR1
Conduct Management Framework	The Conduct Management Framework describes PTSB's approach to risk management of the Conduct Standards under the Individual Accountability Framework (IAF) and Conduct Risk. Managing of the IAF Conduct Standards and Conduct Risk helps to ensure that the best interests of, and fair outcomes for, our customers are considered which will help build trust with our customers as well as our other key stakeholders. The framework aims to ensure that PTSB acts honestly, fairly and professionally in the best interests of our customers, the Bank and all stakeholders, so that: • The required behaviors for individual staff as well as the wider Bank (as detailed in the IAF Conduct Standards) are fully understood and practiced by all applicable stakeholders; • Our customers can be confident that their best interests are central to the Bank's culture; • Our products, services and channels are designed to meet the needs of identified consumer groups and are targeted accordingly, this extends to customers that require enhanced support; • Our customers are provided with clear information and are kept appropriately informed before, during and after the point of sale; • Where we provide information, it is suitable and takes account of our customers circumstances; • Products will perform, and the associated service is of an acceptable standard, as the Bank has led customers to expect; and, • Our customers will not face unreasonable post-sale barriers to change product, switch provider, submit a claim or make a complaint.	Head of Compliance	ESRS 2-MDR-P S1-MDR1 G1-1 G1-MDR 1

Policy	Description	Accountable for Implementation	Reference
Conflict of Interest	A Conflict of Interest occurs when an employee's personal relationships, participation in external activities or interest in another venture influence or could be perceived to influence a business decision. PTSB has in place a Conflict of Interest Policy to provide guidance to employees and to ensure that the Bank proactively manages both personal and organisational Conflict of Interests. Every employee is responsible for identifying, reporting and managing Conflict of Interests and, in doing so, must comply with the letter and spirit of the policy. The Bank has in place procedures to deal with Conflict of Interest that may arise. The Human Resources Team monitors adherence to this policy and reports to the Board and Executive Committee on a half-yearly basis.	Head of People	ESRS 2-MDR-P S1-MDR1 G1-1 G1-MDR 1
Consumer Non-Mortgage Lending	The Consumer Non-Mortgage Lending Policy provides the minimum standards that must be met when approving a loan. These standards are applied to all aspects of Consumer Non-Mortgage lending and act as an overarching policy document that sets out the Bank's 'Core Lending Principles'. This policy ensures that policy approvals and changes to the Bank's Consumer Non-Mortgage lending framework are appropriately recognised, approved and managed. Ensuring a consistent approach to the assessment of credit applications.	Chief Credit Officer	ESRS 2-MDR-P E1-MDR3 E1-MDR4
Credit Risk Management Framework	The Credit Risk Management Framework (CRMF) for the Bank supports the overarching Risk Management Framework (RMF) and Internal Control Framework (ICF) by detailing the Bank's specific approach to Credit Risk Management. PTSB is dedicated to fostering a sustainable future and recognises the critical role of Environmental, Social and Governance (ESG) factors, particularly in the context of Climate Change. PTSB is committed to responsible banking practices including lending with view to proactively managing associated ESG risks. Our Credit Risk Management Framework is guided by regulatory requirements, market sentiments and customer requirements, and is aimed at understanding and mitigating climate-related risks (Physical and Transition risk). As the ESG agenda continues to evolve, so too will our approach to support Bank Risk Appetite to ensure we continue to contribute to a resilient and sustainable financial future, while always being mindful of Customer impact, in line with our community-based banking values. This framework is intended to promote sound Credit risk management across the Bank. It aims to embed and communicate the method by which PTSB manages Credit risk, details the key principles, objectives, and primary components of PTSB's approach to Credit risk management, and distributes Credit risk responsibilities across the Bank's three lines of defence. This includes adherence to the Data Protection Policy which includes Storage Limitations. Pursuant to the Risk Management Framework (RMF), the Bank shall manage Credit risk within the limits and thresholds established in PTSB's Risk Appetite Statement (RAS) approved by the Board. This framework is aligned with PTSB's RMF and applicable regulatory requirements.	Chief Credit Officer	ESRS 2-MDR-P E1-MDR1 S4-MDR2

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ESRS 2 General Disclosures(continued)

Policy	Description	Accountable for Implementation	Reference
Data Protection Policy	Data Protection is a fundamental right under the EU Charter of Fundamental Rights and therefore PTSB safeguards the data protection/ privacy rights of customers and employees. The Bank has a strong data protection culture in place, including a Data Protection Policy that sets out PTSB's policy objectives in respect of the protection of personal data. The policy includes the data protection principles, objectives, and primary components of PTSB's approach to the management of data protection risk and sets out responsibilities across the Three Lines of Defence Model. The scope of this policy is Bank-wide, for example, it applies to all entities and activities within the Bank which involve the processing of personal data. Adherence to this policy is mandatory for all employees, contractors and the Board of Directors.	Data Protection Officer	ESRS 2-MDR-P S1- MDR 1 S4- MDR 1 G1- MDR 1
Dignity and Respect Code	The Code sets out the Bank's procedures for dealing with allegations of inappropriate behaviours such as bullying and harassment/ sexual harassment, as laid out within the code. The code applies to all colleagues while they are both in the workplace and at work-associated events such as meetings, conferences and work-related social events, whether on the company's premises or off-site. It also applies to people that our colleagues may reasonably expect to come into contact with during the course of their employment such as customers, clients, contractors or business partners.	Head of People	ESRS 2-MDR-P S1- MDR1 S4-1
Disciplinary Procedure	The procedure is to be followed for disciplinary action taken on behalf of the Company, is in line with fair procedure and natural justice as set out in the Workplace Relations Commission's (WRC) Code of Practice on Grievance and Disciplinary Procedures and takes cognisance of previous cases within the Bank. It ensures that employees are treated equitably in relation to any complaints/concerns about performance or behaviour and that action is not taken without having regard to the facts and circumstances of each case.	Head of People	ESRS 2-MDR-P S1- MDR1
Driving for Work Protocol	In accordance with the Safety, Health and Welfare at Work Act, 2005, PTSB must provide, in so far as is reasonably practicable, a safe and healthy work environment for our employees. Under the Act, a vehicle used in the course of business is classified as a place of work. Driving for work is an activity undertaken by employees of the Bank and as such, poses as a potential hazard to both employees, and other road users including pedestrians. It is a shared responsibility between the Bank, and its employees with two main types of legislation applicable to this activity in Ireland, Road Traffic Acts and the Safety, Health and Welfare at Work Act, 2005. The purpose of the protocol is to set out guidelines for any employee who drives for work along with clearly defined responsibilities of both the Bank and the driver.	Head of Shared Services	ESRS 2-MDR-P E1-MDR1
Employee Volunteering Policy	PTSB's Employee Volunteering Policy describes the principles and practices the Bank applies to encourage and support employees at all levels of the organisation to take part in volunteering opportunities in local communities.	Chief Sustainability and Corporate Affairs Officer	ESRS 2-MDR-P G1-MDR3

Policy	Description	Accountable for Implementation	Reference
Enhanced Customer Support Policy	The Bank has in place an Enhanced Customer Support Policy that sets requirements to be adhered across the bank in relation to the identification, assessment, management, and support for customers who may require additional support or support with decision-making, including customers in vulnerable circumstances. The policy reflects our commitment to fostering trust, inclusivity, and compliance with relevant legislation, including CPC and ADMA. It provides the Bank's business areas with structured guidance on how to embed enhanced support measures within their processes, ensuring all customers can access the financial services, they need, in a way that is inclusive and responsive to their circumstances. At the heart of this policy, are key principles that reflect the Bank's commitment to customer care, including proactive identification of support needs, tailored assistance, where possible depending on circumstances, and a culture of continuous improvement in how we serve customers in vulnerable circumstances. The policy is overarching and ensures that customers in vulnerable circumstances are also considered during product and service design to ensure exceptional customer outcomes, including when in vulnerable circumstances. The policy also ensures that all staff members understand their role in delivering a consistent and exceptional level of customer care, especially for customers in vulnerable circumstances. This policy is updated and communicated across the bank on a yearly basis, and it is also included in the bankwide mandatory training delivered to all staff.	Chief Retail Banking Officer	ESRS 2-MDR-P S4-MDR1

Sustainability Statement

ESRS 2 General Disclosures(continued)

Policy	Description	Accountable for Implementation	Reference
Enterprise Risk Management Framework (ERMF)	ERMF describes PTSB's overarching approach to enterprise risk management, forming a critical component of the Bank's Internal Control Framework (ICF). The ERMF outlines the structures and practices that enable the Bank to recognise the economic substance of all risk exposures and make informed risk-taking decisions. It sets forth the Bank's approach to risk governance, risk culture, risk strategy, risk appetite, risk management processes (including risk identification, risk assessment & measurement, risk mitigation, risk monitoring & testing, risk reporting & escalation), risk assurance, and the monitoring and maintenance of risk data and IT systems. The framework is further supported by the Risk Appetite Framework, risk category frameworks, risk policies, and risk procedures, which collectively guide the Bank's risk management practices. A key component of the ERMF is the Bank's Risk Categories, which provide a structured classification of risks faced by the Bank, including those arising from its revenue-generating activities and those inherent in its operations and business support functions. These categories establish a common language for understanding, discussing, and managing risks across the enterprise, forming the foundation for risk governance structures and core risk management processes. The Level 1 – Key Risk Categories represent the most significant risk areas that could materially impact the Bank and include Capital Adequacy risk, Liquidity and Funding risk, Market risk, Credit risk, Business risk, Operational risk, Information Technology risk, Model risk, Compliance risk, Conduct and Reputational risk, and Climate-Related and Environmental risk. Supporting these are Level 2 – Sub-Risk Categories, which provide a more detailed classification of specific risk types, facilitating targeted risk management practices and enabling risk aggregation within each key risk category. The ERMF is designed to support the Board of Directors and management in ensuring the financial and operational soundness of the Bank while enabling the execution of its strategic priorities. It defines a Three Lines of Defence model, assigning clear ownership and accountability for risk identification, assessment, measurement, mitigation, monitoring, and reporting across business units (First Line of Defence), Group Risk and Compliance (Second Line of Defence), and Group Internal Audit (Third Line of Defence). The framework also seeks to embed a strong risk culture, establish a robust risk governance structure, and implement sustainable risk management processes that ensure the timely identification, assessment, and control of current and emerging risks.	Head of Enterprise Risk	ESRS 2-MDR-P E1-MDR3 E1-MDR4
Environmental Policy Statement	PTSB's Environmental Policy Statement outlines the Bank's commitment to environmental sustainability through the ongoing identification, management and improved efficiency of those significant environmental impacts associated with our business activities, including carbon impact and contributing to a low carbon economy, energy management, use of natural resources, biodiversity and waste management.	Chief Sustainability and Corporate Affairs Officer	ESRS 2-MDR-P E1-2 E1-MDR1
Equality through Diversity and Inclusion Charter	The purpose of the Charter is to set out the Bank's position in terms of its commitment to promoting equality, through diversity, equity and inclusion and in challenging discriminatory behaviour together with setting the supports available for colleagues in promotion and challenging such behaviour.	Head of People	ESRS 2-MDR-P S1-MDR1 S4-1
Human Rights Charter	PTSB has developed a Human Rights Charter to support us in meeting all relevant human rights legislation in the Republic of Ireland. We acknowledge our responsibility to respect human rights as set out in the International Bill of Human Rights and the eight fundamental conventions on which the United Nations Guiding Principles on Business and Human Rights are based..	Chief Sustainability and Corporate Affairs Officer	ESRS 2-MDR-P S1-MDR1 S4-1

Policy	Description	Accountable for Implementation	Reference
Financial Crime Compliance Framework	PTSB maintains an overarching Financial Crime Compliance Framework, which includes three supporting policy documents relating to Money Laundering/Terrorist Financing, Sanctions and Bribery and Corruption Risk. The framework and related policies set out how the business adheres to all laws and regulations relating to financial crime compliance and how these risks are managed within the Bank. An assessment of the specific Money Laundering/Terrorist Financing and Sanctions Risk faced by the Bank is undertaken annually, and a review of the Bribery and Corruption risk relevant to the Bank's business is also completed on a periodic basis. Financial crime compliance training, which covers Money Laundering/Terrorist Financing, Sanctions and Bribery and Corruption risk, is provided to all employees each year, with tailored training provided to the Board of Directors and members of the Executive Committee. PTSB is committed to managing and mitigating the financial crime compliance risk associated with its business activities and complying with all applicable Money Laundering/Terrorist Financing, Sanctions and Bribery and Corruption laws and regulations in the jurisdictions in which it operates. To mitigate against any financial crime compliance related risk that may occur, the Bank has comprehensive due diligence procedures in place, which include requesting documents such as proof of identity and proof of address at account opening and at intervals, thereafter conducting enhanced due diligence reviews and undertaking Politically Exposed Persons (PEPs) and Sanctions screening in accordance with our policies.	Head of Financial Crime Compliance and Money Laundering Reporting Officer	ESRS 2-MDR-P S1-MDR1 G1-1 G1-3 G1-MDR1 G1-MDR 3
Fitness and Probity Policy	The objective of the PTSB Fitness and Probity Policy is to clearly define the specific roles, responsibilities and accountabilities across the Bank in relation to the implementation of Fitness and Probity Regime requirements as set out by the Central Bank of Ireland. The core function of the Fitness and Probity Regime is to ensure that individuals in key and customer facing positions (referred to in the legislation as Controlled Functions (CFs) and Pre-Approval Controlled Functions (PCFs) within a Regulated Financial Service Provider are competent and capable, honest, ethical and of integrity and also financially sound.	Head of IAF Governance and Operations	ESRS 2-MDR-P S1-MDR1 G1-1
Green Bond Framework	The Green Bond Framework was established by PTSB, under which it or any of its subsidiaries can issue green bond instruments, which may include senior bonds (preferred and non-preferred), subordinated bonds, green securitisation and medium-term notes to finance (the 'Green Bond Instruments') and/or refinance green eligible loans with a positive environmental benefit. The framework is aligned with the International Capital Markets Association (ICMA) Green Bond Principles 2025. The framework is presented through the key pillars of the ICMA principles: 1. Use of Proceeds 2. Process for Project Evaluation and Selection 3. Management of Proceeds and 4. Reporting. This Framework remains under review internally and may from time to time be updated. The framework may evolve to account for changes to the ICMA Green Bond Principles, and any regulatory developments deriving from the EU Taxonomy or other relevant regulation/legislation.	Head of Debt Capital Markets	ESRS 2-MDR-P E1-2 E1-MDR4

Sustainability Statement

ESRS 2 General Disclosures(continued)

Policy	Description	Accountable for Implementation	Reference
Green Product and Proposition Design Principles	The Bank has developed Green Product and Proposition Design Principles which aim to support the Bank in aligning its Corporate and Product Strategies to its Science-based Targets (SBTs), and work to guide, inform and prioritise the development of end-to-end green product offering(s) over the short to medium-term.	Senior Product Manager	ESRS 2-MDR-P E1-2 E1-MDR4
Grievance Procedure	The Grievance Procedures purpose is to provide colleagues with an avenue to raise informal and formal complaints. The aim of the procedure is to address any colleague's grievance and attempt to resolve it, if possible. The Bank recognises that many colleagues' matters will be resolved informally and locally with their own management however, at times, it will be necessary to formally invoke the Grievance Procedures. The procedure is in line with fair procedure and natural justice as set out in the Workplace Relations Commission's (WRC) Code of Practice on Grievance and Disciplinary Procedures.	Head of People	ESRS 2-MDR-P S1-MDR1
Group Credit Policy	PTSB has in place a Group Credit Policy. The policy addresses all material aspects of the full credit lifecycle, including Credit Risk assessment and mitigation, collateral requirements, collections and forbearance and the risk grading of individual credit exposures. The Group Credit Policy takes account of the Group's Risk Appetite Statement, applicable sectoral credit limits, the Group's historical experience and resultant loan losses, the markets in which the business units operate, risk outlook and the products which the Group provides. Each staff member involved in assessing or managing credit has a responsibility to ensure compliance with these policies and effective procedures are in place to manage the control and monitoring of exceptions to policy. The Group Credit Committee (GCC) is responsible for developing, maintaining and overseeing implementation of credit policy within the Group. The Bank's Group credit policy and procedures are designed to comply with the requirements of relevant regulation. In setting the Group Credit Policy and Enhanced Customer Support Policy, consideration was given to the interests of key stakeholders to ensure it addresses their needs and concerns effectively. This included consultation with relevant subject matter experts (SMEs) and colleagues to understand their expectations and the potential impact the policy may have on them.	Chief Credit Officer	ESRS 2-MDR-P E1-MDR3 E1-MDR4 S1-MDR1
Group Safety Statement	PTSB is required under the provisions of the Safety, Health and Welfare at Work Act, 2005 to prepare a written statement of policy, to be known (and referred to in the Act) as a 'Safety Statement', based on the identification of hazards and assessment of risks and specifying the manner in which the safety, health and welfare at work of employees, and of all persons who work for or come into contact with the organisation shall be secured. This Safety Statement is designed to be a primary document which supports all areas of the Bank but must be read in conjunction with any other local/site specific Safety Statement and Risk Assessments, including other policies, protocols, guides, codes, and procedures, which may be individual or unique to that area.	Head of Shared Services	ESRS 2-MDR-P S1-MDR3

Policy	Description	Accountable for Implementation	Reference
Individual Accountability Framework (IAF) Conduct Standards Policy	The IAF Conduct Standards require CF role holders to take reasonable steps to adhere to the standards of conduct that the Bank (and by extension our customers and the CBI) expect from each of us. PTSB is obligated to establish, maintain, and give effect to policies on how the IAF Conduct Standards are integrated into the culture and conduct of the affairs of PTSB, as well as notify and train in-scope colleagues on how the IAF Conduct Standards apply to them. The IAF Conduct Standards Policy sets out the requirements across PTSB for the embedding of the IAF Conduct Standards. An IAF Conduct Standards Handbook has been prepared by PTSB which provides practical support to colleagues in understanding the concept of reasonable steps and guiding them in understanding the steps that are reasonable for them to take to uphold the relevant IAF Conduct Standards.	Head of Governance, Conduct and Planning (Retail Banking)	ESRS 2-MDR-P E1-2 S1-MDR1 G1-1
Information and Communication Technology (ICT) Risk Management Policy	The ICT Risk Management Policy sets out the minimum standards, key roles and responsibilities and governance arrangements for the management of ICT Risk across the Bank, with the focus and goal to protect the Bank's customers, employees, business and shareholders, and supporting the Bank to achieve its strategic objectives while managing IT Risk within the Board approved Risk Appetite tolerance levels. This document aims to set out the minimum requirements for the identification and assessment, management and mitigation, monitoring and reporting of ICT Risk across the Bank.	Head of Operational and IT Risk	S4-MDR2 G1-MDR1 E1-MDR4 S4-MDR1
Information Security Policy	The Information Security Policy sets out the requirements for the Bank to manage its information and information technology systems in a manner that appropriately protects the security of the information stored and processed in those systems. This includes the requirements for Bank staff, contractors and suppliers, who access PTSB's systems and information, to ensure IT systems are operated in alignment with Bank's risk appetite and the legal and regulatory environment that encompasses Bank activities.	Chief Information Security Officer (CISO)	ESRS 2-MDR-P S1-MDR1 S4-MDR1 G1-MDR1
Learning and Development Policy	The purpose of this policy is to ensure that induction, training and professional development are planned and delivered to a high standard consistently throughout the Bank, enabling colleagues to perform effectively in their current role and enabling them to develop their capability to progress to different and/or more senior roles in the future.	Head of Talent	ESRS 2-MDR-P S1-MDR1
Liquidity and Funding Risk Policy	The Policy details the Bank's focus on the identification, measurement, management and monitoring of Liquidity and Funding risk over an appropriate set of time horizons. This includes recognition of the impact of Physical and Transition risks that may impact liquidity and funding in the future.	Head of Financial Risk	ESRS 2-MDR-P E1-2
Lobbying Policy	The purpose of PTSB's Lobbying Policy is to outline the Bank's obligations regarding lobbying activities as related to the Regulation of Lobbying Act 2015 and the Lobbying Amendment Act 2023 (the 'Acts'). PTSB is registered as a lobbyist and, as such under the Acts, it must publish material details of its lobbying activities with certain categories of Designated Public Officials (DPOs) on the 'Register of Lobbying' (the Register). The Register is publicly available on the Lobbying.ie website and is maintained by the Standards in Public Office Commission.	Chief Sustainability and Corporate Affairs Officer	ESRS 2-MDR-P G1-1 G1-5
New Product Approval Policy	The Policy sets out the Bank's minimum requirements in relation to its New Product Approval Process. The policy defines what constitutes a 'new product', along with describing the processes, roles and responsibilities throughout the New Product Approval Process and throughout the life of the product, including product oversight and governance requirements, in respect of its retail and SME banking products.	Head of Operational and IT Risk	S4-MDR1 G1-MDR1 E1-MDR4

Sustainability Statement

ESRS 2 General Disclosures(continued)

Policy	Description	Accountable for Implementation	Reference
Operational Resilience Framework	PTSB's Operational Resilience Framework details the Bank's structured and systematic approach to managing operational resilience activities, with its key focus of ensuring that the Bank can withstand severe but plausible situations and recover effectively and efficiently from major disruptive events. The framework sets out high-level requirements to: identify, assess and manage critical business services to ensure the Bank can respond to disruptions in line with the agreed Impact Tolerance limits set, set clear resilience standards, governance and management structures to allow the key stakeholders to meet their roles and responsibilities effectively and, continuously improve the operational resilience of the Bank by identifying vulnerabilities and ensuring remediation to address those vulnerabilities is completed.	Head of Operational Resilience and Payments	ESRS 2-MDR-P E1-2 E1-MDR1 E1-MDR2
Operational Risk Management Policy	The Operational Risk Management Policy sets out the minimum standards, key roles and responsibilities and governance arrangements for the management of Operational Risk across the Bank, with the focus and goal to protect the Bank's customers, employees, business and shareholders, and supporting the Bank to achieve its strategic objectives while managing Operational Risk within the Board approved risk appetite tolerance levels. This policy aims to set out the minimum requirements for the identification and assessment, management and mitigation, monitoring and reporting of Operational Risk across the Bank.	Head of Operational and IT Risk	G1-MDR1 E1-MDR4 S4-MDR1
Operational and ICT Risk Framework	The purpose of the Operational and ICT Risk Framework is to outline the Bank's approach to managing Operational and ICT Risks and associated risk exposures. Additionally, this Framework outlines the specific governance structures and processes that enable the management of the Bank's Operational and ICT Risks, under the umbrella of the general risk management approach outlined in the Enterprise Risk Management Framework (ERMF). The Framework assists in identifying and addressing operational and technology risks at the enterprise level; integrating the management of ICT risk, information security and cyber risk into the overall Enterprise Risk Management processes; facilitating comprehensive, holistic, risk-informed decision making at the enterprise level; and guiding the enterprise risk response whenever an Operational or ICT Risk exceeds tolerance. In line with the ERMF, the Operational and ICT Risk Management documentation, including Frameworks, Policies and Processes, are critical to the safety and soundness of the Bank as well as the achievement of the Bank's strategy within its risk appetite. The Operational and ICT Risk Management Framework is supported by the Bank's Risk Appetite Framework and the Enterprise Risk Management Framework, risk policies and suite of risk procedures that are established pursuant to this Framework.	Head of Operational & IT Risk	ESRS-2-MDR-P E1-2 E1-MDR2-P
Our Culture Charter	Our Culture Charter sets out our Purpose, Values and Beliefs that guide colleague interactions to support the delivery of our Ambition. It ensures that all colleagues have a consistent understanding of our culture and the expectations of them, as well as reflecting our evolved Purpose and Ambition, and our Brand Promise. Our Culture Charter is reviewed annually under our Prescribed Responsibility, Culture and Diversity Equity and Inclusion Reasonable Steps Approach and is a core cultural artefact for the Bank.	Head of People	ESRS-2-MDR-P S1-1 G1-1

Policy	Description	Accountable for Implementation	Reference
Protected Disclosures Procedures (for Disclosers and Discloser Recipients)	The purpose of the Protected Disclosures Procedures (for disclosers and discloser recipients) is to provide clear guidance on how to raise a Protected Disclosure under the Speak Freely Procedure. The Protected Disclosures Procedures (for discloser and discloser recipients) should be read in conjunction with the Speak Freely Procedure. Our colleagues must feel confident to raise any concerns they have and must have assurance of protection under the scope of the Speak Freely Procedure and, if applicable, the Protected Disclosures (Amendment) Act 2022. The Protected Disclosures Procedures (for discloser and discloser recipients) are also in line with our Conduct Risk Appetite. Together these documents provide clarity to any colleague who makes a protected disclosure ('discloser') and confirms that their confidentiality will be respected, disclosures will be taken seriously, and appropriate investigations will be undertaken. It also provides guidance for People Managers and Nominated Internal Recipients of disclosures on how to handle disclosures received ('discloser recipients').	Head of People	ESRS 2-MDR-P S1-MDR1 S4-1 G1-2 G1-MDR2
Regulatory Compliance Framework	The Regulatory Compliance Framework supports the Bank in achieving its strategic priorities while managing regulatory compliance risks within the Board approved Regulatory Compliance Risk Appetite. In addition, it sets out how the Bank manages current and emerging Regulatory Compliance risk (including CR&E risk) and details the key principles, objectives, and primary components of PTSB's approach to Regulatory Compliance Risk Management and sets out Regulatory Compliance Risk Management responsibilities across the Three Lines of Defence Model.	Head of Compliance	ESRS 2-MDR-P E1-MDR3 E1-MDR4
Remuneration Policy	The Remuneration Policy sets out how the remuneration components used by PTSB operate. It applies to all remuneration components which may be received by any employee, director (including non-executive directors), but excluding any staff seconded from a third party. It applies across the whole of PTSB including all operations and legal entities.	Head of People Operations	ESRS 2-MDR-P S1-MDR1
Reputational Risk Framework	The Reputational Risk Policy defines the specific governance structures and processes, for managing PTSB's Reputational Risk, under the umbrella of the general risk management approach outlined in PTSB's ERMF.	Head of Compliance	ESRS 2-MDR-P E1-MDR-4 G1-1 G1-3
Reputational Risk Policy	The purpose of the Bank's Reputational Risk Policy is to define the minimum requirements and accountabilities for PTSB employees with regards to Reputational Risk. The policy supports the Bank in understanding the role every colleague plays in impacting the Bank's reputation, and the risks associated with same.	Chief Sustainability and Corporate Affairs Officer	ESRS 2-MDR-P E1-MDR-4 G1-1 G1-3
Residential Mortgage Lending Policy	The Residential Mortgage Lending Policy provides guidance on minimum standards that must be met and applied to all aspects of Residential Mortgage lending. This includes requirements for Retail Mortgage customers to demonstrate insurance cover for Physical Risk impacts (for example, flooding and subsidence).	Chief Credit Officer	ESRS 2-MDR-P E1-2 E1-MDR3 E1-MDR4

Sustainability Statement

ESRS 2 General Disclosures(continued)

Policy	Description	Accountable for Implementation	Reference
Sanctions Policy	The Bank's Sanctions Policy is in place to outline how the Bank adheres to applicable Sanctions regulations and how it manages the associated risk. Sanctions emanate from supranational or international bodies such as the European Union (EU), the United Nations (UN). As an Irish financial services provider, PTSB is legally obliged to adhere to sanctions emanating from the EU and UN. National governments can impose their own sanctions such as the UK and the US (Office of Foreign Assets Control (OFAC). In line with industry practise in Ireland, PTSB adheres to UK and US sanctions. The Bank has no appetite for breaches of these Sanctions regulations and will not knowingly provide banking services to persons, entities, or countries where the provision of such service would constitute a breach of these sanctions' regulations.	Head of Financial Crime Compliance and Money Laundering Reporting Officer	ESRS-2-MDR-P S1-MDR1 G1-1 G1-1 G1-MDR1
Senior Executive Accountability Regime (SEAR) Policy	The SEAR is designed to improve governance, performance and accountability in Financial Services firms by obliging firms and colleagues in Pre-Approved Controlled Function (PCF) roles to clearly document where responsibility and decision-making lie in the firm. This promotes a culture of accountability within PTSB. The PTSB SEAR Handbook outlines how SEAR operates within PTSB and sets out the steps that PCFs, their teams and all relevant stakeholders must take to manage the obligations under SEAR. The SEAR Regulations include a number of Prescribed Responsibilities (PRs) which must be allocated to a PCF role holder. The CEO has allocated Prescribed Responsibility 24 (PR24) 'responsibility for managing financial risks from climate change' to the CRO under SEAR.	Head of IAF Governance and Operations	ESRS 2-MDR-P G1-1 G1-3
Smart Working Framework	The Smart Working Framework aims to bring different types of Flexible, Smart and Home Working policies under one framework for Colleagues within the Bank. The framework outlines PTSB's smart working options available to employees and how those options can be requested. It also outlines the factors that influence the approval of requested smart working arrangements and the steps available to employees if their request is not approved. Aligned to the Workplace Relations Commission's 'Code of Practice for Employers and Employees Right to request Flexible Working and Right to Request Remote Working', PTSB's Smart Working Framework has been reviewed to ensure compliance with this Code of Practice.	Head of People	ESRS 2-MDR-P E1-MDR1 E1-MDR2 S1-MDR1
Sourcing and Procurement Policy	The Bank's Sourcing and Procurement Policy is aimed at providing an understanding of the process requirements for the purchase of goods, services or works on behalf of the Bank, to ensure compliance to internal governance and associated regulations, and to ensure the selection of the most competitive suppliers based on commercial and technical capability, aligned to the Bank's priorities.	Head of Sourcing	ESRS 2-MDR-P G1-2 G1-MDR 2
Speak Freely	To support the cultural evolution of PTSB, the Bank has developed an alternative approach to simplifying and clarifying the channels by which an employee can speak up and raise a concern; namely, Speak Freely. Speak Freely, and associated procedures, protects employees who wish to make a protected disclosure, relating to an actual or potential wrongdoing in the workplace. The Bank has in place procedures to deal with any protected disclosures that may arise as part of Speak Freely and reports to the Board and Executive Committee on a half-yearly basis.	Head of People	ESRS 2-MDR-P S1-MDR1 S4-1 G1-2 G1-MDR2
Stakeholder Engagement Policy	The Bank's Stakeholder Engagement Policy encompasses our overarching approach to stakeholder engagement in PTSB, from who we identify as our stakeholders, to the processes currently in place to ensure that they are genuinely involved and considered in key decisions.	Chief Corporate Affairs and Sustainability Officer	ESRS 2-MDR-P G1-MDR2 G1-MDR 3

Policy	Description	Accountable for Implementation	Reference
Succession Planning Policy	Succession Planning is the process by which PTSB identifies and develops in a planned manner, the pipeline of individuals whose performance and potential marks them out as 'next-in-line' for specific roles or levels across the Bank. The objective of the policy is to document the standards that apply to the succession planning process in the Bank.	Head of Talent	ESRS 2-MDR-P S1-MDR1
Supplier Relationship Management Standards	The Bank's Supplier Relationship Standards detail the requirements to staff managing Third Party arrangements, generally described a 'Supplier Relationship Management'. The Standards outline the activities that must be carried out by the business area/or specifically the identified contract owner to comply with the Third Party Risk Management Policy and other associated Policies that outline obligations in relation to Third Party Management.	Head of Third Party Management	ESRS 2-MDR-P G1-MDR2 G1-MDR3
Sustainable Supplier Charter	The Sustainable Supplier Charter sets out the Bank's expectations of suppliers and acts as a 'Code of Conduct' detailing what is expected from all suppliers with regard to business practice and responsibilities as a supplier to PTSB. The Bank has categorised the charter into the following 7 core areas, in line with ISO 20400 which outline our expectations of suppliers of PTSB. They include: • Environmental • Human Rights • Operating Practices • Labour practices • Supply Chain • Social • Health, Safety and Wellbeing	Head of Sourcing	ESRS 2-MDR-P E1-2 E1-MDR1 G1-2 G1-MDR2 G1-MDR3
Third Party Management Framework	The Bank's Third Party Management Framework provides guidance relating to the Third Party Management Lifecycle on the necessary steps for stakeholders planning to engage in Third Party arrangements.	Head of Operational Resilience	ESRS 2-MDR-P G1-MDR2 G1-MDR3
Third Party Outsourcing Strategy	The Bank's Third Party and Outsourcing Strategy is designed to set out the appetite for outsourcing in line with the Bank's Business Strategy and the overall Risk Appetite. The goal is to leverage outsourcing, where appropriate, to enable the successful delivery of the Bank's Business Strategy.	Head of Operational Resilience	ESRS 2-MDR-P G1-MDR2 G1-MDR3
Third Party Risk Management Policy	The Bank's Third Party Risk Management Policy sets out the approach and minimum requirements, clear accountability and roles and responsibilities, for the consistent, continuous, and effective identification and mitigation of the risks associated with Third Party (including outsourcing) engagements across the Bank.	Head of Operational and IT Risk	ESRS 2-MDR-P G1-MDR2 G1-MDR3

Minimum Disclosure Requirements

The Bank has outlined additional information based on its material IROs in relation to its Policies, Actions, Metrics and Targets in the MDR sections. Please refer to the associated MDR-P, MDR-A, MDR-M and MDR-T sections below.

ESRS E1 Climate Change



Disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)

Strategy

E1-1 Transition plan for climate change mitigation

PTSB acknowledges that climate change is a source of financial stability risk and recognises the important role that the Bank plays in supporting our customers and broader Irish society in navigating the transition to a low carbon economy.

In 2025, PTSB was pleased to introduce its refreshed Sustainability Strategy 2025-2027 in response to evolving market conditions and to reinforce our commitment to long-term sustainable growth. Through delivery of the objectives set out within the strategy, the Bank is committed to further integrating sustainability into all areas of our business by channelling investment and directing our impact towards areas that enhance societal wellbeing. This includes consideration for Environmental, Social & Governance (ESG) risk, which includes a focus on Climate-related and Environmental (CR&E) risks and opportunities.

PTSB has an overarching Integrated Strategic Plan (ISP), which brings together the Bank's three-year strategic direction, financial plan and change delivery roadmaps. The ISP sets out the Bank's core priorities over a medium-term time horizon and considers the needs of all our stakeholders. Through the ISP, PTSB channels its investment and resources into the initiatives that will support and accelerate delivery of the Bank's strategy in a safe and compliant manner.

During 2025, the Bank has made progress in further embedding sustainability into strategy delivery and execution. The implementation of a new strategy performance review process on a bi-annual basis ensures that sustainability-related key performance indicators (KPIs) (within our broader suite of Business Strategy KPIs) are reviewed, challenged and progress and/or interventions are reported at Board level. In addition, members of our Sustainability team play an active role in the Bank's Strategic Planning Process (the process through which the ISP is developed and refreshed) to ensure that due consideration is being given to sustainability-related issues during the strategy development process and the resulting change delivery portfolio.

Following a programme of work, during 2025 the Bank developed our science-based targets (SBTs) in line with the Science Based Target initiative's (SBTi) Version 2 Guidance for Financial Institutions. This work included the development of a corresponding Carbon Reduction Plan to support us in achieving our targets.

The SBTi provide a pathway for companies to reduce greenhouse gas emissions, aiming to mitigate the impacts of climate change while ensuring sustainable business growth. Targets are deemed 'science-based' when they align with the latest climate science necessary to limit global warming to 1.5°C above pre-industrial levels, as outlined in the Paris Agreement.

The Targets were validated by the SBTi organisation during 2025 and are outlined below:

- Scope 1: Reduce absolute scope 1 GHG emissions 42% by 2030 from a 2023 base year.
- Scope 2: Continue active annual sourcing of 100% renewable electricity¹ from 2023 through 2030.
- Scope 3: Reduce all in-use operational GHG emissions from the Bank's Mortgage Loan Portfolio² 51.5% per square meter by 2030 from a 2023 base year.

1. 100% renewable energy denote the use of renewable energy certificates supplied by the energy provider, recognising that under the structure of the Irish gross pool electricity market, suppliers cannot procure electricity that is physically sourced exclusively from renewable generation.
2. Targets set on Residential Mortgage Loan Portfolio only.

For more on the Bank's SBT's, please refer to E1-4.

As of the 31 December 2025, the Bank does not have a Climate Transition Plan in place. In line with the European Banking Authority's (EBA) Guidelines on the Management of ESG Risk, PTSB will be developing an ESG Transition Plan over the short to medium-term. Consideration for climate, as well as the Bank's SBT's and Carbon Reduction Plan commitments, will form a key element of our ESG Transition Plan once developed.

Material impacts, risks and opportunities and their interaction with strategy and business model

PTSB's Double Materiality Assessment (DMA) identified Climate-related and Environmental (CR&E) risk as a material risk for the Bank.

CR&E risk is a Key Risk Category defined within the Bank's Enterprise Risk Management Framework (ERMF) of which there are two sub-risk categories, Physical Risk and Transition Risk. Both sub-risk types may act as a driver that impacts the financial services sector to varying degrees over a range of plausible climate scenarios, across the short, medium and long-term.

The Physical and Transition Risk definitions outlined within the ERMF include:

Physical Risk

Physical Risk, the risk of economic cost and financial losses resulting from the increasing severity and frequency of:

- Acute Physical Risk - arises from extreme weather events, such as floods, storms, droughts, heatwaves; and,
- Chronic Physical Risk - arises from longer-term gradual shifts in climate patterns, such as increasing temperatures, sea-level rises, water stress, biodiversity loss, land use change, habitat destruction and resource scarcity.

Transition Risk

The risk of economic cost, financial loss or an adverse outcome related to the process of adjustment towards a low-carbon and more environmentally sustainable economy. Transition to a low-carbon economy may require substantial policy, legal, technology and market changes. These changes may result in a financial loss and reputational risk to organisations, with the severity of this depending on the scope and speed of change required.

Transition Risk may include:

- Policy Risks that come with the evolution of policies and regulations that promote the adaptation to a less carbon intensive and more sustainable economy; and those that constrain actions that lead to climate change and harm the environment.
- Legal Risks that relate to litigation claims against institutions and their representatives who fail to mitigate and adapt to climate change, and who fail to disclose material climate and environmental information;
- Market Risks that arise through changing demand and supply for commodities, products and services; and,
- Reputation Risk that relates to the changing stakeholder perception of institutions' commitments to, or detraction from, the transition to a lower-carbon economy.

The impacts of climate change are predicted to occur over longer time horizons than the typical cycle of financial institutions' analysis and forecasting. To ensure a meaningful assessment of CR&E risk, a review of the Bank's existing defined time horizons was conducted, considering the European Central Bank's (ECB) guidance on good practice, industry peers and internal processes, resulting in the below time horizons being applied within the Bank's CR&E Risk Materiality Assessment.

The time horizons utilised in our assessments are outlined below:

Assessment Time Horizon*	Short-term	Medium-term	Long-term
Double Materiality Assessment (Sustainability Statement)	0-1 years	1-5 years	5+ years
Climate-Related and Environmental Risk	0-3 years	3-5 years	5+ years

* The Bank recognises that the time horizons that it uses for CR&E risk are not aligned to the Double Materiality Assessment (DMA) time horizons disclosed within the Sustainability Statement. The time horizons are not aligned given that the timelines set out by regulation are different. The Bank will review the opportunity to align time horizons as part of future risk review cycles, in line with regulation and as appropriate.

In 2025, the Bank's CR&E Risk Materiality Assessment was reviewed. The review included a detailed assessment of the potential impacts of CR&E risk upon the Gross Risk Profile of the Bank across the Key Risk Categories defined in the ERMF. Building on the foundations set in previous cycles, the approach used a blend of qualitative and quantitative information by reviewing the risk identified and applying a more granular lens to materiality ratings to understand the potential impact for the Bank. It included detailed descriptions of the relevant transmission channels between Physical and Transition Risk drivers and Risk Categories as defined in the ERMF.

The below table provides a description of defined CR&E risk drivers used to identify CR&E risk transmission channels. For the purposes of this assessment, the following definition of CR&E risk transmission channels was used: "the causal impact chains that explain how CR&E risk drivers give rise to the financial risks faced by PTSB (directly or indirectly)."³

3. Basel Committee on Banking Supervision, 2021, 'Climate-related risk drivers and their transmission channels' (<https://www.bis.org/bcbps/publ/d517.pdf>)

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ESRS E1 Climate Change (continued)

ERMF Sub-Risk	Driver	Description
Physical Risk	Acute	Increased severity or frequency of extreme weather events and subsequent impacts such as flooding and storms.
	Chronic	Long-term gradual shifts to climate patterns and subsequent impacts such as, sea-level rise, temperature rises, and coastal erosion.
Transition Risk	Policy & Regulation	Changes to external policy and regulation to support the transition towards a low-carbon economy and other climate impacts.
	Technology	Technological advancements that enable the transition towards a low-carbon economy that may impact business competitiveness or resilience.
	Behaviour & Sentiment	Changes to behaviour and sentiment (consumers, investors, suppliers, third parties, and wider market) related to the transition towards a low-carbon economy that may impact demand for certain products, services, and performance.

As part of the review of PTSB's CR&E Risk Materiality Assessment in 2025, the Bank completed a qualitative review of Nature-related risk. The assessment considered how changes to nature and biodiversity could result in additional risk for the Bank using Physical and Transition sub-risk drivers. This review was conducted through the lens of how the Bank's value chain interfaces with nature (for example, the natural world and the ecosystems that underpin the economy, spanning both living and non-living components across land, air, water and biodiversity). Nature-related risk is relevant for the Bank; however, no new material risks were identified as part of this assessment.

Currently, the Bank has not yet formally implemented climate-related scenario analysis to assess the resilience of its Business Strategy. However, in accordance with the requirements set out in the EBA's Guidelines on the Management of ESG Risk and the EBA's Guidelines on Environmental Scenario Analysis, the Bank will enhance its capabilities in this area as part of the delivery of its ESG Risk Action Plan.

During 2025, CR&E risk was measured as part of the Bank's Operational and IT Risk Pillar 2 Internal Capital Adequacy Assessment (ICAAP). A CR&E Physical Risk standalone sub-scenario was assessed through a business disruption scenario, in respect of non-financial risk impacts. The outputs of this scenario analysis are used as an input to the overall Bank's Operational and IT Risk Pillar 2 ICAAP assessment, contributing to the determination of the level of capital held to absorb potential climate and environmental related operational losses.

In addition, the potential impact of CR&E risk was assessed as part of Credit risk sensitivities within the 2025 ICAAP. As part of this assessment a range of possible scenarios were considered, and sensitivity analysis was presented. This sensitivity analysis showed that the expected quantum of climate-related Credit risk is likely to be immaterial over the short-term. The Bank has considered this impact and have deemed that the overall Expected Credit Loss (ECL) as of the 31 December 2025 is appropriate.

CR&E risk was also evaluated within the Bank's Internal Liquidity Adequacy Assessment Process (ILAAP). The evaluation incorporated a quantitative analysis of CR&E risk, including the assessment of the impact of adverse (Network for Greening the Financial System (NGFS)) macroeconomic scenarios linked CR&E risk on the Bank's Deposit Portfolio and the Sovereign Bond Portfolio within the Liquidity Buffer.

The Bank has in place an ESG Risk Action Plan, which includes a focus on further integrating consideration for CR&E risk into the 2026 ICAAP and ILAAP further, through improved benchmarking, data collection and analytical capabilities.

Impact, risk and opportunity management

Description of the processes to identify and assess material climate-related impacts, risks and opportunities

Beyond the DMA, PTSB has not undertaken a formal process to screen activities to identify actual and potential future Greenhouse Gas (GHG) emission sources.

The Bank has assessed its actual impact on climate change (for example, its GHG emissions). For an overview of the methodology and outcome of this assessment, please refer to E1-4.

In 2025, the Bank reviewed its CR&E Risk Materiality Assessment to assess the potential impacts of CR&E risk upon the Gross Risk Profile of the Bank across the Key Risk Categories defined in the ERMF. Please refer to the Material impacts, risks and opportunities and their interaction with strategy and business model section above for more information regarding the assessment.

Additional Physical CR&E risk analysis has been performed on the Bank's Mortgage Portfolio in line with Pillar 3 ESG disclosure requirements. PTSB first assessed the most material types of Climate-related Physical Risks for our Mortgage Portfolio, with primary risk types determined to correspond to coastal, fluvial and pluvial flooding events.

In addition, the Bank has assessed sensitivity to climate change physical events using JBA Flood Risk Scores. Collaterals have been mapped to a geolocation-based flood score that considers the likelihood, severity, and type of flooding events under different scenarios and time periods. The findings have guided and informed a programme of work aimed at supporting customers while mitigating the Bank's Flood risk exposure.

For the completion of Pillar 3 Template 5, the Bank has considered 'Very High Risk' Flood Scores covering the period up to 2050 under the 'RCP8.5' scenario (which forecasts a global temperature increase of c. 5°C above pre-industrial levels by 2100).

For more on the Climate-related Impacts and Opportunities that were identified as part of the Bank's DMA, please refer to ESRs 2-SBM-3-1.

At present, the Bank does not yet formally use climate-related scenario analysis to identify Transition Risk over the short, medium and long-term.

Through the embedding of CR&E risk within the established ERMF structure and risk categories, CR&E risk is considered as integrated across the 3LOD model of risk management. Each line of defence performs its duties by identifying and assessing CR&E risk, analysing the

relevance of risks, evaluating the impact on the Bank's operations and business and formulating control measures and response strategies.

The First Line of Defence (1LOD Business Units and Functions) undertake frontline commercial and operational activities and their support function are responsible for identifying, owning, managing, monitoring, and mitigating CR&E risk.

The Second Line of Defence (2LOD Risk and Compliance Function) ensure that all CR&E risks are identified, assessed, measured, monitored, managed, and properly reported on by the relevant Business Units from across the Bank.

As the Third Line of Defence (3LOD), Group Internal Audit provide independent assurance to the Board over the adequacy, effectiveness and sustainability of the Bank's internal control, risk

management and governance systems and processes, thereby supporting both the Board and Senior Management in promoting effective and sound risk management and governance across the Bank, in relation to CR&E risk.

E1-2 Policies related to climate change mitigation Policies

Details of the Bank's frameworks and policies and how they address climate change mitigation, energy efficiency and energy that is certified as renewable deployment are stated below:

Policy	Climate Change Mitigation	Energy Certified as Renewable Deployment	Energy Efficiency
Climate-related & Environmental (CR&E) Risk Management Framework	✓		
Individual Accountability Framework (IAF) Conduct Standards Policy	✓	✓	✓
Business Lending Credit Policy	✓		
Residential Mortgage Lending Policy	✓		
Liquidity and Funding Risk Policy	✓		
Environmental Policy Statement	✓	✓	✓
Green Product and Proposition Design Principles	✓		✓
Sustainable Supplier Charter	✓		
Operational and ICT Risk Framework	✓		
Operational Resilience and Continuity Risk Policy	✓		
Green Bond Framework	✓		

For more information on policy contents and objectives, as well as the most senior level role in PTSB accountable for the implementation, please refer to ESRs 2-MDR-P.

E1-3 Actions and resources in relation to climate change policies

Actions

The Bank has allocated resources and undertaken actions regarding climate change mitigation as follows and as outlined in the four E1-MDR-As below.

Sustainability Statement

ESRS E1 Climate Change (continued)

Where appropriate, climate change mitigation matters are integrated across governance mechanisms within the Bank. A CR&E Risk Management Framework has been developed that is linked to the Bank's ERMF. Throughout 2025, the Bank has continued to integrate these matters into relevant policies, as appropriate.

Further to this, the Bank has in place an overarching three-year strategic and financial plan for the Bank - The Integrated Strategic Plan (ISP).

The Plan sets out the core priorities of the Bank and considers the needs of our stakeholders. PTSB channels its investment and efforts into the activity required to deliver on the strategic initiatives that have been agreed within the plan.

For more information on how sustainability is considered within the Bank's ISP, please refer to ESRS 2-IRO1.

In addition, the Bank has invested in resources to deliver on its sustainability objectives, which includes the appointment of a Chief Sustainability and Corporate Affairs Officer and a Head of Sustainability and supporting team.

The Bank has identified the following climate change mitigation actions:

Risk Management

The Bank follows a Three Lines of Defence Model for CR&E risk, as outlined above.

Sustainability Governance

For more information on Sustainability Governance, please refer to ESRS 2-GOV-1.

Emissions Measurement and Monitoring

PTSB adopts best practice in relation to the measurement of its carbon emissions across Scope 1, 2 and 3 using the Greenhouse Gas (GHG) Protocol. In the measurement of the Bank's Scope 3 (financed emissions) the Partnership for Carbon Accounting Financials (PCAF), Financed Emissions Standard is utilised. Limited assurance is undertaken on the Bank's full carbon footprint by the Bank's assurance provider.

Setting GHG Emissions Reduction Targets

Over the last number of years, we have continued to focus on improving our data and have completed a comprehensive assessment of the Bank's emissions across Scope 1, Scope 2 and Scope 3, including our financed emissions. This has enabled the establishment of a carbon baseline for the organisation, by which the Bank's SBTs have been developed. PTSB's carbon baseline has been established using FY2023 energy consumption and carbon emissions data.

Please refer to E1-4 for further information on the Bank's SBTs and wider carbon management programme.

Lending Policies

PTSB has in place a Business Lending Credit Policy which states that finance must not be provided to borrowers that engage in a list of Excluded Business Activities which the Bank deem to contribute to irreversible environmental and/or social harm to society. This includes areas such as non-renewable energy (for example, extraction of gas, oil or coal), unnecessary deforestation or the sale of weapons. Meeting the requirements set out in the Policy is a condition of doing business with PTSB.

PTSB's Business Lending Credit Policy requires that all credit applications include commentary on how ESG factors are likely to impact the applicant's future business performance.

In addition, PTSB has in place a Residential Mortgage Lending Policy that outlines the requirement for the Bank's Retail Mortgage customers to demonstrate insurance cover for Physical Risk impacts (for example, flooding).

As part of the development of the Bank's ISP, financial investment and resources are allocated to the delivery of sustainability-related activities. PTSB has not disclosed these figures publicly.

Environmental, Social and Governance (ESG) Due Diligence

The Bank has established an ESG Questionnaire (ESGQ) for Business Banking customers. The ESGQ forms part of the loan origination process for small and medium-sized enterprises (SME) lending applications of €250,000 and above and includes climate change mitigation related questions. Information gathered supports the assessment of chronic physical risks (such as coastal erosion) and the impact of emissions, facilitating the integration of CR&E risk into credit lending decisions.

Product Development

PTSB has in place a Green Mortgage offering, a 5-Year and 3-Year Fixed Rate Product available to all new and existing home loan customers, where their homes have a confirmed or proposed BER of A1 to B3. In addition, the Bank participates in the Strategic Banking Corporation of Ireland's (SBCI) Home Energy Upgrade Loan Scheme, aimed at supporting eligible applicants who wish to invest and improve in the energy efficiency of a residential property and the SBCI's Growth and Sustainability Loan Scheme which focuses on providing eligible businesses with long-term financing to enhance their growth and sustainability efforts. In early 2026, the Bank launched a Home Upgrade Tool which allows homeowners to plan the specific home energy upgrade options suitable for their home based on their Building Energy Rating (BER).

Procurement

Sustainable Sourcing and Procurement is at the heart of the Bank's Sustainability Strategy and ensuring that we purchase goods and services and engage with our suppliers in a sustainable way is fundamental to its delivery. Our Sourcing and Procurement Policy sets out a framework for engaging with our suppliers, including a commitment to procure goods and services from suppliers who can support the needs of our business in a sustainable manner. The policy is supported by our Sustainable Supplier Charter, which sets out our expectations of suppliers and acts as a 'Code of Conduct' detailing what is expected from all suppliers regarding business practice and responsibilities as a supplier to PTSB. We have categorised our Sustainable Supplier Charter into 7 core areas, in line with ISO 20400 which outline our expectation, including Environmental matters.

Disclosures

The Bank reports its climate-related disclosures in line with its supervisory expectations as part of Pillar 3 and the Sustainability Statement. In addition, the Bank voluntarily discloses through CDP (formerly the Carbon Disclosure Project) each year.

In alignment with the EU Taxonomy requirements, below are the key performance indicators (KPIs) that reflect the Bank's commitment to sustainability through the measurement of Taxonomy-eligible and Taxonomy-aligned activities.

Green Asset Ratio (GAR)

GAR KPI Stock: This metric represents the total value of assets or investments that are classified as Taxonomy-eligible or Taxonomy-aligned at a specific point in time. It provides a snapshot of the Bank's exposure to economic activities that meet the criteria set out in the EU Taxonomy, reflecting the cumulative value of such activities within the Portfolio.

GAR KPI Flow: This metric captures the value of new investments or activities that are classified as Taxonomy-eligible or Taxonomy-aligned over a defined reporting period. It highlights the Bank's ongoing commitment to supporting sustainable economic activities and demonstrates the transition towards a greener Portfolio by tracking the inflow of eligible investments during the reporting cycle.

Main KPIs and Additional KPIs

2025

		Total environmentally sustainable assets	KPI ****	KPI *****	% coverage (over total assets) ***	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2. of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)
Main KPI	Green asset ratio (GAR) stock	1849	7.62%	7.62%	6.01%	7.10%	21.18%
Additional KPIs	GAR (flow)	382	11.85%	11.85%	8.32%	6.29%	29.79%
	Trading book*	-	-	-			
	Financial guarantees	-	-	-			
	Assets under management	-	-	-			
	Fee and commissions income **	-	-	-			

* For credit institutions that do not meet the conditions of Article 94(1) of the CRR, or the conditions set out in Article 325a(1) of the CRR

** Fees and commissions income from services other than lending and AuM. Institutions shall disclose forward looking information for this KPIs, including information in terms of targets, together with relevant explanations on the methodology applied

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

**** Based on the Turnover KPI of the counterparty

***** Based on the CapEx KPI of the counterparty, except for lending activities where for general lending Turnover KPI is used

Note 1: Fees and Commissions (sheet 6) and Trading Book (sheet 7) KPIs shall only apply starting 2028. SME inclusion in these KPIs will only apply subject to a positive result of an impact assessment

Note 2: Taxonomy aligned properties built before 31st December 2020, must have an Energy Performance Certificate (EPC) rating in the top 15% of the national or regional building stock. To identify the top 15% of the most energy efficient buildings within the national or regional building stock, as per the EU Taxonomy and associated technical screening criteria, we used energy ratings data from the Central Statistics Office (CSO) representing approximately 77.6% of Ireland's housing stock. Based on this weighted national dataset, the Bank estimated the top 15% threshold corresponded to a BER rating of B2 or higher for 2025 reporting (2024: B3 or higher). PTSB has adopted this B2 threshold to identify the properties with a valid EPC certificate within the residential mortgage portfolio that meet this technical screening criteria.

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ESRS E1 Climate Change (continued)

2024

		Total environmentally sustainable assets	KPI ****	KPI *****	% coverage (over total assets) ***	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2. of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)
Main KPI	Green asset ratio (GAR) stock	1854	7.98%	7.98%	6.32%	6.42%	20.82%
Additional KPIs	GAR (flow)	360	14.80%	14.80%	9.61%	7.48%	35.07%
	Trading book*	-	-	-			
	Financial guarantees	-	-	-			
	Assets under management	-	-	-			
	Fee and commissions income **	-	-	-			

* For credit institutions that do not meet the conditions of Article 94(1) of the CRR, or the conditions set out in Article 325a (1) of the CRR

** Fees and commissions income from services other than lending and AuM. Institutions shall disclose forward looking information for this KPIs, including information in terms of targets, together with relevant explanations on the methodology applied

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

**** Based on the Turnover KPI of the counterparty

***** Based on the CapEx KPI of the counterparty, except for lending activities where for general lending Turnover KPI is used

Note 1: Fees and Commissions and Trading Book KPIs shall only apply starting 2028. SME inclusion in these KPIs will only apply subject to a positive result of an impact assessment.

For the 31 December 2025 disclosure, the Bank has reviewed the book for exposures to nuclear gas related and fossil gas related activities based on the questionnaire provided in Annex XII Template 1. PTSB has no exposures to these activities as of the 31 December 2025 or 31 December 2024.

The Bank reviewed the book for exposure based on the below questionnaire provided in Annex XII Template 1.

Nuclear gas related activities		
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	No
2.	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	No
3.	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	No
Fossil gas related activities		
4.	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	No
5.	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	No
6.	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	No

Metrics and targets

E1-4 Targets related to climate change mitigation

Targets

As outlined in E1-1, during 2025 the Bank developed its SBTs.

The Bank's SBTs were validated by the SBTi during 2025 and are outlined below:

- Scope 1: Reduce absolute scope 1 GHG emissions 42% by 2030 from a 2023 base year.
- Scope 2: Continue active annual sourcing of 100% renewable electricity¹ from 2023 through 2030.
- Scope 3: Reduce all in-use operational GHG emissions from the Bank's Mortgage Loan Portfolio² 51.5% per square meter by 2030 from a 2023 base year.

1. 100% renewable energy denote the use of renewable energy certificates supplied by the energy provider, recognising that under the structure of the Irish gross pool electricity market, suppliers cannot procure electricity that is physically sourced exclusively from renewable generation.
2. Targets set on Residential Mortgage Loan Portfolio only.

The GHG Protocol Corporate Standard was used to calculate the Bank's carbon footprint. The process involved the following steps:

Setting Boundaries:

- PTSB employs the GHG Protocol methodology to establish the organisational boundaries for its GHG inventories. The calculation of its carbon footprint adopts an operational control approach, allowing PTSB to account for 100% of Scope 1 and Scope 2 emissions from operations where it has full authority to implement operating policies.
 - To effectively define its Portfolio Target Boundary, the Bank has ensured that its targets collectively cover at least 67% of its relevant activities.⁴
 - PTSB analysed the proportion of its total investment and lending activities to assess these boundaries. The
4. SBTi's Version 2 Guidance for Financial Institutions

calculation's denominator includes all 'Required Activities' and 'Optional Activities', while the numerator consists of activities covered by the targets. The Bank set boundaries to determine what was in and out of scope for the purpose of target setting in accordance with the SBTi's Framework.

Establishing a Baseline for Targets:

- Following a programme of work, the Bank established a carbon baseline for the organisation on which its SBTs were developed. The baseline uses FY 2023 energy consumption and associated carbon emissions data to calculate Scope 1, 2 and 3 (Residential Mortgage Portfolio) emissions. Baseline emissions represent the recorded GHG emissions before any reduction strategies are implemented, serving as a reference point for measuring current and future emission reductions.

Progress towards our SBTs:

The Bank's performance against its SBTs is outlined below.

Emission Source	Target Year 2030	Baseline Year 2023	Current Year 2025	Performance	Commentary
Scope 1 (tCO ₂ e)	Reduce absolute scope 1 GHG emissions 42% by 2030 from a 2023 base year	841	937	+11.4%	The increase can be attributed to an increase in Natural Gas emissions since 2023. We expect emissions to reduce year-on-year as a result of the upgrade of the Bank's heating and cooling systems at our Head Office location. In addition, petrol emissions have also increased, however the Bank's combined petrol and diesel emissions are reducing as we complete the migration to a hybrid-petrol fleet and move away from the use of diesel vehicles. Carbon Reduction Plan Activity The Bank commits to reducing emissions in the short- to medium-term through: • Migration of the Bank's vehicle fleet from diesel to hybrid-petrol (the migration is c.95% complete as of the 31st December 2025) • Upgrading the Bank's heating and cooling systems to more energy efficient options at our Head Office location. Work commenced during 2025 and will reach completion during 2026.
Scope 2	Continue active annual sourcing of 100% renewable electricity ¹ from 2023 through 2030	100%	100%	Achieved	Carbon Reduction Plan Activity The Bank continues to procure electricity certified as 100% renewable.

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ESRS E1 Climate Change (continued)

Emission Source	Target Year 2030	Baseline Year 2023	Current Year 2025	Performance	Commentary
Scope 3 (kgCO ₂ /m ²)	Reduce Residential Mortgage emissions 51.5% per square meter by 2030 from a 2023 base year	40.83	39.37	-3.6%	Although the Bank's financed emissions are trending in the right direction, we are behind our SBT by c.12%. Internal factors within the Bank's control are currently performing above target. External factors outside the Bank's control (including national decarbonisation targets and Government housing targets) are not being met. Carbon Reduction Plan Activity - PTSB is committed to continuing to advance green product and proposition development and the provision of support for customers on their sustainability journey through our green products and propositions, including our Green Mortgage Product, participation in the SBCI's Home Energy Upgrade Loan Scheme and through introduction of our Home Upgrade Tool, which launched in early 2026. - During 2025, Green Mortgage Lending⁵ was c.€1.26bn (+44% YoY, accounting for 44% of New Mortgage Lending).

- 100% renewable energy denote the use of renewable energy certificates supplied by the energy provider, recognising that under the structure of the Irish gross pool electricity market, suppliers cannot procure electricity that is physically sourced exclusively from renewable generation. 100% renewable
- PTSB's Green Mortgage Product is defined as a 3-Year and 5-Year Fixed Rate Product available to all new and existing home loan customers, where their homes have a confirmed or proposed Building Energy Rating (BER) of A1 to B3 (inclusive). PTSB's Taxonomy aligned assets include those properties with a BER of A1 to B2 (inclusive). As a result, total Green Mortgage Lending is broader than the population of Taxonomy-aligned assets and the associated balances are not directly comparable

The Bank does not expect progress against its SBTs to be linear and recognises that it is dependent on factors outside of its control, such as national decarbonisation efforts and Government housing targets. PTSB is committed to monitoring and disclosing on our performance against targets annually.

Please refer to the table below for a full view of the Bank's carbon emissions from 2023 – 2025.

Carbon emissions across Scope 1, 2 and 3 (2023 - 2025)

Emission source	Parameters	tCO ₂ e			Baseline Year 2023 - Current Year 2025	
		2023	2024	2025	Change Absolute value tCO ₂ e	Change %
Scope 1	Fuel Combustion	841	882	937	96	11.4%
Scope 2: Location-based value	Purchased Electricity	2,217	1,714	1,246	-971	-43.8%
Scope 2: Market-based value	Purchased Electricity	0	0	0	0	0.0%
Scope 3	Upstream and Downstream Emissions	295,820	301,479	287,859	-7,961	-2.7%
Combined Emissions						
Total Scope 1, 2 & 3	Location-based value	298,878	304,075	290,042	-8,836	-3.0%
Total Scope 1, 2 & 3	Market-based value	296,661	302,361	288,796	-7,865	-2.7%

Carbon emissions Scope 3 breakdown (2023 – 2025)

Scope 3 Emissions	Parameters	tCO ₂ e			Baseline Year 2023 - Current Year 2025	
		2023	2024	2025	Change Absolute value tCO ₂ e	Change %
Scope 3 - Category 1	Purchased Goods and Services	19,117	19,586	20,381	1,264	6.6%
Scope 3 - Category 2	Capital Goods	662	869	767	105	15.9%
Scope 3 - Category 3	Other Fuel & Energy	335	317	291	-44	-13.1%
Scope 3 - Category 4	Upstream Transportation and Distribution	1,827	838	1,066	-761	-41.7%
Scope 3 - Category 5	Waste	7	2	2	-5	-71.4%
Scope 3 - Category 6	Business Travel	167	272	265	98	58.7%
Scope 3 - Category 7	Employee Commuting	5,840	6,024	3,375	-2,465	-42.2%
Scope 3 – Category 15*	Financed Emissions	267,865	273,571	261,712	-6,153	-2.3%

* Scope 3 Category 15 financed emissions includes; the Mortgage Portfolio for 2023; and the Mortgage Portfolio and Asset Finance – Motor Vehicle Loan emissions for 2024 and 2025.

Notes:

- Data was calculated using The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard, Revised Edition, ('GHG Protocol') methodology and Partnership for Carbon Accounting Financials (PCAF) Financed Emissions Standard.
- Emission factors were sourced from DEFRA's Greenhouse gas reporting: conversion factors 2025, the Commission of Utilities (CRU) 2023, Carbon Cube®, Climatque and Motorcheck.ie.
- The CarbonCube® uses procurement spend data to calculate carbon emissions. Spend data is categorised, and emissions factors are matched to the categorised spend to calculate emissions. This data can then be enhanced over time with supplier-specific data, as it becomes available.
- We adopt the operational control approach on reporting boundaries. In 2025, the data covers 100% of our operations in the Republic of Ireland.
- All 15 categories of Scope 3 emissions were evaluated, and material categories have been disclosed.
- Category 15 includes the Bank's Retail and Commercial Mortgage Portfolio and Asset Finance Motor Vehicle Loans for Personal and Business Banking customers. Mortgage Portfolio emissions are calculated as a product of Carbon Intensity*LTV*Floor Area. LTV is calculated as (Accumulated Balance Amount)/(Original Value Amount), generating a value between 0 and 1. Asset Finance Motor Vehicle Loan emissions are calculated as a product of attribution factor*distance travelled*CO₂ Emissions. Attribution factor is calculated as (Outstanding Amount / Total value at origination), generating a value between 0 and 1.
- Data is subject to estimation and limitations exist of the accuracy of the data as an input to the estimate. Our approach will continue to evolve in line with industry developments and as data quality improves.
- Figures are rounded.

Detailed carbon emissions calculation methodology:

Scope 1 Emissions Methodology:

Scope 1 includes direct GHG emissions from sources that are owned or controlled by the Bank, such as natural gas combustion and company owned vehicles.

To calculate the Bank's carbon emissions (tCO₂e) for Scope 1, the Bank used energy use activity data for its Scope 1 emissions categories. The 2025 emission conversion factors, published by the UK Department for Environmental, Food and Rural Affairs (DEFRA), were applied to each of the identified emission sources across the organisational boundary.

$$\text{GHG emissions (tCO}_2\text{e)} = \text{activity data (Unit)} * \text{Emissions factor (DEFRA 2024, tCO}_2\text{e/unit)}$$

Scope 2 Emissions Methodology:

Scope 2 accounts for GHG emissions from the generation of purchased electricity, heat and steam generated off-site. The emissions are reported using both a location-based method and a market-based method.

Using a location-based approach, the Bank applies the emission conversion factor provided by the Irish Commission for Regulation of Utilities (CRU).

Sustainability Statement

ESRS E1 Climate Change (continued)

$$\text{GHG Emissions (tCO}_2\text{e)} = \text{activity data (Unit)} * \text{Emissions factor (CRU 2024, tCO}_2\text{e/kWh)}$$

For Scope 2 emissions, the Bank procures electricity certified as 100% renewable. As a result, the Bank's Scope 2 emissions using a market-based approach (emissions the Bank is responsible for through its purchasing decisions) are 0.

Scope 1 and 2

During 2025, we continued to make progress in reducing our combined Scope 1 and 2 carbon emissions. This has been achieved through the procurement of electricity certified as 100% renewable from our electricity providers, efficiencies in energy use by the business through initiatives aimed at reducing our carbon footprint and the impacts of hybrid working with 68% of our organisation now availing of our smarter working options.

Scope 3 Emissions Methodology

Scope 3 includes all the Bank's other indirect emissions: Purchased Goods and Services, Capital Goods, Other Fuel and Energy, Transportation and Distribution, Waste, Business Travel, Employee Commuting (including home working) and Investments (financed emissions).

As part of our ongoing commitment to reduce our carbon footprint, during 2025, we continued to enhance our data collection processes for our Scope 3 emissions. Through our partnership with Efficio, we have used the CarbonCube® spend based carbon footprint calculator, refining the methodology of calculating emissions through detailed classification of spend categories for Purchased Goods and Services, Capital Goods, and Upstream Transportation and Distribution.

For emissions associated with Water, Waste and Business Travel, activity data provided directly from our suppliers, or spend data collected directly through our internal systems, is used to calculate emissions. For Employee Commuting, an employee survey is used to gather responses in relation to our colleagues commuting and work from home behaviours.

Mortgage Portfolio

Over the past number of years, the Bank has been reporting on its Mortgage Portfolio emissions. PTSB's Mortgage constituted 93% of the Bank's total Loan Book as of 31 December 2025.

To calculate emissions associated with the Mortgage Portfolio, the Bank used available BER codes that have a kg CO₂e/m² identified, currently c.25.1% of the Portfolio has BER certificates. To address the gap, a BER proxy process was developed to estimate the BER rating where no valid BER certificate was available.

This process relies on identifying the property location by matching property addresses to Eircodes and available collateral characteristics (age, dwelling type, heating fuel type and location) to estimate BERs and kg CO₂e/m².

The proxy methodology stems from the creation of a Lookup Table which is generated using the data sourced externally from the Sustainable Energy Authority of Ireland (SEAI), which contains a complete list of c.1.4 million properties from the national distribution. This Lookup Table contains averaged ratings across key characteristic variables present in both datasets. These averages are what are used to fill in the blanks of unknown data points within the mortgage book and are extrapolated to generate the Financed Emissions estimate.

Using the standards set by the Partnership for Carbon Accounting Financials (PCAF), the emissions are calculated as follows:

$$\text{Financed Emissions} = \Sigma (\text{Attribution Factor} \times \text{Buildings Emissions})$$

This process resulted in a total estimate for Scope 3 Financed Emissions for the Retail Mortgage Portfolio of 243,553 tCO₂e and Commercial Mortgages of 3,639 tCO₂e for 2025, resulting in a 7.7% reduction in absolute emissions since 2023.

Asset Finance

To calculate emissions associated with the PTSB's Motor Vehicle Loans, the Bank sourced CO₂ values for each vehicle measured in grams per kilometre (g/km) and the average kilometres travelled in the year (segmented by vehicle and fuel types) from external sources, currently for 67% of the motor vehicle exposure. A proxy value was then used to estimate the emissions for the remaining 33% of the Portfolio.

This process resulted in a total estimate for Scope 3 Financed Emissions for Asset Finance Motor Vehicle Loans of 14,520 tCO₂e for 2025, a 15% decrease in absolute emissions since 2024.

E1-5 Energy consumption and mix

Energy Consumption and Mix

The below table outlines the Bank's energy consumption and mix and associated GHG emissions for 2023 - 2025.

Energy Consumption and Mix and associated GHG Emissions (2023 - 2025)

Emission source	Unit	Activity Data			tCO2e		
		2023	2024	2025	2023	2024	2025
Natural Gas	kWh	1,768,829	2,156,995	2,912,096	324	395	533
Kerosene	Litres	4,000	6,500	4,038	10	17	10
Gas Oil	Litres	2,907	3,664	1,944	8	10	5
Diesel	Litres	164,051	127,892	69,112	412	321	178
Petrol	Litres	1,460	52,916	100,057	3	110	207
F-Gas (R410A)	Kg	74	26	4	84	29	4
Purchased Electricity*	kWh	9,476,427	7,685,694	7,641,492	2,217	1,714	1,246

* Location-based emissions.

PTSB's Scope 2 market-based emissions were 0 tCO2e from 2023 - 2025 due to the procurement of electricity certified as 100% renewable. PTSB will continue to commit to purchasing electricity certified as renewable across its operations to maintain Scope 2 market-based emissions at 0 as per our SBTs.

Energy intensity based on gross carrying amounts

The Bank has undertaken an assessment of the Transition Risk associated with climate change: Exposures to GHG-intensive and energy intensive assets and products.

The Bank's alignment efforts with the Paris Agreement objectives for a selected number of sectors and the extent to which financial flows are consistent with a pathway towards low greenhouse gas emissions and climate-resilient development as defined in the Paris Agreement.

These sectors account for 0.29% of the total gross carrying amounts.

Sector		Portfolio gross carrying amount (Mn EUR)
1	Power	4
2	Fossil fuel combustion	-
3	Automotive	6
4	Aviation	48
5	Maritime transport	8
6	Cement, clinker and lime production	23
7	Iron and steel, coke, and metal ore production	-
8	Chemicals	0

Detailed above are the high impact sectors identified through the Bank's assessment of the Transition Risk associated with climate change: Exposures to GHG-intensive and energy intensive assets and products. The above reflects gross carrying amounts and not net revenue as required by the CSR Regulation. The above gross carrying amounts aligns to the Bank's Pillar 3, Template 3 disclosure.

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ESRS E1 Climate Change (continued)

E1-6 Gross Scope 1, 2, 3 and Total GHG emissions

Please refer to E1-4 for an overview of the Bank's Gross Scope 1, 2, and Scope 3 emissions (including Scope 3 Financed Emissions) in tCO₂e.

Please refer to E1-5 for an overview of the gross Scope 1 and 2 GHG emissions for 2023 - 2025, by activity data and tCO₂e.

The Bank has no biogenic emissions of CO₂ from the combustion or biodegradation of biomass to disclose in 2025.

No removals, or any purchased, sold or transferred carbon credits or GHG allowances have been included in the calculation of GHG emissions in 2025.

No activities are reported under the EU Emissions Trading System.

GHG Intensity based on net revenue and Headcount for 2023 - 2025

The below table provides an overview of the Bank's GHG emissions intensity for (total GHG emissions/tCO₂e per net revenue) and (total GHG emissions/tCO₂e per Headcount) for 2023 - 2025.

	2023	2024	2025	Baseline Year 2023 - Current Year 2025	
				Change Absolute value	% Change
Total tCO ₂ e (Location-based value)/€m Rev	343.54	303.47	293.27	-50.27	-15%
Total tCO ₂ e (Market-based value)/€m Rev	340.99	301.76	292.01	-48.98	-14%
Total tCO ₂ e (Location-based value)/Headcount	89.75	87.96	93.59	3.84	4.3%
Total tCO ₂ e (Market-based value)/Headcount	89.09	87.46	93.19	4.10	4.6%

PTSB's intensity figures for 2023, 2024 and 2025 are based on revenues of €870m, €1,002m and €989m respectively, and Total Headcount figures for 2023, 2024 and 2025 of 3,330, 3,457 and 3,099 respectively.

E1-7 – GHG removals and GHG mitigation projects financed through carbon credits

PTSB has no GHG removals and storage in its own operations or upstream and downstream value chain to report. PTSB procures electricity certified as 100% renewable directly from its electricity provider which is certified by the Commission of the Regulation of Utilities (CRU) of its use of Guarantee of Origin (GO) certificates.

PTSB has no GHG emission reductions or removals from climate change mitigation projects to report.

PTSB has not made any public claims of GHG neutrality that involve the use of carbon credits.

E1-8 – Internal carbon pricing

PTSB does not apply an internal carbon pricing scheme, for example, the shadow prices applied for CapEx or research and development investment decision making, internal carbon fees or internal carbon funds.

E1 Minimum Disclosure Requirements

As part of the development of the Bank's Impacts, Risks and Opportunities (IROs) themes were identified and as such, the Minimum Disclosure Requirements (MDRs) have been consolidated under thematic headings. The four themes under which the Bank has disclosed its material Environmental IROs are: E1 MDR1 Own Emissions; E1 MDR2 Own Operations; E1 MDR3 Regulatory Risk; and E1 MDR4 Product Financing.

E1 MDR 1 - Own Emissions

The IROs reflected in E1 MDR1 are outlined below.

IRO-Ref	IRO	Description	Details	Positive or Negative	Potential or Actual
I-2	Impact	The impact PTSB has on the environment by reducing emissions across its business operations.	The Bank's own operations can impact the environment in several ways including energy consumption, waste generation, water usage, transportation, real estate, technology infrastructure, procurement and through the supply chain. PTSB will have tangible and potential direct impacts on the external environment by reducing emissions through the decarbonisation of its operations including using electricity certified as 100% renewable, the migration of services to online channels, and the use of electric vehicle charging points. Through the implementation of sustainable water and waste management practices, including monitoring consumption and adopting water-saving measures, utilising recycling and waste management stations, and by screening suppliers for responsible practices, the Bank will also have tangible and potential direct impacts on water consumption, resource use, and waste in its business operations. The similarities in each of these impacts have been consolidated based on their shared actual or potential impact of minimising the Bank's environmental footprint and contributing to a more sustainable future.	Positive	Both
O-2	Opportunity	The opportunity for PTSB to reduce operational costs and improve its reputation by making internal investments/ decisions that are considerate of the environment.	PTSB has an opportunity to reduce operational costs and improve reputation through environmentally considered internal investments and decisions. The Bank considered a wide range of related opportunities including initiatives such as using electricity certified as 100% renewable, improving water and resource efficiency, implementing circular economy principles, the digitalisation of external communications, and a commitment to reduce waste and support sustainable waste management practices. The extensive suite of opportunities was consolidated due to their shared objective of reducing operational costs through optimised resource and energy management. Additionally, each action supports PTSB's alignment with growing customer expectations surrounding sustainability and sustainable practices, enhancing brand loyalty.	n/a	n/a

Sustainability Statement

ESRS E1 Climate Change (continued)

E1- MDR1-P Policies adopted to manage Own Emissions

The Bank has the following Frameworks and Policies to address climate change mitigation, energy efficiency, and renewable energy deployment on its own emissions:

- CR&E Risk Management Framework
- Environmental Policy Statement
- Green Bond Framework
- Operational Resilience Framework
- Operational Resilience and Continuity Risk Policy
- Regulatory Compliance Framework
- Smart Working Framework
- Sustainable Supplier Charter

For more information on policy contents and objectives, as well as the most senior level role in PTSB accountable for implementation, please refer to ESRS 2-MDR-P.

The following Stakeholders are affected:

- Members of the Board and its Committees, Management Committees and Risk Committees;
- All employees, as defined in ESRS S1 Own Workforce;
- Shareholders and Investors; and,
- Owners of interlinked Frameworks and Policies who are responsible for aligning their Frameworks, Policies, and Procedures.

The Customer Committee (CustCo) is a sub-committee of the Bank's Executive Committee (ExCo) and is chaired by the Chief Retail Banking Officer. The Committee approves new, and changes to current, products and services that are aligned to the Bank's Sustainability Strategy which includes consideration for climate-related sustainable finance products and propositions, including the Bank's Green Mortgage.

The Assets and Liabilities Committee (ALCo) is a sub-committee of the ExCo and is responsible for overseeing pricing decisions. As such, the Bank's Green Mortgage was brought through the Committee for approval prior to implementation.

The Sustainability Committee (SusCo) is a sub-committee of the ExCo and is responsible for the delivery of PTSB's Sustainability Strategy by ensuring that there is sufficient governance, oversight, alignment and challenge of activity across each of its key areas of focus. This includes the Bank's SBTs, Carbon Reduction Plan and associated policies.

The Bank has the following commitments in place:

- PTSB is required to comply with legislation and regulations relevant to CR&E risk management, including from the Central Bank of Ireland (CBI) and the European Central Bank (ECB). These include the ECB's Guide on Climate-related and Environmental Risk (2020), the ECB's Report on the supervisory review of Banks' approaches to manage climate-related and environmental risks (2021) and the EBA's Guidelines on the management of ESG risks (2025);
- The Bank recognises the role it will play in financing elements of Ireland's Climate Action Plan (CAP). The CAP provides a detailed plan for taking decisive action to achieve a 51% reduction in overall greenhouse gas emissions by 2030 and setting the country on a path to reach Net Zero emissions no later than 2050;
- A Board-approved Sustainability Strategy aligned to the UN SDGs;
- A commitment to achieving its SBTs and implementing the Carbon Reduction Plan; and,
- Continuing to enhance the Bank's transparency through disclosures, including the Sustainability Statement, Pillar 3, EU Taxonomy, TCFD and CDP.

The Bank has considered its value chain when preparing its Carbon Reduction Plan, and other relevant frameworks and policies.

Public Communications

Details of sustainability considerations for the Bank's customers can be found on in the Sustainability section of our website. This includes sharing information on our green product offerings, as well as the Bank's participation in the SBCI's Home Energy Upgrade Loan Scheme and Growth and Sustainability Loan Scheme to support customers in their transition to a low carbon economy.

Additional detail can be found in PTSB's Sustainability Strategy 2025-2027 and Pillar 3 disclosure outlining our commitment to reducing our GHG emissions. Both documents can be found on our website.

E1- MDR1-A Actions and resources in relation to Own Emissions

At PTSB, we know that the use of energy in our facilities and our Scope 3 financed emissions are significant contributors to our overall carbon emissions and that to reduce our impact on climate change, we need to address our own energy usage and enhance our green product offerings to support our customers.

To achieve reductions in our Scope 1 and 2 emissions associated with energy use, we are committed to reducing our overall consumption, while also moving to low carbon energy sources. In 2025, we have continued to minimise the carbon impact of our operations by investing in energy efficiency initiatives and programming, including:

- Purchasing electricity certified as 100% renewable from our electricity provider and being provided a green energy certificate;
- Ongoing use of energy smart metres across our branch locations to get information relating to consumption in real time;
- Continuing to implement LED lighting across our branch network as part of our ongoing branch refurbishment process; and,
- Commencing work to upgrade our heating and cooling systems to more energy efficient options at our Head Office location.

To achieve reductions in our Scope 3 financed emissions we continue to advance green product and proposition development and the provision of support for customers on their sustainability journey; including through our Green Mortgage offering, a 5-Year and 3-Year Fixed Rate Product available to all new and existing home loan customers, where their homes have a confirmed or proposed BER of A1 to B3 and through delivery of our Home Upgrade Tool, a bespoke online tool allows homeowners to plan the specific home energy upgrade options suitable for their home based on their BER.

In addition, the Bank participates in the SBCI's Home Energy Upgrade Loan Scheme, aimed at supporting eligible applicants who wish to invest and improve in the energy efficiency of a residential property. PTSB was the first lender to participate in the Scheme, with the ability to offer a total of €100m in loans. To support delivery, in early 2026 the Bank reduced variable interest rates for the SBCI's Home Energy Upgrade Loans by up to 0.56%, including a new market-leading

rate of 2.99% for loans of €50,000 to €75,000. In addition, the Bank participates in the SBCI's Growth and Sustainability Loan Scheme (GSLS) with the ability to offer a total of €70m in loans. The GSLS focuses on providing eligible businesses with long-term financing to enhance their growth and sustainability efforts.

Information regarding the calculations of the Bank's carbon emission values and corresponding reduction activity can be found in E1-4.

As part of the development of the Bank's Integrated Strategic Plan, financial investment and resources are allocated to the delivery of our emissions reduction activity. PTSB has not disclosed these figures publicly.

E1- MDR1-M Metrics in relation to Own Emissions

Please refer to E1-1 to E1-7 for the carbon emission metrics the Bank uses in relation to its Own Emissions.

E1-MDR1-T Tracking effectiveness of policies and actions through targets

As outlined in E1-1 and E1-4, during 2025 the Bank worked to develop our SBTs which were validated by the SBTi.

The process included bankwide stakeholder engagement sessions which were conducted to establish targets, set decarbonisation pathways, and gather insights that informed the development of our targets and the corresponding Carbon Reduction Plan. Please refer to E1-4 for an overview of the Bank's targets to evaluate the performance of Own Emissions.

PTSB's SBTs and Carbon Reduction Plan are a key element of the Bank's Sustainability Strategy and have been considered within our Environmental Policy Statement. The Bank will measure and report on progress against our targets annually as part of our annual reporting cycle.

E1-MDR 2 – Own Operations

The IROs reflected in E1-MDR2 are outlined below.

IRO-Ref	IRO	Description	Details	Positive or Negative	Potential or Actual
R-11	Risk	Service Availability Risk: The risk that the performance and availability of IT systems and data are adversely impacted (for example, customer experience or business processes), including the inability to recover the Bank's services in a timely manner, due to a failure of IT hardware or software components; weaknesses in IT system management; or any other event.	Elements of this risk have been mapped to the climate change mitigation subtopic. These relate to: - Physical climate risk of weather events on the Bank's operations including data centres and branch operations. - Transition climate risk as a result of the transformation of processes and systems to meet regulatory requirements.	n/a	n/a

Sustainability Statement

ESRS E1 Climate Change (continued)

E1-MDR2-P Policies adopted to manage Own Operations

Physical Risk may impact PTSB's business operations and may trigger the Bank's Business Continuity Plan (BCP) or impact IT infrastructure (for example, data centre vulnerabilities). This may also impact third party suppliers depending on the geographical locations of their supply chain.

The Bank has in place individual Business Unit Business Continuity Management (BCM) plans and an Enterprise Incident Response Plan which consider adverse weather conditions that may, in some cases, cause a reduction in operational capacity.

The following frameworks and policies are in place to support delivery of the Business Unit BCM plans as well as the Bank's wider Enterprise Incident Response Plan:

- Operational Resilience and Continuity Risk Policy
- Operational Resilience Framework
- Adverse Weather Protocol
- Driving for Work Protocol
- Smart Working Framework

For more information on policy contents and objectives, as well as the most senior level role in PTSB accountable for implementation, please refer to ESRS 2-MDR-P.

These frameworks and policies outline the Bank's approach to service availability risk and business continuity. The following stakeholders are affected by these policies:

- Members of the Board and its Committees, Management Committees and Risk Committees;
- All employees, as defined in ESRS S1 Own Workforce;
- Business Banking Customers;
- Retail Customers;
- Third party service providers;

- External stakeholders, including Regulators and Supervisors who require an overview of the climate-related and environmental regulatory compliance management principles, process, and governance arrangements; and,
- Owners of interlinked frameworks and policies who are responsible for aligning their frameworks, policies, and procedures.

The Board has overall responsibility for oversight of the frameworks and policies related to PTSB's own operations and operational resilience.

The Operational and ICT Risk Framework details the Bank's approach to managing operational resilience across the three pillars of 'Identify and Prepare', 'Respond and Adapt', and 'Recover and Learn', and considers the interests of customers, colleagues and wider society as well as the importance of maintaining delivery of services.

Annual Training is delivered through the Operational Resilience eLearning module each year, with additional BCM training provided to the Incident Management Team, Exceptional Situation Management Committee, Heads of Function, and BCM Coordinators annually.

E1-MDR2-A Actions and resources in relation to Own Operations

PTSB has made the following progress in relation to the management of Service Availability risk within its Own Operations across the Bank.

- The Bank's BCM Plan considers adverse weather conditions that may, in some cases, cause a reduction in operational capacity.
- The Bank's Enterprise Incident Response Plan is driven by a dedicated Resilience Committee who reviews our preparation at regular intervals. There is an Adverse Weather Protocol in place that provides guidance should such circumstances arise.

- The Bank has a tiered structure for dealing with incidents, including weather-related incidents that could impact our operations. There is an Incident Management Team (IMT) in place, which is made up of the Head of Functions from across the Bank. This team has the option to escalate incidents to the Exceptional Situation Management Team (ESMT), which is a subset of the Executive Committee.
- In line with our Operational Resilience Framework, the Bank completes a number of scenario tests each year and, with severe weather scenarios having been incorporated as part of these exercises. Learnings from the above are reviewed and integrated into the Bank's BCM planning processes and shared wider at the Resilience Committee as appropriate.
- PTSB's Hybrid Working Programme has increased the resilience of the Bank's operations in recent years, with the majority of colleagues having the ability to work from home.

As part of the development of the Bank's Integrated Strategic Plan, financial investment and resources are allocated to the delivery of this activity. PTSB has not disclosed these figures publicly.

E1-MDR2-M Metrics in relation to Own Operations

PTSB has not disclosed these metrics publicly.

E1-MDR2-T Tracking effectiveness of policies and actions through targets

PTSB has not disclosed these targets publicly.

E1-MDR3 - Regulatory Compliance Risk, Credit Risk, CR&E Risk and Change Management.

The IROs reflected in E1-MDR3 are outlined below.

IRO-Ref	IRO	Description	Details	Positive or Negative	Potential or Actual
R-1	Risk	Change Management: The risk arising from inability of the Bank to manage projects and changes to a high quality standard and in a timely and controlled manner, in particular for large and complex change programmes will not achieve the desired outcomes, will have a negative impact on resource levels of the Bank or in case of regulatory based requirements may result in fines or sanctions.	Change Management has been identified as a Top 10 risk for the Bank. Elements of this risk have been mapped to the climate change mitigation subtopic. The Bank will be subject to challenges when implementing changes to its operational processes and IT systems to fulfil strategic change projects and meet changing regulatory requirements associated with the transition to a low carbon economy.	n/a	n/a
R-2	Risk	Climate-related and Environmental (CR&E) Risk: The risk of financial loss or an adverse outcome arising from the consequences, likelihoods and a lack of or inadequate response to the impacts of climate change.	CR&E Risk has been mapped to the climate change mitigation subtopic. CR&E risk for the Bank is categorised into Physical and Transition risk. The Bank identified a number of elements pertaining to CR&E risk, including adverse weather conditions and long term climate shifts causing a reduction in operational capacity; strategy amendments, including climate change mitigation ambitions, governmental initiatives, credit risk and exposures to issues with commercial and retail borrower repayment ability; current and emerging CR&E risk regulatory requirements and compliance costs; IT risk management; CR&E model risk; market risk and public and investor opinion of ESG; and changes to collateral impacting liquidity and funding.	n/a	n/a
R-3	Risk	Credit Risk: The risk of financial loss due to the failure of a customer, or counterparty, to meet their financial obligations to the Bank as they fall due.	Credit Risk has been mapped to the climate change mitigation subtopic. Within the topic of climate change mitigation, the Bank identified a number of factors as contributing to credit risk. These include the types of properties financed; emerging regulation affecting industries with poor sustainability credentials; climate change impacting economic growth and energy prices; exposure of individuals and their income to climate risks; increased exposure to climate risk within the SME and commercial financing portfolio and technological changes resulting in reduced payment capacity and inability to meet loan requirements.	n/a	n/a

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ESRS E1 Climate Change (continued)

IRO-Ref	IRO	Description	Details	Positive or Negative	Potential or Actual
R-9	Risk	Regulatory Compliance Risk: The risk of material financial loss or liability, legal or regulatory sanctions, or brand damage arising from the failure to comply with or adequately plan for change to, official sector policy, laws, regulations, major industry standards, compliance policies and procedures or the expectations of customers and stakeholders.	Elements of this risk have been mapped to the climate change mitigation Subtopic. CR&E risk continues to increase in prominence globally resulting in additional supervisory and regulatory requirements for the Bank. The Bank considers these sustainability regulations as adding to its regulatory compliance risk.	n/a	n/a

E1-MDR3-P Policies adopted to manage Regulatory Compliance Risk, Credit Risk, CR&E Risk and Change Management.

The Bank is committed to ensuring it manages and monitors its Regulatory Risk, Credit Risk, CR&E risk and Change Management practices appropriately. To support this commitment the Bank has implemented the following policies.

- Enterprise Risk Management Framework
- Regulatory Compliance Framework
- Credit Risk Management Framework
- Business Lending Credit Policy
- Group Credit Policy
- Collateral Valuations Policy
- Consumer Non-Mortgage Lending
- Residential Mortgage Lending Policy
- CR&E Risk Management Framework
- Change Framework
- Change Risk Policy
- Sourcing and Procurement Policy
- Third Party Risk Management Policy

For more information on policy contents and objectives, as well as the most senior level role in PTSB accountable for implementation, please refer to ESRS 2-MDR-P.

Regulatory Compliance Risk, Credit Risk, CR&E Risk and Change Management Risk stakeholder groups within the Bank include the following:

- Members of the Board and its Committees, Management Committees and Risk Committees;
- All employees, as defined in ESRS S1 Own Workforce;
- Business Banking Customers;
- Retail Customers;
- Third party service providers;
- External stakeholders, including Regulators and Supervisors who require an overview of the climate-related and environmental regulatory compliance management principles, process, and governance arrangements; and,
- Owners of interlinked frameworks and policies who are responsible for aligning their frameworks, policies, and procedures.

Regulatory Risk, Credit Risk and CR&E Risk

The Board has overall responsibility for oversight of regulatory risk, including the regulatory risk associated with CR&E risk.

The Head of Compliance is responsible for the implementation of the Regulatory Compliance Framework.

For more on the Bank's Three Lines of Defence Model and associated activities, please refer to ESRS 2-GOV1.

The Bank is committed to complying with European and local CR&E risk regulatory requirements. This includes complying with legislation and regulations relevant to Climate Risk and CR&E risk management, including from the Central Bank of Ireland, the European Central Bank and the European Banking Authority.

By promoting transparency, fairness, and due diligence in credit assessments, the Bank fosters trust and accountability, enhancing customer confidence and reducing the likelihood of defaults. This approach supports a sustainable credit environment, contributing to long-term financial stability for both the Bank and its customers.

PTSB demonstrates a strong commitment to transparency and accountability by actively respecting a range of third party standards and initiatives through its policies. In addition, we are committed to supporting customers that are experiencing financial difficulty and seeks to work with those customers to find a sustainable solution through proactive arrears management and forbearance. PTSB's Credit Policy and procedures are designed to comply with the requirements of the CBI's Code of Conduct on Mortgage Arrears (CCMA), which sets out the framework that must be used when dealing with borrowers in mortgage arrears or in pre-arrears.

Change Management

The Board is collectively responsible for the governance of the Bank and approves the Bank's Strategy and the associated financial plans, of which the Integrated Strategic Plan, Three Year Strategic Change Roadmap and Investment Plan are key components.

Enterprise Change provide the Board with monthly reporting on the performance of the Change Portfolio, highlighting portfolio performance against timelines and cost, as well as project reports aligned to overall Change risk.

To support the above, PTSB has in place a Group Expenditure Committee (GEC), Prioritisation and Intervention Forum, Management Design Authority, and a Business and IT Readiness Forum made up of key stakeholders from Business Units across the Bank. These Committees and Forums meet at regular intervals and are in place to provide oversight of the Bank's Change Management activity.

E1-MDR3-A Actions and resources in relation to Regulatory Compliance Risk, Credit Risk, CR&E Risk and Change Management

Regulatory Compliance Risk

To ensure the effective implementation of the Regulatory Compliance Framework, the Bank continues to engage with external information sharing forums, including the Banking and Payments Federation of Ireland, through which it shares and receives information related to Regulatory Compliance Risk trends and threats and evolving industry best practice.

Credit Risk

The Bank's Credit risk management approach is focused on detailed credit assessment at initial underwriting stage together with early borrower engagement where there are signs of pre-arrears or delinquency with a view to taking remedial action to prevent the loan defaulting. Where a borrower is in pre-arrears, arrears or default, the Bank will consider offering treatments/options which apply to the borrower's circumstance cognisant of affordability and sustainability.

The Bank's Credit risk management actions include our Credit Policies lending authorization, Credit risk mitigation, Credit

risk monitoring, arrears management and forbearance and Credit risk measurement. They cover a wide range of activities across the entire lending process. These actions primarily affect our customers alongside colleagues who are responsible for lending or Credit risk management.

These measures are reviewed and updated regularly to ensure their ongoing effectiveness in mitigating risk and adapting to changing market conditions.

CR&E Risk

For more on the actions taken in relation to the identification, measurement and management of CR&E risk, please refer to E1-1.

Change Management

PTSB continues to make progress across the Bank's Change Management agenda. Progress includes.

- Leveraging the refreshed Business Strategy to drive a three-year strategic change planning horizon;
- Extending planning horizons in alignment with that of the Business Strategy;
- Furthering our strategic planning, through the use of an enhanced Strategic Planning Process (SPP) to create alignment across the organisation;
- Evolving our agile-based Digital Change Model, combined with the more traditional waterfall oriented Change Model;
- Implementing a Project Portfolio Management tool;
- Enhancing the Bank's stage gate process to continue to drive organisational adoption through the delivery portfolios;
- Continuing to review the Operating Model investments across the Bank; and,
- Improving Change and Risk culture and underlying practices, by ensuring focused enhancement around lessons learned, increased 2LOD project level engagement, risk awareness and assurance.

As part of the development of the Bank's Integrated Strategic Plan, financial investment and resources are allocated to the delivery of Regulatory risk, Credit risk, CR&E risk and Change Management activity. PTSB has not disclosed these figures publicly.

E1-MDR3-M Metrics in relation to Regulatory Compliance Risk, Credit Risk, CR&E Risk and Change Management

Regulatory Compliance Risk

The following metrics are utilised to evaluate the performance and effectiveness of the Bank's actions towards managing the Regulatory Compliance risk:

- Regulatory Compliance risk may arise from our ability to adapt or comply with climate-related regulations. PTSB has no appetite for not implementing regulatory changes in full and on time. In addition, the Bank has a medium appetite for CR&E risk.
- Progress against these metrics is reported upward to the Board, Executive Committee and Group Risk Committee on a monthly basis via the CRO Report.

Credit Risk

The bank has metrics in place to evaluate the performance and effectiveness of the Banks's actions towards managing Credit Risk.

- Credit Risk Appetite metrics and limits are designed to align with the strategic objectives of the Bank to maintain stable earnings growth, stakeholder confidence and capital adequacy.
- The Bank sets concentration limits for higher risk product and business segments, ensuring new business meets pricing hurdle rates and through monitoring default rates and losses. Limits are also set in the context of the peer group and regulatory and economic landscape, to ensure the Bank does not become an outlier in the market. Monthly updates are presented to the Board Risk and Compliance Committee and Group Credit Committee, which include an overview, trends, limit categories and the detail relating to mitigation plans proposed where a particular parameter is near or at its limit.
- Credit Risk Appetite is considered an integral part of the annual planning/budget process and is reviewed regularly throughout the year to ensure the appetite is being met and is not expected to be breached.

PTSB has not disclosed these metrics publicly.

Sustainability Statement

ESRS E1 Climate Change (continued)

CR&E Risk

Please refer to E1-1 and E1-MDR-4 for metrics that are utilised to evaluate the performance and effectiveness of the Bank's actions towards managing CR&E risk.

- Cost and forecast spend for the period versus available investment funding set out for the period; and,
- Forecast Compliance Status of all material Change projects versus regulatory deadline commitments.

PTSB has not disclosed these targets publicly.

Credit Risk

PTSB has not disclosed these targets publicly.

Change Management

The following metrics are utilised to evaluate the performance and effectiveness of the Bank's actions towards Change Management:

- Key Performance Indicators based on level of projects with a status of 'At Risk' and 'Off Track' from a Strategic Change Portfolio and Regulatory specific perspective;

PTSB has not disclosed these metrics publicly.

E1-MDR3-T Tracking effectiveness of policies and actions through targets

Regulatory Compliance Risk

PTSB has no appetite for regulatory non-compliance and is committed to ensuring strict adherence to laws, standards, and ethical practices.

CR&E Risk

PTSB has not disclosed these targets publicly.

Change Management

PTSB has not disclosed these targets publicly.

E1-MDR4- Product Financing

The IROs reflected in E1-MDR4 are outlined below.

IRO-Ref	IRO	Description	Details	Positive or Negative	Potential or Actual
I-1	Impact	The impact on the environment by considering climate change and energy use when financing projects.	The influence of the Bank on environmental impacts extends through the financing and investment decisions it makes. Based on PTSB's material Mortgage Portfolio (93% as of 31 December 2025), it was determined that its actual or potential impact on the environment from its financing activities was primarily on climate change and energy use through the associated emissions and energy consumption of the collaterals on the Retail Mortgage Portfolio. Through the Double Materiality Assessment, impacts specifically related to water consumption, pollution and biodiversity were deemed not material at this time although these factors can be influenced through a broader focus on climate change and energy usage.	Both	Both
O-1	Opportunity	Providing sustainable products, propositions and funding activities that integrate environmental considerations help to meet customer demand, may provide PTSB with a competitive advantage and helps to reduce PTSB's impact on the environment.	Banks have a unique opportunity to finance sustainable products and integrate environmental considerations into their offerings. These opportunities not only align with global sustainability goals but also create new business opportunities, enhancing the bank's long-term profitability and reputation. The Bank considered a number of opportunities from new and enhanced green products and propositions including green bonds, loans, mortgages and asset finance, retrofitting loans, renewable energy investments, and strategic partnerships for climate adaptation and sustainability projects. Collectively, sustainable products provide the Bank with an opportunity to address growing customer and investor demand.	n/a	n/a

IRO-Ref	IRO	Description	Details	Positive or Negative	Potential or Actual
R-2	Risk	Climate-related and Environmental Risk (CR&E): The risk of financial loss or an adverse outcome arising from the consequences, likelihoods and a lack of or inadequate response to the impacts of climate change.	CR&E risk has been mapped to the climate change mitigation subtopic. CR&E risk for the Bank is categorised into Physical and Transition risk. The Bank identified a number of elements pertaining to CR&E risk, including adverse weather conditions and long term climate shifts causing a reduction in operational capacity; strategy amendments, including climate change mitigation ambitions, governmental initiatives, credit risk and exposures to issues with business and retail borrower repayment ability; current and emerging CR&E regulatory requirements and compliance costs; IT risk management; CR&E model risk; market risk and public and investor opinion of ESG; and changes to collateral impacting liquidity and funding.	n/a	n/a
R-9	Risk	Regulatory Compliance Risk: The risk of material financial loss or liability, legal or regulatory sanctions, or brand damage arising from the failure to comply with or adequately plan for change to, official sector policy, laws, regulations, major industry standards, compliance policies and procedures or the expectations of customers and stakeholders.	Elements of this risk have been mapped to the climate change mitigation subtopic. CR&E risk continues to increase in prominence globally resulting in additional supervisory and regulatory requirements for the Bank. The Bank considers these sustainability regulations as adding to its Regulatory Compliance risk.	n/a	n/a
R-10	Risk	Reputational and Conduct Risk: The risk of material financial loss or liability, legal or regulatory sanctions, or brand damage arising from the failure to comply with or adequately plan for change to, official sector policy, laws, regulations, major industry standards, compliance policies and procedures or the expectations of customers and stakeholders.	Elements of this risk have been mapped to the climate change mitigation subtopic. In relation to reputational risk these pertain to growing demand to make progress in integrating ESG factors; expectations to align with government initiatives and comply with regulations where failure to make progress can lead to negative public opinion. Conduct risk emerges for the Bank in relation to its practices; and meeting its ethical business requirements and customer expectations.	n/a	n/a

Sustainability Statement

ESRS E1 Climate Change (continued)

IRO-Ref	IRO	Description	Details	Positive or Negative	Potential or Actual
R-12	Risk	Business Risk: The risk that volumes may decline, margins may shrink, or management costs may increase, arising from an underperforming Business model and/or failure in the Bank's strategic ambitions.	Elements of this risk have been mapped to the climate change mitigation subtopic. Regarding Physical Risk, the Bank considers these associated risks to include customers concentrated in high Physical Risk areas. Regarding Transition Risks, these include planning, cost and resources related to emerging and future regulation, impacts on customer finances and changes in consumer preferences.	n/a	n/a

E1-MDR4-P Policies adopted to manage Product Financing

The Bank has in place policies to manage and mitigate its climate-related product financing and associated IROs as follows:

- Enterprise Risk Management Framework
- Group Credit Policy
- Residential Mortgage Lending Policy
- Collateral Valuations Policy
- Consumer Non-Mortgage Lending
- Green Product and Proposition Design Principles
- Green Bond Framework

For more information on policy contents, objectives, the most senior level role in PTSB accountable for implementation, please refer to ESRS 2-MDR-P.

These Frameworks and Policies cover PTSB's enterprise operations and apply to the organisational functions and risk management practices of the Bank's Three Lines of Defence, as defined in PTSB's ERMF.

The following Stakeholders are affected:

- Members of the Board and its Committees, Management Committees and Risk Committees;
- All employees, as defined in ESRS S1 Own Workforce;
- Business Banking Customers;
- Retail Customers;
- Third Party suppliers;
- External stakeholders, including Regulators and Supervisors who require an overview of the climate-related and environmental regulatory compliance management principles, process, and governance arrangements; and

- Owners of interlinked frameworks and policies who are responsible for aligning their frameworks, policies, and procedures.

These frameworks and policies detail relevant requirements and exclusions such as the exclusion of environmentally harmful activities from loan eligibility, the requirement for Business Banking lending of sufficient scale to complete an ESG Questionnaire (ESGQ) as part of due diligence, and the requirement for the Bank's Mortgage customers to demonstrate insurance cover for Physical Risk impacts (for example, flooding).

The Board has overall responsibility for the establishment and oversight of the Bank's ERMF and Credit Risk Management Framework.

The Assets and Liabilities Committee (ALCo) is a sub-committee of the ExCo and is responsible for overseeing pricing decisions. As such, the Bank's Green Mortgage was brought through the Committee for approval prior to implementation.

The Customer Committee (CustCo) is a sub-Committee of the ExCo and ExCo and is chaired by the Chief Retail Banking Officer. The Committee approves new, and changes to current, products and services that are aligned to the Bank's Sustainability Strategy 2025-2027, which includes consideration for Green Products and Propositions. The CustCo meets monthly, with an update on CR&E risk integration into the Bank's Products and Propositions provided as required.

The Sustainability Committee (SusCo) is a sub-committee of the ExCo and is responsible for the establishment and oversight of the Bank's SBTs, Carbon Reduction Plan and associated policies.

Framework and policy owners are accountable for the implementation of their respective frameworks and policies.

For more on the third-party standards and initiatives that the Bank is committed to, please refer to E1-MDR1-P.

PTSB's customers are a central focus when considering the IROs associated with our green products and propositions. In addition, the Bank's Investors, Regulators and other Shareholders (Government) are key stakeholders when considering the IROs associated with the Bank's funding activities.

E1-MDR4-A Actions and resources in relation to Product Financing

PTSB has made the following progress in relation to the integration of CR&E risk across the Bank:

- Investing in resources to deliver on our Sustainability Programme objectives, including the appointment of a Chief Sustainability and Corporate Affairs Officer, a Head of Sustainability and supporting team;
- Integrating the findings of the CR&E Risk Materiality Assessment across the organisation to build capacity in relation to CR&E risk;
- Enhancing the CR&E Risk Materiality Assessment with additional granularity and supporting information;

- Delivering the first qualitative review of nature-related risk across all Key Risk Categories as part of work to mature the CR&E Risk Materiality Assessment;
- Enhancing the Risk Appetite Statement (RAS) with quantitative elements that encompass the cross-cutting nature of CR&E risk across Key Risk Categories, including the further development and refinement of limits and tolerances for a subset of KRIs;
- Implementing mitigation and control processes to manage CR&E risk with a 'Three Lines of Defence' Model adopted across the Bank to ensure robust and fit for purpose CR&E risk oversight and management;
- Continuing to integrate CR&E risk into the Bank's ICAAP and ILAAP processes in line with supervisory expectation;
- Continuing to evolve CR&E data requirements and improve the data availability and quality for use in scenario analysis, stress testing, strategy and reporting;
- Taking steps to understand, manage and mitigate Physical CR&E risk, including exposure to chronic risk. Within the Retail Mortgage Portfolio, for new Mortgage applications the BER and Eircode are being captured, where available. This has allowed the development of metrics to monitor the exposure to acute and chronic Physical risk in the form of flooding and coastal erosion, and the energy efficiency of the Bank's Mortgage Portfolio;
- Continuing to advance green product and proposition development and the provision of support for customers on their sustainability journey through our Green Mortgage Product and Home Upgrade Tool launched in early 2026;
- Participating in the SBCI's Home Energy Upgrade Loan Scheme aimed at supporting eligible applicants who wish to invest and improve in the energy efficiency of a residential property;
- Participating in the SBCI's Growth and Sustainability Loan Scheme focused on providing eligible businesses with long-term financing to enhance their growth and sustainability efforts;
- Continuing to review and enhance the Bank's ESGQ for our Business Banking Customers;
- Ensuring lending officers consider CR&E risk for each Business Banking Lending application, and assessment criteria for new Retail Property Lending and incorporate an evaluation of

potential Physical Risk, including flood, subsidence, coastal and environmental risks as part of the valuation process. Lending should not proceed where the valuer identifies risks at individual property level which might potentially restrict the customer's ability to obtain home insurance;

- Issuing Green Bonds under the Bank's Green Bond Framework. PTSB's Green Bond Framework has been established to help mitigate climate change through reduced carbon emissions and energy demand, protect vulnerable ecosystems, and support the strategic outcomes of Project Ireland 2040, the United Nation's Sustainable Development Goals and Ireland's Climate Action Plan; and,
- Providing CR&E risk training to relevant colleagues, including the Board and Senior Management.

The Bank is focused on continuing to mature its approach to sustainability-related risk management, green product and proposition development and transparency through disclosures. In addition, we will continue to monitor and develop the relevant CR&E risk indicators with a view to assessing their potential impact on the Bank's Market Risk Profile over time.

PTSB has in place an overarching three-year strategic and financial plan for the Bank - The Integrated Strategic Plan (ISP). As part of the development of the ISP, financial investment and resources are allocated to the delivery of these activities. PTSB has not disclosed these figures publicly.

For more information on the Bank's actions related to green products and propositions, please refer to E1-MDR1-A.

E1-MDR4-M Metrics in relation to Product Financing

The Bank uses the following metrics to evaluate performance and effectiveness in key areas.

A CR&E risk metric is monitored following a standard reporting procedures to relevant governance committees. This metric captures the energy efficiency of the Mortgage Portfolio through Building Energy Ratings (BER). It is used to understand exposure to Transition Risk

and the impact of financed emissions. The BER metric uses a proxy score for those properties where a validated BER is not available based on property characteristics outlined by the Sustainable Energy Authority of Ireland. PTSB has not disclosed this metric publicly.

- During 2025, c.€1.26 bn in green lending⁶ was drawn down, accounting for 44% of New Mortgage lending, +44% YoY; and, €100m in funding is available to drawdown through the SBCI's Home Energy Upgrade Loan Scheme. The fund launched in 2024 and is available until 31st December 2026.
- During 2025, €100m in total funding was made available to drawdown through the SBCI's Home Energy Upgrade Loan Scheme.

Lending is measured annually.

E1-MDR4-T Tracking effectiveness of policies and actions through targets

Targets relating to lending activity include:

- The Bank has a lending target in place associated with its Green Mortgage Product; and,
- The Bank has a target in relation to drawdowns associated with the SBCI's Home Energy Upgrade Loan Scheme.

PTSB has not disclosed these targets publicly.

6. PTSB's Green Mortgage Product is defined as a 3-Year and 5-Year Fixed Rate Product available to all new and existing home loan customers, where their homes have a confirmed or proposed Building Energy Rating (BER) of A1 to B3 (inclusive). PTSB's Taxonomy aligned assets include those properties with a BER of A1 to B2 (inclusive). As a result, total Green Mortgage Lending is broader than the population of Taxonomy-aligned assets and the associated balances are not directly comparable

ESRS S1 Own workforce



For the purposes of this disclosure:

- **Employees:** Employees are defined as individuals who have a direct contract of employment with the Bank (permanent and fixed-term contract employees).
- **Non-Employees:** Non-employees are defined as individuals that do not have a direct contract of employment with the Bank. This includes third party advisory services, contractors, agency partners and self-employed individuals.

The Bank's Employees who may be subject to the impact caused by adequate working conditions, equal opportunities for all and protection of worker's rights include:

- Permanent Employees – Customer Facing
- Permanent Employees – Non-Customer Facing
- Fixed-term Contract Employees – Customer Facing
- Fixed-term Contract Employees – Non-Customer Facing
- Part-time – Customer Facing
- Part-time – Non-Customer Facing

As part of the Bank's DMA, we identified the material Impacts, Risks and Opportunities (IROs) in relation to Own Workforce. These have been outlined in ESRS 2 SBM-3. Further detail is provided in S1-MDR1.

PTSB is a Retail and Business Bank that delivers a full-service banking experience to all customers. We operate within the boundaries of a Low Risk Appetite. Given that the Bank exclusively provides financial services to customers in a regulated environment and operates in the Republic of Ireland (which is not considered to be an 'at risk' geographic area that is prone to labour law breaches). As such, there is no significant risk of child labour, forced labour or compulsory labour.

People with particular characteristics, those working in particular contexts, or those undertaking particular activities may be at greater risk of harm, were not specifically identified as part of PTSB's DMA. However, they were considered as part of the Bank's employee cohort as a whole.

Following our assessment of the material risks and opportunities related to impacts and dependencies on our workforce, no specific cohort was identified as being uniquely affected.

Impacts, risks and opportunities management

S1-1 Policies related to own workforce

The Bank has policies, procedures and Codes in place to manage the material IROs related to Own Workforce as outlined in ESRS 2-MDR-P. Further detail is provided in S1-MDR1.

We recognise our responsibility to respect the human rights of every individual. PTSB has developed a new Human Rights Charter to support the Bank in meeting all relevant human rights legislation in the Republic of Ireland in respect to Own Workforce.

In addition, the Bank has in place a Dignity and Respect Code and Equality through Diversity and Inclusion Charter. The Code and the Charter focus on the prevention of discrimination and the provision of equal opportunities, enabling employees to be treated with dignity and respect in the workplace.

Additional policies and procedures that are in place to prevent or mitigate against the risk and negative impact on human rights are included in G1-Business Conduct and S1-MDR1. We keep our policies under review and update them as required as part of the Bank's policy review cycle.

To mitigate against Human Rights risk, or violations that may occur, the Bank has due diligence procedures in place. These include the implementation of a Colleague Conduct Policy that establishes the requirements for the effective management of appropriate behaviours within the Bank, procedures to support us in meeting all relevant human rights legislation in the Republic of Ireland and a suite of reporting mechanisms through our Speak Freely channels. Procedures are in place for dealing with reported human rights allegations and instances to ensure they are addressed in a timely manner.

In addition, the Bank has requirements set out in other policy documents that help to encourage the right behaviour, including a Conflict of Interest Policy, Anti-Money Laundering/Terrorist Financing, Sanctions, and Anti-Bribery and Corruption policies and procedures.

The Bank uses the following engagement channels with its employees:

- Group of Unions (Unite, Mandate and FSU) /Employee Representative Bodies (ERBs)
- Employee surveys
- Team meetings
- Let's Talk ExCo quarterly all staff meetings
- Virtual and in-person networking forums
- Internal Intranet platform
- A bankwide communications platform and app
- In-house digital screens
- People Experience Council (PEC)
- Employee Resource Groups (ERGs)
- Other channels as appropriate

For more information on how the Bank listens to employees and acts on feedback, as well as the detail relating to PTSB's Speak Freely Procedure, please refer to S1-MDR1.

For more information on policy contents and objectives, as well as the most senior level role in PTSB accountable for implementation, please refer to ESRS 2 MDR-P.

The Bank exclusively provides financial services to customers in a regulated environment and operates in the Republic of Ireland (which is not considered to be an 'at risk' geographic area that is prone

to labour law breaches). As such, there is no significant risk of child labour, forced labour or compulsory labour. However, the Bank has developed a Human Rights Charter to support us in meeting all relevant human rights legislation in the Republic of Ireland and that gives reference to human trafficking, forced labour or compulsory labour and child labour.

We will continue to monitor the human rights environment to ensure it does not become a material risk for the Bank.

PTSB has a Group Safety Statement in place which documents how the highest standards of Health and Safety Management are maintained across the organisation.

The Safety Statement, and associated policies and processes, have been prepared in accordance with Section 20 of the Safety, Health and Welfare at Work Act, 2005. The Safety Statement is reviewed on a regular basis and is revised as necessary. For more on the Bank's Group Safety Statement, please refer to S1-MDR1.

The Bank is committed to fostering a workplace that is free from discrimination, harassment, and bias, ensuring that all employees have the opportunity to thrive in an inclusive environment.

Through the implementation of our Colleague Conduct Policy, Dignity and Respect Code, Culture Charter, Equality Through Diversity and Inclusion Charter, we aim to eliminate discrimination, promote equal opportunities, and ensure a diverse and inclusive workforce. PTSB's Equality through Diversity and Inclusion Charter celebrates and values the diversity of the Bank's workforce and outlines our commitment to a fair and inclusive culture. It provides an overview of how we treat all colleagues with dignity and respect and seeks to encourage a positive working environment that is free from discrimination, harassment, or victimisation.

The Bank's Culture Charter sets out our purpose, values and beliefs that guide colleague interactions to support the delivery of our ambition. For more information on the Bank's Culture Charter, please refer to ESRS 2 MDR1-P.

PTSB is committed to equality through diversity, equity and inclusion and is focussed on ensuring that all colleagues are treated in a respectful manner. Through our Speak Freely Procedure, we aim to ensure that inappropriate behaviour is challenged and addressed. We recognise that a modern workforce is made up of people with different characteristics, backgrounds and experiences, all of which are dimensions of diversity that we recognise and value.

As a Bank, we believe that by valuing and promoting diversity, equity, and inclusion, we are providing a workplace where colleagues are comfortable to be themselves and will grow as individuals within our environment. The Colleague Conduct Policy outlines the 9 Grounds of Discrimination considered by PTSB, including gender, marital status, family status, sexual orientation, religion, age, disability, race, or membership of the traveller community.

Please refer to ESRS 2 MDR-P for more information on the Bank's Dignity and Respect Code, Equality through Diversity and Inclusion Charter and Colleague Conduct Policy.

The Bank takes deliberate steps to ensure that policies are in place to advance diversity, equity and inclusion (DEI) and to prevent discrimination. These policies are implemented through the following procedures:

- Delivering mandatory training programmes: All employees (including the Bank's Leadership Team) are required to participate in annual training focused on discrimination, harassment, unconscious bias, and inclusive behaviours. This includes a requirement for all colleagues to be familiar and comply with our Dignity and Respect Code, Equality through Diversity and Inclusion Charter and Colleague Conduct Policy.
- Ensuring regular employee engagement: We enable our colleagues to provide feedback on matters relating to discrimination through regular surveys and our Speak Freely Procedure where staff can voice concerns, share ideas, and recommend improvements. This ongoing dialogue helps us to proactively identify and address potential issues before they escalate.

Sustainability Statement

ESRS S1 Own workforce (continued)

- Working alongside our Employee Resource Groups (ERGs): To support the delivery of our DEI Strategy, the Bank has in place a number of ERGs, whose aim is to enable employees to join together based on shared characteristics or life experiences. Where issues are raised through the ERGs, these are reviewed and actioned on as required.

The Bank's ERGs include:

- PRISM - Our LGBTQ+ Network for colleagues and allies. The Network promotes and values individual differences no matter how our people identify.
- Balance - The Network aims to be the catalyst for change in achieving Gender Balance in PTSB.
- DiCE - The Network promotes and celebrates people of all races, ethnicities, nationalities, and cultural heritage.
- LiveWell - The Network provides space, connection, and support for colleagues to engage in areas of wellbeing important to them regardless of location.
- Adapt - The Network's Vision is to empower, educate, elevate, equip, and empathise by creating an inclusive and equitable place to work for abled and disabled colleagues.

The ERGs help diverse groups achieve a collective voice within the organisation and serve as an organised platform that our people can utilise to promote change. They include representation from all areas of the Bank, meet regularly and report into members of the Bank's People Experience Team.

As our ERGs continue to evolve, we acknowledge that we are stronger together as a collective. In 2025, we launched the Unity Network, which brings together all our ERGs to support delivery of the Bank's DEI Strategy.

S1-2 Processes for engaging with own workforce and workers' representatives about impacts

The Bank actively engages employees across all levels, fostering a culture of open communication, feedback, and collaboration. This inclusive approach allows us to gain diverse insights, manage the actual and potential impacts of our operations and identify potential risks early, ensuring that our strategies are both informed and responsive. For more information, please refer to S1-MDR1-A.

For details relating to PTSB's DMA and wider stakeholder engagement with the Bank's Own Workforce, please refer to ESRS 2 SBM-3 and S1-MDR1.

As a requirement of the UK Corporate Governance Code⁷, the Board is required to review workforce engagement mechanisms, to ensure they remain effective.

Key examples of this include the establishment of a Nominations Culture and Ethics Committee (NomCo) with accountability for culture, behaviour, ethics and reputation management oversight in the Bank, ongoing representation of Senior Management and Executive Committee members at employee events, regular engagement with our Employee Representative Bodies (ERBs) and review of our Every Voice Counts Survey and Micro-pulse Surveys.

The Bank gains insight into perspectives of colleagues who may be vulnerable through a number of channels including, our Every Voice Counts Survey, Micro-pulse Surveys and through our Speak Freely Procedure. For more information on employee wellbeing programmes to support colleagues, please refer to S1-MDR1-A.

S1-3 Processes to remediate negative impacts and channels for own workforce to raise concerns

The Bank has in place a Grievance Procedure, Speak Freely Procedures and a Dignity and Respect Code.

For further detail on the channels the Bank has in place to gather employee feedback or enable our colleagues to raise concerns, please refer to S1-1. For more on the Bank's Dignity and Respect Code, please refer to S1-1.

Speak Freely/Protected Disclosures

The Bank has in place a Speak Freely Procedure and Protected Disclosure Procedures which aim to create a culture whereby employees can speak up and raise a concern. Those concerns are investigated and dealt with in a timely manner. We monitor the usage of the Bank's Speak Freely Procedure and include this in our Key Risk Indicator (KRI) reporting, which particularly focuses on a KRI of trust, that colleagues feel confident to raise concerns in a confidential manner. The implementation of the Bank's Speak Freely Procedure ensures colleagues have trusted channels to raise concerns, designed to ensure fairness, transparency, and accessibility. This channel is well known and easy to access, with clear procedures and timeframes communicated to all employees. We prioritise accountability through impartial oversight, ensuring legitimacy and trust. Protected Disclosures Procedures (for disclosers and discloser recipients) provide clear guidance on how to raise a Protected Disclosure under the Speak Freely Procedure. These procedures should be read in conjunction with the Speak Freely Procedure. For more details refer to ESRS 2-MDR-P.

Grievance/Investigation/ Disciplinary Procedures

PTSB has a Grievance Procedure in place which sets out the procedures a staff member can follow in terms of the staff member's right to seek to address grievances relating to their employment.

In line with these procedures, colleagues may raise complaints in the workplace respective to themselves and which may apply to other cohorts of colleagues. The Bank has formal procedures in place to investigate instances of misconduct in the workplace. Conduct-related matters are

7. The Company's shares are admitted to trading on the Main Securities Market of Euronext Dublin and the London Stock Exchange and the Company must comply or explain against the provisions of the 2024 UK Corporate Governance Code (the "UK Code").

reported to the Bank's Colleague Conduct Committee on a quarterly basis and to the NomCo on an annual basis, with reporting outlining high-level themes and actions to address common/reoccurring issues. Where there are common or recurring issues, these are dealt with through policy updates and HR people management training.

We maintain transparency by keeping complainants informed throughout the process and, where relevant, through sharing information with the public to meet broader interests. Our focus is on dialogue, working collaboratively with employees to reach mutually agreed solutions. Insights from complaints guide and inform the development of programming to improve our processes, driving continuous learning and improvement across the organisation.

Workplace Relations Commission / Labour Court

The Bank manages complaints that are raised with the Workplace Relations Commission and Labour Court through mediation and adjudication. Where a complaint is upheld action is taken to address the outcome and determine if there are further impacts to other colleagues. Where appropriate, remedial action is taken. During 2025, the Bank introduced a new set of protocols with our Group of Unions which includes an adjudication and complaint process in relation the Bank and Union-related issues.

S1-4 Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

Please refer to S1-MDR1-A for an overview of the Bank's action plans and resources to manage the material IROs related to Own Workforce.

For more information on how the PTSB tracks and assesses the effectiveness of its actions in delivering outcomes for the Bank's Own Workforce, please refer to S1-MDR1-M.

Process for Identifying Appropriate Action in Response to Negative Workforce Impacts

The Bank has established a structured process for identifying when and what actions are necessary in response to actual or potential negative impacts on our workforce. This process enables us to address issues that arise, whether they are caused by our direct operations, contributed to through our activities, or linked to our business relationships.

Our workforce environment is continuously monitored to identify any actual or potential negative impacts. This includes:

Internal Reporting Systems: We have implemented robust reporting mechanisms such as Speak Freely, that allow colleagues to raise concerns or report incidents confidentially.

Risk Assessments: We engage in regular risk assessments to proactively identify vulnerabilities in areas such as workplace safety, employee wellbeing, discrimination, and labour rights. These assessments help us to identify potential impacts before they materialise.

Stakeholder Engagement: We actively engage with our workforce through surveys, interviews, and open forums to gather direct feedback on workplace conditions. External stakeholders, such as Group of Unions and advocacy groups, are also consulted when needed to gain a broader perspective on workforce-related risk.

To ensure that the Bank's practices do not cause or contribute to material negative impacts on our workforce, we have implemented comprehensive frameworks, policies and procedures. This approach is designed to prevent harm, promote ethical practices, and balance business performance with our responsibility to safeguard the wellbeing of our employees.

Employee Engagement and Feedback Mechanisms

To effectively safeguard the wellbeing of our workforce, we engage in regular dialogue with our employees to gather feedback and assess workplace conditions. Key channels include our Every Voice Counts Employee Engagement Survey, regular Micro-pulse Surveys, town halls, team meetings, virtual and in-person networking forums, internal intranet

platform, a bank-wide communications platform and app, in-house digital screens, Employee Resource Group and People Experience Council engagement, and other channels as appropriate.

Risk Management and Controls

The Bank has a comprehensive Risk Management Framework that identifies, assesses, and mitigates risks related to workforce impacts. For more on the Bank's Risk Management Framework, please refer to ESRS 2 MDR-P.

Internal Policies and Controls: Ethics and Employee Conduct

To reinforce ethical behaviour and protect our workforce, we have implemented robust internal policies and controls related to ethics and employee conduct. These policies ensure that all aspects of our business operations, whether procurement, sales, or data use, adhere to high ethical standards and do not harm employees.

Please refer to S1-MDR1 for further information on the Bank's material IROs in relation to the policies, actions, metrics and targets related to Own Workforce.

Metrics and targets

S1-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Please refer to S1-MDR1-M and S1-MDR1-T for an overview of the metrics and targets that the Bank has set to manage material IROs including, Gender Pay Gap, Culture Index Score and Board Diversity.

Our approach to setting targets for improving working conditions is dynamic, allowing us to adapt and respond to new challenges and employee feedback as it arises. We regularly review progress toward our objectives in collaboration with internal workforce representatives and adjust our strategies as necessary to ensure that we continue to make meaningful progress in creating a safer, healthier, and more supportive work environment. We track and monitor progress through a Diversity, Equity and Inclusion Dashboard and updates are brought to the Board and the ExCo through the Bank's Culture Paper on a quarterly basis.

Sustainability Statement

ESRS S1 Own workforce (continued)

S1-6 Characteristics of the undertaking's employees

The breakdown of employees (as defined in S1-1) for 2025 and 2024 is outlined below:

Metric	2025	2024
Number of employees as of 31 December (Headcount)	3,099	3,457
Average number of employees (Headcount)	3,310	3,442
Full Time Equivalent (FTE)	3,026	3,359

Information in relation to the characteristics of the Bank's employees has been compiled on a headcount basis.

Gender	Number of employees (Headcount) at of 31st December 2025	Average number of employees (Headcount) for 2025
Male	1,461 (2024: 1,601)	1,552 (2024: 1,619)
Female	1,638 (2024: 1,856)	1,758 (2024: 1,823)
Other*	-	-
Total employees**	3,099 (2024: 3,457)	3,310 (2024: 3,442)

* PTSB currently does not have complete data to report this figure at present. However, we actively encourage employees to provide a range of DEI metrics on a voluntary basis to support the improvement of data and to encourage transparency and progress.

** Total employees are based on Headcount figures for the purposes of this Sustainability Statement. The Bank also reports a Full Time Equivalent (FTE) figure of 3,026 which includes seasonal workers and staff on maternity leave, career breaks, or long-term absence.

PTSB currently operates exclusively in the Republic of Ireland and therefore does not have employees in operations outside of this region.

2025 Category	Female	Male	Other*	Total
Number of employees (Headcount)	1,638	1,461	-	3,099
Number of permanent employees (Headcount)	1,557	1,410	-	2,967
Number of temporary employees (Headcount)	81	51	-	132
Number of full-time employees (Headcount)	1,429	1,449	-	2,878
Number of part-time employees (Headcount)	209	12	-	221
Number of non-guaranteed hours employees (Headcount)	-	-	-	0

* PTSB currently does not have complete data to report this figure at present. However, we actively encourage employees to provide a range of DEI metrics on a voluntary basis to support the improvement of data and to encourage transparency and progress.

The total number of employees who left the Bank (Headcount) in 2025 is 635 (in 2024 this figure was 424). The percentage of employee turnover in 2025 was 19.2% (in 2024 the percentage employee turnover was 12.3%).

The data for employee figures is generated from the PTSB HR platform Tableau. This platform allows us to record and monitor total headcount, average headcount, gender, age, turnover and leavers in real time.

Data assumptions include:

- For payroll purposes, we record only two genders on our headcount file.
- Employees counted as 'Long Term Absent' are included as they may still be in receipt of payments from the Bank.
- Employees on 'Career Break' or 'Carers Leave' are not included as they are not in receipt of any direct payment from the Bank.

S1-8 Collective bargaining coverage and social dialogue

The total percentage of employees covered by collective bargaining agreements is 92%. PTSB currently operates exclusively in the Republic of Ireland and therefore does not have employees in operations outside of this region.

Employees that are not covered by collective bargaining agreements are treated as per their individual contracts. Additionally, these conditions are aligned with the standards established by the Bank for all employees, ensuring consistency and fairness across the organisation.

The existence of an agreement with employees for representation by a European Works Council (EWC) is not applicable, as the Bank does not operate in multiple jurisdictions which is a requirement for EWCs. However, the Bank engages with the formally recognised Group of Unions as outlined in S1-1.

S1-9 Diversity metrics

The Board and the ExCo have been considered as top management for the purposes of this disclosure.

The gender distribution in number of employees (Headcount) at top management level is as follows:

Gender	Number of employees at top management level
Male	11 (2024: 12)
Female	9 (2024: 8)
Other	- (2024: -)
Not Reported	- (2024: -)
Total Employees (Headcount)	20 (2024: 20)

The distribution of employees by age is as follows:

Age Group	Headcount	%
18-30	715 (2024: 772)	23% (2024: 22%)
30-50	1,810 (2024: 1,975)	58% (2024: 57%)
50+	574 (2024: 710)	19% (2024: 21%)
Total	3,099 (2024: 3,457)	

S1-10 Adequate wages

All PTSB employees are employed subject to Republic of Ireland employment contracts and legislation and as such, we have no employees paid below Ireland's national minimum wage of €25,448. The minimum under the PTSB Remuneration Policy is €29,580. Please refer to ESRS 2MDR1-P for more information on the Bank's Remuneration Policy.

S1-14 Health and safety metrics

The percentage of people within PTSB who are covered by the internal health and safety statement is 100%. There were no fatalities amongst the Bank's workforce as a result of work-related injuries or ill health during 2025.

The total number of work-related accidents for PTSB's Own Workforce was 47.

S1-16 Remuneration metrics (pay gap and total remuneration)

The Mean Gender Pay Gap⁸ for the Bank is 18.1% (2024: 16.9%).

Formula:

$\frac{(\text{Average gross hourly pay level of male employees} - \text{average gross hourly pay level of female employees})}{\text{Average gross hourly pay of male employees}} \times 100$	

The Median Gender Pay Gap⁸ is 12.0% (2024: 11.6%).

Sustainability Statement

ESRS S1 Own workforce (continued)

Formula:*

$$\frac{(\text{Median gross hourly pay level of male employees} - \text{median gross hourly pay level of female employees})}{\text{Median gross hourly pay of male employees}} \times 100$$

* Median is calculated as the median of the mean gross hourly rate per employee

8. There have been no material changes up to 31st December 2025.

The annual total remuneration ratio of the highest paid individual to the median annual total remuneration for all employees for the Bank is currently 12.99:1.

Formula:

$$\frac{(\text{Annual total remuneration for the undertaking's highest paid individual})}{\text{Median employee annual total remuneration (excluding the highest-paid individual)}}$$

PTSB's Gender Pay Gap has been reviewed by the Bank's Internal Audit Team and has also received limited assurance from our assurance provider.

S1-17 Incidents, complaints and severe human rights impacts

The total number of incidents of discrimination for 2025 was 2 (2024: 2). The total number of complaints filed through channels designed for PTSB employees to raise concerns in 2025 was 7 (2024: 4). The total number of complaints filed externally to national contact points such as the Workplace Relations Commission and Labour Court for OECD Multinational Enterprises in 2025 was 0 (2024: 4) (this is not inclusive of the 2 recorded incidents noted above).

There were no severe human rights incidents connected to PTSB's workforce in 2025. There were no severe human rights incidents connected to PTSB's workforce that do not respect the UN Guiding Principles and Organisation for Economic Cooperations and Development (OECD) Guidelines for Multinational Enterprises in 2025. There were no fines, penalties, and compensation incidents relating to human rights issues during 2025.

S1 Minimum Disclosure Requirements

As part of the development of the Bank's IROs, we identified similar themes emerging. As such, the MDRs have been consolidated under thematic headings. For S1 Own Workforce, we have consolidated all material IROs under the theme S1-MDR1-Working Conditions.

S1-MDR1 Working Conditions

The IROs reflected in S1-MDR1 are outlined below:

IRO-Ref	IRO	Description	Details	Positive or Negative	Potential or Actual
I-3	Impact	The impact PTSB has on its employees by ensuring adequate working conditions, equal opportunities for all, and protection of worker's rights.	PTSB understands that the impact it has on its employees is far reaching and that it not only impacts the employees themselves but the Bank's long-term success. As part of its analysis, the Bank considered a wide range of actual and potential, positive and negative, impacts on its own workforce. The impacts focused on corporate culture, workplace dynamics, employee wellbeing, mental health, job satisfaction, quality of life, burnout, conflict, employee experience, morale, productivity and gender balance. The overall impact of ensuring adequate working conditions, equal opportunities and protection of worker's rights is a well-supported workforce leading to increased engagement, improved performance, and a more resilient organisation.	Both	Both

IRO-Ref	IRO	Description	Details	Positive or Negative	Potential or Actual
O-3	Opportunity	A working environment that has appropriate working conditions, protects worker's rights, promotes inclusion and offers adequate training and innovation opportunities may lead to increased productivity, reduce costs and enhanced brand and reputation.	PTSB understands it can unlock significant opportunities by fostering a working environment with appropriate working conditions. As part of its analysis, the Bank considered a number of different opportunities which centred on the themes of appropriate working conditions, protection of worker's rights and inclusion of all in the workplace. When employees feel respected, valued and supported they will be motivated to perform well and contribute to the business objectives. Opportunities considered included fostering an attractive corporate culture with stable working conditions, where diversity in the workforce is promoted, health and safety risks are effectively managed, and employees feel comfortable to raise concerns (including whistleblowing) and are supported to innovate. PTSB views these opportunities as collectively investing in the wellbeing of its employees leading to increased productivity, reduced operational costs, enhanced reputation, better talent retention and the overall strengthening its position in the marketplace.	n/a	n/a
R-7	Risk	People Risk: The risk of financial, operational or reputational damage to the Bank arising from failure of the Bank to meet its employment obligations and duty of care to staff or the failure to ensure adequate resources and skills are in place, that succession planning is not effective or that the operation of the Bank may be impacted by labour disputes.	People Risk is associated with the behaviours and actions of the Bank's workforce and has been identified as a key risk by PTSB. Elements of this risk have been mapped to the Own Workforce topic. These relate to employee wellbeing and mental health, including stress and burnout; inadequate wages, remuneration and development opportunities harming workforce retention; lack of transparent work environment or equal opportunities for all, reducing trust and communication; difficulties in attracting talent; regulatory compliance including health and safety; human rights and protections against discrimination requirements; and lack of engagement with unions and lack of effective communication leading to strikes.	n/a	n/a

SI-MDR1-P Policies adopted to manage Working Conditions

PTSB has in place a number of policies to mitigate against Social and People risk, ensure adequate working conditions, equal opportunities and the protection of worker's rights. These include:

- Individual Accountability Framework (IAF)
- Conduct Standards Policy
- Colleague Conduct Policy
- Conduct Management Framework
- Code of Ethics
- Speak Freely (Whistleblowing) Procedure and Protected Disclosure Procedure;
- Dignity and Respect Code
- Equality through Diversity and Inclusion Charter

- Conflict of Interest Policy
- Fitness and Probity Policy
- Grievance Procedure
- Disciplinary Procedure
- Financial Crime Compliance Framework
- Anti-Money Laundering and Countering the Financing of Terrorism Policy
- Anti-Bribery and Corruption Policy
- Data Protection Policy
- Information Security Policy
- Learning and Development Policy
- Smart Working Framework
- Remuneration Policy
- Group Safety Statement
- Succession Planning Policy

Framework and Policy Implementation Monitoring Process

The application of these frameworks and policies is monitored by the framework or policy owner. The policies referenced above comply with best practice guidance in line with the relevant body such as the Workplace Relations Commission, the Health and Safety Authority, Employment and Data Protection Law updates and regulatory requirements.

It is an employee's responsibility to comply with policies made aware to them by their Line Managers. Relevant training is provided at least annually, with the Bank's Learning and Development team monitor completion.

Sustainability Statement

ESRS S1 Own workforce (continued)

All frameworks and policies that the Bank has in place to protect its workforce meet the relevant regulatory requirements, adhere to PTSB's Document Management Guidelines, and are reviewed and updated as part of the Bank's policy review cycle. These frameworks and policies apply to all of the Bank's Business Units. Accordingly, every colleague should be familiar with the policies and relevant processes, procedures, codes and guidelines in support of the protection of worker's rights.

The Board has overall governance responsibility for the operations of the Bank. While the Board retain ultimate accountability for long-term implementation of PTSB's Business Strategy, specific policy owners have been designated for various policies.

The Bank demonstrates a strong commitment to transparency and accountability by actively respecting a range of third party standards and initiatives through its frameworks and policies. These include:

- Receiving re-accreditation to the Irish Centre for Diversity's Investors in Diversity Gold accreditation;
- Setting Board diversity objectives (for more information, please refer to S1-MDR1-M), through the NomCo and considering diversity benchmarking results, census data and the latest regulatory guidance published by competent authorities, the Economic and Social Research Institute (ESRI), the European Banking Authority (EBA), or other relevant international bodies or organisations;
- Continuing membership of the 30% Club, a group of c.200 Chairs and CEOs committed to better gender balance at all levels of their organisations;
- Supporting Balance for Better Business, and playing an active role in the development of the Banking and Payments Federation Ireland (BPFI's) Women in Finance Charter;
- Partnering with Business in the Community Ireland (BITCI) to track and report on DEI progress through the Elevate Pledge, which includes submitting relevant data for an annual report on diversity efforts;
- Attaining the Irish Business and Employers Confederation's (IBEC) KeepWell Mark accreditation;

- Reporting on the Bank's Gender Pay Gap and aligning with best practices for gender equity in the workplace; and,
- Respecting The Employment Equality Acts 1998-2015 and the Equal Status Act 2000 to not treat anyone unfairly because of any of the 9 Grounds of Discrimination (as defined in law) gender, marital status, family status, sexual orientation, religion, age, disability, race or membership of the traveller community.

We recognise that building strong relationships with our stakeholders, and ensuring that we engage with them regularly, plays a fundamental role in informing our Business Strategy and associated policy environment. A key role of the NomCo is to ensure effective engagement with and participation from the Bank's key stakeholders. PTSB's People Function continues to ensure that feedback from colleagues, customers and communities is measured effectively in line with the Bank's purpose and that key insights are brought to the NomCo on a regular basis. The Bank actively engages employees across all levels, fostering a culture of open communication, feedback, and collaboration. This inclusive approach allows us to gain diverse insights and identify potential risks early, ensuring that our strategies are both informed and responsive.

Listening to Employees and Acting on Feedback

Every Voice Counts (EVC) Employee Engagement Survey is conducted annually and is designed to measure progress across our culture, engagement and trust scores and to give our people an opportunity to provide feedback on what is working well across the organisation, while identifying areas for improvement.

The Bank regularly conducts micro-pulse surveys which cover a number of themes including, flexible and hybrid working and speaking freely. The findings enable us to evolve our action plans, ensuring we focus on the right things to support our colleagues.

For more information relating to colleague engagement, including the channels by which engagement occurs, please refer to S1-1.

S1-MDR1-A Actions and resources in relation to Working Conditions

During 2025, the Bank made progress in the implementation of actions to foster optimal working conditions, promote equitable opportunities for all employees, and safeguard worker's rights.

Actions taken include:

- Completing the Irish Centre for Diversity's Gold re-accreditation process. Engagement resulted in an improved Inclusion Score of 80.2%, positioning PTSB ahead of both the National Benchmark and the Financial Services Benchmark in Ireland;
- Enhancing our DEI Strategy with the recommendations put forward by the Irish Centre for Diversity following our Gold re-accreditation;
- Continuing to embed our Smarter Working Framework with c.69% of our colleagues now availing of Hybrid Working Options;
- Launching the Unity Network to bring all our ERGs together to support delivery of the Bank's DEI Strategy;
- Ongoing roll out of the DEI Awareness mandatory annual eLearning for all colleagues;
- Offering support for parents through 1:1 coaching and group sessions with our parental support partners;
- Ongoing review of all internal training material, ensuring consideration for accessibility and representation;
- Maintaining our Faith Room, Wellbeing Room and All Gender Toilets facilities at the Bank's Head Office, which now form part of our Property Strategy; and,
- Promoting a culture of psychological safety through Speak Freely, our channel for encouraging colleagues to speak up and raise a concern.

High Performance Culture

The Bank's Performance Management Strategy applies to all employees across the organisation, ensuring a consistent approach to employee performance, development, and evaluation. The Bank has in place a set of core competencies for all colleagues, relevant to their role within the business. These competencies are aligned to our Business Strategy and organisational values. The competencies are an integral part of our Career Development Framework, supporting

colleagues' development and on the job and career growth trajectory. PTSB has in place an online performance management system, Performance COMPASS, to encourage quality conversations and to streamline the completion of the performance management process.

Ways of Working (Hybrid Flexible Working)

Throughout 2025, the Bank has continued to advance its approach towards a flexible and hybrid workplace, with the aim of creating a modern work environment that prioritises employee wellbeing and fosters a supportive and inclusive workplace.

Employee Wellbeing

The wellbeing of our employees throughout all stages of their career and personal lives is of paramount importance to us. We are committed to ensuring a lasting positive impact on our colleagues through the implementation of various initiatives, including the completion of IBEC's KeepWell Mark accreditation during 2025 and the development of the Bank's first Wellbeing Strategy which was guided by IBEC's accreditation feedback. The Bank's Wellbeing Strategy 2025-2028 includes 8 key areas of focus. They include Mental Health, Physical Activity, Diet and Nutrition, Substances and Gambling, Talent and Development, Leaders and delivery of our DEI Strategy.

As part of PTSB's investment in employee wellbeing, we offer a range of programmes and benefits to assist and support our people. As part of our Employee Proposition, our people are provided with a range of financial, physical and emotional health and wellbeing programmes and benefits.

Financial	Physical/Emotional/Mental Health
Pension Plan	Health Screening
Income Protection Benefit	Eye Testing
Sick Pay Scheme	Employee Assistance Programme for Colleagues and their Spouses, Adult Dependent Children and Dependent Parents (Counselling Service)
Staff Banking	Parental Supports (1:1 Career Coaching for Parents and People Managers And Supports For Parents And Carers Of Toddlers To Teenagers)
Cycle To Work Scheme	Menopause Supports for Colleagues and People Managers
Annual Travel Pass Scheme	Mental Health Training Addressing a Variety of Themes
Employee Discount Scheme	A Range of Health and Wellbeing Related Information Sessions
Holiday Fund	Lifestyle/Wellbeing Workshops
	Work Station Assessments (Both In Office And At Home)
	Education Support
	Paid Maternity and Paternity Leave Adoptive Leave
	Life Leave (5 Days) and a You@PTSB Day
	MyLife App

PTSB has a Pension Plan in place for employees. All PTSB employees are included in the Pension Plan as a default from the first day of joining the Bank. As such, there are no employees subject to the Government's 'My Future Fund' arrangements.

Investing in Learning and Development

PTSB recognises the importance of both personal and professional development when it comes to delivering on our purpose and ambition. Our focus is on our people and our mission to equip them with the necessary skills and behaviours to grow and develop in a changing financial services landscape. We support our colleagues through a diverse catalogue of education and training courses as well as other professional development opportunities tailored to their role, enabling them to learn and adopt new skills that will be critical to the future of banking. A dedicated Learning and Development Team is in place to coordinate activity and deliver programming.

Diversity, Equity and Inclusion

PTSB is an equal opportunities employer committed to creating a professional environment in which our employees feel valued, included and empowered to succeed in their career, regardless of gender, age, sexual orientation, race, religion, ability/disability, background or life experiences.

We acknowledge the role that our colleagues play in ensuring operational success and long-term sustainability. We are committed to addressing the material People risk that arise from impacts and dependencies on our workforce, such as those related to employee wellbeing, safety, engagement, and productivity. To manage these risks, we have implemented a range of actions and ensure that their effectiveness is continuously monitored and tracked.

The Bank monitors any incidents, breaches, or complaints related to working conditions, equal opportunities and workers' rights through channels including:

Sustainability Statement

ESRS S1 Own workforce (continued)

Employee Representative Bodies (ERBs) / Group of Unions

- PTSB operates under an established partnership model with our formally recognised Group of Unions (GOU)/ Representative Bodies under an agreed set of 'Better Ways of Working' Protocols;
- Company representatives meet with the internal committees and the full-time officials on a regular basis. This allows for matters to be discussed in a structured way and provides an opportunity to deal with anything that may arise at inception, greatly increasing the chances of internal resolution;
- All material organisational changes, including changes to established terms and conditions of employment (to the extent they arise), are discussed and negotiated in advance with the Trade Unions/Representative Bodies;
- PTSB engaged in extensive and constructive negotiations with its Group of Unions during 2025 in relation to 2024, 2025 & 2026 pay matters. The Bank's proposal to resolve outstanding Pay 2024 issues was balloted and accepted in April 2025 which included the introduction of the Group of Union (GOU) 'Better Ways of Working' Protocols. Following this, Pay 2025 negotiations progressed and this was agreed and accepted in July 2025 following GOU ballots. Pay 2026 negotiations commenced in October 2025 and an agreement was reached in December 2025 for payment during Q1 2026.
- During 2025, the Bank engaged extensively with the GOU on organisational change initiatives such as the Voluntary Severance Scheme, Organisational Design, BAU matters, Pay matters relating to 2024 – 2026, new Protocols, new operating rhythms and other material developments occurring in the Bank which may impact the Unions such as the Formal Sales Process;
- All employees receive regular updates on organisational matters through a diverse range of communication mechanisms;

- Monthly engagements with the formally recognised Group of Unions to discuss business updates and to raise and address areas of concern for colleagues;
- Annual pay negotiations with the Group of Unions/Representative Bodies; and,
- Executive and Senior Leadership Team members meet the Group of Unions on an as needed basis depending on the agenda and business requirements and have scheduled bi-annual engagements with the Group of Unions to update them on the Bank's trading position and Business Strategy, together with the opportunities and challenges being faced.

People Experience Council (PEC)

PTSB has in place a PEC, a group of leaders within the organisation, with representation across multiple levels and functions. PEC members are empowered and mandated by their ExCo member to work with teams in their area as they seek to drive and support positive cultural and behavioural change. Members listen to and elevate colleague feedback and work to support the cultural evolution within their function to address behavioural inconsistencies across the Bank.

Following the results of PTSB's annual employee survey Every Voice Counts (EVC) Employee Feedback Survey, PEC members lead the development of their Business Unit's EVC Action Plan to address areas of improvement.

Having reviewed the series of employee engagements during 2025, the NomCo was satisfied that this engagement was effective and in compliance with the UK Code. Our progress in creating this culture is measured through our EVC Survey and our Micro-pulse Survey which asks the question 'I feel safe to speak up if I saw inappropriate behaviour without fear of negative consequences'. During 2025, 73% (2024:74%) of employees said they agreed with the statement.

Gender Pay Gap Reporting

The Gender Pay Gap is the difference between the average gross hourly earnings of all men and the gross hourly earnings for all women in an organisation, regardless of the nature, experience, qualifications or working pattern of their jobs.

As part of the development of the Bank's Integrated Strategic Plan (ISP), financial investment and resources are allocated to the delivery of activity in place to support the Bank's Own Workforce. PTSB has not disclosed these figures publicly.

S1-MDR1-M Metrics in relation to Working Conditions

The Bank employs key metrics to evaluate its performance and effectiveness regarding its impact on employees, particularly in relation to ensuring adequate working conditions, equal opportunities, and the protection of workers' rights.

The following metrics and targets, alongside previously disclosed metrics, demonstrate PTSB's commitment to fostering a positive work environment which is an essential factor for productivity, people risk mitigation, and the enhancement of brand reputation and industry awareness.

Gender Pay Gap (GPG)

The Bank reports the difference between the average (mean) and the midpoint (median) earnings of men and women, expressed relative to men's earnings. PTSB report twenty different metrics, based on a 'snapshot' of pay data on a date of our choosing in June 2025⁸, which acts as a baseline for the reporting year.

- Mean Gender Pay Gap 2025 – 18.1% (2024: 16.9%)
- Median Gender Pay Gap 2025 – 12.0% (2024: 11.6%)

8. There have been no material changes up to 31st December 2025.

Culture Index Score

The Bank measures its Culture Index Score through its annual EVC Survey. It is calculated from 20 specific questions with themes such as Personal responsibility for Risk, Feeling of Belonging and Managers and Leadership behaviours.

In 2025, the Bank's Culture Index was 76% (+6% on target).

Board Diversity Metrics

PTSB acknowledges the value of maintaining a diverse Board composed of members who possess a broad spectrum of knowledge, skills, and experience. Diversity in educational and professional background, ethnicity, gender, age, cognitive and personal strengths, as well as other attributes, enables the Board to fulfil its duties and responsibilities effectively. Furthermore, PTSB is committed to ensuring diversity within its senior leadership and executive management succession pipeline.

The Bank tracks the following metrics in relation to Board diversity:

- Board members with core relevant banking and/or financial services knowledge and experience; and,
- Board Gender Balance.

For more on Board Diversity, please refer to ESRS 2-GOV1 and S1-9.

PTSB's Gender Pay Gap has been reviewed by the Bank's Internal Audit Team and has also received limited assurance from our assurance provider. The other metrics disclosed have not been validated by an external body other than the Bank's assurance provider.

S1-MDRI-T Tracking effectiveness of policies and actions through targets

Our approach to setting targets for improving working conditions is dynamic, allowing us to adapt and respond to new challenges and employee feedback as it arises. We regularly review progress toward our goals in collaboration with workforce representatives and adjust our strategies as necessary to ensure that we continue to make meaningful progress in creating a safer, healthier, and more supportive work environment.

To ensure that the targets we set for improving working conditions reflect the needs and expectations of our workforce, we actively involve employees in shaping these objectives. Through a combination of direct feedback mechanisms and collaboration with employee representatives, we ensure that our goals are grounded in the real experiences and concerns of those most affected, our employees.

Culture Index Score

PTSB has a Culture Index score target of 70%.

Board Diversity Targets

Board Diversity Targets include:

- The majority of Non-Executive Directors, the Board Chairperson together with the Chairpersons of the Audit and Risk and Compliance Committee should have core relevant banking and/or financial services knowledge and experience (obtained working for a financial institution or through the provision of services to a financial institution);
- The Board exceeded its objective of requiring the majority of Non-Executive Directors, the Board Chairperson together with the Chairpersons of the Audit and Risk and Compliance Committees to have relevant banking and/or financial experience and is satisfied that all Directors have attained the required financial literacy threshold.
- The Board will be gender balanced (50% between Directors identifying as Male or as Female). Where the Board (or Board Committee) has an uneven number of Directors, a rounding down is deemed still to have achieved balance (for example, 6 out of 13 Directors).
- At least one of the Chairperson, Chief Executive Officer, Senior Independent Director or Chief Financial Officer positions was held by a Female (including those self-identifying as a Female).

Board Diversity Progress include:

- As of the 31 December 2025 the Board Female:Male Ratio stood at 55:45 (2024: 60:40) and 64:36 (2024:67:33) for Non-Executive Directors against a Gender Diversity Target of 50:50. This exceeds the UK Listing Rules Target to have at least 40% female representation on the Board.
- The Board has also met its Diversity Target of having at least one Senior Board position held by a Female, with the Bank's Chairperson position held by a Female throughout the year. This is in line with the role model ambitions of the Board in increasing diversity and inclusion across the rest of the Bank.

The metrics and targets disclosed above are related to the Bank's Own Workforce and do not directly pertain to environmental matters.

ESRS S4 Consumers and End-Users



Permanent TSB Group Holdings plc is a company whose shares are listed on the Main Market Stock Exchanges in Dublin and London. Permanent TSB plc, trading as PTSB, is a licensed bank regulated by the Central Bank of Ireland.

PTSB is one of Ireland's longest serving financial services institutions tracing its operations back more than 200 years through the savings bank and building society movements. Throughout this time, the Bank's focus has been on delivering exceptional customer service and connecting with local communities.

Today, PTSB is a leading provider of personal and business banking services focused exclusively in the Irish market. The Bank serves more than 1.3 million customers through its voice and digital channels, as well as in person through our nationwide network of 98 branches in communities across Ireland.

We consider our Retail Customers, Business Customers (Small and Medium Enterprise), Asset Finance Customers, Corporate Deposit Customers and Other Customers (including those who may be underrepresented, vulnerable or require enhanced support) as subject to material impacts. In addition, we consider

the society we operate in as subject to material impacts through our own operations or through our value chain.

The findings from the Bank's DMA, which included the viewpoints of our Consumers and End-Users, informed the development of a refreshed Sustainability Strategy 2025-2027. Through delivery of the objectives set out within the strategy, we are committed to further integrating sustainability into all areas of our business by channelling investment and directing our impact towards areas that enhance societal wellbeing.

The Bank defines vulnerable customers as per the guidance set out in the Consumer Protection Code (CPC) 2012. 'A vulnerable customer means a natural person who: Has the capacity to make his or her own decisions but who, because of individual circumstances, may require assistance to do so (for example, hearing impaired or visually impaired persons); and/or,

- Has limited capacity to make his or her own decisions and who requires assistance to do so (for example, persons with intellectual disabilities or mental health difficulties): (Consumer Protection Code 2012, Chapter 3, S 3.1)

- Customers who may have an associated risk of harm have been considered in relation to the Bank's activities. We are committed to understanding the needs of our customers and to ensuring that the products and services we provide allow all people (including those who may be underrepresented, vulnerable or require enhanced support), equal opportunity to access them. In compliance with the Assisted Decision-Making (Capacity) Act 2015, we have built strong relationships with external Government bodies, worked to modernise our internal systems and have enhanced our procedures for supporting vulnerable customers. In response to meeting the needs of customers who require enhanced support, the Bank has established a dedicated Vulnerable Customer Support Team and an Enhanced Customer Support line within its Contact Centre, whose role is to provide additional support to vulnerable customers. The Bank's Enhanced Customer Support Policy, Framework and Charter are focussed on all customers who may require additional assistance, including those who may find themselves in vulnerable circumstances.

PTSB does not offer products that are harmful to people and/or may increase the risk of chronic disease.

When considering the Consumers and End-Users that may be subject to negative impacts regarding their rights to privacy, personal data protection, freedom of expression or non-discrimination, the Bank considers the following customer cohorts: Retail, Business Banking (Small and Medium Enterprise) and Asset Finance. This includes those who may be underrepresented, vulnerable or require enhanced support.

When considering the Consumers and End-Users that may be dependent on accurate and accessible product or service-related information, such as manuals and product labels, to avoid potentially damaging use of a product or service, the Bank considers the following customer cohorts: Retail, Business Banking (Small and Medium Enterprise), Asset Finance and Other. This includes those who may be underrepresented, vulnerable or require enhanced support.

There are currently no material Risks or Opportunities associated with dependencies on specific Consumers and End-users.

S4-1 Policies related to Consumers and End-Users

The Bank has policies, procedures and codes in place to manage the material IROs related to Consumers and End-Users as outlined in ESRS 2-MDR-P. Further detail can be found in S4 MDR1 and S4 MDR2.

Policies are reviewed and updated as required as part of the Bank's policy review cycle.

For more information on policy contents and objectives, as well as the most senior level role in PTSB accountable for implementation, please refer to ESRS 2-MDR-P.

Human Rights

The Bank recognises our responsibility to respect the human rights of every individual. PTSB has developed a Human Rights Charter to support us in meeting all relevant human rights legislation in the Republic of Ireland in respect to Consumers and End-Users. Additional policies and procedures utilised to prevent or mitigate against the risk and negative impact on human rights are included in G1-Business Conduct and S1-MDR1. We keep our policies under review and update them as required as part of our policy review cycle.

In addition, the Bank has in place a Dignity and Respect Code and Equality through Diversity and Inclusion Charter. The Code and the Charter focus on the prevention of discrimination and the provision of equal opportunities, enabling employees to be treated with dignity and respect including Consumers and End-Users.

To mitigate against human rights risk, or violations that may occur, the Bank has comprehensive due diligence procedures in place to support us in meeting all relevant human rights legislation in the Republic of Ireland in respect to Consumers and End-Users.

To support, we also have in place a suite of reporting mechanisms through our Speak Freely channels that enables the timely reporting of issues. For more on our Speak Freely Procedure, please refer to ESRS 2-MDR-P.

Procedures are in place for dealing with reported human rights allegations and instances are addressed in a timely manner. At the time of preparing this disclosure, PTSB has identified no severe human rights issues or incidents relating to its Consumers or End-Users that require disclosure.

We acknowledge our responsibility to respect human rights as set out in the International Bill of Human Rights and the eight fundamental conventions on which the United Nations Guiding Principles on Business and Human Rights are based. PTSB has developed a Human Rights Charter which is aligned with the UN Guiding Principles, International Bill of Human Rights and the Organisation for the Economic Co-operation and Development (OECD) in respect to Consumers and End-Users. The Bank meets all relevant human rights legislation in the Republic of Ireland in respect to Consumers and End-Users.

The Bank has in place additional requirements set out in other policy documents that help to encourage the right behaviour, including Conflict of Interest, Anti-Money Laundering and Countering the Financing of Terrorism Policy, Sanctions Policy and Anti-Bribery and Corruption Policy. Please refer to ESRS 2-MDR-P for more information.

S4-2 Processes for engaging with Consumers and End-Users about impacts

The Bank engaged with our stakeholders as part of the Double Materiality Assessment conducted in 2024. This engagement included our Consumers and End-Users and covered the Impacts outlined in ESRS 2-SBM-2 and ESRS 2-IRO-1.

A sample of our customers were engaged with directly through a survey and no proxies were used. The assessment was undertaken by an independent third party to ensure complete confidentiality and impartiality. Insights gathered from this engagement were assessed as part of the 2025 review of material IROs. Oversight of this process was provided by PTSB's Sustainability Committee.

The Bank has in place a dedicated Customer Team with responsibility for overseeing engagement with our customers. For the DMA process, the Chief Sustainability and Corporate Affairs Officer was the Executive Committee member responsible for overseeing the engagement with our Consumers and End-Users.

Given the engagement with our customers was designed to determine the material IROs for PTSB, the Bank did not evaluate the effectiveness of the engagement or agree any outcomes beyond supporting us to understand the material IROs.

The Bank is committed to fostering openness and inclusivity and to delivering an exceptional experience to our customers and communities, especially those that may be underrepresented, vulnerable or require enhanced support. By prioritising the needs of vulnerable customers, we not only enhance their financial wellbeing but also strengthen our commitment to building trust within our communities. Through our stakeholder engagement channels, we have procedures in place to enable our vulnerable customers to feedback any issues that they may experience.

Sustainability Statement

ESRS S4 Consumers and End-Users (continued)

S4-3 Processes to remediate negative impacts and channels for consumers and end-users to raise concerns

PTSB has a number of channels in place for Consumers and End-Users to raise concerns, as well as remediation processes in place once a concern is raised. These include:

- Support channels through the Bank's branch network, customer contact centres, online complaints forms and social media are available for our customers to raise their concerns;
- A dedicated Vulnerable Customer Support Team and Enhanced Customer Support line within the Contact Centre, aimed at providing extra support to both our customers and our frontline employees when required;
- A Voice of the Customer (VOC) Programme, designed to give our customers a voice and create a channel for two-way communication and feedback. The Bank's Customer Experience Continuous Improvement Forum meets weekly to review customer feedback and determine and agree upon actions to address customer pain points; and,
- Engagement with third parties in interactions with customers throughout the lifetime of the relationship, including when customers make complaints directly through the Bank, through the Financial Services and Pensions Ombudsman (FSPO), or when customer impacting errors (CIEs) occur.

The Bank has in place frameworks, policies and procedures applicable to ensure that we can remedy CIEs in a comprehensive, customer-focussed, and timely manner whenever they occur. These cover how we define the issue identified, stop the harm, identify the population of customers, put in place a remediation and communication approach, future proof the issue and complete any remediation that may be required. This process is overseen by a dedicated CIE Forum, which includes representation from key stakeholders from around the business. The Forum meets monthly. When CIEs are identified, the Bank aims (where possible) to put the customer back in the position had they been in had the error not occurred.

In instances where there may be a customer appeal, these appeals are monitored, and the Bank remains committed to reviewing the outcome to ensure potential liabilities are addressed effectively.

PTSB has a Customer Committee in place to ensure that fair customer outcomes remain at the forefront of decision making, in the context of building customer trust and executing a purpose-led, customer growth strategy. Part of the role of the Customer Committee is to review relevant customer events, issues and complaints, when escalated by relevant sub-committees and forums, to provide guidance on significant issues/events, and to delegate appropriate action. The Customer Committee is a sub-committee of the Executive Committee and is chaired by the Chief Retail Banking Officer.

In addition, the Bank has a dedicated Complaints and FSPO Forum (CFF) which is a sub-committee of the Customer Committee. The CFF meets monthly to review complaint operations and trends and works with business units from around the Bank to develop and implement improvement plans for issues identified. The Forum also discusses individual cases, with a view to ensuring lessons are learned and issues identified are rectified.

Formal complaints can be raised through the Bank's branch network, customer contact centres and through PTSB's online complaints forms. The Bank aims to deal with customer complaints fairly, while logging and investigating complaints as quickly and efficiently as possible. We assess all the facts of the complaint and all issues raised on the basis of all the evidence that is available to us and determine a fair and reasonable outcome. The process for tracking and monitoring complaints is outlined below:

- We aim to resolve all issues where possible when a customer contacts us;
- If we are unable to resolve the complaint within 5 business days, we will write to formally acknowledge the complaint and provide a complaint reference number. Customers are also informed of the name and contact details of the person dealing with the complaint;

- Some complaints are more complex and cannot be resolved in the time we would like, so while under investigation, the customer is kept updated;
- Customers may be telephoned for further details in relation to the complaint and to keep them informed on our investigations; and,
- Once all the details of the complaint have been investigated, we will issue the customer with a 'Final Response Letter'.

If the customer is still not satisfied, the Bank can be contacted to further discuss the matter. Should this remain unresolved, customers have the option to escalate to the FSPO. Further details can be found within the Bank's Complaints Charter, which is made available online.

Trends and issues identified through complaints are discussed at the CFF. Business units use this information to identify areas for improvement in customer service, with the aim of improving processes and reducing complaints, where possible.

To ensure that consumers are aware of the complaints structures that are in place, and the channels that they can raise their concerns, PTSB has in place a Complaints Charter which is available to all customers online.

Like other financial services institutions, in the normal course of business customers bring complaints to the FSPO in relation to a variety of issues. The Bank considers the applicability of FSPO decisions and findings to other customers in similar circumstances. We provide for these cases, where, based on legal advice, the directors believe that it is more likely than not that an outflow of resources embodying economic benefits, will be required to settle a present obligation arising from a past event.

S4-4 Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions

The Impacts, Risks and Opportunities (IROs) related to the Consumers and End-Users have been grouped into two themes. They cover S4-MDR1 Customer Experience and S4-MDR2 Housing. The detailed actions and effectiveness of the actions relating to the IROs under each theme are outlined in the relevant sections below.

S4-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

The targets relevant to the management of IROs related to Consumers and End-Users are outlined in S4-MDR1-T and S4-MDR2-T.

S4 Minimum Disclosure Requirements

As part of the development of the Bank's IROs, we identified similar themes emerging. As such, the Minimum Disclosure Requirements have been consolidated under thematic headings. The two themes under which we disclosed material IROs related to Consumers and End Users are S4-MDR1-Customer Experience, S4-MDR2-Housing.

S4-MDR1-Customer Experience

IRO-Ref	IRO	Description	Details	Positive or Negative	Potential or Actual
I-4	Impact	The impact PTSB has on society and Consumers and End-Users from failing to implement appropriate measures to protect customer information and ensure vulnerable customers may avail of the Bank's services.	Banks play a crucial role in shaping the financial landscape and if we fail to protect vulnerable customers or address key societal issues the negative impact on society and consumers can be significant. PTSB considered a range of potential negative impacts under this theme including poor corporate culture, neglecting social inequality, insufficient digital access, lack of inclusion and failure to cater to those effected by extreme weather events.	Negative	Potential
I-5	Impact	The impact PTSB has on society and Consumers and End-Users by encouraging financial wellbeing and providing customer supports.	The Bank's impact on society extends beyond its role in financial transactions. PTSB considered a longlist of positive and negative, actual and potential impacts which could be categorised under the shared theme of customer experience. By promoting financial wellbeing and offering customer support, PTSB can contribute to the broader good. Effective corporate culture fosters engaged employees who deliver better customer service, ensuring accurate and transparent financial advice and fair treatment, which helps customers make informed financial decisions. Thorough business conduct risk assessments prevent harmful practices, which otherwise cause financial stress and hardship. Together, these measures alleviate financial burdens, reduce stress, and enhance mental wellbeing by fostering trust and stability in customers' financial lives. Additionally, providing financial advice and ensuring accessible, non-discriminatory services promote financial literacy and wellbeing. Together, these actions demonstrate the Bank's commitment to positively impacting society by addressing housing needs, supporting economic growth, and empowering customers financially.	Positive	Both

Sustainability Statement

ESRS S4 Consumers and End-Users (continued)

IRO-Ref	IRO	Description	Details	Positive or Negative	Potential or Actual
O-4	Opportunity	The opportunity for the Bank to enhance its brand and reputation by providing exceptional customer experience.	PTSB considers enhancing its brand reputation a key driver of its long-term success. Banks are increasingly evaluated on their behaviour, corporate culture, political engagement, supplier relationships, due diligence processes and partnerships with Non-Governmental Organisations (NGOs), government agencies, and community organisations. These opportunities contribute to increasing customer and employee trust and loyalty, building a positive public image within the community, and ultimately creating a sustainable competitive advantage.	n/a	n/a
R-4	Risk	Cyber Security Risk: The risk of unauthorised access, modification, malicious disruption or use of IT systems and data from within or outside the Bank (for example, cyber-attacks).	Elements of this risk have been mapped to the Information-related Impacts for Consumers and End-Users topic. These relate to inadequate privacy protections, misleading/incomplete information, and inadequate GDPR compliance.	n/a	n/a
R-9	Risk	Regulatory Compliance Risk: The risk of material financial loss or liability, legal or regulatory sanctions, or brand damage arising from the failure to comply with or adequately plan for change to, official sector policy, laws, regulations, major industry standards, compliance policies and procedures or the expectations of customers and stakeholders.	Elements of this risk have been mapped to Information-related Impacts for Consumers and End-Users subtopics. These relate to ethics and conduct, data protection measures and current and emerging regulation.	n/a	n/a

S4-MDR1-P Policies adopted to manage Customer Experience

As outlined in S4-MDR1-A, during 2025 PTSB launched a refreshed three-year Bank Strategy which will see us deepen customer relationships, diversify our income, and differentiate through customer experience. The strategy includes a focus on protecting customer information.

To support this commitment, the Bank has the following policies in place:

- Regulatory Compliance Framework
- Data Protection Policy

- Information Security Policy
- ICT Risk Management Policy
- Operational Risk Management Policy
- Complaints Charter
- Complaints Management Policy
- New Product Approval Policy
- Colleague Conduct Policy

For more information on policy contents and objectives, as well as the most senior level role in PTSB accountable for implementation, please refer to ESRS 2 MDR-P.

S4-MDR1-A Actions and resources in relation to Customer Experience

The Bank is focused on developing trusted banking relationships with customers through listening to what they have to say; developing products that matter most to them; and, delivering a great customer service experience, whether that be in our network of 98 branches, through our customer contact centre, or via our digital channels including online or through the PTSB app.

Branch Network

At PTSB, we believe that our branches are a vital part of our business model and that the key to safeguarding their future is to make them efficient. For us that's about delivering the innovative digital solutions that our customers are asking for, while also providing that in-person support.

Over the last number of years, the Bank has invested in our branches to allow us to better serve our customers via a channel of their choosing. Our refurbished branches now have enhanced digital capabilities including, digital marketing screens that reduce our reliance on print marketing, new Open 24 kiosks with enhanced capabilities, state of the art, purpose-built customer meeting areas and the latest ATM and SSBM technology that allows us to accept cash and cheque lodgements across many branches in our network 24/7.

Customer Contact Centres

The Bank has in place a Customer Contact Centre which provides support to our customers. For us, this means providing a service that is responsive, consistent, and designed around the needs of our customers whether they choose to engage with us by phone, online, or through our digital channels.

The Bank has continued to invest in our Contact Centre to strengthen the level of service we provide. This includes enhancements to our customer support systems, improved digital tools that help us resolve queries more efficiently, and ongoing training to ensure our teams can deliver clear guidance and timely assistance. These improvements allow us to offer customers a seamless experience across channels and ensure they receive the help they need quickly and reliably.

Digital Transformation

Our customers want the ability to interact with us at a time and place that works for them, and through the optimal channel. As customer needs continue to evolve, digitalisation is playing an ever increasing role in our service offering. Throughout 2025, we continued to invest in improved customer experiences through our technology and digital channels.

Actions taken include:

- Modernising our technology architecture;
- Renovating our core banking platforms;
- Ensuring continuous improvement in our Digital Current Account and Digital Mortgage Journeys;
- New in app functionality such as Biometrics, Quick Balance, and gambling block features;
- Adopting customer-led research and prototyping practices, ensuring our digital propositions are validated directly with our customers; and,
- Introducing a 'Voice of the Customer' (VOC) in our app, allowing customers to share their experiences and feedback in real time, enabling us to iterate and improve in response to customer needs.

Vulnerable Customers

Please refer to the section below dealing with enabling accessibility of our products and services for an overview of the Bank's approach to supporting our vulnerable customers.

Enabling Accessibility of Our Products and Services

The following measures are in place to provide appropriate access and support to our customers including:

- A set of Vulnerable Customer Guiding Principles and an Enhanced Customer Support Policy and Framework to enable us to meet the needs of customers who may require additional support and care and to provide guidance and support to our colleagues;
- Vulnerable Customer Appointment Booking Service. A dedicated webpage for customers requiring enhanced support, outlining the services available and providing detail in relation to how they can be accessed;
- Enhanced Customer Support Charter for all colleagues;
- Support for the most vulnerable when moving their banking relationship as set out in 'A Guide to Moving Banks for Customers in Vulnerable Circumstances';
- Provision of an Enhanced Customer Support Team;
- Creation of an internal digital hub for staff with training and supports including Assisted Decision-Making (Capacity) Act 2015 Resources and Supports, policies and procedures, internal communications and links to external supports for all colleagues across the Bank;
- Branches within our Retail Network have been specifically designed to ensure accessibility; A Sign Language Interpreting Service (SLIS) for customers to interact with us via interpreter services in our branch and over the phone;
- Worked with the Inclusion and Accessibility Labs (IA Labs) and the National Council for the Blind (NCBI) towards Web Content Accessibility Guidelines 2.1 level AA certification in order to provide a website that is accessible to the widest possible audience, regardless of technology or ability;
- Easy to Read guides developed in association with ACE communications (Accessible Communication Environments) which promotes total communication for customers with intellectual disabilities to manage their own day to day banking requirements, keeping their account safe and use ATM/SSMB machines.
- Web Accessibility Advice Guidelines offering customers simple ways to make it easier to view content on our web pages including changing font size, colours and browser zoom options;
- A webchat service providing alternative ways to access the help and support of our Customer Support Team;
- 'PTSB Protect', a feature to our banking app which will help prevent customers falling victim to fraudulent scams;
- In-App Gambling blocks that enable customers to block card payments to merchants registered as gambling services (betting shops, online casinos, sports betting apps and websites).
- PTSB is proud to support the 'Just a Minute' (JAM) Card initiative across each of our retail locations nationwide. JAM Card is a growing initiative that allows customers with a learning difficulty, autism or communication barrier tell others that they need 'Just a Minute' discreetly and easily when in public settings like shops, public transport or their local PTSB branch;
- The Bank has a multi-year partnership in place with Ireland's Autism Charity (AsiAm). The partnership enables the charity to further support autistic customers and families and to promote and drive greater inclusivity in Irish society.
- PTSB was the first financial institution in Ireland to be accredited with Autism-Friendly branches in 2024. During 2025, all the 98 branches received full accreditation.

Sustainability Statement

ESRS S4 Consumers and End-Users (continued)

Financial Wellbeing

Financial Wellbeing is a key area of focus within the Bank's Sustainability Strategy 2025-2027 under the Shaping an Inclusive Future Pillar. During 2025, the Bank introduced a Financial Wellbeing Strategy 2026-2028 focussed on three core objectives:

- Meeting regulatory and policy expectation;
- Improving the financial literacy of our customers to enhance their financial wellbeing, improve decision making and mitigate against financial difficulty; and,
- Leveraging personalisation, innovation and the use of AI to enable us to create a point of competitive differentiation, deepen customer relationships and be recognised as a leader in financial wellbeing over the coming years.

Through delivery of the strategy, the Bank aims to improve the financial literacy of our customers through financial education, inclusion supports and the delivery of digital tools that ensure that they have the confidence to make informed financial decisions and the knowledge to plan for their future.

The following measures are in place to support customer financial wellbeing and improve financial literacy:

- As part of our partnership with Irish Life, all customers can avail of a free financial review, focused on supporting them in making informed financial decisions. During 2025, c.10,000 financial reviews were completed (in-person and through our digital channels) to support customers in taking control of their financial future;
- A Financial Wellbeing Hub on the Bank's website covering a number of topics, including the opportunity to talk to a Financial Advisor;
- A Financial Wellbeing Blog (with Behavioural Scientist Claire Cogan);
- Introduction of an in-app voluntary block for customers who wish to stop card transactions involving gambling merchants;
- A partnership with Leading Ireland's Future Together (LIFT) Ireland, aimed at building and strengthening young people's behaviours around their futures through our support of the delivery of a new 'Minding Our Futures' Pilot Programme. The pilot focused on the themes of Sustainability and Financial Wellbeing and was delivered in 10 schools across Ireland during the 2024/2025 academic year; and,

- Regular research conducted through the Bank's Reflecting Ireland Report, aimed at getting insight into consumer attitudes towards various topics, including Financial Literacy.

To support us in putting the customer at the centre of our decision making, the Bank has introduced additional programming and tools, including:

- Using our 'Customer Yes Checks', which help colleagues weigh up the impact and consider the consequences of our decisions, so that we know the decisions we take are in the best interests of our customers;
- Introducing our 'Behaviour Gauge', which is a visual designed to help every colleague across the Bank make appropriate and proportionate decisions in line with our Conduct Risk Appetite. The Gauge promotes the right behaviours in line with our Customer Focus and Straightforward Values, by encouraging colleagues to consider two simple questions to assess how their actions can impact customers, now and into the future;
- Ensuring transparent communication and responsible marketing and research in line with advertising standards; and,
- Ongoing compliance with the Bank's regulatory requirements.

Regulatory Framework

Responsible Marketing and Research

PTSB ensures transparent communication of its policies with consumers. All communications activity (including contracts and terms and conditions) within the Bank is guided by regulation, including the Consumer Protection Code (CPC) 2012, the Advertising Standards Association of Ireland Code 7th Edition, and the values and operating principles set by the Association of Irish Market Research.

All information on product contracts and terms and conditions is written in plain English and is highly governed and approved by the Central Bank of Ireland. The Bank adheres to its regulatory requirements and meets all of its commitments in relation to contracts and Terms and Conditions of products or services. As part of the sales journey, detailed Terms and Conditions are provided to customers. These are available on our website and are represented in our marketing material in line with the guidance set out in regulation.

Consumer Protection Code 2025

During 2025, the Bank commenced a programme of work to meet the requirements set out within the revised CPC 2025 Framework. The process involved a comprehensive assessment of our alignment with the updated Regulation. The findings informed the development of a comprehensive action plan, supported by the mobilisation of resources from across the Bank to ensure effective and timely implementation. The work reflects PTSB's ongoing focus on securing customers interests, strengthening governance, and embedding robust conduct standards throughout the Bank.

Information and Data Security

The Irish banking landscape is evolving, and the Bank recognises the fundamental role that we play in protecting both our customers and our business from online security threats.

Led by our Chief Technology and Innovation Officer, our Technology Team constantly monitor cyber security threat levels, in addition to completing horizon scanning. Based on threat intelligence, the Bank prioritises investment in cyber defences and implements preventative measures accordingly. Proactive planning, ongoing vigilance and enhanced monitoring are key to our approach to cyber safety within the organisation.

In addition, to support our workforce in navigating the online world in a safe and responsible way the Bank continues to invest in learning and development, with compulsory cyber security training and awareness campaigns delivered to all colleagues on an annual basis.

In today's digital era, data protection threat continues to evolve and as such, protecting and safeguarding our customers' and our colleagues' personal data remains one of our key priorities.

Our day-to-day business activities require the processing of personal data. While Data Protection is a fundamental right under the EU Charter of Fundamental Rights, protected by both European and Irish legislation of which the Bank complies, PTSB has its own Data Protection Policy in place which sets out our approach.

Ensuring data protection is considered as part of change programmes, raising awareness and providing ongoing education and training to our people are critical ways in which we mitigate against data protection risk.

As part of the development of the Bank's Integrated Strategic Plan (ISP), financial investment and resources are allocated to the delivery of PTSB's customer experience activity. PTSB has not disclosed these figures publicly.

S4-MDR1-M Metrics in relation to Customer Experience

The Bank uses the following metrics to evaluate performance and effectiveness in key areas such as enhanced customer support, data protection, information security, and conduct.

Metrics specific to Customer Experience

- A Customer Experience Objective is recorded in every colleague's Performance Management Objectives.
- Customer Experience Target Net Promotor Score (TNPS) is also monitored and tracked across all customer channels.

The Relationship Net Promoter Score (RNPS), which measures customers' willingness to recommend the Bank's products and services, was +24 points in H2 2025, representing a 2 point increase year on year.

Metrics specific to Cybersecurity and Data Protection

All colleagues engage in compulsory Data Protection and Cybersecurity training each year. In 2025, c.100% of colleagues completed the training with an 80% pass rate requirement.

Metrics specific to Conduct

- The Bank has a zero tolerance for deliberate and/or repeated poor or unfair customer outcomes (financial or nonfinancial), or any market impact which arises through inappropriate actions, or inactions in the execution of our business. Any instances of breaches are reported throughout the year.

S4-MDR2-T Tracking effectiveness of policies and actions through targets

The Bank uses the following targets to evaluate performance and effectiveness in key areas such as enhanced customer support, data protection, information security, and conduct.

Targets specific to Customer Experience

- Colleague performance against the Customer Experience Objective is monitored at regular intervals through the Bank's Performance Management Process.
- A target is in place for RNPS and TNPS across all customer channels. These targets are tracked and reported quarterly to the Customer Committee, Executive Committee and Board via the Bank's Customer Strategy and Experience Report.

PTSB has not disclosed these targets publicly.

Targets specific to Cyber Security and Data Protection

- The Bank's target is that 100% of colleagues will complete Data Protection and Cyber Security training each year.

Targets specific to Conduct

- The Bank has a zero tolerance for deliberate and/or repeated poor or unfair customer outcomes (financial or nonfinancial), or any market impact which arises through inappropriate actions, or inactions in the execution of our business. Any instances of breaches are reported throughout the year.

S4-MDR-2 Housing

The IROs reflected in S4-MDR1 are outlined below:

IRO-Ref	IRO	IRO	Details	Positive or Negative	Potential or Actual
O-5	Opportunity	Providing adequate housing via mortgage financing for customers across Ireland can lead to an enhanced reputation and increased market share.	There are a number of reasons why PTSB considers making home ownership more accessible a significant opportunity. These include helping to alleviate the housing crisis, improving living conditions, boosting the economy, broadening the customer base, fostering community stability, and supporting the Bank to position itself as a socially responsible institution. By enabling home ownership, supporting affordable housing initiatives, and driving local economic development, PTSB can contribute to economic stability as well as improved quality of life for its stakeholders.	n/a	n/a

Sustainability Statement

ESRS S4 Consumers and End-Users (continued)

S4-MDR2-P Policies adopted to manage Housing

The Bank has the following policies in place to ensure adequate housing for Consumers and End-Users through mortgage financing:

- Credit Risk Management Framework
- Group Credit Policy
- Enhanced Customer Support Policy
- Residential Mortgage Lending Policy

For more information on policy contents and objectives, as well as the most senior level role in PTSB accountable for implementation, please refer to ESRS 2-MDR-P.

S4-MDR2-A Actions and resources in relation to Housing

During 2025, PTSB launched a refreshed three-year Bank Strategy which will see us deepen customer relationships, diversify our income, differentiate through customer experience, and strengthen the foundations of the Bank through enhanced operational resilience, efficiency and cost management.

To ensure that we can achieve these outcomes, the Strategy is being delivered under five Value Streams. They include 'Own my Home', 'Manage my Money', 'Grow & Run my Business', 'Transform the Bank' and 'Strengthen the Foundations'. Through the 'Own my Home' Value Stream, the Bank is focussed on further enhancing its Mortgage and Consumer Finance offerings to ensure that we can meet the needs of our customers at every stage of their journey.

In addition, the Bank has refreshed its Sustainability Strategy in response to evolving market conditions and to reinforce its commitment to long-term sustainable growth. The new Sustainability Strategy 2025-2027 focuses on channelling investment and directing impact towards areas that enhance societal wellbeing, including Housing under the 'Investing for Impact' Pillar.

The Bank offers a range of mortgage options to new and existing home loan customers as outlined below.

2% & 2% Mortgage

Launched in 2017, PTSB's 2% & 2% Mortgage proposition was the first of its kind in Ireland, enabling customers to get 2% cashback at drawdown and 2% cashback on their monthly repayments when they pay using their Explore Current Account. In 2025, the proposition was extended to enable customers to get 2% cashback at drawdown and 2% cashback on their monthly repayments until December 2030. In addition, the Bank expanded its 2% cashback on monthly mortgage repayments to existing home loan mortgage customers to further align its mortgage offering for new and existing customers, while also rewarding customers for their loyalty.

Green Mortgage

PTSB has in place a Green Mortgage offering, a 3-Year and 5-Year Fixed Rate Product available to all new and existing home loan customers, where their homes have a confirmed or proposed Building Energy Rating (BER) of A1 to B3. The Bank's Green Mortgage offers competitive rates that encourages sustainable home ownership, helping customers invest in energy-efficient properties while contributing to a low carbon economy.

Strategic Banking Corporation of Ireland's Home Energy Upgrade Loan Scheme

During 2024 PTSB was pleased to become the first lender to participate in the Strategic Banking Corporation of Ireland's (SBCI's) Home Energy Upgrade Loan Scheme, aimed at supporting eligible applicants who wish to invest and improve in the energy efficiency of a residential property. Through the Scheme, the Bank has the ability to provide €100m in funding.

To support delivery of the Scheme, in early 2026 the Bank announced a reduction to its variable interest rates for the SBCI's Home Energy Upgrade Loans by up to 0.56%, including a new market-leading rate of 2.99% for loans of €50,000 to €75,000.

Home Upgrade Tool

PTSB has in place a market-leading Home Upgrade Tool. The bespoke online tool, launched in early 2026, allows homeowners to plan the specific home energy upgrade options suitable for their home based on their Building Energy Rating (BER). The Home Upgrade Tool then recommends a suite of retrofit packages ranging from a deep retrofit to individual measures (such as attic insulation or solar PV installation) that are tailored to a customer's individual property and budget. The Bank was the first lender in the Irish market to introduce a home upgrade tool with this level of retrofit package functionality and customisation capability.

Partnership with BuildWright to Provide Mortgages for Modular Homes

PTSB partnered with Irish modular building company BuildWright to provide mortgages for new innovative modular homes, which offer customers a near turnkey home constructed in approximately six months.

Customers purchasing a BuildWright modular home qualify for PTSB's Green Mortgage fixed lending rates which range between 3.35% and 3.80%, depending on the loan amount, term required, and Loan to Value (LTV). The modular homes are delivered with 90% of the build completed offsite in a controlled factory environment (including windows, doors, kitchen, internal finishes) in approximately six months and only then introduced onto the home site itself for assembly. This is in contrast with self-build homes, which are constructed entirely onsite and can be subject to variable cost inflation and potential construction delays.

First Home Scheme

The Bank has participated in the First Home Scheme Ireland DAC since 2022, with the aim of providing equity support to future homeowners. First Home Scheme Ireland DAC is incorporated and operates in the Republic of Ireland providing equity support to future homeowners by taking a beneficial interest in residential dwellings which enables customers to purchase these residential dwellings. Under the scheme, the support provided takes the

form of a percentage equity share in the home equal to the funding gap between the maximum mortgage available to the customer under the Central Bank of Ireland's (CBI) rules and the cost of a new home.

Online Mortgage Portal

The Bank has in place a Digital Mortgage Journey that enables customers to submit their mortgage application online, track its progress, and contact a PTSB team member whenever they need to, at a time and place that suits them. The portal facilitates efficient communication between the customer and the mortgage team and allows for the straightforward uploading of documents required to support the application.

Mobile Mortgage Manager

The Bank has a dedicated team of Mobile Mortgage Consultants who support customers throughout every stage of their home-buying journey. They provide expert advice on mortgages, as well as a broader range of PTSB product and service offerings.

Supporting Customers in Financial Difficulty

The Bank is committed to supporting customers that are experiencing financial difficulty and seeks to work with those customers to find a sustainable solution through proactive arrears management and forbearance. The Bank's Forbearance Strategy is built on two key factors namely affordability and sustainability. The main objectives of this strategy are to ensure that arrears solutions are sustainable in the long term, that they comply with all regulatory requirements and where possible keep customers in their home. Types of forbearance arrangements currently offered by PTSB are customer specific and provide, temporary and or term appropriate arrangements, as necessary.

Green Bonds

Green Bonds are financial instruments designed to raise funds for projects with environmental benefits. During 2025, PTSB issued a €300m Green Tier 2 instrument at a coupon of 3.875%. The issuance was 11.5 times oversubscribed with a final order book of €3.45bn, comprised of over 130 investors. These bonds finance energy-efficient housing.

The issuance complements the Bank's €500m Green Senior HoldCo notes released in 2024, which had a coupon price of 4.25% and was 4.5 times oversubscribed.

As part of the development of the Bank's Integrated Strategic Plan (ISP), financial investment and resources are allocated to the delivery of PTSB's Mortgage financing and Green Bond activity. PTSB has not disclosed these figures publicly.

S4-MDR2-M Metrics in relation to Housing

The Bank uses the following metrics to evaluate performance and effectiveness:

Mortgage Lending

- New Mortgage Lending: c.€2.9bn in 2025. The Bank's share of the New Business Mortgage Market was 20% as of the 31 December, 2025
- Green Mortgage Lending⁶: c. €1.26bn in 2025, accounting for 44% of New Mortgage Lending and up 44% YoY.

S4-MDR2-T Tracking effectiveness of policies and actions through targets

The Bank uses the following targets to evaluate performance and effectiveness:

Mortgage Lending

- New Mortgage Lending Target: PTSB has not disclosed these targets publicly.
- Green Mortgage Lending⁶ Target: PTSB has not disclosed these targets publicly.
- Green Portfolio Coverage Target: PTSB has not disclosed these targets publicly.

6. PTSB's Green Mortgage Product is defined as a 3-Year and 5-Year Fixed Rate Product available to all new and existing home loan customers, where their homes have a confirmed or proposed Building Energy Rating (BER) of A1 to B3 (inclusive). PTSB's Taxonomy aligned assets include those properties with a BER of A1 to B2 (inclusive). As a result, total Green Mortgage Lending is broader than the population of Taxonomy-aligned assets and the associated balances are not directly comparable.

ESRS G1 Business conduct



Governance

GOV-1 The role of the administrative, supervisory and management bodies

PTSB defines its administrative, management, and supervisory (AMS) bodies as the Board, the Executive Committee and their respective sub-committees. The Board's sub-committees include the Audit Committee, Risk and Compliance Committee, Remuneration Committee, and the Nomination, Culture, and Ethics Committee.

The Executive Committee's sub-committees include a number of committees, including the Sustainability Committee, which is responsible for oversight of the delivery of PTSB's Sustainability Strategy 2025-2027.

PTSB is committed to operating responsibly and conducting our business to the highest ethical and professional standards. We are focused on upholding the highest standard of conduct and behaviour among our people.

The Individual Accountability Framework (IAF), introduced by the Central Bank of Ireland (CBI) in 2023, aims to enhance

accountability in financial services through three key components namely, the Senior Executive Accountability Regime (SEAR), the IAF Conduct Standards, and enhancements to the Fitness and Probity (F&P) Regime.

- The SEAR is designed to improve governance, performance and accountability by obliging firms and colleagues in Pre-Approved Controlled Function (PCF) roles to clearly document where responsibility and decision-making lie within the organisation. This includes the roles within the Bank that are sustainability-related and promote a culture of accountability within the organisation. The PTSB SEAR Policy outlines how the SEAR operates within the Bank and sets out the steps that PCFs, their teams and all relevant stakeholders must take to manage the obligations under the SEAR.
- The core function of the F&P Regime is to ensure that individuals in key and customer facing positions (referred to in the legislation as Controlled Functions (CFs) and PCFs within a Regulated Financial Service Provider) are competent and capable, honest, ethical and of integrity and financially sound. The objective of PTSB's F&P Policy is to clearly define the specific roles,

responsibilities and accountabilities across the Bank in relation to the implementation of F&P requirements.

- The IAF Conduct Standards require CF role holders to take reasonable steps to adhere to the standards of conduct that the Bank (and by extension, our customers and the CBI) expect from each of our colleagues. PTSB is obligated to establish, maintain, and give effect to policies on how the IAF Conduct Standards are integrated into the culture and conduct of the affairs of the Bank, as well as notify and train in-scope colleagues on how the IAF Conduct Standards apply to them. The IAF Conduct Standards Policy sets out the requirements across PTSB for the embedding of the IAF Conduct Standards. An IAF Conduct Standards Handbook has been prepared by the Bank which provides practical support to colleagues in understanding the concept of reasonable steps and guiding them in understanding the steps that are reasonable for them to take to uphold the relevant IAF Conduct Standards. This includes consideration for sustainability, where required.

The following groups or individuals form part of PTSB's AMS bodies and support the Bank in adhering to its business conduct commitments.

The Board of Directors (Board)

The Board is collectively accountable for the governance of the Bank and is responsible for:

- Setting and overseeing performance against strategy;
- Ensuring business activity aligns with the Bank's stated purpose, ambition, values and culture;
- Setting and overseeing all risk, financial, compliance and performance standards; and,
- Demonstrating leadership and setting the 'tone from the top'.

For more on the roles and responsibilities of the Board, please refer to ESRS 2-GOV-1

Board Risk and Compliance Committee (BRCC)

The BRCC oversees the Bank's risk management, ensuring risks are identified, monitored, and managed within PTSB's Risk Appetite Statement (RAS). It monitors compliance with laws, regulations and ethical standards, overseeing policies on fraud prevention, anti-money laundering and regulatory compliance. The BRCC supports the Board on risk management and ensures that PTSB's Strategy is

consistent with the Bank's Risk Appetite. The Committee focuses on operational resilience, the incidence and management of material risk events. It also reviews the Bank's engagement with regulators and the effectiveness of risk management controls.

Board Audit Committee (BAC)

The BAC monitors the effectiveness and adequacy of financial controls, risk management and internal audit processes. It reviews financial statements to confirm they are accurate and fairly represent the company's financial health. The BAC also oversees the work of internal and external auditors and considers the external auditor's independence and objectivity and the effectiveness of the audit process. The Committee reviews discoveries of fraud and legal violations reported by the internal audit team. Additionally, the BAC review the Bank's governance and approval processes as they related to financial statements, and internal controls to ensure compliance with laws and regulations, making recommendations to the Board on approving financial reports and maintaining transparency.

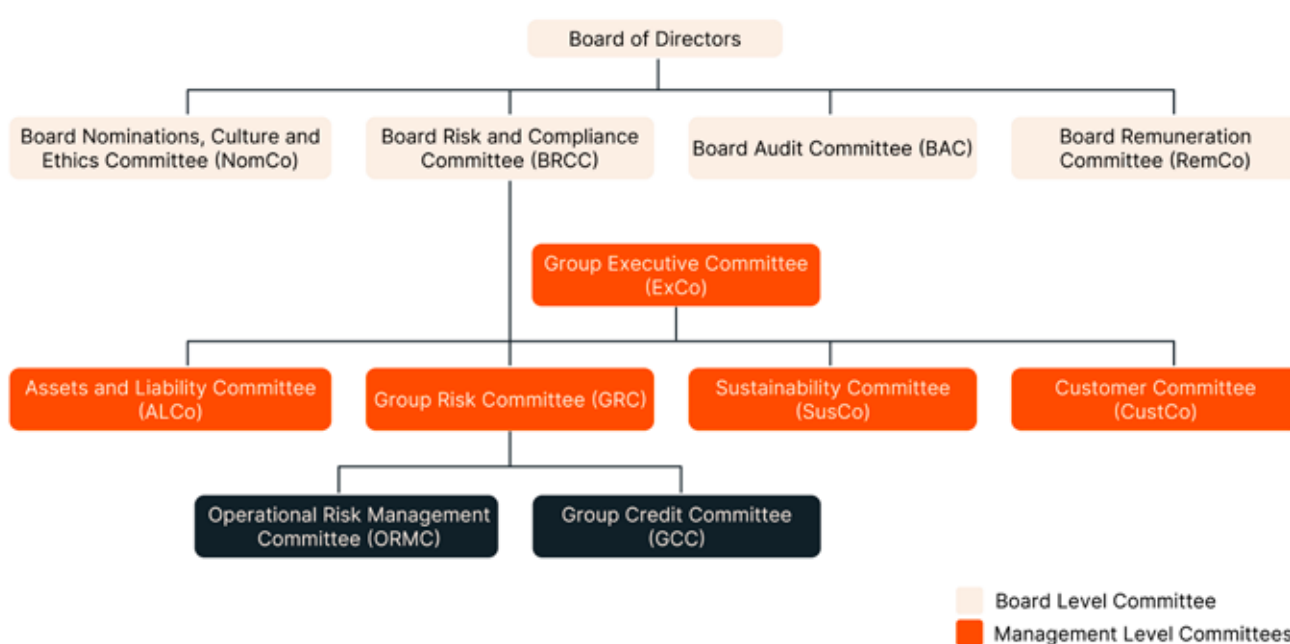
Nomination, Culture and Ethics Committee (NomCo)

The NomCo is a dedicated Board Committee with accountability for culture, behaviour, ethics and reputation management oversight within the Bank.

Directors must act in a way they consider, in good faith, would promote the success of the Bank for the benefit of shareholders as a whole and, in doing so, have regard (amongst other matters) to the likely consequences of any decision in the long-term. Directors must foster the Bank's business relationships with customers, suppliers and others, interests of the Bank's employees, impact of the Bank's operations on the community, environment and taxpayer, and desirability of the Bank maintaining a reputation for high standards of business conduct.

The NomCo receives regular updates on key themes and issues reported through the Bank's Speak Freely process.

PTSB's Governance Structure



Sustainability Statement

ESRS G1 Business conduct (continued)

The Chief Executive Officer (CEO)

The Board delegates executive responsibility to the CEO in relation to the Bank's operations, performance and compliance. The role of the CEO is to select and lead an effective team to manage the Bank. The CEO is required to provide information and insight to the Board that is reliable, relevant, timely, clear and balanced, to assist the Board in monitoring the performance of the Bank and in making well-informed and sound decisions.

Executive Management Oversight

The Executive Committee (ExCo) is the Senior Management Committee of PTSB established by the CEO with authority to operate and make decisions within limits set by the Board. The ExCo is the accountable body for the Group's operations, performance and compliance, defining the Bank's organisational structure, ensuring the adoption, application and maintenance

of all standards set by the Board. The Committee acts as a forum for colleagues and an escalation point for other functional issues, while ensuring that a robust and resilient operating framework exists within which the Bank's activities are undertaken.

Senior Leadership Team

The ExCo is supported by the Senior Leadership Team (SLT) in the implementation of high standards of operational and business conduct. Members of the Bank's SLT include the heads of key business divisions and functions, such as Retail Banking, Risk, Compliance, Sustainability and Corporate Affairs, Finance, Operations, Technology, Human Resources, Product and Marketing, Legal and Governance and Secretariat. Together, the SLT ensures the effective execution of the Bank's strategic objectives, adherence to regulatory requirements and alignment with the

principles of sound governance and sustainability.

The SusCo is a sub-committee of the Executive Committee (ExCo) and is in place to provide oversight of all activity relating to the environmental, social and governance (ESG) factors that are core to operating our business in a responsible and sustainable way.

Board

For an overview of the expertise of the Board, please refer to ESRS 2-GOV-1.

Executive Committee

The relevant experience of each of the Bank's Executive Committee members is outlined below.

Name	Role	Relevant Experience
Eamonn Crowley	Chief Executive Officer	Please refer to ESRS 2-GOV-1.
Barry D'Arcy	Chief Financial Officer	Please refer to ESRS 2-GOV-1.
Fiona McMahon	Chief Risk Officer	- Appointed to the Bank's Executive Committee as Chief Risk Officer in August 2025. - Former Chief Risk Officer and Director of Compliance at Ulster Bank DAC. Prior to that, worked in the Central Bank of Ireland for 17 years in senior roles including Head of Division, Banking Supervision. - Fellow of Chartered Accountants Ireland and a Certified Bank Director.
Ger Mitchell	Chief Customer and People Officer	- Member of the Executive Committee since 2012. - Held a number of roles at Executive level including HR, Products, Corporate Affairs, Sustainability and Marketing. - Role expanded to include the Bank's Product and Pricing Strategy, which brings the Colleague and Customer Experience together alongside the Marketing and Product Strategy. - Extensive experience in Acquisitions, Responsible and Sustainable Business, Brand Positioning, Retail Banking, Product Marketing and Management, Consumer Marketing, Business Transformation, Customer Remediation and Human Resources.
Andrew Walsh	Chief Legal Counsel	- Member of the Executive Committee since 2015. - Extensive legal advisory experience, in both private practice and in-house roles. - Former partner in a leading corporate Irish law firm, advising a number of Irish and international banks and financial services institutions.

Name	Role	Relevant Experience
Claire Heeley	Head of Internal Audit	- Non-Voting member of ExCo since 2021 (independent reporting line to Chair of Board Audit Committee) - Chartered Accountant with over 20 years' experience, joined the Bank in 2021 as the Bank's Head of Group Internal Audit. - Former Managing Director, Risk and Regulatory Consulting in KPMG, leading major risk transformation projects and the delivery of internal audit services to a portfolio of financial services clients for over six years. - Former Retail Division Audit Partner in the Group Internal Audit division of Bank of Ireland and Deputy Group Secretary of Bank of Ireland.
Tom Hayes	Chief Technology & Innovation Officer	- Member of the Executive Committee since 2017. - Responsible for the development and implementation of the Bank's Technology and Innovation Strategy, the implementation of the Digital Transformation Roadmap and the full portfolio of IT Change Delivery. - Former AIB Head of Customer Engagement Technology. - Former AIB Digital and Group Head of IT Infrastructure and Operations.
Patrick Farrell	Chief Retail Banking Officer	- Member of the Executive Committee since 2018. - Over 25 years' experience across the banking industry. - Responsible for the Retail Banking Business, including SME and Asset Finance, and for delivering on the Bank's Sales Strategy and service provision to PTSB's customers across all channels. - Former PTSB Retail Banking Director. - Previously held senior management roles in Strategy, Product and Proposition Development, Marketing, Private Banking and Retail Sales and Service Distribution.
Peter Vance	Chief Operations Officer	- Member of the Executive Committee since 2021. 25 years' experience in Financial Services. - Held senior positions as Head of Group Operations and Executive Head of Direct Sales and Service Channels in AIB. - Responsible for leading multiple activities in both Ireland and the UK including Payments, Treasury services, Financial Crime, SME Lending and the Customer Service Centre.
Leontia Fannin	Chief Sustainability and Corporate Affairs Officer	- Member of the Bank's Executive Committee since 2024. - Responsible for leading development and delivery of the Bank's Sustainability and Corporate Affairs Strategies. - Joined the Bank in 2018 as Head of Corporate Affairs and Communications and has led out on a number of the Bank's key strategic initiatives, including Reputation Management, Sponsorship and Sustainability Programmes. - The role of Chief Sustainability and Corporate Affairs Officer was created to reflect the Bank's commitment to sustainability as a key driver of its corporate strategy and the value it places on corporate affairs as enabler of internal and external stakeholder engagement.

Impact, risk and opportunity management

IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities

Please refer to ESRS 2-IRO-1 for an overview of the process taken to identify the Bank's material IROs in relation to business conduct matters.

G1-I Business Conduct policies and corporate culture

The Bank's frameworks and policies on business conduct are integral to operating our business in a responsible way and are aligned with our corporate culture and values. Relevant frameworks and policies include:

- Conduct Management Framework
- Individual Accountability Framework (IAF) Conduct Standards Policy
- Senior Executive Accountability Regime (SEAR) Policy

- Fitness and Probity Policy
- Colleague Conduct Policy
- Code of Ethics
- Speak Freely
- Conflict of Interest
- Financial Crime Compliance Framework
- Anti-Money Laundering and Countering the Financing of Terrorism Policy
- Anti-Bribery and Corruption Policy
- Lobbying Policy
- Reputational Risk Framework
- Reputational Risk Policy

Sustainability Statement

ESRS G1 Business conduct (continued)

For more information on policy contents and objectives, as well as the most senior level role in PTSB accountable for the implementation, please refer to ESRS 2-MDR-P.

PTSB is committed to and actively involved in the Irish Banking Culture Board (IBCB) since it was established in 2018. The IBCB is chaired by Justice John Hedigan, and functions as an independent body dedicated to strengthening public trust in the Irish banking sector by cultivating a sustainable and ethically grounded banking culture. The IBCB's Board promotes key values including customer focus, ethical behaviour, respect, empathy, accountability, leadership, and psychological safety. It operates on the principle that cultural transformation is essential to achieving improved outcomes across the sector. Through structured engagement with stakeholders such as employees, customers, and the wider public (via initiatives like the éist survey and listening sessions), the IBCB has implemented a range of measures aimed at supporting member Bank employees, ensuring fair customer outcomes, and restoring institutional reputation to develop a sustainable banking industry. PTSB is an active member and remains committed to advancing these cultural improvements across the Irish financial services landscape.

Throughout 2025, we continued to support the IBCB and its programme of work, including:

- Playing an active role in IBCB-led initiatives addressing sector-wide challenges, such as our contribution to the development of a collaborative initiative aimed at supporting customers experiencing gambling-related harm, providing financial wellbeing education to victims and survivors of Domestic and Sexual Gender-Based Violence (DSGBV), financial literacy education to marginalised youth, financial inclusion programming for people with intellectual disabilities, as well as continuing to uphold our Commitment of Care to Bereaved Customers;
- Participating in the IBCB's 'Proud to Work in Banking' Awards in 2025 to recognise employees across member banks whose behaviours align with the IBCB's values;

- Incorporating the industry-wide DECiDE Ethical Decision-Making Framework into our Code of Ethics, reinforcing ethical conduct across the Bank; and,
- Collaborating with member banks through the IBCB to ensure a unified and impactful approach to the éist 2026 Staff Culture Survey.

At PTSB, we describe our culture as the way we do things: We are Open. We are Inclusive. We build Trust. We are One PTSB.

Our cultural evolution is a strategic priority that impacts how customers engage with us, how colleagues collaborate within our teams, and how we contribute to the communities we serve.

Over the last number of years, we have been on a journey to improve the culture of the Bank. Progress includes:

- Developing Our Culture Charter and the 12 Culture Enablers, which provide colleagues with a clear and consistent understanding of our organisational culture and expectations. By articulating our ambition and brand promise, they guide everyday behaviours that shape how we work together and how we serve our customers. At the heart of this framework is a customer-centric culture, ensuring that every interaction, decision, and service reflects our commitment to delivering meaningful customer experiences. The Culture Enablers play a key role in embedding this ethos and driving continuous cultural improvement across the organisation;
- Creating a psychologically safe workplace is a key cultural priority, supported through our Speak Freely initiative. This programme aims to empower colleagues to voice concerns about practices, processes, or behaviours that fall short of our standards or values. By fostering open dialogue and psychological safety, the organisation promotes a culture of accountability and alignment with our purpose;
- Establishing our People Experience Council (PEC). As a group of leaders within the organisation, across levels and functions, PEC members are nominated by their ExCo member for exemplifying our behavioural standards. Empowered to lead locally, PEC members seek to drive

and support positive cultural and behavioural change. The PEC members listen to colleague feedback and support the culture evolution in their function by addressing behavioural inconsistencies across the Bank. Their work strengthens engagement across teams and ensures our culture supports the delivery of consistent, values-driven customer experiences;

- Utilising Our Customer Yes Checks to support better decision-making by helping colleagues assess the potential impact of their actions before they are taken. This tool encourages thoughtful, values-led choices that align with our customer-centric culture and contribute to more consistent, positive customer experiences;
- Introducing a Behaviour Gauge which is a simple visual designed to help every colleague across the Bank make appropriate and proportionate decisions in line with our Conduct Risk Appetite. It promotes the right behaviours in line with our Customer Focus and Straightforward Values, by encouraging colleagues to consider two simple questions to assess how their actions can impact customers, now and into the future;
- Maintaining the Bank's Ibec KeepWell Accreditation, which was first received in 2024, to acknowledge the Bank's Wellbeing Strategy; and,
- Supporting colleagues in role-modelling our values through their behaviours through our Living as Leaders Programme. The Programme utilises a self-reflective roundtable table approach with our behaviour articles that can be found in the Bank's Living as Leaders booklet. Through completing the Programme, colleagues become more self-aware of their own actions and behaviours.

Speak Freely

Our Speak Freely Procedure protects colleagues who wish to raise a concern or to make a protected disclosure, relating to actual or potential wrongdoing in the workplace, and ensures that they can do so without any fear of retribution or penalisation. As part of our Speak Freely Procedure we have several different channels through which a concern can be raised.

The Bank continued to deliver on our Speak Freely Strategy in 2025. Progress includes:

- Celebrating our annual Speak Freely Week, which saw engagement from colleagues across the business on the various initiatives taking place. The activities included launching Speak Freely videos with our Board, ExCo and colleagues from across the business. In addition, Speak Freely open information sessions were held for colleagues and two guest speaker sessions on 'Making People Feel They Matter' were also held;
- Training People Managers and Speak Freely Champions on Speak Freely and protected disclosure procedures and colleague conduct;
- Delivering mandatory conduct training to all colleagues, which included further awareness and focus on Speak Freely;
- Continuing to embed the IBCB's DECIDE Framework on ethical decision making and the Bank's Culture Charter; and,
- Half yearly reporting on Speak Freely concerns to the ExCo and Board.

The Bank has in place procedures to deal with any protected disclosures that may arise, including associated investigation processes. When potential incidents arise, there are processes outlined within the Speak Freely Procedure that are followed and managed by Bank's People Experience Team. The Bank seeks to identify, thoroughly investigate, remediate and report any incidents in a timely manner.

The Bank has in place additional policy documents that help to encourage the right behaviour, including Conflict of Interest, Anti-Money Laundering/Terrorist Financing, Sanctions and Anti-Bribery and Corruption. For more information on policy contents please refer to ESRS 2-MDR-P.

The requirement for high standards of business conduct is reinforced through annual training which is delivered to all colleagues annually. The training modules covered are outlined in the following tables:

Mandatory e-Learning

Mandatory E-Learning Course Title	Completion Rate 2025 ¹ %	Completion Rate 2024 ¹ %	Audience ²
Operational and IT Risk Awareness	95%	100%	All
Resilience at PTSB	98%	100%	All
Mortgages	99%	100%	Cohort 1
Term Lending	99%	100%	Cohort 1
Data Protection	99%	100%	All
Savings and Investments	99%	100%	Cohort 1
Transactional Banking	99%	100%	Cohort 1
Health, Safety & Physical Security at PTSB	100%	100%	All
Asset Finance	98%	99%	Cohort 1
Business Banking	99%	95%	Cohort 1
Fraud Awareness	99%	99%	All
Bibby Invoice Finance	100%	100%	Cohort 2
Anti-Money Laundering, Countering the Financing of Terrorism and Sanctions	98%	97%	All
Code of Conduct on Mortgage Arrears	100%	100%	Cohort 3
Advertising Compliantly	99%	100%	Cohort 4
Customer Complaints	97%	92%	All
Individual Accountability Framework	97%	99%	All (except CF2 to CF11 colleagues)
Colleague Integrity and Ethics	89%	89%	All
Diversity, Equity and Inclusion Awareness	89%	89%	All
Conduct Risk – The Risk of Unfair Customer Outcomes	78%	78%	All
Vulnerable Customer Training	98%	-	All
Cyber Security	99%	-	All
Sustainability 101	99%	-	All

Notes:

- 1 The completion number target is set at the start of the year. It does not include the number of new joiners. As such, the completion rate can be over 100% when new joiners are allocated this training as mandatory and complete it
- 2 PTSB's colleagues are classified into appropriate cohorts based on their roles and responsibilities within the organisation. Additionally, where relevant, the Bank's colleague roles are aligned to the 11 Controlled Functions (CF) as outlined by the Central Bank of Ireland.
- 3 The Institute of Bankers (IOB) is a professional network of over 32,100 members who work in banking and the international financial services sector. The IOB is a recognised college of University College Dublin and is a centre of excellence in the provision of specialist education to the financial services sector.

The above table provides an overview of all mandatory online training. In addition, further training is delivered to colleagues where it is deemed relevant to their roles and responsibilities. This includes training provided in-house and also through the use of external training providers. Completion rates for these trainings modules are not tracked annually.

Sustainability Statement

ESRS G1 Business conduct (continued)

Additional Training Courses

Course Title	Completion Rate %	Audience
IAF Common Conduct Standards and Additional Conduct Standards	100%	PCF & CF1 role holders

Board and ExCo Training

Training and Content	Completion Date	Training Session Briefing
Operational and Digital Resilience Cyber Security External Reporting: Corporate Sustainability Reporting Directive (CSRD)	Q1 2025	Training Session
Capital Model Programme	Q1 2025	Training Session
IAF Conduct Standards Annual Legal and Regulatory Update including Market Abuse Training	Q2 2025	Training Session
Recovery Plan Dry Run and Simulation	Q3 2025	Integration with Board Strategy Day
Anti-Money Laundering (AML) Counter Terrorist Financing (CTF) Anti-Bribery and Anti-Corruption	Q4 2025	Training Session
ESG Risk Management	Q4 2025	Training Session

As a Retail Bank, PTSB manages risk in respect of corruption and bribery where employees are processing loan applications, particularly those that may be deemed as high risk. This presents a risk to the Bank from a regulatory, reputational, credit and operational perspective. The Bank actively promotes a culture of integrity throughout our operations, providing regular training to mitigate any risks associated with corruption and bribery. For more on compliance policies, actions, targets and metrics, please refer to G1-MDR1.

G1-2 Management of relationships with suppliers

Sustainable Supply Chain Management is at the heart of the Bank's Sustainability Strategy and ensuring that we purchase goods and services and engage with our suppliers in a sustainable way is fundamental to its delivery.

Our Procurement Policy sets out a Framework for engaging with our suppliers, including a commitment to procure goods and services from those who can support the needs of

our business in a sustainable manner. The Framework is supported by our Sustainable Supplier Charter, which sets out our expectations of suppliers and acts as a 'Code of Conduct' detailing what is expected from all suppliers with regard to business practice and responsibilities as a supplier to PTSB.

We have categorised our Sustainable Supplier Charter into the following 7 core areas, in line with ISO 20400 Sustainable Procurement Guidelines which outline our expectations of suppliers of PTSB. They include:

- Environmental;
- Human Rights;
- Operating Practices;
- Labour practices;
- Supply Chain;
- Social; and,
- Health, Safety and Wellbeing.

You can view the Bank's Sustainable Supplier Charter online.

In addition, we hold membership to the Financial Supplier Qualification System

(FSQS) Hellios, an online platform where suppliers submit their compliance data and information relating to their organisation, allowing us to have a consistent view of our suppliers and facilitating due diligence activities to ensure they meet our minimum standards.

Through our business practices and continuous supplier engagement, we seek to implement strategies and procurement practices that create mutually beneficial relationships. We set objectives and action plans that support sustainable procurement and look to continuously improve the impacts of our supply chain.

The Bank's Procurement team has participated in a number of sustainability-related training courses that have been delivered internally within the Bank and have also engaged in training activity that has been delivered by our third party procurement partners.

We do not utilise any business incentives throughout the sourcing or procurement journey and all onboarding activity is subject to evaluation, with bidder submissions being scored from a capability, commercial and ESG perspective.

We conduct assessments of potential suppliers through mandatory questions that are included in our tendering processes and through on-boarding to our FSQS (Hellios). The Bank's FSQS, is an external third party system that contains several questions related to ESG where suppliers provide specific compliance data and additional organisation information to facilitate due diligence activities. This activity ensures that we have a consistent view of relevant suppliers and their adherence to the minimum standards that we require, allowing the us to manage supplier compliance. Questions relate to sustainability policies and plans, energy and water consumption, employee training, modern slavery, business continuity, amongst others.

Completion of the FSQS Questionnaire is mandatory for all suppliers working with PTSB. The Bank encourages suppliers and third parties to put in place their own Sustainable Procurement Framework in line with ISO 20400 Sustainable Procurement Guidelines and be certified (or working towards certification) to ISO 45001, the internationally recognised Occupational Health and Safety Management Standard.

The Bank prefers to work with suppliers within the European Economic Area (EEA), but at present, do not have an official Policy in place that sets out this expectation.

G1-3 Prevention and detection of corruption and bribery

Within its Risk Register, the Bank has identified that there is a Regulatory Risk and a Reputational Risk of failing to maintain adequate procedures against corruption and bribery. Business Units across the Bank are tasked with preventing and detecting incidents of corruption and bribery.

The Bank has a Financial Crime Compliance Framework designed to cover Anti-money Laundering/Counter Financing of Terrorism (AML/CFT), Sanctions and Anti-bribery and Corruption (ABC) risk management, with formal roles assigned to our Regulatory Compliance Team, as well as to all colleagues and contractors within the Bank. This Framework incorporates a dedicated ABC Policy which outlines how the Bank's various ethical processes and procedures operate to address Corruption and Bribery risk. Management within the Bank's Business Units is responsible for the identification, reporting and management of Bribery or Corruption risks within their area. In doing so, Business Units may seek guidance from the Bank's Regulatory Compliance team in managing Bribery and Corruption risks, as appropriate.

PTSB operates Three Lines of Defence Model against all risks, including Corruption and Bribery. For more information, please refer to ESRS 2-GOV-1.

The Bank applies several processes to identify and reduce the potential Corruption and Bribery risk within our business. This includes previously mentioned Policies and Frameworks including, Financial Crime Compliance (including Anti-Money Laundering/ Terrorist Financing; Sanctions and Anti-Bribery and Corruption), the IAF Conduct Standards Policy, SEAR Policy, Colleague Conduct Policy, Code of Ethics, Conflict of Interest, and Speak Freely, aimed at supporting our teams to prevent, detect and address allegations or incidents of corruption and bribery. For more information on these Policies, please refer to ESRS 2-MDR-P.

When investigations arise, they may include expertise from Legal, Compliance and HR.

While it is recommended that reporting be made to line management where appropriate, the Bank also maintains other reporting channels for instances where reporting to line management may not be appropriate. These alternative channels are outlined in the Bank's Speak Freely Procedure. In addition, reports can also be made directly to the Head of Financial Crime Compliance via dedicated channels. This approach ensures appropriate segregation, should employees feel that this is required.

Section 19 of the Criminal Justice Act 2011 makes it an offence for a person not to report to the Gardaí information which he/she knows or believes might be material assistance in the prevention of certain offences, including bribery and corruption. Where any concern relates to bribery or corruption or a suspected breach of the Bank's ABC Policy, concerns must be escalated via the Bank's established channels as soon as possible. The Head of Financial Crime Compliance, together with any relevant Business Owner, will ensure that the Bank meets the obligations set out in the 2011 Act, where applicable.

PTSB would deem that 100% of functions have exposure to Bribery and Corruption risk. The Bank actively promotes a culture of integrity throughout our operations, providing regular training to mitigate any risks associated with corruption and bribery. The training includes details that are relevant to the Policies that are in place. The associated policies, actions, targets and metrics are outlined in G1-MDR1.

Metrics and Targets

G1-4 Incidents of corruption or bribery

Please refer to G1-MDR1 for the actions and the resources implemented by the Bank to manage material IROs.

The Bank has not been convicted of any violations related to anti-corruption and anti-bribery laws during the reporting period. As such, there were no fines for violation of anti-corruption and anti-bribery law and no remediating actions were required. This is also in line with the Bank's position at the end of 2024.

G1-5 Political influence and lobbying activities

PTSB is registered as a lobbyist and, as such in accordance with its obligations under the Regulation of Lobbying Act 2015 and the Lobbying Amendment Act 2023 (the 'Acts'), the Bank must publish material details of its lobbying activities with certain categories of Designated Public Officials (DPOs) on the Register of Lobbying (the Register). The Register is publicly available on the Lobbying.ie website and is maintained by the Standards in Public Office Commission (SIPO).

PTSB Types of Engagement in 2025	Key Themes
Engagement with Senior Government Representatives	Policy discussion in relation to the funding of social and affordable housing
Written engagement with Minister	Submission advocating for a proportionate approach to the banking levy
Engagement with Minister	Policy discussion on agriculture-related aspects of the Growth and Sustainability Loan Scheme
Participation in policy roundtable	Discussion of issues relevant to Ireland's EU Presidency

PTSB has in place a Lobbying Policy which outlines the Bank's obligations regarding lobbying activities as related to the Acts. The Policy Sponsor is the Chief Sustainability and Corporate Affairs Officer, and the Policy Owner is the Senior Manager, Corporate Affairs and Communications.

The Directors have satisfied themselves that there were no financial or in-kind political contributions during the year, which require disclosure under the Electoral Act, 1997.

Sustainability Statement

ESRS G1 Business conduct (continued)

PTSB is not registered on the EU Transparency Register. However, as a publicly listed plc, PTSB Group Holdings (PTSBGH) is subject to disclosure and transparency requirements in Ireland and the EU which includes submission of information to the Companies Registration Office Ireland, Beneficial Owners Register, Stock Exchanges in Dublin and London, and associated Regulatory Authorities (competent authorities).

No members of the Bank's AMS body held a comparable position in public administration (including regulators) in the two years preceding such appointment in the current reporting period.

G1-6 – Payment practices

The Bank's Payment Policies are aligned to the Prompt Payment of Accounts Act, 1997 as amended by the Statutory Instrument 580 of 2012, which took effect on 16 March 2013 and transposed the EU Directive 2011/7/EU on Combating Late Payment in Commercial Transactions. This provides for a payment period of 30 calendar days following the date of receipt of the invoice, or an equivalent request for payment.

The Bank performed an analysis of its supplier payments which identified that of the 41 contracts that make up 70% of total spend on suppliers, 34 (82%) of contracts have a standard payment time of 30 days.

There are currently no identified legal proceedings in relation to outstanding late payments during the reporting period.

G1 Minimum Disclosure Requirements

As part of the development of the Bank's IROs, we identified similar themes emerging and as such, the MDRs have been consolidated under thematic headings. The three themes under which we disclosed our material Governance IROs include G1-MDR1 Compliance; G1-MDR2 Managing Suppliers; and G1-MDR3 Partnerships.

G1-MDR1 - Compliance

The IROs reflected in G1-MDR1 are outlined below.

IRO-Ref	IRO	Description	Details	Positive or Negative	Potential or Actual
I-6	Impact	The impact PTSB has on society and the environment due to the financing of criminal activity.	A bank financing criminal activity has significant and far-reaching consequences on the bank and society through the financing of illegal and unethical organisations that may engage in criminal activity or environmental degradation.	Negative	Potential
R-4	Risk	Cyber Security Risk: The risk of unauthorised access, modification, malicious disruption or use of IT systems and data from within or outside the Bank (for example, cyber-attacks).	Elements of this risk have been mapped to the Corporate Culture and Business Conduct subtopics. These relate to failure to implement robust data protection and information management systems and employees not following procedures leading to non-compliance with regulatory requirements, reputational damage and financial loss.	n/a	n/a
R-5	Risk	Fraud Risk: The risk of losses or unplanned gains arising from acts intended to defraud, misappropriate property, circumvent regulations, the law or company Policy by either an internal party or external parties or a combination of both.	Elements of this risk have been mapped to the protection of whistleblowers and corruption and bribery subtopics. These relate to a failure to have adequate procedures against corruption and bribery as well as a lack of whistleblower protection, potentially resulting in reputational damage and issues with regulatory compliance.	n/a	n/a
R-7	Risk	People Risk: The risk of financial, operational or reputational damage to the Bank arising from failure of the Bank to meet its employment obligations and duty of care to staff or the failure to ensure adequate resources and skills are in place, that succession planning is not effective or that the operation of the Bank may be impacted by disputes.	People Risk has been identified as a key risk by PTSB. Elements of this risk have been mapped to the Corporate Culture and Business Conduct subtopics. These relate to poor culture; inadequate remuneration harming workforce retention; lack of a transparent work environment, reducing trust and communication; regulatory compliance including health and safety; human rights and protections against discrimination requirements; and lack of engagement with unions.	n/a	n/a

IRO-Ref	IRO	Description	Details	Positive or Negative	Potential or Actual
R-8	Risk	Process and Ability to Execute Risk: Process and execution risk can significantly impact PTSB's operational risk, leading to higher loss risk, impacting operational resilience, customer dissatisfaction, a loss of trust and limits the ability to realise stated ambition (especially against the risk of optimistic bias in forecasting). Risk is linked with internal complexity, a high volume of change, increasing collaboration with third parties and outsourcing providers, people risk and transition speed. Making end-to-end processes more digitally straight forward is necessary to reduce complexity and embed / automate controls, and consistent customer service quality.	Elements of this risk have been mapped to the Corporate Culture and Business Conduct sub-topics. These relate to adequate resources; effective processes and controls; well managed IT systems to meet its wide range of demands including regulatory requirements; customer demands; failing to consider needs of the communities; operational risks; and, people management risks including third parties.	n/a	n/a
R-9	Risk	Regulatory Compliance Risk: The risk of material financial loss or liability, legal or regulatory sanctions, or brand damage arising from the failure to comply with or adequately plan for change to, official sector policy, laws, regulations, major industry standards, compliance policies and procedures or the expectations of customers and stakeholders.	Regulatory Compliance has been identified as a key risk by the Bank. Elements of this risk have been mapped to Protection of Whistleblowers/Corruption and Bribery/ Political Engagement sub-topics. These relate to ethics and conduct, political contributions, protection of whistleblowers, political contributions, data protection measures (for example, GDPR).	n/a	n/a

G1-MDRI-P Policies adopted to manage Compliance

The frameworks and policies that support PTSB in addressing the IROs under the theme of compliance are outlined below, except for the policies relating to Corporate Conduct which have been covered in G1-1. For more information on policy contents and objectives, as well as the most senior level role in PTSB accountable for implementation, please refer to ESRS 2-MDR-P.

PTSB has in place frameworks and policies to support the Bank in mitigating against the financing of criminal activity, ensuring effective business conduct and maintaining compliance including:

- Conduct Management Framework
- Colleague Conduct Policy
- Financial Crime Compliance Framework
- Anti-Money Laundering and Countering the Financing of Terrorism Policy
- Anti-Bribery and Corruption Policy

Framework and policies are applicable to all Business Units across the Bank. They apply to all individuals who work directly for the Bank or who provide third party services to PTSB.

The following stakeholders are affected:

- Members of the Board and its Committees, Management Committees and Risk Committees;
- All employees (as defined in S1 Own Workforce);
- Customers;
- Third party service providers;
- External stakeholders, including Regulators and Supervisors who require an overview of the regulatory compliance management principles, process, and governance arrangements; and,
- Owners of interlinked Frameworks and Policies who are responsible for aligning their Frameworks, Policies, and Procedures.

The Board is ultimately responsible for ensuring that PTSB has a framework in place to prevent and detect money laundering/terrorist financing and that the Bank maintains an effective internal control structure for compliance and risk management. The Board delegates oversight of the Bank's Money Laundering/ Terrorist Financing, Sanctions and Bribery and Corruption risk management (FCC risk management) to the BRCC.

In line with the Board approved Internal Control Framework, responsibility for the review and onward recommendation to BRCC of the Anti-money Laundering/ Counter Financing of Terrorism-related Policies underpinning the FCC Framework has been delegated to the GRC. For more on the Bank's GRC, please refer to G1-GOV-1.

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ESRS G1 Business conduct (continued)

The ExCo is the Senior Management Executive Committee of the Bank. For more on the ExCo, please refer to G1-GOV-1.

PTSB is regulated and supervised by the Central Bank of Ireland (CBI).

The Bank complies with relevant legal requirements and CBI regulation, including:

- The Criminal Justice (Money Laundering and Terrorist Financing) 2010 (as Amended)
- Criminal Justice (Corruption Offences) Act 2018
- Corporate Governance Requirements for Credit Institutions 2015
- UK Corporate Governance Code
- Relationship Framework with Irish State
- The Consumer Protection Code (CPC)
- Individual Accountability Framework (IAF) Requirements
- Senior Executive Accountability Regime (SEAR)
- Common Conduct Standards and Additional Conduct Standards
- Fitness & Probity (F&P) Regime

The Bank has in place frameworks and policies to support PTSB in mitigating against data breaches including:

- Data Protection Policy
- Regulatory Compliance Framework
- Information Security Policy

The Board delegates oversight of data protection to the Data Protection Officer.

G1-MDR1-A Actions and resources in relation to Compliance

An assessment of the specific Money Laundering/Terrorist Financing and Sanctions Risk faced by the Bank is undertaken annually, and a review of the Bribery and Corruption Risk relevant to the Bank's business is also completed on a periodic basis.

Financial Crime Compliance training, which covers Money Laundering/Terrorist Financing, Sanctions and Bribery and Corruption Risk, is provided to all employees each year, with tailored training provided to the Board and members of the ExCo.

PTSB is committed to managing and mitigating the financial crime compliance risk associated with its business activities and complying with all applicable Money Laundering/Terrorist Financing, Sanctions and Bribery and Corruption laws and regulations in the jurisdictions in which it operates. To mitigate against any Financial Crime Compliance-related risk that may occur, the Bank has comprehensive due diligence procedures in place, which include requesting documents such as proof of identity and proof of address at account opening and at intervals, thereafter, conducting enhanced due diligence reviews and undertaking Politically Exposed Persons (PEPs) and Sanctions screening in accordance with our Policies.

To meet its obligations, PTSB implements relevant Anti-money Laundering/Counter Financing of Terrorism and Anti-bribery and Corruption controls and maintains robust oversight measures, with all elements of the Framework operating as intended throughout 2025.

As part of the development of the Bank's Integrated Strategic Plan (ISP), financial investment and resources are allocated to the delivery of compliance activity. PTSB has not disclosed these figures publicly.

In today's digital era, data protection threat continues to evolve and as such, protecting and safeguarding our customers' and our colleagues' personal data remains one of our key priorities.

Our day-to-day business activities require the processing of personal data. While Data Protection is a fundamental right under the EU Charter of Fundamental Rights, protected by both European and Irish legislation of which the Bank complies, PTSB has its own Data Protection Policy in place which sets out our approach. Complying with the requirements and principles of the policy is a condition of employment for our colleagues.

The Bank has in place procedures to deal with data security breaches and reports regularly to the Board and the ExCo. Ensuring data protection is considered as part of change programmes, raising awareness and providing ongoing education and training to our people are critical ways in which we mitigate against Data Protection risk.

As part of the development of the Bank's Integrated Strategic Plan (ISP), financial investment and resources are allocated to the delivery of data protection activity. PTSB has not disclosed these figures publicly.

G1-MDR1-M Metrics in relation to Compliance

The following metrics are utilised to evaluate the performance and effectiveness of the Bank's actions towards the prevention of the financing of criminal activity, ensuring data protection, and enhancing the corporate culture to ensure effective business conduct and maintain compliance:

- All colleagues engage in compulsory data protection training each year. During 2025, c.99% of colleagues completed the training with an 80% pass rate requirement.
- 76% Culture Index Score during 2025 (2024:76%). The Bank measures its Culture Index Score through its annual Every Voice Counts (EVC) Survey. It is calculated from 20 specific questions with themes such as Personal Responsibility for Risk, Feeling of Belonging and Managers and Leadership Behaviours.

There are no methodologies or assumptions in deriving the above metrics. The metrics are validated by the Bank's assurance provider.

In addition, the Bank monitors the usage of our Speak Freely Procedure and includes this in our Key Risk Indicator reporting, which particularly focuses on a key indicator of trust – that colleagues feel confident to raise concerns in a confidential manner which is measured through our EVC and Micro-pulse Surveys.

G1-MDRI-T Tracking effectiveness of policies and actions through targets

The following targets are utilised to assess progress of the Bank's actions towards the prevention of financing of criminal activity, ensuring data protection, and enhancing the corporate culture to ensure effective business conduct and maintain compliance:

- The Bank's target is that 100% of colleagues will complete Anti-Money Laundering, Countering the Financing of Terrorism, and Sanctions training each year.
- The Bank's target is that 100% of colleagues will complete Data Protection training each year.
- 70% Culture Index Score Target.

G1-MDR2 Managing Suppliers

IRO-Ref	IRO	Description	Details	Positive or Negative	Potential or Actual
I-7	Impact	The impact PTSB has on society and the environment by ensuring suppliers are appropriately managed.	In its analysis, PTSB considered impacts on society and the environment related to supplier management including supplier due diligence and screening. These sustainable procurement efforts have been considered collectively as they are all linked to ensuring suppliers are appropriately managed.	Positive	Both
R-6	Risk	Outsourcing and Third-Party Risk: The risk of current or prospective loss or reputational damage connected with the engagement and management of third parties contracted internally or externally (for example, for the purposes of customer engagement, data processing, systems development, cloud services or Information and Communications Technology (ICT) systems), including lack of third party diversification, inadequate business continuity plans or insufficient monitoring and oversight of the engagement.	Elements of this risk have been mapped to the managing supplier relationships subtopic. These relate to the impact of inadequate due diligence, supply chain dependency, poor management and payment practices, and poor data management.	n/a	n/a
R-11	Risk	Service Availability Risk: The risk that the performance and availability of IT systems and data are adversely impacted (for example, customer experience or business processes), including the inability to recover the Bank's services in a timely manner, due to a failure or IT hardware or software components; weaknesses in IT system management; or any other event.	Elements of this risk have been mapped to Managing Supplier Relationships subtopic. These relate to poor management of third parties, including payment practices, as potentially contributing to the Service Availability risk associated with IT hardware, software and system management.	n/a	n/a

Sustainability Statement

ESRS G1 Business conduct (continued)

G1-MDR2-P Policies adopted to manage Managing Suppliers

The Bank has in place frameworks and policies to ensure our suppliers are appropriately managed and to mitigate the risk associated with outsourcing and use of third parties, including:

- Third Party Management Framework
- Third Party Risk Management Policy
- Third Party Outsourcing Strategy
- Supplier Relationship Standards
- Sourcing and Procurement Policy
- Sustainable Supplier Charter
- Supplier Contracts
- Stakeholder Engagement Policy

For more information on policy contents and objectives, as well as the most senior level role in PTSB accountable for implementation, please refer to ESRS 2-MDR-P.

The following stakeholders are affected:

- Members of the Board and its Committees, Management Committees and Risk Committees;
- All employees (as defined in S1 Own Workforce);
- Customers;
- Third party service providers;
- External stakeholders, including Regulators and Supervisors who require an overview of the regulatory compliance management principles, process, and governance arrangements; and,
- Owners of interlinked Frameworks and Policies who are responsible for aligning their Frameworks, Policies, and Procedures.

The Board is collectively responsible for the governance of the Bank and has delegated responsibility for supplier management to the following committees.

Operational Risk Management Committee (ORMC)

The ORMC is a sub-committee of the Group Risk Committee (GRC) established with delegated authority to operate and make decisions in accordance with the Terms of Reference approved by the Bank's GRC. The ORMC also monitors the oversight of new or amended Third Party/ Outsourcing relationships, new products, and/or significant changes to existing products and strategic change that is implemented across the Bank, highlighting any risks where required.

Third Party Management Committee (TPMC)

The Bank's TPMC is the governance body accountable for formalising the Third Party Management arrangements with Third Party Service Providers. Their role is to approve on-boarding of new Third Parties over a certain risk threshold, oversee the performance of existing service providers, monitor Third Party breaches, escalations and remediation plans, and review material changes to existing Third Party arrangements.

The Bank demonstrates a strong commitment to transparency and accountability by actively respecting a range of Third Party standards and initiatives through its policies, standards and charters. For more information regarding the Bank's Sustainable Supplier Charter and its use of a FSQS for supplier due diligence, please refer to G1-2.

G1-MDR2-A Actions and resources in relation to Managing Suppliers

The Bank is focused on working alongside its suppliers to find opportunities to procure goods in a sustainable way. Key progress during 2025 includes:

- Continuing to engage with all suppliers through the expectations that we set out in the Bank's Sustainable Supplier Charter;
- Including consideration for ESG within our tendering processes through the implementation of dedicated ESG questions that are part of supplier onboarding;
- Working alongside our procurement partners, to continue to develop the Carbon Cube[®]; which takes spend data and combines it with a category-specific emission factor to calculate supplier emissions in line with the Greenhouse Gas (GHG) Protocol methodology; and,
- Producing a quarterly ESG dashboard to the Chief Financial Officer and Senior Management team within Group Finance.

During 2025, the Bank continued to embed and enhance Third Party Management across the organisation, with the objective of providing a clear and consistent approach to managing Third Party providers through the Bank's

Third Party Management Framework. This approach continues to focus on driving value and empowering the organisation, while minimising any potential adverse outcomes for our customers, key stakeholders or the Bank. The centralised Third Party Management team support the delivery of Third Party Management across the Bank.

As part of our onboarding and due diligence process, each relevant Third Party Provider is required to complete a level of due diligence relating to ESG, which is supported by relevant documentation. This enables the Bank to assess the Third Party Provider's sustainability and ESG credentials.

As part of the development of the Bank's Integrated Strategic Plan (ISP), financial investment and resources are allocated to the delivery of managing suppliers. PTSB has not disclosed these figures publicly.

G1-MDR2-M Metrics in relation to Managing Suppliers

The following metrics are utilised to evaluate the performance and effectiveness of the Bank's actions towards ensuring that suppliers are appropriately managed and to mitigate risks associated with outsourcing and the use of Third Parties:

- Service Level Agreements and Key Performance Indicators (relevant to each supplier relationship) form part of outsourced and Third Party Contracts; and,
- Balanced scorecards are completed each month by business owners evaluating the performance of Third Parties.

A dedicated Third Party Management Committee sits monthly to review Third Party performance.

There has been no formal methodology employed when designing the Bank's supplier management governance metrics. There are no significant assumptions behind the metrics. Supplier Management metrics are not validated by an external body other than limited assurance from the Bank's assurance provider. These metrics are set and monitored internally by the Bank.

G1-MDR2-T Tracking effectiveness of policies and actions through targets

At present, the Bank does not have any targets assigned to evaluate performance and effectiveness in relation to Managing Suppliers in the context of Governance.

G1-MDR 3 Community Partnerships

The IROs reflected in G1-MDR3 are outlined below.

IRO-Ref	IRO	Description	Details	Positive or Negative	Potential or Actual
I-8	Impact	The impact PTSB has on society and local communities through building community partnerships, providing charitable donations and engaging in volunteering activity.	PTSB recognises its potential for community impact by providing financial support to community organisations through the PTSB Community Programme, building strong community partnerships and engaging in employee volunteering initiatives.	Positive	Both

G1-MDR3-P Policies adopted to manage Community Partnerships

The Bank has frameworks and policies in place that help to ensure that our community programming is appropriately assessed and managed, including:

- Code of Ethics
- Speak Freely
- Conflict of Interest
- Financial Crime Compliance Framework
- Third Party Management Framework
- Third Party Risk Management Policy
- Third Party Outsourcing Strategy
- Supplier Relationship Standards
- Sourcing and Procurement Policy
- Sustainable Supplier Charter
- Supplier Contracts
- Stakeholder Engagement Policy
- Community Policy
- Community Fund Constitution
- Employee Volunteering Policy

For more information on policy contents and objectives, as well as the most senior level role in PTSB accountable for implementation, please refer to ESRs 2-MDR-P.

These frameworks and policies apply to the Bank's community engagement activity, including PTSB Community (the Bank's funding programme) and Employee Volunteering. The following stakeholders have been considered in their development and are affected:

- Members of the Board and its Committees, Management Committees and Risk Committees;

- All employees (as defined in S1 Own Workforce);
- Customers;
- Community Partners;
- External stakeholders who require an overview of community partnership compliance management principles, process, and governance arrangements; and,
- Owners of interlinked frameworks and policies who are responsible for aligning their frameworks, policies, and procedures.

The Board is collectively responsible for the governance of the Bank and has delegated responsibility for Community Partnerships to the following committees.

Executive Committee (ExCo)

The ExCo is the Senior Management Executive Committee of the Bank. It is chaired by the CEO and has a primary role in providing assurance to the Board of Directors and its Committees on the financial performance and integrity of the Bank's businesses, that the systems of internal control, internal audit, financial reporting and IT operate effectively, that process/systems are in place to ensure all risks have been correctly identified, that appropriate controls are in place, and escalating matters to the Board and its Committees, where appropriate.

Sustainability Committee (SusCo)

The SusCo acts on delegated authority from the ExCo to provide oversight on execution of the Bank's Sustainability Strategy, including a focus on Community Partnerships under the 'Shaping an Inclusive Future' pillar.

Chief Sustainability and Corporate Affairs Officer (CSCAO)

The CSCAO is responsible for leading the development and implementation of the Bank's Sustainability Strategy in line with regulatory and supervisory expectation, while ensuring all activity is aligned with the Bank's overarching Business Strategy and purpose. The CSCAO chairs the Bank's Sustainability Committee and is supported by a Head of Sustainability and associated team who oversee the implementation of the Bank's community programming.

For more on Governance, please refer to ESRs 2-GOV-1.

As a regulated financial institution, the Bank abides by the following:

- The Individual Accountability Framework (IAF)
- Central Bank of Ireland (CBI) Consumer Protection Act
- Advertising Standards Authority of Ireland (ASAI) Code
- Broadcasting Authority of Ireland (BAI) General Commercial Communications Code (GCC)

Sustainability Statement

ESRS G1 Business conduct (continued)

G1-MDR3-A Actions and resources in relation to Community Partnerships

In 2025, PTSB continued to deepen its community impact by providing financial support to community organisations including through PTSB Community (the Bank's funding programme), building strong community partnerships and engaging in employee volunteering initiatives. Key highlights include:

- c.€20.7m million in funding made available to the Social Finance Foundation since 2009;
- c.€270,000 in charitable giving through PTSB Community (the Bank's funding programme) in 2025, which included matched funding by the Bank.. The community fund has contributed more than €2m in funding to Irish community organisations working to address social issues across the country since its establishment;
- Working alongside community partners like LIFT Ireland, delivering a 'Minding My Future' module into their school roundtable programme focused on developing leadership capability across the themes of Sustainability and Financial Wellbeing. 'Minding my Future' is new to LIFT Ireland's programme and is proudly supported by PTSB;
- A partnership with Dublin City University Access Scholarship Programme and Access to the Workplace Programme, to support those from socioeconomically disadvantaged backgrounds;
- A partnership with the Trinity Centre for People with Intellectual Disabilities (TCPID) to support interns and work placements;
- A partnership with Common Purpose Ireland, Legacy Dublin Program and sponsored a breakout room, focused on neurodiversity at the National Diversity and Inclusion Conference.
- Activating our 3-year partnership with AsIAM, Ireland's Autism Charity, that enables the charity to further support autistic people and their families and to promote and drive greater inclusivity in Irish society. The Bank has also become the first financial institution in Ireland to be accredited with Autism-Friendly branches, with all 98 branches now accredited as Autism-Friendly; and,

- Encouraging employee volunteering with registered charities across Ireland through the PTSB Volunteering Programme. More than 2,500 volunteering hours were provided on the ground last year, equating to c.€80,000 of in-kind giving.

All activity took place in the Republic of Ireland. The time horizon was January-December 2025.

As part of the development of the Bank's Integrated Strategic Plan (ISP), financial investment and resources are allocated to the delivery of community programme. The budget allocated considers resourcing that needs to be in place to deliver on activity, as well as the associated community programme and activation fees that are required as part of the contractual rights. PTSB has not disclosed these figures publicly.

G1-MDR3-M Metrics in relation to Community Partnerships

The following metrics are utilised to evaluate performance:

- Total contributions through PTSB Community (the Bank's funding programme), including matched funding by the Bank;
- Number of hours contributed through employee volunteering;
- In-kind giving figures associated with Employee Volunteering Programme hours;
- PR and Earned Media Value; and,
- Social Media Performance where a paid for social media campaign is part of the Activation Strategy.

Methodologies used have been introduced in line with industry best practice and have been developed internally by the Bank through engagement with internal stakeholders. No significant assumptions exist behind the metrics.

Community metrics are not validated by an external body other than limited assurance from the Bank's assurance provider. These metrics are set and monitored internally by the Bank.

G1-MDR3-T Tracking effectiveness of policies and actions through targets

PTSB is committed to managing the material impact associated with our community programme in a proactive and measurable way. The following targets have been established:

- €200,000 in financial giving through PTSB Community (the Bank's funding programme), which includes matched funding by the Bank;
- c.1,000 volunteer hours on the ground in local communities through the Employee Volunteering Programme per year; and,
- Bespoke social media performance metrics which are established on a campaign-by-campaign basis.

The Bank observed no compliance breaches in relation to community programming during 2025. All activity took place in the Republic of Ireland.

The targets are set annually and as such, the baseline year is January-December 2025.. All targets have been set internally within the Bank by the respective teams responsible for delivery.

Progress against targets is monitored on a quarterly basis and reported upwards to the Bank's Sustainability Committee, ExCo and Board, as appropriate.

Appendix A - List of datapoints in cross-cutting and topical standards that derive from other EU Legislation

Disclosure Requirement and related datapoint	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page Number
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)		Commission Delegated Regulation (EU) 2020/1816 (27), Annex II		143
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)		Delegated Regulation (EU) 2020/1816, Annex II		143
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i	Pillar 3 Template 3 (Not disclosed Mid- Year)	Delegated Regulation (EU) 2020/1816, Annex II		149
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii		Delegated Regulation (EU) 2020/1816, Annex II		149
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii		Delegated Regulation (EU) 2020/1818 (29) , Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		149
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv		Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		149
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14			Regulation (EU) 2021/1119, Article 2(1)	174
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)	Pillar 3 Template 1	Delegated Regulation (EU) 2020/1818, Article 12.1 (d) to (g), and Article 12.2		174
ESRS E1-4 GHG emission reduction targets paragraph 34	Pillar 3 Template 3 (target validation in progress)	Delegated Regulation (EU) 2020/1818, Article 6		181
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38				185
ESRS E1-5 Energy consumption and mix paragraph 37				185

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ESRS G1 Business conduct (continued)

Disclosure Requirement and related datapoint	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page Number
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43				186
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	Pillar 3 Template 1	Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)		181
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	Pillar 3 Template 1	Delegated Regulation (EU) 2020/1818, Article 8(1)		186
ESRS E1-7 GHG removals and carbon credits paragraph 56			Regulation (EU) 2021/1119, Article 2(1)	186
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66		Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II		-
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a) ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c).	Pillar 3 Template 5			-
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c).	Pillar 3 Template 2			-
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities paragraph 69		Delegated Regulation (EU) 2020/1818, Annex II		-
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28				Not material
ESRS E3-1 Water and marine resources paragraph 9				Not material
ESRS E3-1 Dedicated policy paragraph 13				Not material
ESRS E3-1 Sustainable oceans and seas paragraph 14				Not material

Disclosure Requirement and related datapoint	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page Number
ESRS E3-4 Total water recycled and reused paragraph 28 (c)				Not material
ESRS E3-4 Total water consumption in m 3 per net revenue on own operations paragraph 29				Not material
ESRS 2- SBM 3 - E4 paragraph 16 (a) i				Not material
ESRS 2- SBM 3 - E4 paragraph 16 (b)				Not material
ESRS 2- SBM 3 - E4 paragraph 16 (c)				Not material
ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24 (b)				Not material
ESRS E4-2 Sustainable oceans / seas practices or policies paragraph 24 (c)				Not material
ESRS E4-2 Policies to address deforestation paragraph 24 (d)				Not material
ESRS E5-5 Non-recycled waste paragraph 37 (d)				Not material
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39				Not material
ESRS 2- SBM3 - S1 Risk of incidents of forced labour paragraph 14 (f)				199
ESRS 2- SBM3 - S1 Risk of incidents of child labour paragraph 14 (g)				199
ESRS S1-1 Human rights policy commitments paragraph 20				198
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21		Delegated Regulation (EU) 2020/1816, Annex II		198
ESRS S1-1 processes and measures for preventing trafficking in human beings paragraph 22				198
SRS S1-1 workplace accident prevention policy or management system paragraph 23				204

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ESRS G1 Business conduct (continued)

Disclosure Requirement and related datapoint	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page Number
ESRS S1-3 grievance/complaints handling mechanisms paragraph 32 (c)				200
ESRS S1-14 Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)		Delegated Regulation (EU) 2020/1816, Annex II		203
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)				203
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)		Delegated Regulation (EU) 2020/1816, Annex II		203
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)				204
ESRS S1-17 Incidents of discrimination paragraph 103 (a)				204
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD Guidelines paragraph 104 (a)		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)		204
ESRS 2- SBM3 – S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b)				Not material
ESRS S2-1 Human rights policy commitments paragraph 17				Not material
ESRS S2-1 Policies related to value chain workers paragraph 18				Not material
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Not material
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19		Delegated Regulation (EU) 2020/1816, Annex II		Not material

Disclosure Requirement and related datapoint	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page Number
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36				Not material
ESRS S3-1 Human rights policy commitments paragraph 16				Not material
ESRS S3-1 non-respect of UNGPs on Business and Human Rights, ILO principles or OECD guidelines paragraph 17		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Not material
ESRS S3-4 Human rights issues and incidents paragraph 36				Not material
ESRS S4-1 Policies related to consumers and end-users paragraph 16				211
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		211
ESRS S4-4 Human rights issues and incidents paragraph 35				211
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)				227
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Annex VI - Template for the KPIs of credit institutions

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0. Summary of KPIs to be disclosed by credit institutions under Article 8 Taxonomy Regulation

This template requires credit institutions to disclose relevant KPIs on the basis of the scope of their prudential consolidation determined in accordance with regulation (EU) No 575/2013, Title II, Chapter 2, Section 2.

In accordance with the Disclosure Delegated Act, PTSB is required to calculate the green asset ratio (GAR) for on-balance sheet exposures covering the following accounting categories of financial assets, including loans and advances, debt securities, equity holdings and repossessed collaterals:

- (a) financial assets at amortised cost;
- (b) financial assets at fair value through other comprehensive income;
- (c) investments in subsidiaries;
- (d) joint ventures and associates;
- (e) financial assets designated at fair value through profit or loss and non-trading financial assets mandatorily at fair value through profit or loss; and
- (f) real estate collaterals obtained by credit institutions by taking possession in exchange for the cancellation of debts.

The following assets shall be excluded from the numerator of the GAR:

- (a) financial assets held for trading;
- (b) on-demand interbank loans; and
- (c) exposures to undertakings that are not obliged to publish non-financial information pursuant to Article 19a or 29a of Directive 2013/34/EU.

PTSB is required to calculate the KPIs for off-balance sheet exposures considering financial guarantees granted by the credit institution and assets under management for guarantee and investee non-financial undertakings. Other off-balance sheet exposures such as commitments are excluded from that calculation.

For details on the Bank's approach to determining taxonomy alignment, and calculation of these summary KPIs, please see notes in Template 1.

2025

		Total environmentally sustainable assets	KPI****	KPI*****	% coverage (over total assets)***	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2. of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)
Main KPI	Green asset ratio (GAR) stock	1849	7.62%	7.62%	6.01%	7.10%	21.18%

		Total environmentally sustainable activities	KPI	KPI	% coverage (over total assets)	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2. of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)
Additional KPIs	GAR (flow)	382	11.85%	11.85%	8.32%	6.29%	29.79%
	Trading book*	-	-	-			
	Financial guarantees	-	-	-			
	Assets under management	-	-	-			
	Fees and commissions income**	-	-	-			

* For credit institutions that do not meet the conditions of Article 94(1) of the CRR or the conditions set out in Article 325a(1) of the CRR

** Fees and commissions income from services other than lending and AuM (Fees and Commissions and Trading Book KPIs shall only apply starting 2028)

Institutions shall disclose forward looking information for this KPIs, including information in terms of targets, together with relevant explanations on the methodology applied.

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

****based on the Turnover KPI of the counterparty

*****based on the CapEx KPI of the counterparty, except for lending activities where for general lending Turnover KPI is used

2024

		Total environmentally sustainable assets	KPI****	KPI*****	% coverage (over total assets)***	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2. of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)
Main KPI	Green asset ratio (GAR) stock	1854	7.98%	7.98%	6.32%	6.45%	20.82%

		Total environmentally sustainable activities	KPI	KPI	% coverage (over total assets)	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2. of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)
Additional KPIs	GAR (flow)	360	14.80%	14.80%	9.61%	7.48%	35.07%
	Trading book*	-	-	-			
	Financial guarantees	-	-	-			
	Assets under management	-	-	-			
	Fees and commissions income**	-	-	-			

* For credit institutions that do not meet the conditions of Article 94(1) of the CRR or the conditions set out in Article 325a(1) of the CRR

** Fees and commissions income from services other than lending and AuM (Fees and Commissions and Trading Book KPIs shall only apply starting 2028)

Institutions shall disclose forward looking information for this KPIs, including information in terms of targets, together with relevant explanations on the methodology applied.

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

****based on the Turnover KPI of the counterparty

*****based on the CapEx KPI of the counterparty, except for lending activities where for general lending Turnover KPI is used

Annex VI - Template for the KPIs of credit institutions

(continued)

1. Assets for the calculation of GAR

Template 1 discloses the Bank's assets used in the calculation of the Green Asset Ratio (GAR). Exposures are reported for 31st December 2025. EU Taxonomy balances are presented gross of ECL and deferred fees, discounts and business combination related fair value adjustments.

For this disclosure, given the residential mortgage book represents the bank's most significant portion of on-balance sheet exposures in terms of value, we have prioritised analysis of alignment with the EU Taxonomy within households, secured against residential immovable property.

The criteria to determine alignment for residential mortgage loans to households vary based on the year of construction, and alignment is determined based on EPC rating criteria, and exposure to physical risk.

Taxonomy aligned properties built before 31st December 2020, must have an Energy Performance Certificate (EPC) rating in the top 15% of the national or regional building stock. To identify the top 15% of the most energy efficient buildings within the national or regional building stock, as per the EU Taxonomy and associated technical screening criteria, we used energy ratings data from the Central Statistics Office (CSO) representing approximately 77.6% of Ireland's housing stock. Based on this weighted national dataset,

2025 Turnover Based

Million EUR											
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)	
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)	
		Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)	
	Total [gross] carrying amount	Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
GAR - Covered assets in both numerator and denominator											
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	22,075.34	20814.8	1849.20	1849.20	-	-	-	-	-	-
2	Financial undertakings	403.15	-	-	-	-	-	-	-	-	-
3	Credit institutions	399.85	-	-	-	-	-	-	-	-	-
4	Loans and advances	157.68	-	-	-	-	-	-	-	-	-
5	Debt securities, including UoP	242.17	-	-	-	-	-	-	-	-	-
6	Equity instruments	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	3.30	-	-	-	-	-	-	-	-	-
8	of which investment firms	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-
20	Non-financial undertakings	-	-	-	-	-	-	-	-	-	-
21	Loans and advances	-	-	-	-	-	-	-	-	-	-
22	Debt securities, including UoP	0	-	-	-	-	-	-	-	-	-
23	Equity instruments	0	-	-	-	-	-	-	-	-	-
24	Households	21,672.20	20,814.80	1849.20	1849.20	-	-	-	-	-	-
25	of which loans collateralised by residential immovable property	20,929.91	20,620.47	1849.2	1849.2	-	-	-	-	-	-
26	of which building renovation loans	7.73	7.73	-	-	-	-	-	-	-	-
27	of which motor vehicle loans	191.54	186.59	-	-	-	-	-	-	-	-
28	Local governments financing	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-

Annex VI - Template for the KPIs of credit institutions

(continued)

Million EUR	Total [gross] carrying amount	Climate Change Mitigation (CCM)			Climate Change Adaptation (CCA)			Water and marine resources (WTR)		
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)		
		Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)		
		Of which Use of Proceeds			Of which Use of Proceeds			Of which Use of Proceeds		
		Of which transitional	Of which enabling		Of which transitional	Of which enabling		Of which transitional	Of which enabling	
31	Collateral obtained by taking possession: residential and commercial immovable properties	4.54	-	-	-	-	-	-	-	-
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	2185.73	-	-	-	-	-	-	-	-
33	Financial and Non-financial undertakings	894.92								
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	893.40								
35	Loans and advances	893.40								
36	of which loans collateralised by commercial immovable property	-								
37	of which building renovation loans	-								
38	Debt securities	-								
39	Equity instruments	-								
40	Non-EU country counterparties not subject to NFRD disclosure obligations	1.53								
41	Loans and advances	0.25								
42	Debt securities									
43	Equity instruments	1.28								
44	Derivatives	21.10								
45	On demand interbank loans	163.03								
46	Cash and cash-related assets	74.63								
47	Other categories of assets (e.g. Goodwill, commodities etc.)	1,032.04								
48	Total GAR assets	24,265.62	20,814.80	1,849.20	1849.20	-	-			
49	Assets not covered for GAR calculation	6,520.36								
50	Central governments and Supranational issuers	5,118.66								
51	Central banks' exposure	1,398.62								
52	Trading book	3.07								
53	Total assets	30,785.98	-	-	-	-	-	-	-	-
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations										
54	Financial guarantees	1.53	-	-	-	-	-	-	-	-
55	Assets under management	-	-	-	-	-	-	-	-	-
56	Of which debt securities	-	-	-	-	-	-	-	-	-
57	Of which equity instruments	-	-	-	-	-	-	-	-	-

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Annex VI - Template for the KPIs of credit institutions

(continued)

2024 Turnover Based

Million EUR		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
		Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
		Total [gross] carrying amount	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling
	GAR - Covered assets in both numerator and denominator												
	Loans and advances, debt securities and equity instruments not HFT eligible for GAR												
1	calculation	21,319.99	19,996.73	1,853.58	1,853.58	-	-	-	-	-	-	-	-
2	Financial undertakings	293.64	-	-	-	-	-	-	-	-	-	-	-
3	Credit institutions	291.19	-	-	-	-	-	-	-	-	-	-	-
4	Loans and advances	181.74	-	-	-	-	-	-	-	-	-	-	-
5	Debt securities, including UoP	109.45	-	-	-	-	-	-	-	-	-	-	-
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	2.45	-	-	-	-	-	-	-	-	-	-	-
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-
20	Non-financial undertakings	-	-	-	-	-	-	-	-	-	-	-	-
21	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-
24	Households	21,026.35	19,996.73	1,853.58	1,853.58	-	-	-	-	-	-	-	-
	of which loans collateralised by residential												
25	immovable property	20,298.61	19,996.73	1,853.58	1,853.58	-	-	-	-	-	-	-	-
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-
28	Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-
	Collateral obtained by taking possession: residential and commercial immovable												
31	properties	7.32	-	-	-	-	-	-	-	-	-	-	-
	Assets excluded from the numerator for GAR												
32	calculation (covered in the denominator)	1,891.71	-	-	-	-	-	-	-	-	-	-	-
33	Financial and Non-financial undertakings	796.29											
	SMEs and NFCs (other than SMEs) not												
34	subject to NFRD disclosure obligations	786.58											
35	Loans and advances	786.58											
	of which loans collateralised by commercial												
36	immovable property	-											
37	of which building renovation loans	-											
38	Debt securities	-											
39	Equity instruments	-											
40	Non-EU country counterparties not subject to NFRD disclosure obligations	9.71											

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Annex VI - Template for the KPIs of credit institutions (continued)

Million EUR		Climate Change Mitigation (CCM)			Climate Change Adaptation (CCA)			Water and marine resources (WTR)		
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)		
		Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)		
		Of which Use of Proceeds			Of which Use of Proceeds			Of which Use of Proceeds		
		Of which transitional enabling			Of which transitional enabling			Of which transitional enabling		
	Total [gross] carrying amount									
41 Loans and advances	0.28									
42 Debt securities										
43 Equity instruments	9.43									
44 Derivatives	58.52									
45 On demand interbank loans	132.91									
46 Cash and cash-related assets	72.07									
Other categories of assets (e.g. Goodwill, commodities etc.)	831.93									
48 Total GAR assets	23,219.02	19,996.73	1,853.58	1,853.58	-	-				
49 Assets not covered for GAR calculation	6,105.36									
Central governments and Supranational issuers	4,217.80									
51 Central banks' exposure	1,887.23									
52 Trading book	0.33									
53 Total assets	29,324.39	-	-	-	-	-	-	-	-	-
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations										
54 Financial guarantees	1.53	-	-	-	-	-	-	-	-	-
55 Assets under management	-	-	-	-	-	-	-	-	-	-
56 Of which debt securities	-	-	-	-	-	-	-	-	-	-
57 Of which equity instruments										

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Annex VI - Template for the KPIs of credit institutions

(continued)

2025 CapEx Based

	Total [gross] carrying amount	Climate Change Mitigation (CCM)			Climate Change Adaptation (CCA)			Water and marine resources (WTR)		
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)		
		Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)		
		Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling	
Million EUR										
GAR - Covered assets in both numerator and denominator										
Loans and advances, debt securities and equity instruments not HfT eligible for										
1 GAR calculation	22,075.34	20,814.8	1,849.2	1,849.2	-	-	-	-	-	-
2 Financial undertakings	403.15	-	-	-	-	-	-	-	-	-
3 Credit institutions	399.85	-	-	-	-	-	-	-	-	-
4 Loans and advances	157.68	-	-	-	-	-	-	-	-	-
5 Debt securities, including UoP	242.17	-	-	-	-	-	-	-	-	-
6 Equity instruments	-	-	-	-	-	-	-	-	-	-
7 Other financial corporations	3.30	-	-	-	-	-	-	-	-	-
8 of which investment firms	-	-	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-	-	-
10 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	-	-	-	-	-	-	-	-
12 of which management companies	-	-	-	-	-	-	-	-	-	-
13 Loans and advances	-	-	-	-	-	-	-	-	-	-
14 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	-	-	-	-	-	-	-	-
16 of which insurance undertakings	-	-	-	-	-	-	-	-	-	-
17 Loans and advances	-	-	-	-	-	-	-	-	-	-
18 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-
19 Equity instruments	-	-	-	-	-	-	-	-	-	-
20 Non-financial undertakings	-	-	-	-	-	-	-	-	-	-
21 Loans and advances	-	-	-	-	-	-	-	-	-	-
22 Debt securities, including UoP	0	-	-	-	-	-	-	-	-	-
23 Equity instruments	0	-	-	-	-	-	-	-	-	-
24 Households	21,672.20	20,814.80	1,849.20	1,849.20	-	-	-	-	-	-
25 of which loans collateralised by residential immovable property	20,929.91	20,620.47	1,849.20	1,849.20	-	-	-	-	-	-
26 of which building renovation loans	7.73	7.73	-	-	-	-	-	-	-	-
27 of which motor vehicle loans	191.54	186.59	-	-	-	-	-	-	-	-
28 Local governments financing	-	-	-	-	-	-	-	-	-	-
29 Housing financing	-	-	-	-	-	-	-	-	-	-
30 Other local government financing	-	-	-	-	-	-	-	-	-	-
Collateral obtained by taking possession: residential and commercial immovable properties										
31 properties	4.54	-	-	-	-	-	-	-	-	-

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Annex VI - Template for the KPIs of credit institutions

(continued)

	Total [gross] carrying amount	Climate Change Mitigation (CCM)			Climate Change Adaptation (CCA)			Water and marine resources (WTR)		
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)		
		Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)		
		Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling	
Million EUR										
Assets excluded from the numerator for GAR calculation (covered in the denominator)										
32	2185.73	-	-	-	-	-	-	-	-	-
Financial and Non-financial undertakings										
SMEs and NFCs (other than SMEs) not subject to NFRD										
34	893.40									
35	893.40									
of which loans collateralised by commercial immovable property										
36	-									
of which building renovation loans										
37	-									
38	-									
39	-									
Equity instruments										
Non-EU country counterparties not subject to NFRD disclosure obligations										
40	1.53									
41	0.25									
42										
43	1.28									
44	21.10									
45	163.03									
46	74.63									
Other categories of assets (e.g. Goodwill, commodities etc.)										
47	1,032.04									
48	24,265.62	20,814.80	1,849.20	1,849.20	-	-				
Assets not covered for GAR calculation										
49	6,520.36									
Central governments and Supranational issuers										
50	5,118.66									
51	1,398.62									
52	3.07									
53	30,785.98	-	-	-	-	-	-	-	-	-
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations										
54	1.53	-	-	-	-	-	-	-	-	-
55	-	-	-	-	-	-	-	-	-	-
56	-	-	-	-	-	-	-	-	-	-
57	-	-	-	-	-	-	-	-	-	-

Disclosure reference date T																	
Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)									
Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)					
Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which transitional		Of which enabling	
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Annex VI - Template for the KPIs of credit institutions

(continued)

2024 CapEx Based

Million EUR		Total [gross] carrying amount	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
			Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling					
GAR - Covered assets in both numerator and denominator														
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	21,319.99	19,996.73	1,853.58	1,853.58	-	-	-	-	-	-	-	-	-
2	Financial undertakings	293.64	-	-	-	-	-	-	-	-	-	-	-	-
3	Credit institutions	291.19	-	-	-	-	-	-	-	-	-	-	-	-
4	Loans and advances	181.74	-	-	-	-	-	-	-	-	-	-	-	-
5	Debt securities, including UoP	109.45	-	-	-	-	-	-	-	-	-	-	-	-
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	2.45	-	-	-	-	-	-	-	-	-	-	-	-
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Non-financial undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-
21	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-
22	Debt securities, including UoP	0	-	-	-	-	-	-	-	-	-	-	-	-
23	Equity instruments	0	-	-	-	-	-	-	-	-	-	-	-	-
24	Households	21,026.35	19,996.73	1,853.58	1,853.58	-	-	-	-	-	-	-	-	-
25	of which loans collateralised by residential immovable property	20,298.61	19,996.73	1,853.58	1,853.58	-	-	-	-	-	-	-	-	-
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-
28	Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: residential and commercial immovable properties	7.32	-	-	-	-	-	-	-	-	-	-	-	-
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	1,891.71	-	-	-	-	-	-	-	-	-	-	-	-
33	Financial and Non-financial undertakings	796.29												
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	786.58												
35	Loans and advances	786.58												
36	of which loans collateralised by commercial immovable property	-												
37	of which building renovation loans	-												

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Annex VI - Template for the KPIs of credit institutions (continued)

Million EUR		Total [gross] carrying amount	Climate Change Mitigation (CCM)			Climate Change Adaptation (CCA)			Water and marine resources (WTR)		
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)		
			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)		
			Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling	
38	Debt securities	-									
39	Equity instruments	-									
40	Non-EU country counterparties not subject to NFRD disclosure obligations	9.71									
41	Loans and advances	0.28									
42	Debt securities										
43	Equity instruments	9.43									
44	Derivatives	58.52									
45	On demand interbank loans	132.91									
46	Cash and cash-related assets	72.07									
47	Other categories of assets (e.g. Goodwill, commodities etc.)	831.93									
48	Total GAR assets	23,219.02	19,996.73	1,853.58	1,853.58	-	-				
49	Assets not covered for GAR calculation	6,105.36									
50	Central governments and Supranational issuers	4,217.80									
51	Central banks' exposure	1,887.23									
52	Trading book	0.33									
53	Total assets	29,324.39	-	-	-	-	-	-	-	-	-
Off-balance sheet exposures -											
Undertakings subject to NFRD disclosure											
obligations											
54	Financial guarantees	1.53	-	-	-	-	-	-	-	-	-
55	Assets under management	-	-	-	-	-	-	-	-	-	-
56	Of which debt securities	-	-	-	-	-	-	-	-	-	-
57	Of which equity instruments	-	-	-	-						

[illegible]

Annex VI - Template for the KPIs of credit institutions

(continued)

2. GAR sector information

The purpose of this template is to provide information on exposures in the banking book toward those sectors (NFCs subject to NFRD) covered by the Taxonomy (NACE sector 4 levels of detail), using the relevant NACE Codes on the basis of the principal activity of the counterparty.

For the 31st December 2025 disclosure, bank reviewed the book for exposure to NFC's subject to NFRD. Nil return for both Turnover and CapEx in this instance.

This assessment resulted in a nil return.

Breakdown by sector - NACE 4 digits level (code and label)	Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)		Water and marine resources (WTR)	
	Non-Financial corporates (Subject to NFRD)	SMEs and other NFC not subject to NFRD	Non-Financial corporates (Subject to NFRD)	SMEs and other NFC not subject to NFRD	Non-Financial corporates (Subject to NFRD)	SMEs and other NFC not subject to NFRD
	[Gross] carrying amount	[Gross] carrying amount	[Gross] carrying amount	[Gross] carrying amount	[Gross] carrying amount	[Gross] carrying amount
	Of which environmentally sustainable (CCM)	Of which environmentally sustainable (CCM)	Of which environmentally sustainable (CCA)	Of which environmentally sustainable (CCA)	Of which environmentally sustainable (WTR)	Of which environmentally sustainable (WTR)
	Mn EUR	Mn EUR	Mn EUR	Mn EUR	Mn EUR	Mn EUR
1	-	-	-	-	-	-
2	-	-	-	-	-	-
3	-	-	-	-	-	-
4	-	-	-	-	-	-
...	-	-	-	-	-	-

Nil return for 2024.

Breakdown by sector - NACE 4 digits level (code and label)	Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)		Water and marine resources (WTR)	
	Non-Financial corporates (Subject to NFRD)	SMEs and other NFC not subject to NFRD	Non-Financial corporates (Subject to NFRD)	SMEs and other NFC not subject to NFRD	Non-Financial corporates (Subject to NFRD)	SMEs and other NFC not subject to NFRD
	[Gross] carrying amount	[Gross] carrying amount	[Gross] carrying amount	[Gross] carrying amount	[Gross] carrying amount	[Gross] carrying amount
	Of which environmentally sustainable (CCM)	Of which environmentally sustainable (CCM)	Of which environmentally sustainable (CCA)	Of which environmentally sustainable (CCA)	Of which environmentally sustainable (WTR)	Of which environmentally sustainable (WTR)
	Mn EUR	Mn EUR	Mn EUR	Mn EUR	Mn EUR	Mn EUR
1	-	-	-	-	-	-
2	-	-	-	-	-	-
3	-	-	-	-	-	-
4	-	-	-	-	-	-
...	-	-	-	-	-	-

Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
Of which environmentally sustainable (CE)		Of which environmentally sustainable (CE)		Of which environmentally sustainable (PPC)		Of which environmentally sustainable (PPC)		Of which environmentally sustainable (BIO)		Of which environmentally sustainable (BIO)		Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)		Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	
Mn EUR		Mn EUR		Mn EUR		Mn EUR		Mn EUR		Mn EUR		Mn EUR		Mn EUR	
-	-			-	-			-	-			-	-		
-	-			-	-			-	-			-	-		
-	-			-	-			-	-			-	-		
-	-			-	-			-	-			-	-		
-	-			-	-			-	-			-	-		

Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
Of which environmentally sustainable (CE)		Of which environmentally sustainable (CE)		Of which environmentally sustainable (PPC)		Of which environmentally sustainable (PPC)		Of which environmentally sustainable (BIO)		Of which environmentally sustainable (BIO)		Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)		Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	
Mn EUR		Mn EUR		Mn EUR		Mn EUR		Mn EUR		Mn EUR		Mn EUR		Mn EUR	
-	-			-	-			-	-			-	-		
-	-			-	-			-	-			-	-		
-	-			-	-			-	-			-	-		
-	-			-	-			-	-			-	-		
-	-			-	-			-	-			-	-		

Annex VI - Template for the KPIs of credit institutions (continued)

3. GAR KPI stock

The purpose of this template is to disclose GAR KPIs on stock of loans calculated based on data disclosed in template 1, by applying the formulas proposed in this template.

For the 31st December 2025 disclosure, bank reviewed the book and expressed as a percentage the proportion of the stock of assets funding activities referred to in Regulation (EU) 2020/852 (i.e. eligible assets) in total stock of covered assets.

This assessment resulted in 7.62%.

The bank's green assets relate to residential mortgage lending which predominately involves financing existing home purchases.

2025 Turnover Based

		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)			Water and marine resources (WTR)		
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
		Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling				
% (compared to total covered assets in the denominator)												
	GAR - Covered assets in both numerator and denominator											
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	94.29%	8.38%	8.38%	-	-	-	-	-	-	-	
2	Financial undertakings	-	-	-	-	-	-	-	-	-	-	
3	Credit institutions	-	-	-	-	-	-	-	-	-	-	
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	
12	of which management companies	-	-	-	-	-	-	-	-	-	-	
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	
20	Non-financial undertakings	-	-	-	-	-	-	-	-	-	-	
21	Loans and advances	-	-	-	-	-	-	-	-	-	-	
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	
24	Households	96.04%	8.53%	8.53%	-	-	-	-	-	-	-	
25	of which loans collateralised by residential immovable property	98.52%	8.84%	8.84%	-	-	-	-	-	-	-	
26	of which building renovation loans	100.00%	0.00%	0.00%	-	-	-	-	-	-	-	
27	of which motor vehicle loans	97.42%	0.00%	0.00%	-	-	-	-	-	-	-	
28	Local governments financing	-	-	-	-	-	-	-	-	-	-	
29	Housing financing	-	-	-	-	-	-	-	-	-	-	
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	
32	Total GAR assets	85.78%	7.62%	7.62%	-	-	-	-	-	-	-	

Annex VI - Template for the KPIs of credit institutions

(continued)

2024 Turnover Based

	Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)						Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)						Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
	Of which Use of Proceeds		Of which transitional	Of which enabling			Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling	
% (compared to total covered assets in the denominator)														
	GAR - Covered assets in both numerator and denominator													
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	93.79%	8.69%	8.69%	-	-	-	-	-	-	-	-	-	-
2	Financial undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-
3	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Non-financial undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-
21	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
24	Households	95.10%	8.82%	8.82%	-	-	-	-	-	-	-	-	-	-
25	of which loans collateralised by residential immovable property	98.51%	9.13%	9.13%	-	-	-	-	-	-	-	-	-	-
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-
28	Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-
32	Total GAR assets	86.12%	7.98%	7.98%	-	-	-	-	-	-	-	-	-	-

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Annex VI - Template for the KPIs of credit institutions

(continued)

2025 CapEx Based

		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
		Of which Use of Proceeds		Of which transitional	Of which enabling	Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds		Of which enabling			
		% (compared to total covered assets in the denominator)												
	GAR - Covered assets in both numerator and denominator													
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	94.29%	8.38%	8.38%	-	-	-	-	-	-	-	-	-	-
2	Financial undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-
3	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Equity instruments	-	-		-	-	-		-	-	-		-	-
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-		-	-	-		-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-		-	-	-		-	-
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-		-	-	-		-	-
20	Non-financial undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-
21	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
23	Equity instruments	-	-		-	-	-		-	-	-		-	-
24	Households	96.04%	8.53%	8.53%	-	-	-	-	-	-				
25	of which loans collateralised by residential immovable property	98.52%	8.84%	8.84%	-	-	-	-	-	-				
26	of which building renovation loans	100.00%	0.00%	0.00%	-	-	-	-	-	-				
27	of which motor vehicle loans	97.42%	0.00%	0.00%	-	-								
28	Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-
32	Total GAR assets	85.78%	7.62%	7.62%	-	-	-	-	-	-	-	-	-	-

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Annex VI - Template for the KPIs of credit institutions

(continued)

2024 CapEx Based

		Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)			Water and marine resources (WTR)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)						Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)						Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
		Of which Use of Proceeds		Of which transitional		Of which enabling		Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds		Of which enabling	
		% (compared to total covered assets in the denominator)												
	GAR - Covered assets in both numerator and denominator													
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	93.79%	8.69%	8.69%	-	-	-	-	-	-	-	-	-	-
2	Financial undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-
3	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Non-financial undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-
21	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
24	Households	95.10%	8.82%	8.82%	-	-	-	-	-	-	-	-	-	-
25	of which loans collateralised by residential immovable property	98.51%	9.13%	9.13%	-	-	-	-	-	-	-	-	-	-
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-
28	Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-
32	Total GAR assets	86.12%	7.98%	7.98%	-	-	-	-	-	-	-	-	-	-

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Annex VI - Template for the KPIs of credit institutions (continued)

4. GAR KPI flow

The purpose of this template is to disclose GAR KPIs on flow of loans calculated (new loans on a net basis) based on data disclosed in template 1, by applying the formulas proposed in this template.

For the 31st December 2025 disclosure, bank reviewed the book and expressed as a percentage the proportion of new assets (i.e. assets originated and acquired within the current disclosure period) funding taxonomy-relevant activities (i.e. eligible assets) for the objective of climate change mitigation in total new eligible assets (i.e. eligible assets originated and acquired within the current disclosure period).

This assessment resulted in 11.85%.

The bank's green assets relate to residential mortgage lending which predominately involves financing existing home purchases rather than new capital expenditures.

2025 Turnover Based

	Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)			Water and marine resources (WTR)				
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)						Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)						Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
	Of which Use of Proceeds		Of which transitional	Of which enabling	Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds		Of which enabling				
	% (compared to total covered assets in the denominator)													
GAR - Covered assets in both numerator and denominator														
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	86.29%	11.85%	11.85%	-	-	-	-	-	-	-	-	-	-
2	Financial undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-
3	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Non-financial undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-
21	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
24	Households	94.82%	13.02%	13.02%	-	-	-	-	-	-	-	-	-	-
	of which loans collateralised by residential													
25	immovable property	100.00%	14.11%	14.11%	-	-	-	-	-	-	-	-	-	-
26	of which building renovation loans	100.00%	0.00%	0.00%	-	-	-	-	-	-	-	-	-	-
27	of which motor vehicle loans	100.00%	0.00%	0.00%	-	-	-	-	-	-	-	-	-	-
28	Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-
	Collateral obtained by taking possession: residential and commercial immovable													
31	properties	-	-	-	-	-	-	-	-	-	-	-	-	-
32	Total GAR assets	86.29%	11.85%	11.85%	-	-	-	-	-	-	-	-	-	-

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Annex VI - Template for the KPIs of credit institutions

(continued)

2024 Turnover Based

		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)			Water and marine resources (WTR)		
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
		Of which Use of Proceeds		Of which transitional	Of which enabling	Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds		Of which enabling	
		% (compared to total covered assets in the denominator)										
GAR - Covered assets in both numerator and denominator												
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	79.58%	14.80%	14.80%	-	-	-	-	-	-	-	-
2	Financial undertakings	-	-	-	-	-	-	-	-	-	-	-
3	Credit institutions	-	-	-	-	-	-	-	-	-	-	-
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-
20	Non-financial undertakings	-	-	-	-	-	-	-	-	-	-	-
21	Loans and advances	-	-	-	-	-	-	-	-	-	-	-
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-
24	Households	89.98%	16.73%	16.73%	-	-	-	-	-	-	-	-
25	of which loans collateralised by residential immovable property	100.00%	18.59%	18.59%	-	-	-	-	-	-	-	-
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-
28	Local governments financing	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-
32	Total GAR assets	79.58%	14.80%	14.80%	-	-	-	-	-	-	-	-

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Annex VI - Template for the KPIs of credit institutions

(continued)

2025 CapEx Based

		Climate Change Mitigation (CCM)			Climate Change Adaptation (CCA)			Water and marine resources (WTR)		
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
		Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling	
% (compared to total covered assets in the denominator)										
GAR - Covered assets in both numerator and denominator										
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	86.29%	11.85%	11.85%	-	-	-	-	-	-
2	Financial undertakings	-	-	-	-	-	-	-	-	-
3	Credit institutions	-	-	-	-	-	-	-	-	-
4	Loans and advances	-	-	-	-	-	-	-	-	-
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-
6	Equity instruments	-	-	-	-	-	-	-	-	-
7	Other financial corporations	-	-	-	-	-	-	-	-	-
8	of which investment firms	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-
20	Non-financial undertakings	-	-	-	-	-	-	-	-	-
21	Loans and advances	-	-	-	-	-	-	-	-	-
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-
23	Equity instruments	-	-	-	-	-	-	-	-	-
24	Households	94.82%	13.02%	13.02%	-	-	-	-	-	-
25	of which loans collateralised by residential immovable property	100.00%	14.11%	14.11%	-	-	-	-	-	-
26	of which building renovation loans	100.00%	0.00%	0.00%	-	-	-	-	-	-
27	of which motor vehicle loans	100.00%	0.00%	0.00%	-	-	-	-	-	-
28	Local governments financing	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-
Collateral obtained by taking possession: residential and commercial immovable properties										
31		-	-	-	-	-	-	-	-	-
32	Total GAR assets	86.29%	11.85%	11.85%	-	-	-	-	-	-

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Annex VI - Template for the KPIs of credit institutions (continued)

2024 CapEx Based

	Climate Change Mitigation (CCM)			Climate Change Adaptation (CCA)			Water and marine resources (WTR)		
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
	Of which			Of which			Of which		
	Use of Proceeds	Of which transitional	Of which enabling	Use of Proceeds	Of which enabling		Use of Proceeds	Of which enabling	
% (compared to total covered assets in the denominator)									
GAR - Covered assets in both numerator and denominator									
Loans and advances, debt securities and equity instruments not HfT eligible for									
1 GAR calculation	79.58%	14.80%	14.80%	-	-	-	-	-	-
2 Financial undertakings	-	-	-	-	-	-	-	-	-
3 Credit institutions	-	-	-	-	-	-	-	-	-
4 Loans and advances	-	-	-	-	-	-	-	-	-
5 Debt securities, including UoP	-	-	-	-	-	-	-	-	-
6 Equity instruments	-	-	-	-	-	-	-	-	-
7 Other financial corporations	-	-	-	-	-	-	-	-	-
8 of which investment firms	-	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-	-
10 Debt securities, including UoP	-	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	-	-	-	-	-	-	-
12 of which management companies	-	-	-	-	-	-	-	-	-
13 Loans and advances	-	-	-	-	-	-	-	-	-
14 Debt securities, including UoP	-	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	-	-	-	-	-	-	-
16 of which insurance undertakings	-	-	-	-	-	-	-	-	-
17 Loans and advances	-	-	-	-	-	-	-	-	-
18 Debt securities, including UoP	-	-	-	-	-	-	-	-	-
19 Equity instruments	-	-	-	-	-	-	-	-	-
20 Non-financial undertakings	-	-	-	-	-	-	-	-	-
21 Loans and advances	-	-	-	-	-	-	-	-	-
22 Debt securities, including UoP	-	-	-	-	-	-	-	-	-
23 Equity instruments	-	-	-	-	-	-	-	-	-
24 Households	89.98%	16.73%	16.73%	-	-	-	-	-	-
25 of which loans collateralised by residential immovable property	100.00%	18.59%	18.59%	-	-	-	-	-	-
26 of which building renovation loans	-	-	-	-	-	-	-	-	-
27 of which motor vehicle loans	-	-	-	-	-	-	-	-	-
28 Local governments financing	-	-	-	-	-	-	-	-	-
29 Housing financing	-	-	-	-	-	-	-	-	-
30 Other local government financing	-	-	-	-	-	-	-	-	-
Collateral obtained by taking possession: residential and commercial									
31 immovable properties	-	-	-	-	-	-	-	-	-
32 Total GAR assets	79.58%	14.80%	14.80%	-	-	-	-	-	-

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Annex VI - Template for the KPIs of credit institutions (continued)

5. KPI off-balance sheet exposures

The purpose of this template is to disclose information for off-balance sheet exposures calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template.

For the 31st December 2025 disclosure, owing to bank's prioritised analysis of alignment with the EU Taxonomy within households, secured against residential immovable property this template hasn't been populated. Nil return for Turnover and Capex for 2025 and 2024.

		Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)		Water and marine resources (WTR)	
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
		Of which Use of Proceeds		Of which transitional	Of which enabling	Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds		Of which enabling
		% (compared to total eligible off-balance sheet assets)									
1	Financial guarantees (FinGuar KPI)	-	-	-	-	-	-	-	-	-	-
2	Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-

Disclosure reference date T																
Circular economy (CE)					Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
Of which Use of Proceeds		Of which enabling			Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which transitional	Of which enabling
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Financial Statements

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Independent Auditor's Report to the Members of Permanent TSB Group Holdings plc

Report on the audit of the financial statements

Opinion

We have audited the financial statements of Permanent TSB Group Holdings plc ('the Company') and its consolidated undertakings ('the Group') for the year ended 31 December 2025 set out on pages 288 to 403, contained within the reporting package 635400DTNHVYGZODKQ93-2025-12-31-1-en.xbri, which comprise the consolidated income statement, consolidated statement of comprehensive income, consolidated statement of financial position, consolidated statement of changes in equity, consolidated statement of cash flows, company statement of financial position, company statement of changes in equity, company statement of cash flows and related notes, including the Group's material accounting policies set out in note 1 and the Company's material accounting policies set out in Note A on pages 295 and 400 respectively. Certain required disclosures have been presented elsewhere in the Annual Report, rather than in the notes to the financial statements. These are incorporated in the financial statements by cross-reference and are identified as audited.

The financial reporting framework that has been applied in their preparation is Irish Law, including the Commission Delegated Regulation 2019/815 regarding the single electronic reporting format (ESEF) and International Financial Reporting Standards (IFRS) as adopted by the European Union and, as regards the Company financial statements, as applied in accordance with the provisions of the Companies Act 2014.

In our opinion:

- the financial statements give a true and fair view of the assets, liabilities and financial position of the Group and Company as at 31 December 2025 and of the Group's profit for the year then ended;

- the Group financial statements have been properly prepared in accordance with IFRS as adopted by the European Union;
- the Company financial statements have been properly prepared in accordance with IFRS as adopted by the European Union, as applied in accordance with the provisions of the Companies Act 2014; and
- the Group and Company financial statements have been properly prepared in accordance with the requirements of the Companies Act 2014 and, as regards the Group financial statements, Article 4 of the IAS Regulation.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (Ireland) (ISAs (Ireland)) and applicable law. Our responsibilities under those standards are further described in the Auditor's Responsibilities section of our report. We believe that the audit evidence we have obtained is a sufficient and appropriate basis for our opinion. Our audit opinion is consistent with our report to the Board Audit Committee ("BAC").

We were appointed as auditor by the Board of Directors on 19 May 2023. The period of total uninterrupted engagement is the three years ended 31 December 2025. We have fulfilled our ethical responsibilities under, and we remained independent of the Group in accordance with, ethical requirements applicable in Ireland, including the Ethical Standard issued by the Irish Auditing and Accounting Supervisory Authority (IAASA) as applied to public interest entities. No non-audit services prohibited by that standard were provided.

Conclusions relating to going concern

In auditing the financial statements, we have concluded that the directors' use of the going concern basis of accounting in the preparation of the financial statements is appropriate. Our evaluation of the directors' assessment of the Group's and Company's ability to continue to adopt the going concern basis of accounting included:

- Evaluating management's assessment of the Group's and the Company's ability to continue to adopt the going concern basis of accounting. In our evaluation of management's conclusions, we considered the inherent risks to the Group's and Company's business model and analysed how those risks might affect the Group's and Company's financial resources or ability to continue operations over the going concern period. The risks that we considered most likely to adversely affect the Group's and Company's available financial resources over this period were:
 - the availability of funding and liquidity in the event of a market-wide stress scenario; and
 - the impact on regulatory capital requirements in the event of an economic slowdown or recession.
- We also considered whether these risks could plausibly affect the availability of financial resources in the going concern period by comparing severe, but plausible, downside scenarios that could arise from these risks individually and collectively against the level of available financial resources indicated by the Group's financial forecasts.

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the Group's or the Company's ability to continue as a going concern for a period of at least twelve months from the date when the financial statements are authorised for issue.

Our responsibilities and the responsibilities of the directors with respect to going concern are described in the relevant sections of this report.

In relation to the Group's and the Company's reporting on how they have applied the Irish Corporate Governance Code, we have nothing material to add or draw attention to in relation to the directors' statement in the financial statements about whether the directors considered it appropriate to adopt the going concern basis of accounting.

Independent Auditor's Report to the Members of Permanent TSB Group Holdings plc

(continued)

Detecting irregularities including fraud

We identified the areas of laws and regulations that could reasonably be expected to have a material effect on the financial statements and risks of material misstatement due to fraud, using our understanding of the entity's industry, regulatory environment and other external factors and inquiry with the directors. In addition, our risk assessment procedures included:

- Inquiring with the directors and management as to the Group's and Company's policies and procedures regarding compliance with laws and regulations, identifying, evaluating and accounting for litigation and claims, as well as whether they have knowledge of non-compliance or instances of litigation or claims.
- Inquiring of directors and Group Internal Audit ("GIA") and inspection of policy documentation as to the Group's and Company's high-level policies and procedures to prevent and detect fraud, including the internal audit function, and the Group's and Company's channel for "whistleblowing", as well as whether they have knowledge of any actual, suspected or alleged fraud.
- Inquiring of directors and GIA regarding their assessment of the risk that the financial statements may be materially misstated due to irregularities, including fraud.
- Inspecting the Group's and Company's regulatory and legal correspondence.
- Reading Board and Board Audit committee and where relevant, other sub-Committee minutes.
- Considering remuneration incentive schemes and performance targets for management and executive directors.
- Performing planning analytical procedures to identify any unusual or unexpected relationships.
- Using our own forensic specialists to assist us in identifying fraud risks based on discussions of the circumstances of the Group and Company.

We discussed identified laws and regulations, fraud risk factors and the need to remain alert among the audit team.

Firstly, the Group and Company are subject to laws and regulations that directly affect the financial statements including companies and financial reporting legislation. We assessed the extent of compliance with these laws

and regulations as part of our procedures on the related financial statement items, including assessing the financial statement disclosures and agreeing them to supporting documentation when necessary.

Secondly, the Group and Company are subject to many other laws and regulations where the consequences of non-compliance could have a material effect on amounts or disclosures in the financial statements, for instance through the imposition of fines or litigation. We identified the following areas as those most likely to have such an effect: regulatory capital and liquidity and certain aspects of company legislation recognising the financial and regulated nature of the Group's and Company's activities.

Auditing standards limit the required audit procedures to identify non-compliance with these

non-direct laws and regulations to inquiry of the directors and other management and inspection of regulatory and legal correspondence, if any. These limited procedures did not identify actual or suspected non-compliance.

We assessed events or conditions that could indicate an incentive or pressure to commit fraud or provide an opportunity to commit fraud. As required by auditing standards, we performed procedures to address the risk of management override of controls. On this audit we do not believe there is a fraud risk related to revenue recognition. We identified fraud risks in respect of:

- the valuation of model adjustments involving management judgement ("Management adjustments") relating to the Group's impairment loss allowances on loans and advances to customers; and
- the accuracy of the non-modelled approach to calculating expected credit losses for non-performing loans ('NPL') in default greater than 36 months also relating to the Group's impairment loss allowances on loans and advances to customers.

Further detail in respect of fraud risks relating to the Group's impairment loss allowance is set out in the key audit matter disclosures in this report.

- In response to the fraud risks, we also performed procedures including:

- Identifying journal entries and other adjustments to test based on risk criteria and comparing the identified entries to supporting documentation;
- Assessing significant accounting estimates for bias; and
- Assessing the disclosures in the financial statements.

As the Group and Company are regulated, our assessment of risks involved obtaining an understanding of the legal and regulatory framework in which the Group and Company operates and gaining an understanding of the control environment including the entity's procedures for complying with regulatory requirements.

Owing to the inherent limitations of an audit, there is an unavoidable risk that we may not have detected some material misstatements in the financial statements, even though we have properly planned and performed our audit in accordance with auditing standards. For example, the further removed non-compliance with laws and regulations (irregularities) is from the events and transactions reflected in the financial statements, the less likely the inherently limited procedures required by auditing standards would identify such irregularities.

In addition, as with any audit, there remains a higher risk of non-detection of irregularities, as these may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal controls. We are not responsible for preventing non-compliance and cannot be expected to detect non-compliance with all laws and regulations.

Key audit matters: our assessment of risks of material misstatement

Key audit matters are those matters that, in our professional judgement, were of most significance in the audit of the financial statements and include the most significant assessed risks of material misstatement (whether or not due to fraud) identified by us, including those which had the greatest effect on: the overall audit strategy; the allocation of resources in the audit; and directing the efforts of the engagement team. These matters were addressed in the context of our audit of the financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

In arriving at our audit opinion above, the key audit matters, in decreasing order of audit significance, were as follows:

Group key audit matters

Impairment allowances on loans and advances to customers at amortised cost, including off-balance sheet elements (€320m (2024: €392m))

Refer to pages 302 to 304 (note 1: corporate information, basis of preparation and material accounting policies), pages 316 to 323 (note 2: critical accounting estimates and judgements) and pages 340 to 344 (note 21: impairment provisions).

The key audit matter	How the matter was addressed in our audit
The calculation of expected credit losses ("ECLs"), referred to as 'Impairment loss allowance' requires significant judgements to reflect recent developments in credit quality, arrears experience and/or emerging macroeconomic risks. The key areas where we identified significant management judgement and therefore increased levels of audit focus in the Group's estimation of ECLs include but are not limited to: 1. Impairment loss allowance under IFRS 9 - accuracy of mortgage probability of default ("PD") and loss given default ("LGD") model outputs: The Group is advanced in its programme for delivering model improvements to address known limitations. This resulted in redevelopments to residential mortgage PD and LGD models implemented over 2025. The calculation of expected credit losses uses complex and inherently judgemental modelling techniques. ECLs may be inappropriate if certain models or underlying assumptions do not accurately predict defaults or recoveries over time, become out of line with wider industry experience, or fail to reflect the credit risk of financial assets. The Group's mortgage lending reflects the most significant portion of financial assets within the scope of ECLs. As a result of these factors, we have identified a significant risk of error arising from the associated complexity and estimation uncertainty in mortgage PD and LGD models and, underlying assumptions therein. 2. Impairment loss allowance under IFRS 9 - model adjustments involving management judgement: Model adjustments involving management judgement ("Management adjustments") are raised by management to address known impairment model limitations, emerging novel risks as a result of late breaking events or, other risks not inherently captured by ECL models. We identified a significant risk of error associated with the completeness of management adjustments to modelled ECL and a significant risk of error and fraud associated with the valuation of those model adjustments with the greatest degree of management judgement.	1. Impairment loss allowance under IFRS 9 - accuracy of mortgage PD and LGD model outputs: We performed end-to-end process walkthroughs to identify the key systems, applications and key controls used in the impairment loss allowance modelling processes. In conjunction with our credit modelling specialists, we tested the design, implementation and operating effectiveness of key controls, including controls over model validation, model monitoring and controls over significant model inputs and outputs. In conjunction with our credit modelling specialists, we challenged the model development, validation and impairment teams through inquiry and inspection of the Group's policies and standards of these functions, to assess the appropriateness of the models used by the Group. We tested the completeness and accuracy of identified critical data elements used within the mortgage PD and LGD models. In conjunction with our credit modelling specialists, we independently re-performed testing over key aspects of the mortgage PD and LGD models, including: • Re-performance of ECL execution using mortgage PD and LGD models and the Group's underlying code; • Independent rebuild and replication testing of the IFRS 9 Mortgage PD model; • Performed a qualitative assessment of initial model validations for mortgage LGD and PD models redeveloped, validated and implemented in 2025; • Inspected model monitoring reports and re-performed model monitoring procedures to assess whether the findings have been appropriately considered, addressed by management and included in the model adjustments involving key management judgement as relevant. 2. Impairment loss allowance under IFRS 9 - model adjustments involving management judgement: We performed end-to-end process walkthroughs and tested the design, implementation and operating effectiveness of the key controls over the identification, calculation, review and authorisation of model adjustments. In conjunction with our credit modelling specialists, we evaluated the conceptual soundness of certain Management adjustments by critically assessing management's methodology, including the limitation and/or risk that those management adjustments are seeking to address, and the Management adjustments' compliance with the requirements of IFRS 9.

Independent Auditor's Report to the Members of Permanent TSB Group Holdings plc (continued)

The key audit matter	How the matter was addressed in our audit
3. Impairment loss allowance under IFRS 9 - economic scenarios: IFRS 9 requires ECLs to be measured as unbiased, probability weighted, forward-looking estimate. Economic scenarios have a direct impact on the loan staging classification and consequently, the quantum of ECLs. The design and selection of economic scenarios and associated probability weightings requires significant management judgement. We have identified a significant risk due to error with respect to management judgement relating to the method for determining alternative scenarios and their probabilities, and the key macroeconomic variables. The focus of this risk is on the key economic variables which drive the ECL scenario modelling including GDP, unemployment rates, interest rates, modified domestic demand ('MDD'), economic inflation and House Price Indices (HPI) which are applied to these figures, the number of scenarios and, the weightings applied to each scenario under both methods in use as at 31 December 2025 . 4. Impairment loss allowance under IFRS 9 - completeness and accuracy of non-modelled long-dated NPL ECL: The calculation of expected credit losses uses complex and inherently judgemental techniques. ECLs may be inappropriate if certain calculations or underlying assumptions do not accurately predict defaults or recoveries over time, become out of line with wider industry experience, or fail to reflect the credit risk of financial assets. Redevelopment of the Group's residential mortgage PD and LGD models in 2025 resulted in management's identification of a cohort of credit impaired mortgages with default characteristics that do not conform to redeveloped residential mortgage modelling assumptions. The Group has elected to measure ECL for NPLs in default for greater than 36 months using a discounted cash flow approach. As a result of these factors, we have identified a significant risk of error with respect to the completeness of ECL calculated using a non-model approach and a significant risk of error and fraud over the accuracy of ECL calculated using a non-model approach arising from subjectivity or uncertainty in the approach, including the underlying assumptions, for measuring ECL for long-dated NPLs.	We inspected the Management adjustments calculation methodology and tested the completeness and accuracy of key relevant data inputs into the model adjustment calculation. We tested the completeness and accuracy of the Management adjustments having regard to the risk profile of the loan books, as well as known model limitations, and by challenging management on their significant assumptions relating to the credit risk impact of prevailing macroeconomic uncertainty. We challenged the overall reasonableness of the Management adjustments by comparing the significant adjustments recognised by management to the key model limitations and/or key data limitations that we consider evident in the portfolio. We performed benchmarking analysis with peer banks over ECL coverage levels and we assessed whether any Management adjustments identified for testing are indicative of fraud, management bias or other deficiencies. Significant audit judgement We identify the following as the areas of particular auditor judgement: We identified, in conjunction with our credit modelling specialists, the timing and extent of audit procedures to assess the completeness and the valuation of management adjustments to modelled ECL involving the greatest degree of management judgement as areas which required significant auditor judgement with respect to this significant risk of error and fraud. 3. Impairment loss allowance under IFRS 9 - economic scenarios: We performed end-to-end process walkthroughs and tested the design, implementation and operating effectiveness of the key controls related to the estimation of macroeconomic forecasts used in measuring ECL including the economic scenarios and probability weightings applied to them. In conjunction with our economics specialist, we challenged management and management's specialists and inspected related documentation to assess whether the basis for significant management assumptions and judgements are reasonable and consistent with independent consensus forecasts.

The key audit matter	How the matter was addressed in our audit
For the reasons outlined above the engagement team determine this matter to be a key audit matter.	In conjunction with our economics specialist, we challenged and assessed the plausibility of the significant assumptions underpinning the Group's economic scenarios which have been identified as GDP, unemployment, House Price Index ('HPI'), Consumer Price Index ('CPI'), Modified Domestic Demand ('MDD') and ECB rates by comparing to independent and observable economic forecasts, leveraging a number of external data points. We involved our economic specialist to assist in assessing the appropriateness of the Group's methodology for determining the economic scenarios applied to residential mortgage ECL and all other portfolios in place at 31 December 2025, and the relevant probability weightings associated to them. We challenged whether management's forward-looking information incorporated within the Group's upside and downside scenarios were reasonable, having regard to all available information at year-end. 4. Impairment loss allowance under IFRS 9 - completeness and accuracy of non-modelled long-dated NPL ECL: We performed end-to-end process walkthroughs and tested the design, implementation and operating effectiveness of the key controls over the long-dated NPL ECL approach. In conjunction with our credit modelling specialists, we challenged the overall reasonableness of the introduction of this approach by critically assessing management's key assumptions with respect to the identification of loans which do not conform to redeveloped residential mortgage modelling assumptions, and we assessed whether these are indicative of fraud, management bias or other deficiencies. We inspected the calculation methodology in conjunction with our credit modelling specialists and tested the completeness and accuracy of key relevant data inputs into the calculation. In conjunction with our credit modelling specialists, we recalculated the ECL measurement for non-performing mortgage loans in default for greater than 36 months, in line with management's key assumptions. Our results: We found the significant judgements used by management in determining the impairment loss allowance and current year release, including the accuracy of modelled ECL estimates, application of model adjustments, selection and application of economic scenarios and, the measurement of ECL for long-dated non-performing loans to be reasonable.

Independent Auditor's Report to the Members of Permanent TSB Group Holdings plc

(continued)

Company key audit matter

Impairment evaluation of the investment by Permanent TSB Group Holdings plc (PTSBGH) Company-only financial statements in PTSB plc (€1.96bn (2024: €2.08bn))

Refer to page 400 (note A: accounting policies) and page 401 (note C: investment in subsidiary)

The key audit matter	How the matter was addressed in our audit
The PTSBGH plc Company-only Balance Sheet includes a €1.96 billion investment in PTSB plc at 31 December 2025. PTSBGH Company carries its investment in its subsidiary undertaking at cost and reviews whether there is any indication of impairment at each reporting date. Impairment testing involves comparing the carrying value of the investment to its recoverable amount. The recoverable amount is the higher of the investment's fair value or its value-in-use (VIU). The recoverable amount at 31 December 2025 is based on the VIU of the subsidiary investment which exceeds the fair value of the investment. Given the inputs used in arriving at the VIU, there is a degree of judgement involved in estimating the value of the underlying business at 31 December 2025. As a result of the subjectivity involved in the VIU estimation and its significance and magnitude to the Company, the engagement team consider this to be a significant risk due to error. For the reasons outlined above the engagement team determine this matter to be a key audit matter.	Our audit procedures included performing an end-to-end process walkthrough over the impairment assessment carried out by management over the carrying value of the investment. We assessed the design and implementation of controls of management's annual impairment review over the Investment in subsidiary. We challenged management's impairment assessment and supporting calculations relating to the Investment in subsidiary. We independently recalculated the fair value less cost of disposal of the Investment in subsidiary. We challenged the appropriateness of the discounted cash flow valuation method applied, reasonability of forecasted free cash flows and other key relevant data inputs used and appropriateness of discount rate applied which forms part of management's calculations. We assessed the relevant macroeconomic assumptions underlying the relevant forecasts in the context of economic consensus and for alignment with Group's Medium Term Plan ('MTP') and other accounting estimates used by the Group. We challenged the significant assumptions underpinning the MTP forecasts used in the VIU calculation for reasonableness by benchmarking to observable market data, actual performance of PTSB plc and via corroborating discussions with management. We challenged management on key inputs such as the selected discount rate, growth rate, free-cash flows and data inputs with the assistance of our Corporate Finance Specialists. We performed a retrospective review of PTSB plc's FY2025 results compared to the prior year VIU forecasts. We assessed the adequacy of the financial statement disclosures in respect of the investment in the Company-only financial statements. Significant audit judgement We identify the following as the areas of particular auditor judgement: We identified, the timing and extent of audit procedures to assess the reasonableness of the assumptions underlying the estimated future cash flows and appropriateness of the discount rate and the growth rate, which were used in the VIU calculation, as the areas of particular judgement. Our results: Based on procedures we performed, we considered the methods and assumptions relating to the impairment evaluation assessment of investment in PTSB plc to be reasonable. No additional impairment has been recorded in the Company only financial statements.

Our application of materiality and an overview of the scope of our audit

Materiality for the Group financial statements and Company financial statements as a whole was set at €22.7m (2024: €20m), determined with reference to a benchmark of net assets (of which it represents 0.9% (2024: 0.8%)).

We consider net assets to be the most appropriate benchmark given the volatility in profit or loss arising over recent years driven by certain exceptional activities and recent instability in the economic environment. Moreover, we believe that net assets, rather than profitability, provides a more appropriate and consistent year-on-year basis for determining materiality. In applying our judgement in determining materiality, we considered a number of factors which had the most significant impact were: the ownership structure of the Group and Company, Debt arrangements, our understanding of the Group and Company and its environment; and earnings sensitivities.

Performance materiality for the Group financial statements and Company financial statements as a whole was set at €14.7m (2024: €15m), determined with reference to a benchmark of materiality (of which it represents 65% (2024: 75%)). We use performance materiality to reduce to an appropriately low level the probability that the aggregate of uncorrected and undetected misstatements exceeds overall materiality. In applying our judgement in determining performance materiality, we considered a number of factors, including the number and value of misstatements detected and the number and severity of deficiencies in control activities identified in the prior year financial statements audits.

We reported to the Board Audit Committee any corrected or uncorrected identified misstatements exceeding €1.135m (2024: €1m), in addition to other identified misstatements that warranted reporting on qualitative grounds.

We applied materiality in planning and performing the audit to assist us in the following:

- Determining the overall audit strategy, including identifying the significant risks and procedures to be performed.
- Evaluating the effect of identified misstatements on the audit and in forming our audit opinion. Our audit scope was determined with reference to materiality and the Group's structure.

Materiality informed the extent of testing over key financial statement areas and the selection of components subject to full-scope or targeted procedures. We evaluated group-wide controls and performed procedures over key service organisations. The Group audit team obtained an understanding of Internal Audit while not placing reliance on its work. As we are also the auditor of Permanent TSB plc, no component auditor was required to be engaged. This approach ensured appropriate coverage of significant risks and key metrics across the Group.

Our audit was undertaken to the materiality and performance materiality level specified above and was all performed by a single engagement team based in Dublin.

Other information

The directors are responsible for the preparation of the other information presented in the Annual Report together with the financial statements. The other information comprises the information included in the directors' report and the non-financial statement included on the company's website at www.ptsb.ie and the Strategic Report set out on pages 2 to 26, the unaudited sections of the Risk Management Report set out on pages 27 to 59, the Directors' Report set out on pages 61 to 66, the Corporate Governance Statement set out on pages 67 to 120 and the parts of 'Other Information' on pages 405 to 415 labelled 'unaudited'.

The financial statements and our auditor's report thereon do not comprise part of the other information. Our opinion on the financial statements does not cover the other information and, accordingly, we do not express an audit opinion or, except as explicitly stated below, any form of assurance conclusion thereon as part of our engagement to audit the consolidated financial statements. We have performed an assurance engagement on the Sustainability Statement that forms part of the other information and provided a separate assurance practitioner's conclusion thereon that is included within the other information.

Our responsibility is to read the other information and, in doing so, consider whether, based on our financial statements audit work, the information therein is materially misstated or inconsistent with the financial statements or our audit knowledge. Based solely on that work we have not identified material misstatements in the other information.

Based solely on our work on the other information undertaken during the course of the audit we report that, in those parts of the directors' report specified for our consideration, which does not include the information required by the European Union (Disclosure of Non-Financial and Diversity Information by certain large undertakings and groups) Regulations 2017:

- we have not identified material misstatements in the directors' report;
- in our opinion, the information given in the directors' report is consistent with the financial statements; and
- in our opinion, those parts of the directors' report specified for our review, which does not include sustainability reporting when required by Part 28 of the Companies Act 2014, have been prepared in accordance with the Companies Act 2014.

Independent Auditor's Report to the Members of Permanent TSB Group Holdings plc (continued)

Corporate governance statement

We have reviewed the directors' statement in relation to going concern, longer-term viability, that form part of the Corporate Governance Statement relating to the Company's compliance with the provisions of the Irish Corporate Governance Code specified for our review by the Listing Rules of Euronext Dublin.

Based on the work undertaken as part of our audit, we have concluded that each of the following elements of the Corporate Governance Statement is materially consistent with the financial statements and our knowledge obtained during the audit:

- Directors' statement with regards the appropriateness of adopting the going concern basis of accounting and any material uncertainties identified set out on page 61;
- Directors' explanation as to their assessment of the Group's prospects, the period this assessment covers and why the period is appropriate set out on page 61;
- Directors' statement on whether it has a reasonable expectation that the Group will be able to continue in operation and meets its liabilities set out on page 61;
- Directors' statement on fair, balanced and understandable and the information necessary for shareholders to assess the Group's position and performance, business model and strategy set out on page 126;
- Board's confirmation that it has carried out a robust assessment of the emerging and principal risks and the disclosures in the annual report that describe the principal risks and the procedures in place to identify emerging risks and explain how they are being managed or mitigated set out on page 61;

- Section of the annual report that describes the review of effectiveness of risk management and internal control systems set out on pages 90 and 91; and;
- Section describing the work of the Board Audit Committee set out on page 99.

We have nothing to report in this regard.

In addition as required by the Companies Act 2014, we report, in relation to information given in the Corporate Governance Statement on pages 67 to 120, that:

- based on the work undertaken for our audit, in our opinion, the description of the main features of internal control and risk management systems in relation to the financial reporting process, and information relating to voting rights and other matters required by the European Communities (Takeover Bids (Directive 2004/EC) Regulations 2006 and specified for our consideration, is consistent with the financial statements and has been prepared in accordance with the Act;
- based on our knowledge and understanding of the Company and its environment obtained in the course of our audit, we have not identified any material misstatements in that information; and
- the Corporate Governance Statement contains the information required by the European Union (Disclosure of Non-Financial and Diversity Information by certain large undertakings and groups) Regulations 2017.

We also report that, based on work undertaken for our audit, the information required by the Act is contained in the Corporate Governance Statement.

Our opinions on other matters prescribed by the Companies Act 2014 are unmodified

We have obtained all the information and explanations which we consider necessary for the purposes of our audit.

In our opinion the accounting records of the Group and the Company were sufficient to permit the financial statements to be readily and properly audited and the financial statements are in agreement with the accounting records.

We have nothing to report on other matters on which we are required to report by exception

The Companies Act 2014 requires us to report to you if, in our opinion:

- the disclosures of directors' remuneration and transactions required by sections 305 to 312 of the Act are not made.
- the Company has not provided the information required by Section 1110N in relation to its remuneration report for the financial year 31 December 2024;
- the Company has not provided the information required by section 5(2) to (7) of the European Union (Disclosure of Non-Financial and Diversity Information by certain large undertakings and groups)
- Regulations 2017 for the year ended 31 December 2024 as required by the European Union (Disclosure of Non-Financial and Diversity Information by certain large undertakings and groups) (amendment) Regulations 2018.

We have nothing to report in this regard.

Respective responsibilities and restrictions on use

Responsibilities of directors for the financial statements

As explained more fully in the directors' responsibilities statement set out on page 126, the directors are responsible for: the preparation of the financial statements including being satisfied that they give a true and fair view; such internal control as they determine is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error; assessing the Group's and Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern; and using the going concern basis of accounting unless they either intend to liquidate the Group or the Company or to cease operations, or have no realistic alternative but to do so.

Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (Ireland) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

A fuller description of our responsibilities is provided on IAASAs website at <https://iaasa.ie/publications/description-of-the-auditors-responsibilities-for-the-audit-of-the-financial-statements/>.

The purpose of our audit work and to whom we owe our responsibilities

Our report is made solely to the Company's members, as a body, in accordance with Section 391 of the Companies Act 2014. Our audit work has been undertaken so that we might state to the Company's members those matters we are required to state to them in an auditor's report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Company and the Company's members, as a body, for our audit work, for this report, or for the opinions we have formed.

Frank Gannon

Frank Gannon
for and on behalf of KPMG
Chartered Accountants, Statutory Audit
Firm 1 Harbourmaster Place
IFSC
Dublin 1 D01 F6F5

4 March 2026

Consolidated Income Statement

For the year ended 31 December 2025

	Note	Year ended 31 December 2025 €m	Year ended 31 December 2024 €m
Interest income calculated using the effective interest rate method	4	848	870
Other interest income	4	30	29
Interest income		878	899
Interest expense	4	(288)	(287)
Net interest income		590	612
Fee and commission income	5	104	98
Fee and commission expense	5	(46)	(43)
Net fee and commission income		58	55
Net trading income	6	5	2
Net other operating income		2	3
Total operating income		655	672
Administrative, staff and other expenses (excluding exceptional items)	7	(415)	(419)
Bank levy and other regulatory charges	8	(25)	(33)
Depreciation of property and equipment	23	(27)	(29)
Amortisation of intangible assets	24	(57)	(62)
Exceptional items			
Voluntary severance and other	9	(42)	(2)
Total operating expenses		(566)	(545)
Operating profit before credit impairment and taxation		89	127
Credit Impairment			
Loans and advances to customers	21	39	30
Impairment arising from deleveraging of loans	9	-	2
Total credit impairment write-back		39	32
Operating profit before taxation		128	159
Taxation	10	(14)	3
Profit for the year		114	162
Attributable to:			
Equity holders of the parent		71	119
Other equity holders*		43	43
*Profits attributable to Other equity holders reflects the coupons paid on the Group's AT1 instruments in the calendar year			
Earnings per ordinary share		€ Cent	€ Cent
Basic earnings per share of €0.5 ordinary share	11	13.0	21.7
Diluted earnings per share of €0.5 ordinary share	11	13.0	21.7

Consolidated Statement of Comprehensive Income

For the year ended 31 December 2025

	Note	Year ended 31 December 2025 €m	Year ended 31 December 2024 €m
Profit for the year		114	162
Items that will not be reclassified to the income statement in subsequent periods			
Fair value reserve (equity instruments)			
Change in fair value of equity instruments	18	-	4
Tax relating to fair value of equity instruments	10	-	(1)
Revaluation of property	23	4	(11)
Tax relating to revaluation of property	10	(1)	4
Other comprehensive income/(expense), net of tax		3	(4)
Total comprehensive income for the year, net of tax		117	158
Attributable to:			
Equity holders of the parent		74	115
Other equity holders*		43	43

* Profits attributable to Other equity holders reflects the coupons paid on the Group's AT1 instruments in the calendar year.

Consolidated Statement of Financial Position

As at 31 December 2025

	Note	31 December 2025 €m	31 December 2024 €m
Assets			
Cash at bank	12	75	72
Items in the course of collection	12	25	23
Loans and advances to banks	13	1,719	2,202
Derivative financial instruments	14	24	59
Other assets	15	51	7
Assets classified as held for sale	16	5	12
Debt securities	17	5,360	4,327
Equity securities	18	1	9
Prepayments and contract assets	19	168	63
Loans and advances to customers	20	22,249	21,423
Interest in associated undertakings	22	32	21
Property and equipment	23	189	183
Intangible assets	24	263	213
Deferred taxation	25	304	316
Current tax asset		-	2
Total assets		30,465	28,932
Liabilities			
Deposits by banks	26	104	105
Customer accounts	27	25,599	24,120
Derivative financial instruments	14	4	-
Debt securities in issue	28	1,723	1,731
Other liabilities	29	131	129
Accruals		12	12
Provisions	30	64	46
Subordinated liabilities	31	347	257
Total liabilities		27,984	26,400
Equity			
Share capital	33	272	272
Share premium	33	804	804
Other reserves	33	(818)	(813)
Retained earnings	33	1,978	1,901
Shareholders' equity		2,236	2,164
Other equity instruments	33	245	368
Total equity		2,481	2,532
Total liabilities and equity		30,465	28,932

On behalf of the Board:

Julie O'Neill
Chairperson

Eamonn Crowley
Chief Executive

Barry D'Arcy
Chief Financial Officer

Conor Ryan
Company Secretary

Consolidated Statement of Changes in Equity

For the year ended 31 December 2025

	Share capital €m	Share premium €m	Revaluation reserve* €m	Fair value reserve* €m	Other capital reserve* €m	Retained earnings €m	Attributable to equity holders of the parent €m	Other equity instrument €m	Total €m
Balance at 1 January 2024	273	804	42	4	(856)	1,784	2,051	368	2,419
Profit for the year	-	-	-	-	-	119	119	43	162
Other comprehensive income, net of tax (note 34)	-	-	(7)	3	-	-	(4)	-	(4)
Total comprehensive income/(expense) for the period	-	-	(7)	3	-	119	115	43	158
Transactions with owners, recorded directly in equity:									
Contributions by and distributions to owners									
Buyback of ordinary shares	(1)	-	-	-	1	(2)	(2)	-	(2)
AT1 coupon paid (note 33)	-	-	-	-	-	-	-	(43)	(43)
Total contributions by and distributions to owners	(1)	-	-	-	1	(2)	(2)	(43)	(45)
Balance as at 31 December 2024	272	804	35	7	(855)	1,901	2,164	368	2,532
Balance at 1 January 2025	272	804	35	7	(855)	1,901	2,164	368	2,532
Profit for the year	-	-	-	-	-	71	71	43	114
Other comprehensive income, net of tax (note 34)	-	-	3	-	-	-	3	-	3
Total comprehensive income/(expense) for the period	-	-	3	-	-	71	74	43	117
Transactions with owners, recorded directly in equity:									
Contributions by and distributions to owners									
Redemption of other equity instruments	-	-	-	-	-	-	-	(123)	(123)
AT1 coupon paid (note 33)	-	-	-	-	-	-	-	(43)	(43)
Loss on redemption of AT1 securities	-	-	-	-	-	(2)	(2)	-	(2)
Reclassification of cumulative gain (net of tax) of equity instruments on disposal	-	-	-	(5)	-	5	-	-	-
Reclassification of cumulative gain (net of tax) of property on disposal	-	-	(3)	-	-	3	-	-	-
Total contributions by and distributions to owners	-	-	(3)	(5)	-	6	(2)	(166)	(168)
Balance as at 31 December 2025	272	804	35	2	(855)	1,978	2,236	245	2,481

* All are included in other reserves in the statement of financial position

Consolidated Statement of Cash Flows

For the year ended 31 December 2025

	31 December 2025 €m	31 December 2024 €m
Cash flows from operating activities		
Operating profit before taxation	128	159
Adjusted for non-cash items and other adjustments:		
Depreciation, amortisation and impairment of property, equipment and intangibles	84	91
Impairment (write-back) on:		
- Loans and advances to customers	(39)	(32)
Unrealised (gains)/losses on financial assets	(3)	-
Other income	(1)	(1)
Other mortgage related adjustments	70	70
Other provisions	63	10
Net interest income	189	221
Other non-cash items*	(94)	(63)
	397	455
(Increase)/decrease in operating assets:		
Derivative assets	26	(13)
Other assets	3	67
Debt securities	55	35
Prepayments and contract assets	(99)	13
Loans and advances to customers	(898)	(26)
Increase/(decrease) in operating liabilities:		
Deposits by banks (including central bank)	(4)	(316)
Customer accounts	1,295	1,010
Debt securities in issue	(97)	99
Derivative liabilities	1	(1)
Other liabilities and accruals	1	(29)
Provisions	(45)	(8)
Subordinated liabilities	-	-
	238	831
Net cash inflow from operating activities before tax	635	1,286
Tax paid	(2)	(4)
Net cash inflow from operating activities	633	1,282
Cash flows from investing activities		
Maturities of debt securities - HTC	281	170
Purchase of debt securities - HTC	(1,271)	(1,212)
Purchase of property and equipment	(9)	(15)
Purchase of intangible assets	(31)	(26)
Investment in associated undertakings	(10)	(3)
Sale of Visa shares	8	-
Sale of properties	4	-
Net cash flows from investing activities	(1,028)	(1,086)

Consolidated Statement of Cash Flows (continued)

For the year ended 31 December 2025

	31 December 2025 €m	31 December 2024 €m
Cash flows from financing activities		
Redemption of AT1 securities	(125)	-
Issuance of Tier 2 capital note	298	-
Redemption of Tier 2 capital note	(199)	-
Buyback of ordinary shares	-	(2)
Payment of lease liabilities	(6)	(7)
AT1 coupon payment	(43)	(43)
Interest paid on T2 capital notes	(11)	(8)
Interest paid on T2 hedging derivative	3	(1)
Net cash flows from financing activities	(83)	(61)
(Decrease)/increase in cash and cash equivalents	(478)	135
Analysis of changes in cash and cash equivalents		
Cash and cash equivalents as at 1 January	2,297	2,162
(Decrease)/increase in cash and cash equivalents	(478)	135
Cash and cash equivalents at the end of the year	1,819	2,297

* For the year ended 31 December 2025 the Other non-cash items line item has been disaggregated.

The net (decrease)/increase in cash and cash equivalents includes interest received of €920m (2024: €965m) and interest paid of €286m (2024: €244m) and dividends paid of €43m (2024: €43m).

Reconciliation of liabilities arising from financing activities

	Subordinated liabilities €m	Lease liabilities €m	Tier 2 hedging derivatives €m	Total €m
1 January 2025	257	35	(6)	286
Financing Cashflows:				-
Lease liability	-	(6)	-	(6)
Interest paid on Tier 2 capital notes	(11)	-	-	(11)
Interest paid on Tier 2 hedging derivatives	-	-	3	3
Tier 2 issuance September 2025	298	-	-	298
Tier 2 partial redemption	(199)	-	-	(199)
Non-cash movements:				
Additions to lease liabilities	-	3	-	3
Interest accrued on Tier 2 capital notes	9	-	-	9
Hedge adjustment on Tier 2 capital notes	(7)	-	-	(7)
Interest accrued on Tier 2 hedging instrument	-	-	(1)	(1)
Fair value movement on Tier 2 hedging derivative asset	-	-	3	3
31 December 2025	347	32	(1)	378
1 January 2024	257	35	(6)	286
Financing Cashflows:				
Lease liability	-	(7)	-	(7)
Interest paid on Tier 2 capital notes	(8)	-	-	(8)
Interest paid on Tier 2 hedging derivatives	-	-	(1)	(1)
Non-cash movements:				
Additions to lease liabilities	-	7	-	7
Interest accrued on Tier 2 capital notes	8	-	-	8
Hedge adjustment on Tier 2 capital notes	-	-	1	1
31 December 2024	257	35	(6)	286

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1. Corporate information, basis of preparation and material accounting policies

1.1 Corporate information

Permanent TSB Group Holdings plc (the Company) is a holding company domiciled in Ireland (registration number 474438). Its registered office is situated at 56 - 59, St. Stephen's Green, Dublin 2, Ireland. The Company's shares are listed on the main market of the Irish and London Stock Exchanges.

The consolidated financial statements include the financial statements of the Company and its subsidiaries (together referred to as the Group) and are prepared up to the end of the financial year, 31 December 2025.

Permanent TSB plc (PTSB), a 100% owned subsidiary of the Company, is the main trading entity of the Group which is involved in retail banking.

These consolidated financial statements for the year ended 31 December 2025 were approved by the Board and authorised for issue by the Directors on 4 March 2026.

The material accounting policies applied in the preparation of the financial statements for the year ended 31 December 2025 are set out below.

1.2 Basis of preparation

Statement of compliance

These consolidated financial statements comprise of the consolidated income statement, the consolidated statement of comprehensive income (SOCl), the consolidated statement of financial position (SOFp), the consolidated statement of changes in equity (SOCE), the consolidated statement of cash flows (SOCF), the Company SOFP, the Company SOCE, the Company SOCF and the notes to the consolidated and the Company financial statements, which have been prepared in accordance with IFRS and interpretations issued by the IFRS Interpretations Committee (IFRIC) as adopted by the EU and those parts of the Companies Act 2014 applicable to companies reporting under IFRS and EU (Credit Institutions: Financial Statements) Regulations 2015.

The accounting policies have been consistently applied by the Group entities and are consistent with the previous year.

The financial statements include the information that is described as being an integral part of the audited financial statements contained in the Directors' Report on Remuneration and in Risk Management. Certain tables and related information in the notes to the financial statements, included in boxes and clearly identified as unaudited do not form part of the audited financial statements.

The individual financial statements of the holding company have also been prepared in accordance with IFRS and interpretations issued by IFRIC as adopted by the EU and those parts of the Companies Act 2014 applicable to companies reporting under IFRS. In accordance with section 304(2) of the Companies Act 2014, the Company is availing of the exemption from presenting its individual income statement and related notes to the AGM and from filing it with the Registrar of Companies. See note 43 for further information.

The Company's profit after tax for the year ended 31 December 2025 was €46m (31 December 2024: loss €216m). For further information, see the Company financial statements on pages 396 to 403.

Basis of measurement

The consolidated and Company financial statements have been prepared on the historical cost basis as modified to include the fair valuation of certain financial instruments such as equity securities classified as fair value through other comprehensive income (FVOCI), derivative financial instruments, assets classified as held for sale, financial assets and liabilities designated as hedged items in qualifying fair value hedge relationships, and land and buildings accounted for using the revaluation model.

Functional and presentation currency

These financial statements are presented in Euro, which is the Company's functional currency. Except where otherwise indicated, financial information presented in Euro has been rounded to the nearest million (m).

Use of estimates and judgements

The preparation of these consolidated and individual financial statements, in conformity with IFRS, requires Management to make judgements, estimates and assumptions that affect the application of accounting policies and the reported amounts of assets, liabilities, income, expenses and related disclosures.

While the actual results may differ from the estimates made, the Directors believe that they are reasonable in the current circumstances based on the best available information at the date of the approval of these consolidated and individual financial statements.

Notes to the Consolidated Financial Statements (continued)

1. Corporate information, basis of preparation and material accounting policies (continued)

Additional information about key assumptions and judgements are disclosed in the relevant notes for the following areas including significant estimation uncertainty:

- Allowance for credit impairment losses (note 21);
- Deferred taxation (notes 10 and 25);
- Fair value of financial instruments (note 35); and
- Impairment review of subsidiary undertaking (note 43).

The estimates and assumptions are reviewed on an on-going basis and where necessary are revised to reflect current conditions. The principal estimates and assumptions made by Management relate to allowance for credit impairment losses, deferred taxation, fair value of financial instruments and impairment review of subsidiary undertakings.

Judgements made by Management that have a significant effect on the financial statements and estimates with a significant risk of material adjustment in the next year are discussed in note 2.

1.3 Going Concern

In considering Management's assessment of the Group's and Company's ability to continue as a going concern, Management considered the principal risks and uncertainties as they might pertain to the going concern assumption, particularly the liquidity, profitability, and capital position. Management considered these in their current status, and future projections.

In doing so, Management considered each risk in turn, and the likelihood of the risk precipitating in the going concern assumptions becoming invalid over the period of assessment, being twelve months from the date of the approval of the financial statements for the year ended 31 December 2025. Management considered realistic alternatives, including downside scenarios applied by the Group and Company to test assumptions and potential outcomes.

Assessment Basis

The time that the Directors and Management have considered in evaluating the appropriateness of the going concern basis in preparing the Company consolidated financial statements for the twelve months ended 31 December 2025 is a period of twelve months from the date of approval of these financial statements (4 March 2027).

In making this assessment, the Directors and Management have considered the Group's and Company's 2026-2030 Medium Term Plan (MTP), profitability forecasts, funding and capital resource projections. These projections include both base and stress scenarios applied by the Group and Company together with a number of factors such as the Irish economy, government fiscal policies, the availability of collateral to access funding through third parties and the euro-system, and on-going changes in the regulatory environment.

Economic and political environment

The Irish economy continued to grow at a steady pace in 2025 and is expected to continue to grow into 2026 albeit at a slower pace. This is supported by a strong labour market, increased Government investment and increasing real wages. However, the high uncertainty and deterioration in global trading conditions are expected to detract from growth.

Irish inflation increased year on year to 2.8% in December 2025, however it is expected to ease in the medium term.

Further to this, the Group and Company continues to be materially reliant on Government and EU policy, and impacted by geopolitical events; such as proposed tariffs imposed by the United States, further policy changes arising from the United States administration which could impact trade, Foreign Direct Investment and public finances, uncertainty around the future trading relationship between Ireland/Eurozone and the United States, ongoing global conflicts, and the introduction of the global minimum corporation tax rate to a sector of the Irish market.

The Group and Company reassessed the financial impacts of the economic and political environment through the Group's and Company's integrated planning process and believes it is reasonably well positioned to withstand any volatility from economic events through continued management of its financial position through capital management.

Funding & Liquidity

The Group and Company continued to have sufficient liquidity throughout 2025 and continues to undertake initiatives to improve its liquidity position in the areas of deposits, collateral optimisation, and wholesale markets activity. The Directors and Management have also considered forecasts of the liquidity position over the going concern period, under a range of stress scenarios.

1. Corporate information, basis of preparation and material accounting policies (continued)

The Group and Company continues to hold a significant liquidity buffer at 31 December 2025 that can be easily and readily monetised in a period of stress. The Directors and Management are aware that the Group's and Company's ability to effectively utilise its contingent counterbalancing capacity is dependent on the underlying collateral remaining eligible. However, the Directors and Management are satisfied, based on a review of funding plans, interaction with wholesale markets and deposit trends that the required liquidity and funding will be available to the Group and Company during the period of assessment.

There are no material uncertainties, which would cast significant doubt on the ability of the Group to continue on a going concern basis over the period of assessment.

Profitability and Capital Adequacy

The Group and Company made a profit for the year ended 31 December 2025. Directors and Management have reviewed the MTP and based on this, the near-term Irish macro-economic conditions, the Directors and Management are satisfied that the Group and Company are well positioned to continue to deliver profits in future years.

The Directors and Management have also considered the Group's and Company's forecast capital position, and a deterioration in economic conditions as might arise from an uncertainty from the Group's and Company's principal risks. Based on the above considerations, the Directors and Management have assessed and concluded that this does not give rise to a material uncertainty, which would cast significant doubt on the ability of the Group and Company to continue on a going concern basis for the period of assessment.

Conclusion

As required by IFRS as adopted by the EU, the Directors and Management have considered the principal risks and uncertainties facing the Group and Company as outlined above. Based on the latest and projected financial performance and position, and the options available to the Group and Company, the Directors have concluded that the Group and Company have no material uncertainties, which would cast significant doubt on the going concern assumption and have considered it appropriate to prepare the financial statements on a going concern basis.

1.4 Comparative information

The comparative information for 2024 has been prepared on a consistent basis with 2025.

1.5 Summary of material accounting policies

(i) Basis of consolidation

Subsidiaries

Subsidiaries are those entities (including special purpose entities) controlled by the Group. Control exists when the Group has:

- the power, directly or indirectly, over the relevant activities of the investee, for example through voting or other rights;
- exposure to, or rights to, variable returns through involvement with the investee; and
- the ability to use its power over the investee to affect the Group's return from the entity.

The financial statements of subsidiaries are included in the consolidated financial statements from the date that control commences until the date that control ceases. Financial statements of subsidiaries are prepared up to the financial position date. Intercompany transaction balances and unrealised gains/losses on transactions between the Group's companies are eliminated on consolidation.

The Company carries its investment in its subsidiary undertaking at cost in the Company financial statements and reviews whether there is any indication of impairment at each reporting date. Impairment testing involves comparing the carrying value of the investment to its recoverable amount. The recoverable amount is the higher of the investment's fair value or its value in use (VIU). If impairment occurs, this loss is recognised in the income statement.

Details of principal subsidiaries are included in note 43.

Interest in associated undertakings

Interest in associated undertakings encompass investments in entities wherein the Group has significant influence over the financial and operating policy decisions of the entity but does not have control. It is presumed that significant influence exists if the Group holds more than 20% of the voting rights in the entity unless it can be demonstrated otherwise. Conversely the Group may hold less than 20% of the voting rights but could be demonstrated to have significant influence.

Notes to the Consolidated Financial Statements (continued)

1. Corporate information, basis of preparation and material accounting policies (continued)

Interest in associated undertakings are initially recognised at cost and subsequently accounted for using the equity method whereby the investment is increased or decreased each year by the Group's share of the post-acquisition profit or loss of the associate. The Group's share of the post-acquisition profit or loss of the associate is recognised in profit or loss and other comprehensive income (OCI).

The Group continues to decrease the carrying amount of the investment for its share of post-acquisition losses until the carrying amount is zero, unless the Group has incurred a legal or constructive obligation to make payments on behalf of the associate, in which case, these additional losses are provided for and a liability is recognised in this instance.

(ii) Business combinations and goodwill

(a) Business combinations

The Group accounts for business combinations, other than those under common control, using the acquisition method when the acquired set of activities and assets meets the definition of a business and control is transferred to the Group (see 1.5(i)).

In determining whether a particular set of activities and assets is a business, the Group assesses whether the set of assets and activities acquired includes, at a minimum, an input and substantive process and whether the acquired set has the ability to produce outputs.

The consideration transferred in the acquisition is generally measured at the fair value of the assets transferred, the liabilities incurred to the former owners and equity interest issued by the Group. Identifiable assets acquired and liabilities and contingent liabilities assumed in a business combination are measured initially at their fair values at the acquisition date. Transaction costs are expensed as incurred, except if related to the issue of debt or equity securities (see (vii) and (a)). The consideration transferred does not include amounts related to the settlement of pre-existing relationships. Such amounts are generally recognised in the income statement. Any contingent consideration is measured at fair value at the date of acquisition. If an obligation to pay contingent consideration that meets the definition of a financial instrument is classified as equity, then it is not remeasured and settlement is accounted for within equity. Otherwise, other contingent consideration is remeasured at fair value at each reporting date and subsequent changes in the fair value of the contingent consideration are recognised in the income statement.

(b) Goodwill

The Group measures goodwill as the excess of (i) the consideration transferred; (ii) the amount of any non-controlling interest in the acquired entity; and (iii) acquisition date fair value of any previous equity interest in the acquired entity over the fair value of the net identifiable assets acquired. If those amounts are less than the fair value of the net identifiable assets of the business acquired, the difference is recognised directly in profit or loss as a bargain purchase.

Goodwill is subject to an impairment review at least annually, and, if events or changes in circumstances indicate that the carrying amount may not be recoverable, it is written down through the income statement by the amount of any impairment loss identified in the year.

(iii) Foreign currencies

Foreign currency transactions are translated into the functional currency of each entity, being the currency of the primary environment in which the entity operates at the exchange rate prevailing at the date of the transaction or valuation where items are remeasured. Monetary assets and liabilities denominated in foreign currency are translated at the exchange rates prevailing at the reporting date. Exchange movements are recognised in the income statement. However, exchange movements arising from the translation of equity investments in respect of which an election has been made to present subsequent changes in fair value in OCI are recognised in OCI.

Non-monetary assets and liabilities that are measured at fair value in a foreign currency are translated into the functional currency at the spot exchange rate at the date on which the fair value is determined. Non-monetary items that are measured based on historical cost in a foreign currency are translated using the spot exchange rate at the date of the transaction.

The results and financial position of the Group's subsidiaries which have a functional currency different from Euro are translated into Euro as follows:

- Assets and liabilities, including goodwill and fair value adjustments, are translated at the rates of exchange ruling at the reporting date;
- Income and expenses are translated at the average exchange rates for the year; and
- All resulting exchange differences are recognised in OCI and as a separate component of equity.

1. Corporate information, basis of preparation and material accounting policies (continued)

(iv) Recognition of income and expenses

(a) Interest and similar income and expenses

For all interest bearing financial instruments, interest income or expense is recorded using the effective interest rate (EIR) method.

The EIR is the rate that exactly discounts estimated future cash payments or receipts through the expected life of the financial instrument to:

- the gross carrying amount of the financial asset; or
- the amortised cost of the financial liability.

The EIR of a financial asset or financial liability is calculated on initial recognition of a financial asset or a financial liability. In calculating interest income and expense, the EIR is applied to the gross carrying amount of the asset (when the asset is not credit-impaired) or to the amortised cost of the liability. The EIR is also revised for fair value hedge adjustments at the date on which amortisation of the hedge adjustment begins. The calculation of the EIR includes transaction costs, premiums or discounts, and fees paid or received that are an integral part of the EIR. Transaction costs include incremental costs that are directly attributable to the acquisition or issue of a financial asset or financial liability.

Interest income is calculated by applying the EIR to the gross carrying amount of financial assets, except for:

1. Purchased or originated credit-impaired (POCI) financial assets, for which the original credit-adjusted EIR is applied to the amortised cost of the financial asset (the calculation of interest income does not revert to a gross basis, even if the credit risk of the asset improves); and,
2. Financial assets that are not 'POCI' but have subsequently become credit-impaired (or 'Stage 3'), for which interest revenue is calculated by applying the EIR to their amortised cost (i.e. net of ECL provision). If the asset is no longer credit-impaired, then the calculation of interest income reverts to the gross basis.

Interest income and expense calculated using the effective interest method presented in the consolidated income statement includes:

- interest on financial assets and financial liabilities measured at amortised cost;
- the effective portion of fair value changes in qualifying hedging derivatives designated in fair value hedges of interest rate risk;
- negative interest on financial liabilities measured at amortised cost;
- negative interest on financial assets measured at amortised cost; and
- interest expense on lease liabilities.

Other interest income presented in the consolidated income statement includes interest income on lease receivables.

(b) Fee and commission income and expense

As outlined above, fee and commission income and expense that are integral to the EIR on a financial asset or liability are included in the measurement of the EIR.

Other fees and commission income are recognised as the related services are performed. Fee and commission expenses relate mainly to transaction and service fees, which are expensed as the services are received.

(c) Net trading income/(expense)

Net trading income/(expense) comprises gains and losses relating to trading assets and trading liabilities and includes all realised and unrealised fair value changes on derivatives that do not qualify for hedge accounting, dividends and FX differences.

Dividend income is recognised when the right to receive income is established.

(d) Exceptional items

Certain items, by virtue of their nature and amount are disclosed separately in order for the user to obtain appropriate understanding of the financial information. These items would not ordinarily occur while carrying out normal business activities.

Exceptional items include gains and losses on the disposal of businesses, gain on bargain purchase in respect of business combinations, material restructuring costs and material transactions, integration and restructuring costs associated with acquisitions (including potential acquisitions).

The definition of exceptional items was refined to exclude gains and losses on material loan deleveraging post 31 December 2021. However, releases on those transactions which occurred prior to this refinement continue to be included in exceptional items is consistent with the treatment of the losses on deleveraging of loans in prior years.

Notes to the Consolidated Financial Statements (continued)

1. Corporate information, basis of preparation and material accounting policies (continued)

(e) Bank levy and other regulatory charges

Bank levy and other regulatory charges consist of DGS fees, Central Bank Industry Funding levy, Single Resolution Fund levy, ECB fees and a bank levy.

A bank levy payable to the Government, is provided for on the occurrence of the event identified by the legislation that triggers the obligation to pay the levy.

(v) Employee Benefits

(a) Defined contribution pension plan

The Group operates a number of defined contribution pension schemes, under which the Group pays fixed contributions to a separate entity.

The contribution payable to a defined contribution plan is recorded as an expense under administration, staff and other expenses. Unpaid contributions are recorded as a liability.

(b) Short term employee benefits

Short term employee benefits, such as salaries and other benefits, are accounted for on an accruals basis over the period in which the employee's service is rendered. Bonuses are recognised where the Group has a legal or constructive obligation to employees that can be reliably measured.

(c) Termination payments

Termination benefits may be payable when employment is terminated by the Group before the normal retirement date, or whenever an employee accepts voluntary redundancy in exchange for these benefits. The Group recognises termination benefits at the earlier of the following dates: (a) when the Group can no longer withdraw the offer of those benefits; and (b) when the entity recognises costs for a restructuring that is within the scope of IAS 37 and involves the payment of termination benefits. In the case of an offer made to encourage voluntary redundancy, the termination benefits are measured based on the number of employees where the offer is irrevocable. Benefits falling due more than 12 months after the end of the reporting period are discounted to their present value.

(vi) Current and deferred taxation

Taxation comprises both current and deferred tax. Taxation is recognised as income or expense and included in the income statement except to the extent it relates to a business combination, or items recognised in either OCI or equity. In the former case, taxation is recognised in OCI while in the latter case, taxation is recognised directly in equity. In a business combination the tax amounts are recognised as identifiable assets or liabilities at the acquisition date.

Current tax is the expected tax payable or receivable on the taxable income or loss for the year, using tax rates enacted or substantively enacted at the reporting date and any adjustment to tax payable in respect of previous years (Republic of Ireland (ROI): 12.5%).

Deferred tax is provided using the liability method on all temporary differences except those arising on goodwill not deductible for tax purposes, or on initial recognition of an asset or liability in a transaction that is not a business combination and which at the time of the transaction (i) affects neither accounting nor taxable profit or loss and (ii) does not give rise to equal taxable and deductible temporary differences.

Deferred tax is measured at the tax rates enacted or substantively enacted by the reporting date that are expected to be applied to the temporary differences when they reverse.

Deferred tax liabilities and assets are offset only when they arise in the same tax reporting group and where there is the intention to settle on a net basis, or to realise the asset and settle the liability simultaneously.

Deferred Tax Assets (DTA) and liabilities (DTL) shall be offset if, and only if:

- there is a legally enforceable right to set off current tax assets and liabilities; and
- the DTA and DTL relate to income taxes levied by the same taxation authority on either:
 - the same taxable entity; or
 - different taxable entities which intend to settle current tax liabilities and assets on a net basis, or to realise the assets and settle the liabilities simultaneously, in each future period in which significant amounts of deferred tax liabilities or assets are expected to be settled or recovered.

1. Corporate information, basis of preparation and material accounting policies (continued)

A DTA is recognised for unused tax losses, tax credits and deductible temporary differences, to the extent that it is probable that future taxable profits will be available against which they can be utilised. DTAs are reviewed at each reporting date and are recognised only to the extent that it is probable that the related tax benefit will be realised. DTA and DTL are not discounted in accordance with IAS 12.

Unrecognised DTAs are reassessed at each reporting date and recognised to the extent that it has become probable that future taxable profits will be available against which they can be used.

(vii) Financial instruments

(a) Classification of financial assets

Financial assets of the Group currently are recorded at fair value and are classified, on initial recognition, as amortised cost designated as fair value hedges, or elected at FVOCI. Purchases and sales of financial assets are recognised on the trade date, being the date on which the Group commits to purchase or sell the asset.

With the exception of assets classified as fair value through profit and loss (FVTPL), the initial fair value of a financial asset includes direct and incremental transaction costs. The fair value of assets traded on an active market will be the price that would be received if an asset were to be sold in an orderly transaction between market participants at the measurement date. In the absence of an active market, the Group establishes a fair value using various valuation techniques that use observable and unobservable inputs. These include recent similar transactions of, discounted cash flow projections, option pricing models and other valuation techniques used by market participants.

The classification requirements for debt and equity instruments are described below.

Debt instruments

Debt instruments, including loans and debt securities, are currently classified as amortised cost.

Classification and subsequent measurement of debt instruments depend on:

- (i) The Group's business model for managing the asset; and
- (ii) The cash flow characteristics of the asset.

(i) Business model assessment

The business model reflects how the Group manages the assets in order to generate cash flows. That is, whether the Group's objective is solely to collect the contractual cash flows from the assets held to collect (HTC) or is to collect both the contractual cash flows and cash flows arising from the sale of assets held to collect and sell (HTC&S). If neither of these is applicable, then the financial assets are classified as part of 'other' business model and measured at FVTPL.

The Group assesses its business model at a portfolio level based on how it manages groups of financial assets to achieve its business objectives. The observable factors considered include:

- How the performance of the business model and the financial assets held within that business model are evaluated and reported to Group ExCo;
- How risks that affect the performance of the business model are managed;
- How business managers are compensated; and
- The timing, frequency and volume of sales.

(ii) Cash flow characteristics assessment

The Group carries out the cash flow characteristics assessment using the contractual features of an instrument to determine if they give rise to cash flows that are consistent with a basic lending arrangement. Contractual cash flows are consistent with a basic lending arrangement if they represent cash flows that are solely payments of principal and interest (the 'SPPI' test). Principal, for the purpose of this test, is defined as the fair value of the financial asset at initial recognition and may change over the life of the financial asset, for example, due to repayments or amortisation of the premium/discount. Interest is defined as the consideration for the time value of money and credit risk, which are the most significant elements of interest within a lending arrangement. If the Group identifies any contractual features that could significantly modify the cash flows of the instrument such that they introduce exposures to risk or volatility that are inconsistent with a basic lending arrangement, the related financial asset is classified and measured at FVTPL.

The Group carries out the SPPI test based on an assessment of the contractual features of each product on origination and subsequently at every reporting period. Derivative instruments and equity instruments are not covered by this assessment as they are held at FVTPL (except when equities have been elected to be accounted for at FVOCI).

Notes to the Consolidated Financial Statements (continued)

1. Corporate information, basis of preparation and material accounting policies (continued)

Based on the above assessments, the Group currently classifies its debt instruments into one category as per below:

Debt instruments measured at amortised cost

Debt instruments are measured at amortised cost if they are held within a business model whose objective is to hold the assets to collect contractual cash flows, where those cash flows represent solely payments of principal and interest. After initial measurement, debt instruments in this category are measured at amortised cost. Interest income on these instruments is recognised in interest income using the EIR method.

The EIR is the rate that discounts estimated future cash payments or receipts through the expected life of a financial asset to the gross carrying amount of a financial asset. Amortised cost is calculated by taking into account any discount or premium on acquisition, transaction costs and fees that are an integral part of the EIR.

Impairment on debt instruments measured at amortised cost is calculated using the ECL approach. Loans and debt securities measured at amortised cost are presented net of allowance for ECL in the SOFP within Loans and advances to customers and debt securities and interest income is recognised in net interest income.

Equity instruments

Equity instruments are measured at FVTPL, unless an election is made to designate them at FVOCI upon purchase. For equity instruments measured at FVTPL, changes in fair value are recognised as part of other operating income in the income statement. The Group can elect to classify non-trading equity instruments at FVOCI. The FVOCI election is made upon initial recognition, on an instrument-by-instrument basis and once made is irrevocable. Gains and losses on these instruments including when derecognised/sold are recorded in OCI and are not subsequently reclassified to the income statement. The Group has classified certain equity instruments as FVOCI on initial recognition as per above. Dividends received are recorded in the income statement.

Reclassifications

Financial assets are not reclassified subsequent to their initial recognition, except in the period after the Group changes its business model for managing financial assets.

(b) Impairment of financial assets

The Group recognises loss allowances for ECL for the following financial instruments that are not measured at FVTPL:

- financial assets at amortised cost;
- lease receivables;
- loan commitments; and
- guarantees.

Measurement

ECL is measured by the Group in a way that reflects:

- an unbiased probability weighted amount that is determined by evaluating a range of possible outcomes;
- the time value of money; and
- reasonable and supportable information that is available without undue cost or effort at the reporting date and past events, current conditions and forecast of future economic conditions.

The amount of ECL recognised as a loss allowance depends on the change in credit risk of the financial instrument since origination and whether the credit risk on those financial instruments has increased significantly since initial recognition. In order to determine the appropriate ECL, a financial instrument is allocated to a stage dependent on the credit risk relative to when the financial instrument was originated:

- **Stage 1** – includes financial instruments that have not had a Significant increase in Credit Risk (SICR) since initial recognition. For these assets, 12-month ECL is recognised. 12-month ECL is the ECL that results from default events that are possible within 12 months of the reporting date. It is not the expected cash shortfalls over the 12-month period but the entire credit loss on an asset weighted by the probability that the loss will occur in the next 12 months. Therefore, all financial assets in scope will have an impairment provision equal to at least 12-month ECL;
- **Stage 2** – includes financial instruments that have had a SICR since initial recognition but that does not have objective evidence of impairment. For these assets, lifetime ECL is recognised, being the ECL that results from all possible default events over the expected life of the financial instrument;
- **Stage 3** – includes financial assets that have objective evidence of impairment at the reporting date, i.e. are credit-impaired. For these assets, lifetime ECL is recognised.

1. Corporate information, basis of preparation and material accounting policies (continued)

The Group has adopted an ECL framework that reflects a component approach using PD, EAD and LGD components calibrated for IFRS 9 purposes. To adequately capture life-time expected losses, the Group also models early redemptions as a separate component within the ECL calculation.

The expected cash flows included in the ECL calculation are derived from a) the loan contract b) on the disposal of collateral or c) sale of loans arising from deleveraging of NPLs which are included in the ECL calculation from the point that they meet the following three conditions:

- (i) Selling the loans becomes a recovery method that the Group expects to pursue in a default scenario;
- (ii) The Group is neither legally nor practically prevented from realising the loans using the recovery method; and
- (iii) The Group has reasonable and supportable information upon which to base its expectations and assumptions.

Credit loss is the difference between all contractual cash flows that are due to an entity in accordance with the contract and all the cash flows that the entity expects to receive (i.e. all cash shortfalls), discounted at the original EIR.

Purchased or originated credit-impaired assets (POCI)

POCI are excluded from the general 3 stage impairment model in IFRS 9. POCI assets are financial assets that are credit-impaired on initial recognition. POCI assets are recorded at fair value at original recognition and interest income is subsequently recognised on a credit-adjusted EIR basis. ECL are only recognised or released to the extent that there is a subsequent change in ECL.

Expected life

When measuring ECL, the Group must consider the maximum contractual period over which the Group is exposed to credit risk. All contractual terms should be considered when determining the expected life, including prepayment options, extension and rollover options. For most instruments, the expected life is limited to the remaining contractual life, adjusted as applicable for expected prepayments.

For certain revolving credit facilities that do not have a fixed maturity (e.g. credit cards and overdrafts), the expected life is estimated based on the period over which the Group is exposed to credit risk and where the credit losses would not be mitigated by Management actions.

For instruments in Stage 2 or Stage 3, loss allowances will cover ECL over the expected remaining life of the instrument.

Expert Credit Judgement

The Group's ECL accounting framework methodology, in line with the requirements of the standard, requires the Group to use its experienced credit judgement to incorporate the estimated impact of factors not captured in the modelled ECL results, in all reporting periods.

Effective Interest Rate

The discount rate used by the Group in measuring ECL is the EIR (or 'credit-adjusted EIR' for POCI financial assets) or an approximation thereof.

For undrawn commitments, the EIR, or an approximation thereof, is applied when recognising the financial assets resulting from the loan commitment.

Low credit risk exemption

The Group applied the low credit risk exemption to sovereign debt securities, reverse repurchase agreements, Loans and advances to banks and certain intercompany positions in scope for impairment under IFRS 9.

The Group considers credit risk on a financial instrument low if it meets the following conditions:

- (i) Strong capacity by borrower to meet its contractual cash flow obligations in the near term.;
- (ii) Adverse changes in economic business conditions in the longer term may, but will not necessarily, reduce the ability of the borrower to fulfil its contractual cash flow obligations; and
- (iii) External rating of investment grade or an internal credit rating equivalent.

These exposures are in Stage 1 with a very low credit risk requiring 12-month ECL and contributing minimally to overall ECL.

Notes to the Consolidated Financial Statements (continued)

1. Corporate information, basis of preparation and material accounting policies (continued)

Modification Policy for Financial Assets

The Group sometimes renegotiates or otherwise modifies the contractual cash flows of loans to customers. When this happens, the Group assesses whether or not the new items are substantially different to the original terms. The Group does this by considering, among others, the following factors:

- If the borrower is in financial difficulty, whether the modification merely reduces the contractual cash flows to amounts the borrower is expected to be able to pay;
- Whether any substantial new items are introduced such as a profit share/equity-based return that substantially affects the risk profile of the loan;
- Significant extension of the loan term when the borrower is not in financial difficulty;
- Significant change in the interest rate;
- Change in the currency the loan is denominated in; and
- Insertion of collateral, other security or credit enhancements that significantly affect the credit risk associated with the loan.

If the terms are substantially different, the Group derecognises the original financial asset and recognises a new asset at fair value and recalculates a new EIR for the asset. The date of renegotiation of the new financial asset is consequently considered to be the date of initial recognition for impairment calculation purposes, including for the purpose of determining whether a SICR has occurred. However, the Group also assesses whether the new financial asset recognised is deemed to be credit-impaired at initial recognition, especially in circumstances where the renegotiation was driven by the debtor being unable to make the originally agreed payments. Differences in the carrying amount are also recognised in profit or loss as a gain or loss on derecognition.

If the terms are not substantially different, the renegotiation or modification does not result in derecognition, and the Group calculates the gross carrying amount based on the revised cash flows of the financial asset and recognises a modification gain or loss in profit or loss. The new gross carrying amount is recalculated by discounting the modified cash flows at the original EIR (or credit-adjusted EIR for POCI financial assets).

Write-off policy

The Group writes off an impaired financial asset (and the related impairment allowance), either partially or in full, when there is no realistic prospect of recovery or on foot of a negotiated settlement. Indicators that there is no prospect of recovery include the borrower being deemed unable to pay due to their financial circumstances or the cost to be incurred in seeking recovery is likely to exceed the amount of the write-off. In circumstances where the net realisable value of any collateral has been determined and there is no reasonable expectation of further recovery, write-off may be earlier than collateral realisation. Write-off on those financial assets subject to enforcement activity will take place on conclusion of the enforcement process.

In subsequent periods, any recoveries of amounts previously written off are credited to the provision for credit losses in the income statement.

Presentation of ECL allowance in the SOFP

The ECL on financial assets measured at amortised cost is presented as a deduction from the gross carrying amount.

Credit losses on items not recognised in the SOFP such as undrawn lending commitments (where the loan commitment relates to a loan already recognised as a financial asset), letters of credit and guarantees (other than financial guarantee contracts) are reported under Loans and advances to customers. Credit losses on loan commitments where there is no recognised financial asset are reported under Provisions.

(c) Financial liabilities and equity

Financial liabilities are currently classified at amortised cost unless mandatorily required to be classified at FVTPL, for example derivatives. Derivative liabilities are dealt with under separate accounting policies. All of the Group's financial liabilities, other than derivative liabilities, are classified at amortised cost.

The classification of instruments as a financial liability or an equity instrument is dependent upon the substance of the contractual arrangement. Instruments which carry a contractual obligation to deliver cash or another financial asset to another entity are classified as financial liabilities. The coupons on these instruments are recognised in the income statement as interest expense using the EIR method. Where the Group has absolute discretion in relation to the payment of coupons and repayment of principal, the instrument is classified as equity and any coupon payments are classified as distributions in the period in which they are made. If the Group purchases its own debt, it is removed from the balance sheet and the difference between the carrying amount of the liability and the consideration paid is included in other operating income, net of any costs or fees incurred.

1. Corporate information, basis of preparation and material accounting policies (continued)

Financial liabilities measured at amortised cost

Financial liabilities include deposits by banks (including Central Banks), customer accounts, debt securities in issue and subordinated debt. The related interest expense is recognised in net interest income.

Debt securities issued and subordinated debt issued are initially recognised on the date that they originated, while all other financial liabilities are recognised initially on the trade date. Both the date of origination and the trade date is the date the Group becomes a party to the contractual provisions of the instrument.

All financial liabilities are recognised initially at fair value, less any directly attributable transaction costs and are subsequently measured at amortised cost and the related interest expense is recognised in the income statement using the EIR method.

Equity

Financial instruments classified as equity are accounted for directly in equity less any transaction costs deducted directly from equity. Transaction costs are incremental costs directly attributable to the equity transaction that otherwise would have been avoided. Equity instruments are not subsequently remeasured. Any coupon payments on the instrument are treated as dividends and accounted for, when declared and paid as a distribution out of retained earnings. Equity instruments are issued at arm's length.

(d) Derecognition of Financial Instruments

Financial assets

The Group derecognises a financial asset when the contractual right to the cash flow from the financial asset expires, or it transfers the rights to receive the contractual cash flows in a transaction in which substantially all of the risks and rewards of ownership of the financial asset are transferred or in which the Group neither transfers nor retains substantially all of the risks and rewards of ownership and it does not retain control of the financial asset. Control over the assets is represented by the practical ability to sell the transferred asset.

On derecognition of a financial asset, the difference between the carrying amount of the asset (or the carrying amount allocated to the portion of the asset derecognised) and the sum of (i) the consideration received (including any new asset obtained less any new liability assumed) and (ii) any cumulative gain or loss that had been recognised in OCI is recognised in profit or loss.

Any cumulative gain/loss recognised in OCI in respect of equity investment securities designated as at FVOCI is not recognised in profit or loss on derecognition of such securities. Any interest in transferred financial assets that qualify for derecognition that is created or retained by the Group is recognised as a separate asset or liability.

The Group enters into transactions whereby it transfers assets recognised on its SOFP, but retains either all or substantially all of the risks and rewards of the transferred assets or a portion of them. In such cases, the transferred assets are not derecognised. Examples of such transactions are securities lending and sale-and-repurchase transactions.

In certain transactions, the Group retains the obligation to service the transferred financial asset for a fee. The transferred asset is derecognised if it meets the derecognition criteria. An asset or liability is recognised for the servicing contract if the servicing fee is more than adequate (asset) or is less than adequate (liability) for performing the servicing.

The Group sells Loans and advances to customers to Structured Entities (SEs) that in turn issue notes to investors which are collateralised by the purchased assets. For the purpose of disclosure, a transfer of such financial assets may arise if the Group sells assets to a consolidated SE, the transfer of financial assets is from the Group (that includes the consolidated SE) to investors in the notes issued by the SE. The transfer is in the form of the Group assuming an obligation to pass cash flows from the underlying assets to investors in the notes. The securitisation is generally retained in the form of senior or subordinated tranches, or other residual interests (retained interests), however, these securitisations may also occur with entities external to the Group. Retained interests are recognised as debt securities in issue. The Group sells Loans and advances to customers to SEs that are not consolidated SEs and the Group retains no interest in these assets and they are derecognised in their entirety.

Financial liabilities

The Group derecognises a financial liability when its contractual obligations are discharged, cancelled, or expired. This may happen when payment is made to the lender; the borrower legally is released from primary responsibility for the financial liability; or if there is an exchange of debt instruments with substantially different terms or a substantial modification of the terms of an existing debt instrument. Derecognition conditions are also satisfied when an entity repurchases its own debt instruments issued previously. When a financial liability is extinguished, any difference between the carrying amount of the financial liability and the consideration paid is recognised in the income statement.

Notes to the Consolidated Financial Statements (continued)

1. Corporate information, basis of preparation and material accounting policies (continued)

(e) Determination of fair value of financial instruments and other assets

Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. The fair value measurement is based on the presumption that the transaction to sell the asset, or transfer the liability takes place either in the principal market for the asset or liability, or in the absence of a principal market, in the most advantageous market for the asset or liability which is accessible to the Group.

The Group uses valuation techniques that are appropriate in the circumstances and for which sufficient data is available to measure fair value, maximising the use of relevant observable inputs and minimising the use of unobservable inputs.

All assets and liabilities for which fair value is measured or disclosed in the financial statements are categorised within the fair value hierarchy based on the lowest level input that is significant to the fair value measurement as a whole and is described as follows:

- Level 1: Quoted market prices in active markets for identical assets or liabilities (unadjusted);
- Level 2: Valuation techniques such as discounted cash flow method, comparison with similar instruments for which market observable prices exist, options pricing models, credit models and other relevant valuation models for which the lowest level input that is significant to the fair value measurement is directly or indirectly observable; or
- Level 3: Valuation techniques for which the lowest level input that is significant to the fair value measurement is unobservable.

For assets and liabilities that are recognised in the financial statements on a recurring basis, the Group determines whether transfers have occurred between levels in the hierarchy by re-assessing categorisation (based on the lowest level input that is significant to the fair value measurement as a whole) at the end of each reporting period. The Group recognises transfers between levels of the fair value hierarchy as of the end of the reporting period during which the change occurred.

An analysis of the fair values of financial instruments, and further details as to how they are measured, are provided in note 35.

(viii) Derivative instruments and hedging

The Group follows the IFRS 9 model for hedge accounting.

Derivative instruments used by the Group primarily comprise interest rate swaps and currency forward rate contracts. Such derivative financial instruments are initially recognised at fair value on the date on which a derivative contract is entered into and are subsequently remeasured at fair value. Derivatives are carried as financial assets when the fair value is positive and as financial liabilities when the fair value is negative.

For the purpose of hedge accounting, the Group engages in fair value hedges which is hedging the exposure to changes in the fair value of a recognised asset or liability in relation to interest rate risk.

At the inception of a hedge relationship, the Group formally designates and documents the hedge relationship to which it wishes to apply hedge accounting and the Risk Management objective and strategy for undertaking the hedge. The documentation includes identification of the hedging instrument, the hedged item, the nature of the risk being hedged and how the Group will assess whether the hedging relationship meets the hedge effectiveness requirements (including the analysis of sources of hedge ineffectiveness and how the hedge ratio is determined). A hedging relationship qualifies for hedge accounting if it meets all of the following effectiveness requirements:

- There is 'an economic relationship' between the hedged item and the hedging instrument;
- The effect of credit risk does not 'dominate the value changes' that result from that economic relationship; and
- The hedge ratio of the hedging relationship is the same as that resulting from the quantity of the hedged item that the Group actually hedges and the quantity of the hedging instrument that the Group actually uses to hedge that quantity of hedged item.

Certain derivative instruments do not fulfil the hedge accounting criteria under IFRS 9 and are consequently classified as Held For Trading (HFT). The fair value movement and any interest income/(expense) are included in Net trading income/(expense).

Hedges that meet all the qualifying criteria for hedge accounting are accounted for, as described below:

1. Corporate information, basis of preparation and material accounting policies (continued)

(a) Fair value hedges

The Group uses interest rate swaps to hedge its exposure to changes in the fair value of fixed-rate euro notes issued in respect of the EURIBOR benchmark interest rate. The Group hedges interest rate risk only to the extent of the benchmark interest rate because the changes in the fair value of a fixed-rate note issued are significantly influenced by changes in the benchmark interest rate.

Before fair value hedge accounting is applied the Group determines whether an economic relationship between the hedged item and the hedging instrument exists. This is performed by comparing the critical terms of each of the instruments and also regression analysis to assess whether the hedging instrument is expected to be highly effective in offsetting changes in the fair value of the hedged item i.e. that the fair value of the hedged item and the fair value of the hedging instrument move in opposite directions and therefore offset. The Group establishes a hedge ratio by aligning the par amount of the fixed-rate note and the notional amount of the interest rate swap designated as a hedging instrument. The Group then performs regression analysis to ensure that the hedge relationship is highly effective as per above. This analysis is also performed at reporting periods to ensure that the hedge relationship remains highly effective.

The main sources of ineffectiveness will include differences in maturities of the instruments and different interest basis calculations.

The effective portion of fair value gains on hedging derivatives and the gain or loss on the hedged item are recognised in net interest income.

For fair value hedges relating to items carried at amortised cost, any adjustment to carrying value is amortised through profit or loss over the remaining term of the hedge using the EIR method. The EIR amortisation may begin as soon as an adjustment exists and no later than when the hedged item ceases to be adjusted for changes in its fair value attributable to the risk being hedged. If the hedged item is derecognised, the unamortised fair value is recognised immediately in profit or loss.

(b) Credit valuation adjustment (CVA)

The Group is engaged in over the counter (OTC) derivative transactions and considers whether a fair value adjustment for credit risk is required. CVA is considered to reflect the counterparty's default risk and Debit valuation adjustment (DVA) to reflect own credit risk. There is no specific guidance on the methods used to calculate CVA or DVA which creates challenges in estimation.

As a result, IFRS 13 requires entities to consider the effects of credit risk when determining a fair value measurement.

The Group mitigates its derivative positions through the use of netting and Credit Support Annex collateral arrangements. The Group does not operationally net positions. The netting and collateral arrangements may be called upon in the event of a default. This allows a counterparty to net all assets and liabilities outstanding with the defaulting counterparty, subject to the agreement when the default event occurs. The collateral arrangements in place require the counterparty in a liability position to place collateral to cover that shortfall. The Group considers and discounts the necessity for any amendments to the valuations to reflect the CVA when calculating the fair value of the derivative positions.

The Group monitors this position at every reporting period and assesses if material CVAs become appropriate to be recognised.

(ix) Cash and cash equivalents

Cash comprises cash on hand and demand deposits and cash equivalents include liquid investments that are readily convertible to known amounts of cash which are subject to an insignificant risk of change in value and with an original maturity of less than three months.

Notes to the Consolidated Financial Statements (continued)

1. Corporate information, basis of preparation and material accounting policies (continued)

(x) Leases

(a) Classification of Leases

At inception of a contract, the Group assesses whether a contract is, or contains, a lease. A contract is, or contains, a lease if the contract conveys the right to control the use of an identified asset for a period of time in exchange for consideration. To assess whether a contract conveys the right to control the use of an identified asset, the Group assesses whether:

- the contract involves the use of an identified asset; this may be specified explicitly or implicitly, and should be physically distinct or represent substantially all of the capacity of a physically distinct asset. If the supplier has a substantive substitution right, then the asset is not identified;
- the Group has the right to obtain substantially all of the economic benefits from use of the asset throughout the period of use; and
- the Group has the right to direct the use of the asset. The Group has this right when it has the decision-making rights that are most relevant to changing how and for what purpose the asset is used. In rare cases where the decision about how and for what purpose the asset is used is predetermined, the Group has the right to direct the use of the asset if either:
 - the Group has the right to operate the asset; or
 - the Group designed the asset in a way that predetermines how and for what purpose it will be used.

Unless the lease is of short-term and of low-value assets, where the Group has the right to obtain substantially all of the economic benefits from use of identified assets and has the right to direct the use of the identified asset, a right-of-use asset is recognised in property and equipment and a lease liability is recognised in other liabilities.

If a lease is assumed as part of a business combination, the Group, subject to not meeting the recognition exemptions as detailed below, will recognise a right-of-use asset and a lease liability as if the lease were a new lease at the acquisition date. The right-of-use assets and lease liability are then measured consistently with the Group's accounting policy as detailed above, with the lease commencement date being the acquisition date.

As a lessee

The Group recognises a right-of-use asset (Property Plant and Equipment) and a lease liability (Other liabilities) at the lease commencement date. The right-of-use asset is initially measured at cost, which comprises the initial amount of the lease liability adjusted for any lease payments made at or before the commencement date, plus any initial direct costs incurred and an estimate of costs to dismantle and remove the underlying asset or to restore the underlying asset or the site on which it is located, less any lease incentives received.

The right-of-use asset is subsequently depreciated using the straight-line method from the commencement date to the earlier of the end of the useful life of the right-of-use asset or the end of the lease term. The estimated useful lives of right-of-use assets are determined on the same basis as those of property and equipment. In addition, the right-of-use asset is periodically reduced by impairment losses, if any, and adjusted for certain remeasurements of the lease liability.

The lease liability is measured at the present value of the lease payments that are not paid at the commencement date, discounted using the incremental borrowing rate. Incremental borrowing rate is the rate of interest that a lessee would have to pay to borrow over a similar term, and with a similar security, the funds necessary to obtain an asset of a similar value to the right of use asset in a similar economic environment. For its incremental borrowing rate, the Group uses its Funds transfer pricing (FTP), which comprises its base cost of funds with add-ons related to regulatory requirements, and term liquidity premium based on the slope of swap curve as a proxy of time value of money. The Group's FTP is fully reflective of its funding profile and therefore considers it an appropriate reflection of the Group's borrowing cost. For retail properties, property yield is added as a lease specific adjustment.

Lease payments included in the measurement of the lease liability comprise fixed payments, including in-substance fixed payments.

The lease liability is remeasured, if there is a change in future lease payments arising from a change in index-linked considerations, if there is a change in the Group's estimate of the amount expected to be payable under a residual value guarantee, or if the Group changes its assessment of whether it will exercise a purchase, extension or termination option.

When the lease liability is remeasured in this way, a corresponding adjustment is made to the carrying amount of the right-of-use asset, or is recorded in profit or loss if the carrying amount of the right-of-use asset has been reduced to zero.

Short-term leases and leases of low-value assets

The Group has elected not to recognise right-of-use assets and lease liabilities for short-term leases of vehicles that have a lease term of twelve months or less and leases of low-value assets, including office equipment. The Group recognises the lease payments associated with these leases as an expense on a straight-line basis over the lease term. IFRS 16: Short – term lease exemption.

1. Corporate information, basis of preparation and material accounting policies (continued)

As a lessor

When the Group acts as a lessor, it determines at lease inception, whether each lease is a finance lease or an operating lease.

To classify each lease, the Group makes an overall assessment of whether the lease transfers substantially all of the risks and rewards incidental to ownership of the underlying asset. If this is the case, then the lease is a finance lease; if not, then it is an operating lease. As part of this assessment, the Group considers certain indicators such as, whether the lease is for the major part of the economic life of the asset.

When assets are held under a finance lease, the present value of the lease payments is recognised as a receivable at an amount equal to the net investment in the lease. The difference between the gross receivable and the present value of the receivable is recognised as unearned finance income. Lease income is included within net interest income and is recognised over the term of the lease reflecting a constant periodic rate of return on the net investment in the lease. Finance lease receivables are recognised within Loans and advances to Customers and the related interest income within net interest income.

The Group applies the derecognition and impairment requirements in IFRS 9 to the net investments in the lease.

When the Group is an intermediate lessor, it accounts for its interests in the head lease and the sub-lease separately. It assesses the lease classification of a sub-lease with reference to the right-of-use asset arising from the head lease, not with reference to the underlying asset. If a head lease is a short-term lease to which the Group applies the exemption described above, then it classifies the sub-lease as an operating lease.

If an arrangement contains lease and non-lease components, the Group applies IFRS 15 to allocate the consideration in the contract.

The Group recognises lease payments received under operating leases as income, on a straight-line basis, over the lease term, as part of other income.

(xi) Property and equipment

Leasehold premises with initial lease terms of less than 50 years and all other equipment are stated at cost less accumulated depreciation and impairment losses. Depreciation is calculated on a straight-line basis to write-off the costs of such assets to their residual value over their estimated useful lives, which are assessed annually.

Freehold premises (including land) are revalued at least annually by external professional valuers. Any accumulated depreciation (on freehold premises excluding land) at the date of revaluation is eliminated against the gross carrying amount of the asset, and the net amount is restated to the revalued amount of the asset. Any resulting increase in value is credited to OCI and shown as revaluation reserves in shareholders' equity. Any decrease in value that offsets previous increases of the same asset are charged in OCI and debited against the revaluation reserves directly in equity while all other decreases are charged to the income statement. The revalued premises, excluding the land element, are depreciated to their residual values over their estimated useful lives.

Subsequent costs are included in the asset's carrying amount, only when it is probable that future economic benefits associated with the item will flow to the Group and the cost of the item can be measured reliably. At the end of each reporting period the Group assesses whether there is any indication that the property and equipment may be impaired. Where impairment exists, the carrying amount of the asset is reduced to its recoverable amount and the impairment loss is recognised against the revaluation reserve to the extent it is available and any remainder is recognised in the income statement. The depreciation charge for the asset is then adjusted to reflect the asset's revised carrying amount.

Notes to the Consolidated Financial Statements (continued)

1. Corporate information, basis of preparation and material accounting policies (continued)

If an item of property, plant and equipment is disposed of, any gains or losses are recognised in the profit or loss before tax. If the asset being disposed of had previously been revalued then any amount in OCI relating to that asset is reclassified directly to retained earnings on disposal rather than the income statement.

The estimated useful lives were updated during 2025 (see 1.9: Change in Accounting Estimate useful life of intangible assets and property, plant, and equipment (PPE)) and are now as follows:

	2025	2024
Freehold Buildings	50 years	50 years
Leasehold Buildings	50 years or term of lease if less than 50 years	50 years or term of lease if less than 50 years
Office Equipment	Up to 15 years	5 – 7 years
Computer Hardware	3 – 7 years	3 – 7 years
Motor Vehicles	3 – 5 years	3 – 5 years
Fixtures and fittings	7 – 15 years	7 – 10 years

(xii) Intangible assets (other than goodwill)

Acquired computer software is stated at cost, less amortisation and provision for impairment, if any. The external costs and directly attributable internal costs of bringing to use the computer software are capitalised where it is probable that future economic benefits that exceed its cost will flow from its use over more than one year.

Capitalised computer software has a finite life and is amortised on a straight-line basis over a period of between three to eight years (see 1.9(i)).

Expenditure on internally developed software is recognised as an asset when the Group can demonstrate: (i) that the product is technically and commercially feasible; (ii) its intention and ability to complete the development and use the software in a manner that will generate future economic benefits; (iii) and that it can reliably measure the costs to complete the development. The capitalised costs of internally developed software include all costs directly attributable to developing the software and capitalised borrowing costs and are amortised over its useful life. Internally developed software is stated at capitalised cost less accumulated amortisation and any accumulated impairment losses.

At the end of each reporting period the Group assesses whether there is any indication that software may be impaired. An asset's carrying value is written down immediately to its recoverable amount if the asset's carrying amount is greater than its estimated recoverable amount. The estimated recoverable amount is the higher of the asset's fair value less costs to sell or VIU.

Costs associated with research activities or maintaining computer software programmes are recognised as an expense as incurred.

(xiii) Collateral in possession

In certain circumstances, property is repossessed following foreclosure on loans that are in default. When a property is repossessed, the associated loan relating to that property is derecognised and any provision on that loan is reversed. On initial recognition the collateral in possession is valued at its fair value.

Subsequent to initial recognition, the property is carried at the lower of its cost and net realisable value.

1. Corporate information, basis of preparation and material accounting policies (continued)

(xiv) Assets and liabilities classified as held for sale

An asset or a disposal group is classified as held for sale if the following criteria are met:

- Its carrying value will be recovered principally through sale rather than continuing use;
- It is available for immediate sale; and
- The sale is highly probable within the next 12 months.

When assets (or disposal groups), other than financial assets as classified under IFRS 9, or rights under an insurance contract, are initially classified as held for sale, they are measured at the lower of the carrying amount or fair value less costs to sell at the date of reclassification.

Impairment losses subsequent to classification of such assets (or disposal groups) are recognised in the income statement. Increases in fair value less costs to sell of such assets (or disposal groups) that have been classified as held for sale are recognised in the income statement to the extent that the increase is not in excess of any cumulative loss previously recognised in respect of the asset (or disposal group).

Where the above conditions cease to be met, the assets (or disposal group) are reclassified out of held for sale and included under the appropriate SOFP classifications.

Financial assets within the scope of IFRS 9, DTAs and income taxes within the scope of IAS 12 continue to be measured in accordance with these standards.

(xv) Provisions

A provision is recognised if, as a result of a past event, the Group has a present legal or constructive obligation that can be estimated reliably, and it is probable that an outflow of economic benefits will be required to settle the obligation. Provisions are determined by discounting the expected future cash flows at a pre-tax rate that reflects current market assessments of the time value of money and, where appropriate, the risks specific to the liability.

A restructuring provision is recognised when there is an approved detailed and formal Restructuring Plan, and the restructuring either has commenced or has been publicly announced. Future operating losses are not permitted to be recognised.

Present obligations arising under onerous contracts are recognised and measured as provisions at the present value of the lower of the expected cost of terminating the contract and the expected net cost of continuing with the contract. An onerous contract is a contract in which the unavoidable cost of meeting the obligation under the contract exceeds the economic benefits expected to be received under it.

Contingent liabilities are either possible obligations that arise from past events whose existence is dependent on whether some uncertain future events occur which are not wholly within the control of the entity or are a present obligation that arises from a past event but is not recognised because:

- It is not probable that an outflow of resources embodying economic benefits will be required to settle the obligation; or
- The amount of the obligation cannot be measured with sufficient reliability.

Contingent liabilities are not recognised but are disclosed unless the probability of their occurrence is remote.

Financial guarantees are contracts that require the Group to make specified payments to reimburse the holder for a loss that it incurs because a specified debtor fails to make payment when it is due in accordance with the terms of a debt instrument.

Loan commitments are firm commitments to provide credit under pre-specified terms and conditions.

The maximum exposure to credit loss under commitments is the contractual amount of the instrument in the event of non-performance by the other party where all counter claims, collateral or security prove worthless. The transfer of economic resources is uncertain and cannot be reasonably measured to be recognised on the SOFP.

ECL held against loan commitments are recognised in Provisions except where the loan commitment relates to a loan already recognised as a financial asset. In this case the ECL is recognised in Loans and advances to customers.

Notes to the Consolidated Financial Statements (continued)

1. Corporate information, basis of preparation and material accounting policies (continued)

Financial guarantees issued or commitments to provide a loan at a below-market interest rate are initially measured at fair value. Subsequently, they are measured at the higher of the loss allowance determined in accordance with IFRS 9 and the amount initially recognised less, when appropriate, the cumulative amount of income recognised in accordance with the principles of IFRS 15.

Other loan commitments issued are measured at the sum of (i) the loss allowance determined in accordance with IFRS 9 and (ii) the amount of any fees received, less, if the commitment is unlikely to result in a specific lending arrangement, the cumulative amount of income recognised. Derecognition policies in section (vii) (d) above are applied to loan commitments issued and held.

The Group has issued no loan commitments that are measured at FVTPL.

(xvi) Dividends

Final dividends on ordinary shares are recognised in equity in the period in which they are approved by the Company's shareholders. Interim dividends are recognised in equity in the period in which they are paid.

(xvii) Operating segments

An operating segment is a component of the Group that engages in business activities from which it may earn revenues and incur expenses, including revenues and expenses that relate to transactions with any of the Group's other components, whose operating results are reviewed regularly by the Group Executive Committee (being the chief operating decision maker (CODM)) to make decisions about resources allocated to each segment and assess its performance, and for which discrete financial information is available.

(xviii) Sales and repurchase agreements

Financial assets may be lent for a fee or sold subject to a commitment to repurchase them ("repos"). Such assets are retained on the SOFP when substantially all the risks and rewards of ownership remain with the Group. The assets are reclassified when the transferee has the right by contract to sell or repledge the collateral. The liability to the counterparty is included separately on the SOFP as appropriate in either Deposits by banks or Customer accounts depending on whether the counterparty is a bank or not.

Similarly, where financial assets are purchased with a commitment to resell ("reverse repos"), or where the Group borrows financial assets but does not acquire the risks and rewards of ownership, the transactions are treated as collateralised loans, and the financial assets are not included in the SOFP. The collateralised loan asset is included separately on the SOFP as appropriate in either Loans and advances to banks or Loans and advances to customers.

The difference between the sale and repurchase price is recognised in net interest income over the life of the agreements using the EIR.

In certain circumstances, the Group pledges collateral in respect of liabilities or borrowings. Collateral pledged in the form of securities or Loans and advances continues to be recorded on the SOFP. Collateral placed in the form of cash is recorded in Loans and advances to banks or customers. Any interest receivable arising is recorded as interest income.

(xix) Collateral

The Group enters into master agreements with counterparties to ensure that in the event of a default, all amounts outstanding with those counterparties will be settled on a net basis. The Group obtains collateral in respect of customer liabilities where this is considered appropriate. The collateral normally takes the form of a lien over the customer's assets and gives the Group a claim on these assets for both existing and future liabilities. The collateral is not recorded on the Group's SOFP.

The Group also receives collateral in the form of cash or securities in respect of other credit instruments, such as sale-and-repurchase contracts and derivative contracts, in order to reduce credit risk. Collateral received in the form of securities is not recorded on the SOFP. Collateral received in the form of cash is recorded on the SOFP, with a corresponding liability recognised within deposits from banks or deposits from customers. Any interest payable arising is recorded as interest expense.

(xx) Offsetting

Financial assets and liabilities are offset and the net amount reported in the balance sheet when there is currently a legally enforceable right of set off and there is an intention to settle on a net basis, or realise the asset and settle the liability simultaneously. No impairment loss allowance for ECL is recognised on a financial asset, or portion thereof, which has been offset.

1.6 Application of new and revised IFRS

In 2025, the Group assessed the impact of new and revised pronouncement of IFRSs which took effect during the year. The changes to IFRSs during 2025 did not have material impact on the Group's financial statements. The Group has not early adopted any of the changes described below.

1. Corporate information, basis of preparation and material accounting policies (continued)

1.7 Impact of other accounting standards with effective periods beginning on or after 1 January 2025.

The following table outlines the new pronouncements coming into effect for accounting periods on or after 1 January 2025 and, did not have a significant impact on the financial statements.

Accounting Standard Update	Description of Change	Key impacts	Effective Date
Lack of Exchangeability (Amendments to IAS 21)	Provides guidance to specify when a currency is exchangeable and how to determine the exchange rate when it is not.	This amendment has no material impact on current or future reporting.	Annual periods beginning on or after 1 January 2025.

1.8 Impact of other accounting standards with effective periods beginning on or after 1 January 2026.

The following table outlines the new pronouncements coming into effect for accounting periods on or after 1 January 2026 and, with the exception of IFRS 18, are not deemed to have a significant impact on the financial statements.

Accounting Standard Update	Description of Change	Key impacts	Effective Date
Amendments IFRS 9 and IFRS 7 regarding the classification and measurement of financial instruments	The amendments clarify: 1) the date of recognition and derecognition of some financial assets and liabilities with a new exception for some financial liabilities settled through an electronic cash transfer system; 2) include further guidance for assessing whether a financial asset meets the solely payments of principal and interest (SPPI) criterion; and 3) new disclosures are added for certain instruments with contractual terms that can change cash flows (such as some instruments with features linked to the achievement of environment, social and governance (ESG) targets) and the amendment updates disclosures for equity instruments designated at FVOCI.	1) The amendments clarify that a financial liability is derecognised on the settlement date with an exception for financial liabilities settled using an electronic payment system. These financial liabilities can be derecognised before settlement if an entity makes an accounting policy choice to do so and certain conditions are met. The conditions include that the entity has no practical ability to withdraw, stop or cancel the payment instruction; the entity has no practical ability to access the cash to be used for settlement as a result of the payment instruction; and the settlement risk associated with the electronic payment system being used to make the payment is insignificant. The Group expect to make this accounting policy choice. 2) No material impact for the SPPI test is expected. 3) No material impact as a result of the new disclosures is expected.	Annual reporting periods beginning on or after 1 January 2026.
Amendments to IFRS 9 and IFRS 7 regarding power purchase arrangements	The amendments aim at enabling entities to include information in their financial statements that in the IASB's view more faithfully represents contracts referencing nature-dependent electricity.	This amendment is expected to have no material impact on current or future reporting.	Applicable to annual reporting periods beginning on or after 1 January 2026.

Notes to the Consolidated Financial Statements (continued)

1. Corporate information, basis of preparation and material accounting policies (continued)

Accounting Standard Update	Description of Change	Key impacts	Effective Date
Annual Improvements to IFRS Accounting Standards — Volume 11	The pronouncement comprises the following amendments: IFRS 1: Hedge accounting by a first-time adopter IFRS 7: Gain or loss on derecognition IFRS 7: Disclosure of deferred difference between fair value and transaction price IFRS 7: Introduction and credit risk disclosures IFRS 9: Lessee derecognition of lease liabilities IFRS 9: Transaction price IFRS 10: Determination of a 'de facto agent' IAS 7: Cost method	This amendment is expected to have no material impact on current or future reporting.	Applicable to annual reporting periods beginning on or after 1 January 2026.
IFRS 18 Presentation and Disclosures in Financial Statements	IFRS 18 Presentation and Disclosure in Financial Statements will replace IAS 1 Presentation of Financial Statements and introduces new requirements for the presentation and disclosure of information in the financial statements.	IFRS 18 introduces the following key new requirements: Entities are required to classify all income and expenses into five categories in the statement of profit or loss, namely operating, investing, financing, discontinued operations and income tax categories. Entities are also required to present a newly defined operating profit subtotal. Entities' net profit will not change. Management-defined performance measures (MPMs) are required for disclosure in a single note in the financial statements. Enhanced guidance is provided on how to group information in the financial statements. In addition, all entities are required to use the operating profit subtotal as the starting point for the SOCF when presenting operating cash flows under the indirect method. The Group is still in the process of assessing the impact of the new accounting standard, particularly with respect to the structure of the Group's statement of profit or loss, the SOCF and the additional disclosures required for MPMs and Aggregation/Disaggregation. The Group is also assessing the impact on how information is grouped in the financial statements, including for items currently labelled as 'other'.	Applicable to annual reporting periods beginning on or after 1 January 2026. Expected to be endorsed for use in the EU in Q1 2026.

1. Corporate information, basis of preparation and material accounting policies (continued)

Accounting Standard Update	Description of Change	Key impacts	Effective Date
IFRS 19 Subsidiaries without Public Accountability: Disclosures	IFRS 19 specifies the disclosure requirements an eligible subsidiary is permitted to apply instead of the disclosure requirements in other IFRS Accounting Standards.	This amendment is expected to have no material impact on current or future reporting.	Applicable to annual reporting periods beginning on or after 1 January 2027. Not yet endorsed for use in the EU.

1.9 Change in Accounting Estimates

Change in Accounting Estimate of useful life of intangible assets and property, plant and equipment (PPE)

In accordance with IAS 16 and IAS 38, Management completed a review of the Group's asset register to determine if the estimated range used for the Useful Estimated Life (UEL) of Intangible Assets and Property, Plant and Equipment remains appropriate.

As a result of this review, Management have revised the UEL of certain categories of Intangible Assets and Property, Plant and Equipment as follows:

Asset Category	Previous UEL (years)	New UEL (years)
Office equipment	5 – 7	15
Fixtures and fittings	7 – 10	7 – 15
Computer hardware	3 – 7	Various (up to 7)
Laptops and other IT peripherals	3	3
Other hardware	Various	7
Intangible fixed assets / Capitalised computer software	5 – 7	5 – 8
- Strategic Commercial	5 – 7	8
- Strategic Regulatory	5	8

Under IAS 16 and IAS 38, a change in useful life is deemed to be a change in accounting estimate as it relates to a change in circumstances (in accordance with IAS 8), and not a change in accounting policy. In this regard, there is no requirement for prior period adjustments to the 2024 comparatives in the Group's 2025 Financial Statements as a result of this change.

The change in estimate primarily affects the depreciation and amortisation expense recognised in the current and future periods. The impact on the current year is estimated to be a reduction in the depreciation and amortisation charge of approximately €16m, offset by other movements in the depreciation and amortisation charges for the year. For future periods, the change impacts the timing of depreciation and amortisation rather than the total charge.

The preparation of these consolidated financial statements, in conformity with IFRS, requires Management to make assumptions, estimates and judgements that affect the reported amounts of income, expenses, assets and liabilities and the accompanying disclosures. Uncertainty about these assumptions and estimates could result in outcomes that may require a material adjustment to the carrying amount of the assets or liabilities affected in future periods.

The current economic climate, with continued geopolitical instability, elevates the uncertainty associated with judgements, estimates and assumptions made by Management. The Irish economy demonstrated continued resilience in the current economic climate in 2025. The results of the actions taken by the Government, EBA and CBI point toward a positive trajectory. The Directors and Management, however, remain cautious and risk remains in the medium to long-term that the Irish banking sector will continue to face challenges, particularly due to higher capital requirements and new and emerging risks.

While the actual results may differ from the estimates made, the Directors believe that they are reasonable in the current circumstances based on the best available information at the date of the approval of these consolidated financial statements.

Assumptions, estimates and judgements are revised on an ongoing basis and where necessary are revised to reflect current conditions and updated information.

Change in Accounting Estimate on ECL.

See note 2 (a) for further details of change.

Notes to the Consolidated Financial Statements (continued)

2. Critical accounting estimates and judgements

Critical accounting estimates and judgements made by Management in applying accounting policies are set out below.

(a) Allowance for credit losses under IFRS 9

IFRS 9 requires an impairment allowance to be recorded for ECL on financial assets regardless of whether there has been an actual loss event. There is a requirement to track and assess changes in credit risk on financial instruments since origination and determine whether the credit risk on those financial instruments has increased significantly since initial recognition.

The following concepts introduce significant judgement within impairment and have a significant impact on the level of ECL allowances.

Determination of significant increase in credit risk (SICR)

The Group's criteria for assessing whether there has been a significant increase in credit risk can cause some volatility in the classification of performing exposures and the amount of the recognised ECL allowances in any accounting period. This is because, in line with IFRS 9, Stage 1 loans require a 12-month ECL whereas a lifetime ECL is recognised for Stage 2 loans.

Criteria to determine whether a significant increase in credit risk has occurred at the reporting date are set out in section 3.1, Risk Management.

Forward Looking Information (FLI)

The Group has adopted an ECL framework that reflects a component approach using PD, EAD and LGD components calibrated for IFRS 9 purposes. To adequately capture lifetime ECL, the Group also modelled early redemptions as a separate component within the ECL calculation. For long dated Non-Performing Loans, ECL is computed considering the present value of expected cashflows and expected recovery of collateral.

Judgement is combined with statistical evidence in determining which forward-looking variables are relevant for the Group's loan portfolios and in determining the extent by which through-the-cycle parameters should be adjusted for FLI to determine point-in-time parameters.

Changes in FLI variables applied to convert through-the-cycle PD and LGD into point-in-time parameters can either increase or decrease ECL impairment allowances in a particular accounting period. On update, increases in the level of optimism in the FLI variables will cause a decrease in ECL while increases in the level of pessimism in the FLI variables will cause an increase in ECL. These movements could be significant in the accounting period of update.

In its calculation of ECL allowance, the Group considers multiple scenarios and possible outcomes together with their probability of occurrence. Scenarios are designed to capture a range of outcomes. Each macroeconomic scenario in the Group's ECL calculation includes a projection of all relevant macroeconomic variables applied in the models for a five-year period, subsequently reverting to long-run averages.

The Group's approach applies extreme-but-plausible economic scenarios (i.e., underpinned by historical evidence) to estimate the distribution of ECL to which the Group is exposed. Using statistical techniques combined with expert credit judgement, the Group then formulates an unbiased probability weighted estimate of ECL at the reporting date. The Group's approach to economic scenario development for its residential mortgage portfolios underwent a review during 2025 as part of the redevelopment of the Group's IFRS 9 models.

Four scenarios (2024: 3 scenarios) are considered in the Group's calculation of ECL allowance for residential mortgages at the reporting date. The four-scenario narrative based approach considers current and emerging macroeconomic risks and outlook, which is the dominant approach from a market practice perspective. The base scenario is used for financial planning purposes. The Group considers one scenario that represents a macroeconomic environment that is more favourable to the central scenario and two scenarios that represents a macroeconomic environment that is less favourable to the central scenario. One of these less favourable scenarios represents a moderately adverse macroeconomic environment while the other represents an extreme but plausible environment.

The Group has maintained a three-scenario approach in its calculation of ECL allowance for unsecured and SME portfolios. The base scenario is identical to that used for the residential mortgage portfolios. The upside and downside scenarios represent extreme 1 in 20 scenarios backed by Irish historical context and international comparatives. An alignment in approach for all portfolios is expected in 2026 following redevelopment of the Group's unsecured and SME IFRS 9 models. Macroeconomic scenarios and associated weights are reviewed by the Asset and Liability Committee ("ALCo") before approval for use by the Board Risk and Compliance committee.

The tables below compare the key macroeconomic variables and probability weightings used for the year-end ECL process to those used at December 2024. Macroeconomic input parameters were last updated in December 2025.

The updated base case scenario reflects marginally higher unemployment forecasts and a worsening GDP outlook vs previous year, due to headwinds in the global economy as a result of geopolitical pressures.

2. Critical accounting estimates and judgements (continued)

Macroeconomic scenarios and weights for the residential mortgage models:

	31 December 2025					31 December 2024			
	Base Case		Upside 1 Scenario	Downside 1 Scenario	Downside 2 Scenario	Base Case		Upside Scenario	Downside Scenario
	Average value over Year 1	Average value over the forecast period	Average value over the forecast period	Average value for the forecast period	Average value over the forecast period	Average value over Year 1	Average value over the forecast period	Average value over the forecast period	Average value over the forecast period
Scenario Probability Weighting		50%	10%	30%	10%		54%	23%	23%
Irish Residential House Prices	2.5%	2.2%	4.1%	-0.4%	-3.0%	3.0%	2.2%	12.4%	-9.6%
Irish Unemployment Y/E	5.5%	4.8%	3.9%	6.9%	10.4%	6.0%	5.6%	3.8%	11.9%
Irish GDP	3.5%	3.2%	3.9%	0.6%	-0.4%	1.0%	2.4%	5.4%	-1.9%
Consumer Price Index	1.7%	1.9%	2.2%	1.8%	2.7%	2.0%	2.0%	1.9%	4.2%
ECB Base Rate	2.2%	2.2%	2.3%	2.0%	2.6%	2.2%	2.2%	0.9%	3.7%

The Group has applied a four scenario approach for residential mortgages at 31 December 2025. This approach is not directly comparable with the three scenario approach applied at 31 December 2024.

Macroeconomic scenarios and weights for the non-residential mortgage models:

	31 December 2025				31 December 2024			
	Base Case		Upside 2 Scenario	Downside 3 Scenario	Base Case		Upside Scenario	Downside Scenario
	Average value over Year 1	Average value over the forecast period	Average value for the forecast period	Average value over the forecast period	Average value over Year 1	Average value over the forecast period	Average value over the forecast period	Average value over the forecast period
Scenario Probability Weighting		54%	23%	23%		54%	23%	23%
Irish Residential House Prices	2.5%	2.2%	12.4%	-9.2%	3.0%	2.2%	12.4%	-9.6%
Irish Unemployment Y/E	5.5%	4.8%	3.8%	11.6%	6.0%	5.6%	3.8%	11.9%
Irish GDP	3.5%	3.2%	5.4%	-1.5%	1.0%	2.4%	5.4%	-1.9%
Consumer Price Index	1.7%	1.9%	1.9%	4.2%	2.0%	2.0%	1.9%	4.2%
ECB Base Rate	2.2%	2.2%	0.9%	3.7%	2.2%	2.2%	0.9%	3.7%

The Group has maintained a three scenario approach for non-residential mortgage portfolios at 31 December 2025. Full alignment in approach for all portfolios is expected in 2026 following redevelopment of the Group's unsecured and SME IFRS 9 models.

The macroeconomic scenarios used at the reporting date are described below.

Base scenario

The base scenario for the Irish economy, which is considered in the ECL measurement of all the Group's portfolios, has improved since mid-year following the confirmed scope of the US tariff levels on EU imports, the continued strong performance of Irish exports, and the robust underlying economic performance.

There has been a continued relatively strong performance in Q3 and into Q4 in the Irish economy, supporting a significantly better outturn for 2025 than was expected early in the year. In particular, the sharp outperformance from stock piling ahead of tariffs in Q1, has driven a forecast 9%+ GDP growth outturn in the Irish economy in 2025, while the underlying economy grows (MDD) at a more sustainable 2.5-3% level.

The significant shortfall in housing completion levels in 2025, has further deepened the underlying supply demand imbalance in the Irish housing market, resulting in a further strong upward movement in Residential Property Price Index of 7.3% in 2025. The outlook for house prices remains positive albeit at a lower growth rate, while affordability becomes more stretched across the country.

On unemployment the base expectation on the economy reflects a conservative assessment of the weakened outlook in global trade in 2025. Some further marginal weakness in the employment market is built into 2026 as global trade adjusts to the tariff regime however the worst of the tariff threats from earlier in the year have not materialised, decreasing the threat to unemployment in the medium term.

Notes to the Consolidated Financial Statements (continued)

2. Critical accounting estimates and judgements (continued)

Upside 1 scenario

The upside 1 scenario used in calculation of ECL allowance for residential mortgage portfolios reflects a much stronger outcome for the Irish economy than in the base scenario and considers accelerated Irish economic recovery driven by global stability.

Downside 1 scenario

The downside 1 scenario, which is used in calculation of ECL allowance for residential mortgage portfolios, is a moderately adverse scenario reflecting geopolitical threat/tariff risks. In this scenario, a breakdown in trade agreements between EU/US, higher tariffs, and retaliation result in a spike in unemployment from loss of exports both to the US and into the EU.

The slowdown in economic activity to a mild recession in Europe pushes down inflationary forces but while Irish inflation decelerates; the higher than target EU inflation significantly curtails monetary stimulus. Irish job losses in the multi-national corporations in Ireland is a key feature of this scenario and an economic slowdown pushes a downward shift in house prices.

Downside 2 scenario

The downside 2 scenario, which is used in calculation of ECL allowance for residential mortgage portfolios, is an extreme but plausible scenario based on a global recession. In this scenario, significant increase in inflation coupled with major global economic shock results in a major global recession.

Debt markets see major volatility from the failures of significant non-bank lenders and weaker corporates. This triggers prolonged deceleration in Irish economic activity and a major and sustained increase in unemployment. Higher inflation directly inhibits the ECB's ability to react to the crisis and fiscal spending is significantly curtailed from the sharp decrease in tax receipts and higher debt costs resulting in a sustained period of house price decreases.

Upside 2 scenario

The upside 2 scenario used in calculation of ECL allowance for unsecured and SME portfolios is an extreme 1 in 20 positive scenario developed to reflect a much stronger outcome for the Irish economy than the base scenario.

Downside 3 scenario

The downside 3 scenario, which is used in calculation of ECL allowance for unsecured and SME portfolios, is an extreme scenario backed by Irish historical context and international comparatives. The scenario captures statistical extremes in unemployment, GDP and HPI, while maintaining plausibility as a 1 in 20 scenario.

Scenario application

Determining probability weightings of the scenarios and forecasting FLI in respect of those scenarios requires a significant degree of Management judgement. The reported ECL allowance is impacted by the probability weighting attributed to each macroeconomic scenario.

If the Group were to only use its base case scenario for the measurement of ECL for the residential mortgage portfolios, excluding overlay adjustments to modelled ECL outcomes, the ECL impairment allowance would be €7m less than reported at 31 December 2025.

Similarly, excluding overlay adjustments to modelled ECL outcomes, if the Group were to only apply its upside scenario for the measurement of ECL for the residential mortgage portfolios, the ECL impairment allowance would be €13m less than reported at 31 December 2025. Whereas, if the Group were to only use its downside 1 scenario, the ECL impairment allowance would be €6m greater than reported at 31 December 2025 and if the Group were to only use its downside 2 scenario, the ECL impairment allowance would be €31m greater than reported at 31 December 2025.

If the Group were to only use its base case scenario for the measurement of ECL for the unsecured and SME portfolios, excluding overlay adjustments to modelled ECL outcomes, the ECL impairment allowance would be €9m less than reported at 31 December 2025.

Similarly, excluding overlay adjustments to modelled ECL outcomes, if the Group were to only apply its upside scenario for the measurement of ECL for the unsecured and SME portfolios, the ECL impairment allowance would be €20m less than reported at 31 December 2025. Whereas, if the Group were to only use its downside 3 scenario, the ECL impairment allowance would be €46m greater than reported at 31 December 2025.

The BAC review the adequacy of ECL allowance on a half-yearly basis. Due to the relative sizes of the portfolios, the key judgemental area for the Group is in relation to the level of ECL calculated for the residential mortgage portfolio.

Management judgement has been incorporated into the Group's impairment measurement process for the period and includes:

- Non-modelled ECL measurement for a cohort of aged residential mortgage defaults;
- Criteria applied to determine significant increase in credit risk;
- Management adjustment in impairment model parameters; and
- Overlay adjustments to modelled ECL outcomes.

2. Critical accounting estimates and judgements (continued)

Impairment measurement

	31 December 2025 €m	31 December 2024 €m
Modelled ECL	162	256
Non-modelled ECL	84	-
Impairment loss allowance pre management adjustments	246	256
Management adjustments:		
Applied to impairment model parameters	17	44
<i>Overlay adjustments to modelled ECL outcomes:</i>		
- Non-performing loans	-	35
- Model to be developed	9	10
- Forward-looking outlook	24	21
- Model limitations	24	26
Total management adjustments	74	136
Total ECL	320	392

Non-modelled ECL – ECL measurement for a cohort of aged residential mortgage defaults

As part of the Group's redevelopment of the IFRS 9 Mortgage LGD model during 2025 it was determined that the chosen modelling approach, which is aligned more closely with the Group's forward looking NPL strategy, did not appropriately capture the risk of elevated loss outcomes for a legacy cohort of aged Stage 3 exposures. The ECL on this cohort is now determined through the application of a Discounted Cash Flow (DCF) measurement method which takes into account current and expected payment patterns on this cohort and assumptions with respect to collateral recoverability. This measurement is expected to be retained until the aged defaults are resolved or no longer material. The total ECL on this cohort (which is included within Stage 3 ECL) is €84m.

Criteria applied to determine significant increase in credit risk

The Group considers both quantitative and qualitative measures, including other reasonable and supportable information that would not otherwise be considered, in the assessment of whether a significant increase in credit risk (SICR) has arisen. Further details on the Group's approach to assessing SICR are set out in section 3.1, Risk Management, Loan impairment. A collective staging assessment applied at December 2024 in respect of a cohort of customers who could be disproportionately impacted by headwinds has been removed as this risk did not materialise in 2025.

Management Adjustments

Management adjustment applied to impairment model parameters

At December 2025, the residential mortgage LGD parameter utilised in the ECL calculation was updated to reflect Management adjustment in respect of proceeds arising from the Glas 3 and 3.1 portfolio loan sales (+€17m). Changes in individual exposure LGD does not impact staging classification.

Overlay adjustments to modelled ECL outcomes

Overlay adjustments approved for 31 December 2025 (with 2024 comparison where applicable), are set out below and categorised as follows:

Non-performing Exposures (NPE)

Previously held overlays in respect of Stage 3 residential mortgage loans that are in default for a prolonged period are removed and have been absorbed within the Group's Non-modelled Stage 3 ECL measurement.

Model to be Built

A €9m overlay has been applied in respect of portfolios which were acquired from Ulster Bank in 2023. This overlay incorporates minimum provision coverage floors, based on pre-determined benchmarks. Given the nature of these acquisitions, the overlay is applied at portfolio level which does not give rise to a staging adjustment. The development of specific impairment models for these portfolios, planned for H1 2026, is expected to remove the requirement for this overlay.

Notes to the Consolidated Financial Statements (continued)

2. Critical accounting estimates and judgements (continued)

Model Limitations

A €24m overlay has been applied to mitigate model-related risks. It incorporates minimum provision coverage floors, informed by internal data and industry benchmarks. This overlay predominantly relates to Stage 2 mortgage exposures. Management is of the view that completion of a full 12-month monitoring cycle for the new residential mortgage ECL models and deployment of a new SME mortgage ECL model is required prior to the unwind of this overlay. The requirement for this overlay is expected to reduce in 2026 as these key milestones in the IFRS 9 Provision Models Programme are met.

Forward-Looking Outlook

The Group is forward-looking in its risk identification process to ensure emerging risks are identified. It acknowledges that not all forward-looking adjustments can be considered in IFRS9 models and as a result will require reassessment on a regular basis.

A €24m overlay to reflect the uncertainty associated with the current economic headwinds comprises of:

- €16m in respect of specific commercial sectors where management consider heightened default risk associated with emerging risks not captured within modelled results (31 December 2024: €15m) with impacted obligations and associated overlay reported as Stage 2;
- €8m in respect of Stage 2 residential mortgage accounts to reflect heightened geopolitical headwinds (31 December 2024: €3m).
- An overlay of €3m held at December 2024 in respect of performing consumer accounts, is no longer deemed necessary due to observed prudence in the modelled ECL for this portfolio.

(b) Deferred taxation

At 31 December 2025, the Group had a net DTA of €304m (31 December 2024: €316m), see note 25 for further details.

DTA are recognised only to the extent that it is probable that future taxable profits will be available against which the asset can be utilised. The recognition of a DTA relies on Management's judgements surrounding the probability and adequacy of future taxable profits and the reversals of existing taxable temporary differences.

The most important judgement relates to Management's assessment of the recoverability of the DTA relating to carried forward tax losses, being €307m at 31 December 2025. The full DTA on tax losses relates to tax losses generated in the PTSB legal entity (i.e. no DTA is being recognised on tax losses carried forward in any other Group company).

The assessment of recoverability of this asset requires significant judgements to be made regarding the projection of long-term profitability because the period over which recovery extends. In addition, given the Group's history of recent losses, in accordance with IAS 12, there must be convincing other evidence to underpin this assessment.

In making the assessment, the Board considered the following factors:

- The current macroeconomic environment and external forecasts for the Irish economy particularly in light of the geopolitical environment, the forecast interest rate movements and inflationary risks;
- The current expected trajectory of the Group's financial performance;
- The impairment performance;
- The Group's projected liquidity and capital position;
- The absolute level of DTA on tax losses compared to the Group's equity;
- The quantum of profits required to be generated to utilise the tax losses and the extended period of time over which these profits are projected to be generated;
- The challenge of forecasting over an extended period and in particular taking account of external factors such as global political uncertainty, the level of competition and disruptors to the market and market size;
- Consideration of the assumptions underpinning the Group's financial projections (on which analysis of the recoverability of the DTA on tax losses are based). The key relevant assumptions considered being:
 - No material change to the Group's business activities in the medium term;
 - Further progress in addressing the Group's non-performing assets;
 - Net Interest Margin is also expected to be positively impacted by the evolution of the Group's lending book as new lending volumes are added and lower yielding tracker mortgages pay down; however, further material reductions in cost of funds are considered unlikely;
 - Continued focus on cost management; and
 - The cost of risk will continue its return to normalised levels reflecting the Group's assessment of the medium to long term average; and
- Consideration of forecasting risks, including sensitivity analysis on the financial projections, such sensitivity analysis including the affect of higher than expected impairments, cost of funds or operating expenditure, and lower than expected asset yields, new lending or ECB rates.

2. Critical accounting estimates and judgements (continued)

Taking the above factors into account, and in the absence of any expiry date for the utilisation of carried forward tax losses in Ireland, the Board have concluded that it is more likely that there will be sufficient taxable profits against which the losses can be utilised and on the basis of the assessment above, continue to recognise €307m of a DTA on tax losses in the SOFP as at 31 December 2025.

In this regard, the Group has carried out an exercise to determine the likely number of years required to utilise the DTA arising on tax losses carried forward. Based on the Group's latest MTP 2026-2030 and assuming a level of profitability growth consistent with GDP growth of approximately 2%, it will take c. 9 years for the DTA on tax losses of €307m to be utilised. A level of profitability consistent with GDP growth continues to be considered by Management to be appropriate given the Group's primarily domestic retail focus and the expectation arising therefrom that, over the long-term, the Group's performance would be expected to broadly track the performance of the Irish economy, with modest GDP growth expected over the medium term. Management are of the view that a long-term assumed growth rate of 2% is not unreasonable in this context.

IFRS does not allow for the DTA recognised to be discounted notwithstanding that it is likely to take a number of years for it to be recovered.

The expected period of time to full utilisation of the DTA is broadly in line with that at 31 December 2024 where the DTA was expected to be utilised by 2036. Assumptions underpinning the DTA recoverability analysis are broadly in line with prior periods.

Management make certain judgements in the process of applying the Group's accounting policies which may impact on amounts recognised in the financial statements and consequently on taxable profits and the utilisation of tax losses. As set out in note 25, analysis carried out demonstrates that were certain adverse events to arise (see below for further detail of the adverse events considered) it continues to be Management's view that there would be sufficient future taxable profits against which the full quantum of tax losses carried forward could be utilised, albeit that the period of time over which such utilisation would occur would be extended.

The analysis of the estimated utilisation of the DTA arising on tax losses carried forward in the Group is based on the current business model of the Group.

The recognition of this asset is dependent on the Group earning sufficient profits to utilise the tax losses. The quantum of and timing of these profits is a source of significant estimation uncertainty. However, as a principle, the Group is expecting to be profitable in the medium term. Consequently, the key uncertainty relates principally to the time period over which these profits will be earned. While the Group may be more or less profitable in certain periods owing to various factors such as the interest rate environment, loan loss provisions, operating costs and the regulatory environment, Management expect that, notwithstanding these, the Group will be profitable over the long term. Consequently, any change to these factors which would ultimately impact on profitability, are highly subjective, but will only impact on the time period over which this asset is recovered.

As set out above, in assessing the appropriateness of recognising a DTA on tax losses carried forward, Management has considered the impact of various stress case scenarios on the period of recoverability. The three scenarios identified as having potentially significant implications for the DTA recoverability are (i) adverse changes in the interest rate environment, (ii) increased impairment charges and (iii) increases in operating costs. These stress case scenarios are intended to simulate a situation where there is an economic downturn. If any one of the stress case scenarios were to occur, within a reasonably possible range, it is the Group's expectation that the time period over which these assets would be unchanged. If all adverse assumptions were to arise the period of recoverability would be extended by 2 years (i.e. full utilisation by 2036). However, Management consider this scenario unlikely. Changes in these assumptions are most impacted by changes to house prices and unemployment, which represent the majority of any expected stress loss which could occur. This position will continue to be reviewed for each reporting period; however, much of this estimation uncertainty may not be resolved for a number of years. Based on the Group's latest MTP 2026 – 2030, it is Management's estimate that the expected time period for recovery of the DTA on tax losses to be 9 years, i.e. full utilisation is expected by 2034.

(c) Fair Value of Financial Instruments

The Group's accounting policy for the determination of fair value of financial instruments is set out in note 1(vii)(e). The best evidence of fair value is quoted prices in an active market. The absence of quoted prices increases reliance on valuation techniques and requires the use of judgement in the estimation of fair value. This judgement includes evaluating available market data, determining the expected cash flows for the instruments, as well as identifying and applying an appropriate discount rate and credit spread.

Valuation techniques that rely on non-observable data require a higher level of Management judgement in estimating the fair value compared to those based on observable data.

The quality of market data, valuation techniques and other inputs into the valuation models used are subject to internal review and approval.

Notes to the Consolidated Financial Statements (continued)

2. Critical accounting estimates and judgements (continued)

The Group carries certain financial assets at fair value. In estimating the fair value of these assets and derivatives, the Group seeks to use quoted market prices (level 1). Where quoted market prices are not available, the Group applies valuation techniques which use observable inputs including quoted prices of financial instruments themselves or quoted prices of similar instruments – in either active or inactive markets (level 2) but where this is not possible, a degree of judgement is used (level 3). Such judgement considerations typically include items such as interest rate yield curves, equity prices, option volatilities and currency rates.

Further details of the fair value of financial assets and liabilities are set out in note 35.

(d) Impairment review of its subsidiary undertaking

The Company carries its investment in its subsidiary undertaking at cost and reviews whether there is any indication of impairment at each reporting date. Impairment testing involves comparing the carrying value of the investment to its recoverable amount. The recoverable amount is the higher of the investment's fair value or its VIU.

An impairment charge arises if the carrying value exceeds the recoverable amount and where the carrying value is not supported by the estimated discounted future cash flows of the underlying business. Management note that the market capitalisation of the Group is lower than its net assets. It is noted that the market capitalisation does not include a control premium. The recoverable amount of the investment is the higher of its fair value less costs to sell or its VIU. The carrying value of the investment in PTSB is €1,960m and recoverable amount based on the VIU was €1,968m resulting in no additional impairment charge for the year (31 December 2024: €263m impairment charge).

The VIU is the present value of the future free cash flows expected to be derived from the investment, based upon a VIU calculation discounted at an appropriate rate for the investment.

The recoverable amount reflecting Management's best estimate is sensitive to changes in the following key assumptions:

Cash flow forecasts

Cash flow forecasts are based on internal management information used for strategic planning for a period of up to five years, after which a long-term growth rate appropriate for the business is applied. The key cash flows in these forecasts are as follows:

- Forecasted net lending growth, which is based on historical experience of the Group, strategic priorities and direction;
- Forecasted SME business and increase in fee based income portfolio stems from the targets for the coming years;
- Increase in revenue reflective of balance sheet growth;
- Operating profits based on historical experience and average margins;
- Impairment charge based on historical experience and forecasted general macro-economic outlook; and
- Deposits projections based on the liquidity funding needs of the Groups.

The projected cash flows are stress tested with actual performance and verifiable economic data annually to reflect current market conditions and Management's best estimates of future projections.

Growth rate

Growth rate is determined by reference to long-term economic growth and does not exceed the relevant long-term average growth rate of the industry in which it operates. A growth rate of 2% (31 December 2024: 2.5%) was used.

Discount rate

The discount rate used is a post-tax weighted average cost of capital of the Group of 13.5% (31 December 2024: 11.5%) as the cash flows used in impairment assessment are post-tax cash flows. The discount rate includes an additional risk premium to account for various specific risks. These specific risks are not reflected in the cash flows projected for impairment analysis.

The discount rate is used for various internal pricing models and is benchmarked with the industry averages to cater for any changes in risk profile of the Group.

Sensitivity analysis

The impact of changes in the growth rate, the discount rate and cash flows has been assessed by the Directors:

- A decrease in ECB interest rate of 100bps would lead to a VIU of €1,721m, resulting in an additional impairment charge of €239m;
- An increase in ECB interest rate of 100bps would lead to a VIU of €2,233m, resulting in full write back of the previous impairment charges of €263m;
- An increase in operating expenses of €20m per annum, would lead to a VIU of €1,804m, resulting in an additional impairment charge of €156m;
- A decrease in operating expenses of €20m per annum, would lead to a VIU of €2,131m, resulting in a partial impairment write back of €171m;

2. Critical accounting estimates and judgements (continued)

- A decrease of 1% in long-term growth rate would lead to a VIU of €1,842m, resulting in an additional impairment charge of €118m;
- An increase of 1% in long-term growth rate would lead to a VIU of €2,117m, resulting in a partial impairment write back of €157m;
- An increase of 1% in the discount rate would lead to a VIU of €1,784m, resulting in an additional impairment charge of €176m; and
- A decrease of 1% in the discount rate would lead to a VIU of €2,188m, resulting in a partial impairment write back of €228m

A reasonably possible change in the above assumptions could result in the carrying amount of the investment in subsidiary undertaking exceeding its recoverable amount. The amount by which each assumption must change in order for the recoverable amount to equal the carrying amount is as follows:

Key Assumption	Change Increase/(decrease)
Overall cash flow projections (year 5)	€ (15)m
Discount rate	0.04%
Growth Rate	(0.06%)

3. Operating segments

The Group reports one operating segment which reflects the internal management reporting structure of the Group and how the Chief

Operating Decision Maker (CODM) assesses performance and allocates resources. The ExCo as the CODM is responsible for implementing the strategic management of the Group as guided by the Board. The ExCo reviews key performance indicators and internal management reports on a monthly basis.

In line with IFRS 8, the Group also reports revenue from external customers for each major group of products and services. The amount of revenue reported is based on the financial information used to produce the Group's financial statements.

The Group has assessed its operating segments and continues to be satisfied that there is only one operating segment based on reporting to the CODM, in accordance with IFRS 8. The requirements of IFRS 8 will continue to be assessed on an ongoing basis as the Group's business develops.

3.1 Revenue from external customers split by products and services

The sources from which the Group earns external revenue are: interest income; fee and commission income; net trading income; and other operating income. Total revenue from external customers was €989m (31 December 2024: €1,002m). The main products from which the Group earns external revenue include: mortgages; consumer finance; treasury assets; and wholesale funding. The interest income from these products is set out in the table below. Interest income from external customers split by product:

	31 December 2025 €m	31 December 2024 €m
Mortgages	663	673
Consumer finance*	73	74
Treasury assets	99	65
Wholesale funding**	43	87
Total	878	899

* Consumer Finance comprises income from term loans, credit cards, overdrafts and asset financing.

** Wholesale funding comprises Loans and advances to other banks.

3.2 Profit for the year based on geographical location

During the year ended 31 December 2025 the Group's profit was incurred solely in Ireland. During the year ended 31 December 2024 the Group's profit was incurred solely in Ireland.

3.3 Assets and liabilities based on geographical location

All assets and liabilities were held in Ireland at 31 December 2025 and 31 December 2024.

Notes to the Consolidated Financial Statements (continued)

4. Net interest income

	Year ended 31 December 2025 €m	Year ended 31 December 2024 €m
Interest income		
Loans and advances to customers	706	718
Loans and advances to banks	43	87
Debt securities and other fixed-income securities	99	65
Interest income calculated using the EIR method	848	870
Other interest income*	30	29
Total interest income	878	899
Interest expense		
Deposits from banks	(3)	(23)
Due to customers	(184)	(139)
Debt securities in issue	(92)	(114)
Loans and advances to banks	(1)	(1)
Subordinated liabilities	(7)	(9)
Lease liabilities	(1)	(1)
Interest expense	(288)	(287)
Net interest income	590	612

* Other interest income consists of interest income on lease receivables.

Net interest income includes a charge of €43m (31 December 2024: €32m) in respect of deferred acquisition costs and €20m (31 December 2024: €22m) amortisation on the business combination related fair value adjustments. Other interest income includes a charge of €3m (31 December 2024: €2m) in respect of deferred acquisition costs and €1m (31 December 2024: €2m) amortisation on the business combination related fair value adjustments.

Debt securities in issue includes €7m net interest income on derivatives that are in a hedge relationships (31 December 2024: €12m net interest expense) and subordinated liabilities contains €2m net interest income on derivatives that are in a hedge relationships (31 December 2024: €1m net interest expense).

5. Net fee and commission income

	Year ended 31 December 2025 €m	Year ended 31 December 2024 €m
Fee and commission income		
Retail banking and credit card fees	91	86
Brokerage and insurance commission	12	11
Other fees and commission income	1	1
Fee and commission income	104	98
Fee and commission expense*	(46)	(43)
Net fee and commission income	58	55

* Fees and commission expenses primarily comprises of retail banking and credit card fees.

6. Net trading Income

	Year ended 31 December 2025 €m	Year ended 31 December 2024 €m
Held-for-trading		
Trading Swaps	2	-
Foreign exchange swaps	3	2
Net trading income	5	2

7. Administrative, staff and other expenses (excluding exceptional items)

	Year ended 31 December 2025 €m	Year ended 31 December 2024 €m
Staff costs (as detailed below)	231	233
Other general and administrative expenses	184	186
Administrative, staff and other expenses (excluding exceptional items)	415	419

Administrative, staff and other expenses (excluding exceptional items) includes costs of €3.7m relating to legacy legal cases (2024: €3m).

Fees paid to the Group's auditors for services outlined below

	Year ended 31 December 2025 €m	Year ended 31 December 2024 €m
Statutory auditor's remuneration (including expenses and excluding VAT)		
- Audit of the individual and the Group financial statements	2.2	2.0
- Other assurance services*	0.4	0.6
- Other non-audit services**	0.1	0.2

* Other assurance services in 2025 & 2024 relate to interim financial statement review, CSRD Regulations and Country by Country Reporting.

** Other non-audit services in 2025 & 2024 include ID&V vendor assessment and Euro Note Programmes.

Notes to the Consolidated Financial Statements (continued)

7. Administrative, staff and other expenses (excluding exceptional items)(continued)

Staff costs

	Year ended 31 December 2025 €m	Year ended 31 December 2024 €m
Wages and salaries (including commission payable to sales staff)	207	205
Social insurance	23	22
Pension costs (payments to defined contribution pension schemes)	21	21
Total staff costs	251	248
Staff costs capitalised	(20)	(15)
Total staff costs included in the Income Statement	231	233

Staff redundancy for the year ended 31 December 2025 and 31 December 2024 are included as part of note 9 exceptional items.

Staff costs of €20m (31 December 2024: €15m), have been capitalised to intangible assets (see note 24), as the cost incurred was directly related to developing software and it is probable that future economic benefits that exceed its cost will flow from its use over more than one year. Therefore, these costs are excluded from staff costs.

Staff numbers

Closing and average number of staff (including Executive Directors) employed during the year are as follows:

	Closing staff numbers*		Average staff numbers	
	2025	2024	2025	2024
Customer facing	1,047	1,198	1,112	1,194
Non-customer facing	1,979	2,161	2,111	2,155
Total number of staff	3,026	3,359	3,223	3,349

* Closing staff numbers are calculated on a full time equivalent (FTE) basis.

8. Bank levy and other regulatory charges

	Year ended 31 December 2025 €m	Year ended 31 December 2024 €m
Bank levy	23	23
Other regulatory charges	2	10
Bank levy and other regulatory charges	25	33

Other regulatory charges include €3m for the Central Bank Industry Funding Levy (CBI) (31 December 2024: €4m) and €2m related to other regulatory charges (31 December 2024: €2m), partially offset by the reversal of a €3m accrual relating to the Deposit Guarantee Scheme (DGS), which no longer applies as the scheme is now fully funded.

9. Exceptional items

	Year ended 31 December 2025 €m	Year ended 31 December 2024 €m
Voluntary severance and other (a)	42	2
Impairment arising from deleveraging of loans (b)	-	(2)
Exceptional cost/(release)	42	-

(a) Voluntary severance and other costs of €42m (31 December 2024: €2m) relate to costs incurred as part of the Group's voluntary severance scheme (€35m), additional costs arising in respect of a previous disposal of a business (€4m) and costs relating to the commencement of the Formal Sale Process (€3m).

(b) The definition of exceptional items was refined to exclude profit or loss on material loan deleveraging post 31 December 2021 (including any increase in impairment arising solely as a result of the sale of loans) due to the sale of loans becoming part of the Group's normal recovery strategy.

During 2025, warranty provisions and accruals of €nil (31 December 2024: €2m) were released in relation to loan deleveraging transactions that the Group executed pre 31 December 2021.

The Group considers these releases as exceptional as the warranties were previously recorded through exceptional impairment. This treatment is consistent with the treatment of losses on deleveraging of loans in prior years.

10. Taxation

(a) Analysis of taxation charge

	Year ended 31 December 2025 €m	Year ended 31 December 2024 €m
Current taxation		
Charge for current year	1	1
	1	1
Deferred taxation		
Origination and reversal of temporary differences	13	(4)
Deferred taxation recognised in the income statement (note 25)	13	(4)
Taxation charged to income statement	14	(3)
Effective tax rate	11%	(2%)

The Group taxation for the year ended 31 December 2025 was €14m charge (31 December 2024: €3m credit). The current tax charge of €1m (31 December 2024: €1m) arises on trading income and certain non trading transactions, subject to the chargeable gains regime. Please refer to note 25 'Deferred taxation' for details of the components of deferred taxation.

Notes to the Consolidated Financial Statements (continued)

10. Taxation (continued)

(b) Reconciliation of standard to effective tax rate

	Year ended 31 December 2025 €m	Year ended 31 December 2024 €m
Profit on the Group activities before tax	128	159
Tax calculated at standard ROI corporation tax rate of 12.5% (2024: 12.5%)	16	20
Previously unrecognised tax losses	-	(16)
Adjustments of tax for prior periods	-	(6)
Other	(2)	(1)
Taxation charged to income statement	14	(3)

(c) Tax effects of each component of OCI

	Year ended 31 December 2025		
	Gross €m	Tax €m	Net €m
Revaluation of property	(4)	1	(3)
- Current tax on property disposal	(5)	1	(4)
- Deferred tax on property disposal	5	(1)	4
Fair value reserve:			
- Change in fair value of equity instruments	-	-	-
- Current tax on equity instrument disposal	(8)	2	(6)
- Deferred tax on equity instrument disposal	8	(2)	6
31 December 2025	(4)	1	(3)

	Year ended 31 December 2024		
	Gross €m	Tax €m	Net €m
Revaluation of property	(11)	4	(7)
- Current tax on property disposal	(1)	-	(1)
- Deferred tax on property disposal	1	-	1
Fair value reserve:			
- Change in fair value of equity instruments	4	(1)	3
- Current tax on equity instrument disposal	-	-	-
- Deferred tax on equity instrument disposal	-	-	-
31 December 2024	(7)	3	(4)

11. Earnings per ordinary share

(a) Basic earnings per ordinary share

	Year ended 31 December 2025	Year ended 31 December 2024
Weighted average number of ordinary shares in issue and ranking for dividend excluding treasury shares	544,991,596	545,458,174
Profit for the year attributable to equity holders	€114m	€162m
Less AT1 coupon paid (see note 33)	(€43m)	(€43m)
Profit for the year attributable to equity holders less AT1 coupon paid	€71m	€119m
Basic earnings per ordinary share (€ cent)	13.0	21.7

(b) Diluted earnings per ordinary share

	Year ended 31 December 2025	Year ended 31 December 2024
Weighted average number of ordinary shares excluding treasury shares held under employee benefit trust used in the calculation of diluted earnings per share	544,991,596	545,458,174
Diluted earnings per ordinary share (€ cent)	13.0	21.7

Diluted earnings per ordinary share is calculated by adjusting the weighted average number of ordinary shares outstanding to assume conversion of all dilutive potential ordinary shares.

No adjustment to the weighted average number of ordinary shares for the effects of dilutive potential ordinary shares was required for the year ended 31 December 2025 or 31 December 2024, as the AT1 securities issued in 2022 and 2020 have no conversion features within the securities.

Weighted average number of ordinary shares*

	2025	2024
Number of ordinary shares in issue at 1 January (note 33)	544,996,176	545,589,119
Treasury shares held (note 33)	(4,580)	(4,580)
Net movements during the year		
Weighted average shares bought back**	-	(126,365)
Weighted average number of ordinary shares	544,991,596	545,458,174

* When calculating the earnings per share, the weighted average number of ordinary shares outstanding during the year and all years presented shall be adjusted for events other than the conversion of potential ordinary shares that have changed the number of ordinary shares without a corresponding change in reserves.

** On the 14 October 2024 the Group completed a share buyback of 592,943 ordinary shares. See note 33 for further details.

There are no instruments with a potential to be converted to ordinary shares at 31 December 2025. The AT1 securities issued in 2022 and 2020 have no conversion features within the securities.

Notes to the Consolidated Financial Statements (continued)

12. Cash and cash equivalents

For the purpose of the SOCF, cash and cash equivalents comprise the following:

	31 December 2025	31 December 2024
	€m	€m
Cash at bank	75	72
Items in the course of collection	25	23
Loans and advances to banks repayable on demand (maturity of less than 3 months) (note 13)	1,719	2,202
Cash and cash equivalents as per SOCF	1,819	2,297

At 31 December 2025, restricted cash of €158m (31 December 2024: €181m) (which is within Loans and advances to banks repayable on demand) consists of cash of €158m (31 December 2024: €180m) held by the Group's securitisation entities and €nil (31 December 2024: €1m) which relates to cash collateral placed with counterparties in relation to derivative positions and repurchase agreements.

The following contractual restrictions apply to our securitisation vehicles cash balances:

- Each vehicle must hold an amount equal to a percentage of the outstanding notes in a reserve account on demand as part of the credit enhancement and liquidity support rules.
- These funds can only be used to fund any revenue shortfall for contractual payments and must be replenished as soon as additional funds are available.
- When the notes are fully repaid these reserve funds can be used to pay outstanding principal on the subordinated loan.

13. Loans and advances to banks

	31 December 2025	31 December 2024
	€m	€m
Held at amortised cost		
Placed with central banks	1,398	1,887
Placed with other banks	321	315
Loans and advances to banks	1,719	2,202

Placements with other banks includes restricted cash of €158m (31 December 2024: €181m) of which €158m (31 December 2024: €180m) is held by the Group's securitisation entities and €nil (31 December 2024: €1m) which relates to cash collateral placed with counterparties in relation to derivative positions and repurchase agreements. The fair value of collateral pledged by counterparties in relation to reverse repurchase agreements at 31 December 2025 is €nil (31 December 2024: €341m).

Loans and advances to banks amounting to €1,719m (31 December 2024: €2,202m) have a maturity of less than three months and therefore have been treated as cash and cash equivalents, with the exception of restricted cash as noted above.

14. Derivative financial instruments

Derivative instruments are used by the Group, for Risk Management purposes, to hedge against interest rate risk and foreign currency risk.

Certain derivative instruments, while being economic hedges, do not fulfil the hedge accounting criteria under IFRS 9 and are consequently classified as HFT. All derivatives are carried at fair value.

The derivative instruments used by the Group include:

- Currency forward rate contracts, which are commitments to purchase and sell currencies, including undelivered spot transactions; and
- Interest rate swaps which involve the exchange of fixed and variable rate interest payments between two parties at specified times based on a common nominal amount and maturity date.

Further details on the Group's Risk Management policies in connection with Derivatives and the policy surrounding Hedge Accounting are set out in section 3.3 of the Risk Management Report.

The notional amounts and fair values of derivative instruments held by the Group are set out in the table below:

	31 December 2025			31 December 2024		
	Contract/ notional amount	Fair value asset	Fair value liability	Contract/ notional amount	Fair value asset	Fair value liability
	€m	€m	€m	€m	€m	€m
Derivatives held for hedging						
Interest rate swaps	1,011	21	(4)	1,900	59	-
	1,011	21	(4)	1,900	59	-
Derivatives held for trading						
Currency Forwards	49	-	-	51	-	-
Interest rate swaps	199	3	-	-	-	-
	248	3	-	51	-	-
Derivative financial instruments as per the SOFP	1,259	24	(4)	1,951	59	-

Fair value hedges on interest rate risk

The Group uses fair value hedge accounting for hedge relationships to protect against changes in the fair value of financial assets and financial liabilities due to movements in interest rates. The Group uses interest rate swaps to hedge interest rate risk. The financial instruments that are currently hedged for interest rate risk are fixed rate debt securities in issue, subordinated liabilities, fixed rate retail mortgages and fixed rate retail deposits. During 2025 fixed rate retail mortgages and fixed rate retail deposits were added to the Group hedging strategy. All hedging instruments are included within derivative financial instruments on the balance sheet and hedged ineffectiveness is included within net trading income in the income statement (31 December 2025 €nil, 31 December 2024 €nil).

During 2025, interest rate swaps designated as hedging instruments for €1,000m of Debt Securities in Issue were terminated. In accordance with IFRS 9, hedge accounting was discontinued from the termination date, as the hedging instruments ceased to exist. On the termination date, the cumulative fair value hedge adjustment attributable to the hedged debt security was calculated and incorporated into the bond's amortisation schedule. This adjustment has been reflected in the EIR and will be amortised to the income statement over the remaining contractual life of the debt security.

In September 2025 c. 80% (€200m) of the €250m Tier 2 instrument was repurchased. The hedge adjustment on the repurchase date was calculated and included in the carrying value used for the calculation of the gain on repurchase recognised in net other operating income/expense. The hedge adjustment was not retained on the balance sheet and amortised as the portion of the T2 instrument that it related to was derecognised from the balance sheet. The swap remains in place and the hedging portion of the swap will be rebalanced going forward. The portion relating to the repurchased bond will be recognised as a trading position with gains/losses and net interest income/expense recognised in net trading income/expense.

The Group held the following interest rate swaps as hedging instruments in fair value hedges of interest rate risk at 31 December 2025 and 31 December 2024.

Notes to the Consolidated Financial Statements (continued)

14. Derivative financial instruments (continued)

Fair value hedges - interest rate swaps

31 December 2025	Less than 1 month	1 to 3 months	3 months to 1 year	1 to 5 years	5 years +
Liabilities:					
Hedges of debt securities in issue*					
Nominal principal amount (€m)	-	-	-	650	-
Average interest rate (%)	-	-	-	3.17%	-
Hedges of subordinated debt*					
Nominal principal amount (€m)	-	-	51	300	-
Average interest rate (%)	-	-	3.48%	2.27%	-
Hedges of retail deposits**					
Nominal principal amount (€m)	-	-	-	5	-
Average interest rate (%)	-	-	-	1.82%	-
Assets					
Hedges of retail mortgages***					
Nominal principal amount (€m)	-	-	-	5	-
Average interest rate (%)	-	-	-	1.84%	-
31 December 2024	Less than 1 month	1 to 3 months	3 months to 1 year	1 to 5 years	5 years +
Liabilities:					
Hedges of debt securities in issue*					
Nominal principal amount (€m)	-	-	-	1,650	-
Average interest rate (%)	-	-	-	2.85%	-
Hedges of subordinated debt*					
Nominal principal amount (€m)	-	-	-	250	-
Average interest rate (%)	-	-	-	3.48%	-
Hedges of retail deposits**					
Nominal principal amount (€m)	-	-	-	-	-
Average interest rate (%)	-	-	-	-	-
Assets					
Hedges of retail mortgages***					
Nominal principal amount (€m)	-	-	-	-	-
Average interest rate (%)	-	-	-	-	-

* The fixed rate on the interest rate swaps detailed above are swapped out for variable 3 month Euribor. The swaps pay 3 month EURIBOR on a quarterly basis and receive fixed on annual basis.

** The fixed rate on the interest rate swaps detailed above are swapped out for variable 1 month Euribor. The swaps pay 1 month EURIBOR on a monthly basis and receive fixed on annual basis.

*** The fixed rate on the interest rate swaps detailed above are swapped out for variable 1 month Euribor. The swaps receive 1 month EURIBOR on a monthly basis and pay fixed on annual basis.

14. Derivative financial instruments (continued)

The tables below set out the amounts relating to items designated as (a) hedging instruments and (b) hedged items in fair value hedges of interest rate risk, together with the related hedge ineffectiveness at 31 December 2025 and December 2024.

(a) Hedging Instruments

31 December 2025	Nominal €m	Assets €m	Liabilities €m	Line item in SOFP where the hedging instrument is included	Change in fair value used for calculating hedge ineffectiveness for the year €m	Hedge ineffectiveness recognised in the income statement €m	Line item in the income statement that included hedge ineffectiveness

Interest rate swaps hedging:

Debt securities in issue	650	20	-	Derivative assets	(24)	-	Net trading income
Subordinated debt	351	1	(4)	Derivative Assets / Derivative Liabilities	(7)	-	Net trading income
Retail mortgages	5	5	-	Derivative Assets	-	-	Net trading income
Retail deposits	5	-	(5)	Derivative Liabilities	-	-	Net trading income

31 December 2024	Nominal €m	Assets €m	Liabilities €m	Line item in SOFP where the hedging instrument is included	Change in fair value used for calculating hedge ineffectiveness for the year €m	Hedge ineffectiveness recognised in the income statement €m	Line item in the income statement that included hedge ineffectiveness

Interest rate swaps hedging:

Debt securities in issue	1,650	53	-	Derivative assets	19	-	Net trading income
Subordinated debt	250	6	-	Derivative assets	-	-	Net trading income

Notes to the Consolidated Financial Statements (continued)

14. Derivative financial instruments (continued)

(b) Hedged Items

31 December 2025	Carrying amount of hedged items recognised in the SOFP		Accumulated amount of fair value hedge adjustments on the hedged items included in the carrying amount of the hedged item		Line item in the SOFP where hedged item is included	Change in fair value of hedged items used for calculating hedge ineffectiveness for the year	Accumulated amount of fair value hedge adjustments remaining in the SOFP for any hedged items that have ceased to be adjusted for hedging
	Assets €m	Liabilities €m	Assets €m	Liabilities €m		€m	€m
Debt securities in issue	-	(686)	-	(9)	Debt securities in issue	24	-
Subordinated debt	-	(347)	2	-	Subordinated liabilities	7	-
Retail mortgages	5	-	-	-	Loans and advances to Customers	-	-
Retail deposits	-	(5)	-	-	Customer Accounts	-	-

31 December 2024	Carrying amount of hedged items recognised in the SOFP		Accumulated amount of fair value hedge adjustments on the hedged items included in the carrying amount of the hedged item		Line item in the SOFP where hedged item is included	Change in fair value of hedged items used for calculating hedge ineffectiveness for the year	Accumulated amount of fair value hedge adjustments remaining in the SOFP for any hedged items that have ceased to be adjusted for hedging
	Assets €m	Liabilities €m	Assets €m	Liabilities €m		€m	€m
Debt securities in issue	-	(1,731)	-	(33)	Debt securities in issue	(19)	-
Subordinated debt	-	(257)	-	(5)	Subordinated liabilities	-	-

15. Other assets

	31 December 2025	31 December 2024
	€m	€m
Loan sale receivable	44	-
Other	7	7
	51	7

Other assets include €7m relating to the Group's Interest First deposit product at 31 December 2025 (31 December 2024: €6m). Loan sale receivable at 31 December 2025 relates to the amount due from the purchaser of a predominately NPL portfolio ("Glas 3.1"), which was received in January 2026. In August 2025, the Group agreed the sale of the Glas 3.1 portfolio. The portfolio gross balance on the SOFP was €73m with a net book value of €47m. In line with IFRS 9, the assets have been derecognised from the SOFP at the date when all economic risk and rewards passed to the purchaser and a receivable of €44m has been recorded for the outstanding cash consideration. As a result of the transaction, a €6m loss was recorded through the 2025 Income Statement in Credit Impairment, Loans and advances to customers as required under IFRS 9. The proceeds from the sale were received on January 30th 2026.

16. Assets classified as held for sale

At 31 December 2025, assets classified as held for sale of €5m (2024: €12m) comprise of:

- €4m (31 December 2024: €7m) which relates to collateral in possession, these properties are expected to be sold within the next 12 months.
- €1m (31 December 2024: €5m) which relates to one branch property (31 December 2024: three branch properties) that is no longer occupied by the Group, the sale of this property is expected to complete within the next 12 months.

17. Debt securities

	31 December 2025	31 December 2024
	Total HTC	Total HTC
	€m	€m
Government bonds	5,160	4,259
Covered bonds	200	68
Gross debt securities	5,360	4,327

As at 31 December 2025, all unpledged debt securities are available to be used and are eligible as collateral (though eligibility will depend on the criteria of the counterparty) in sale and repurchase agreements.

Debt securities that are managed on a (HTC) business model basis are accounted for at amortised cost.

Government bonds of €5.2bn (31 December 2024: €4.3bn) comprise of Irish, Spanish, Portuguese, French, Italian, Belgian, Austrian and EU government bonds which are classified as HTC.

Covered bonds of €0.2bn (31 December 2024: €0.1bn) comprise of French, Belgian and Dutch corporate bonds which are classified as HTC.

The HTC securities represent a portfolio of securities structured for the purpose of collecting contractual cashflows to maturity. The Group had no HTC&S debt securities as at 31 December 2025 and 31 December 2024.

At 31 December 2025, debt securities at amortised cost with a fair value of €89m (31 December 2024: €371m) had been pledged to third parties in sale and repurchase agreements. The Group has not derecognised any securities delivered in such sale and repurchase agreements on the SOFP.

All debt securities at 31 December 2025 are stage 1 for ECL purposes.

Notes to the Consolidated Financial Statements (continued)

17. Debt securities (continued)

(A) HTC

The movement in HTC securities is classified as follows:

	31 December 2025	31 December 2024
	HTC	HTC
	€m	€m
As at 1 January	4,327	3,256
Additions	1,271	1,212
Maturities	(281)	(170)
Interest net of cash receipts	8	7
Amortisation of premium/(discount)	35	22
Total	5,360	4,327

(b) Amounts arising from impairment provisioning on debt securities:

Held at amortised cost

As at 31 December 2025, the amount arising from ECL on debt securities measured at amortised cost is €0.6m (31 December 2024: €0.6m). The ECL on debt instruments measured at amortised cost is offset against the carrying amount of the assets in the SOFP.

18. Equity securities

	31 December 2025	31 December 2024
	€m	€m
As at 1 January	9	5
Revaluation	-	4
Disposal	(8)	-
Total equity securities	1	9

The carrying value of equity securities can be analysed as follows:

	31 December 2025	31 December 2024
	€m	€m
Unlisted	1	9
Gross equity securities	1	9

The Group holds Series B preferred stock in Visa Inc. at 31 December 2025 with a value of €1m (31 December 2024: €9m). These were fair valued at Series A €nil and Series B €1m at 31 December 2025 (31 December 2024: €7m and €2m) and are recognised in the SOFP at FVOCI.

During 2025, the Group disposed of its holding of Visa Series A shares for €8m. This holding comprised Series A preferred stock valued at €1m issued by Visa Inc. in 2025 upon the conversion of Series B preferred stock, together with additional Series A preferred stock valued at €7m that was issued in 2024 following a similar conversion.

The fair value of the preferred stock Series A is classified as Level 1 and the fair value of the preferred stock Series B is classified as Level 3, as the valuation of these preferred stock includes inputs that are based on unobservable data (refer to note 35 for details).

19. Prepayments and contract assets

	31 December 2025	31 December 2024
	€m	€m
Visa prepayments	126	30
Other prepayments	42	33
	168	63

20. Loans and advances to customers

Loans and advances by category are set out below:

	31 December 2025	31 December 2024
	€m	€m
Residential mortgages		
- Held through special purpose entities	4,404	5,342
- Held directly	16,221	14,661
Total residential mortgages	20,625	20,003
Commercial*	557	493
Consumer finance	607	553
Finance leases and hire purchase receivables	472	466
Gross Loans and advances to customers	22,261	21,515
Less: provision for impairment (note 21)	(320)	(392)
Deferred fees, discounts and business combination related fair value adjustments	308	300
Net Loans and advances to customers	22,249	21,423

* The Group's SME mortgage lending is captured within the Commercial line above.

Loans and advances can be analysed into tracker, fixed and variable rate loans as follows:

	Gross Loans and advances to customers		Net Loans and advances to customers	
	31 December 2025	31 December 2024	31 December 2025	31 December 2024
	€m	€m	€m	€m
Tracker rate	2,312	2,692	2,219	2,563
Variable rate	4,307	4,669	4,156	4,525
Fixed rate	15,642	14,154	15,566	14,035
Gross Loans and advances to customers	22,261	21,515	21,941	21,123
Deferred fees, discounts and business combination related fair value adjustments	308	300	308	300
Gross Loans and advances to customers and deferred fees	22,569	21,815	22,249	21,423

The Group has established a number of securitisation entities. This involved transferring the Group's interest in pools of residential mortgages to a number of special purpose entities which issued mortgage-backed floating-rate notes to fund the purchase of the interest in the mortgage pools. The notes are secured by a first fixed charge over the residential mortgages in each pool and may be sold to investors or held by the Group and used as collateral for borrowings.

Notes to the Consolidated Financial Statements (continued)

20. Loans and advances to customers (continued)

Details of the residential mortgage pools sold to special purpose entities and the notes issued by the special purpose entities are included below:

	31 December 2025	31 December 2024
	€m	€m
Residential mortgages held through special purpose entities	4,404	5,342
Notes issued by special purpose entities		
- rated	4,221	5,164
- unrated	262	262

The notes issued by these special purpose entities comprise the following:

	31 December 2025	31 December 2024
	€m	€m
Rated notes, available for collateral*	3,322	4,265
Rated notes, unavailable for collateral	899	899
Unrated notes	262	262
	4,483	5,426

* The eligibility of available collateral will depend on the criteria of the counterparty.

Loans and advances balance movement for the year ended 31 December 2025 and the year ended 31 December 2024 is set out in the following tables:

	Non-credit impaired		Credit impaired		Total
	Stage 1 €m	Stage 2 €m	Stage 3 €m	POCI €m	
Balance as at 1 January 2025	19,100	2,033	382	-	21,515
New assets originated*	3,015	208	2	-	3,225
Stage transfers:					
Transfers from Stage 1 to Stage 2	(1,460)	1,460	-	-	-
Transfers to Stage 3	(25)	(77)	102	-	-
Transfers from Stage 2 to Stage 1	682	(682)	-	-	-
Transfers from Stage 3	5	46	(51)	-	-
Net movement arising from transfer of Stage	(798)	747	51	-	-
Redemptions and repayments	(2,020)	(330)	(42)	-	(2,392)
Decrease due to write offs	(1)	(1)	(11)	-	(13)
Disposals	-	-	(74)	-	(74)
Balance as at 31 December 2025	19,296	2,657	308	-	22,261

* Loan originations are net of repayments in the year and are shown in the year end stage.

20. Loans and advances to customers (continued)

	Non-credit impaired		Credit impaired		Total
	Stage 1	Stage 2	Stage 3	POCI	
	€m	€m	€m	€m	€m
Balance as at 1 January 2024	19,057	1,913	718	-	21,688
New assets originated*	2,228	212	2	-	2,442
Stage Transfers:					
Transfers from Stage 1 to Stage 2	(711)	711	-	-	-
Transfers to Stage 3	(36)	(96)	132	-	-
Transfers from Stage 2 to Stage 1	465	(465)	-	-	-
Transfers from Stage 3	4	57	(61)	-	-
Net movement arising from transfer of Stage	(278)	207	71	-	-
Redemptions and repayments	(1,906)	(297)	(49)	-	(2,252)
Decrease due to write offs	(1)	(2)	(19)	-	(22)
Disposals	-	-	(341)	-	(341)
Balance as at 31 December 2024	19,100	2,033	382	-	21,515

* Loan originations are net of repayments in the year and are shown in the year end stage.

Amounts receivable under finance leases and hire purchase receivables

The following balances principally comprise of leasing arrangements and hire purchase agreements of vehicles, plant, machinery and equipment:

	31 December 2025	31 December 2024
	€m	€m
Gross receivables		
Not later than 1 year	189	184
Later than 1 year and not later than 2 years	143	146
Later than 2 years and not later than 3 years	102	99
Later than 3 years and not later than 4 years	61	60
Later than 4 years and not later than 5 years	25	26
Later than 5 years	7	7
Total	527	522
Unearned future finance income	(55)	(56)
Deferred costs incurred on origination	6	6
Present value of minimum payments	478	472
ECL allowance for uncollectible minimum payments receivable	(19)	(19)

Notes to the Consolidated Financial Statements (continued)

21. Impairment provisions

Loans and advances to customers

The following tables reflect non-performing loans for which ECL provisions are held and include an analysis of Stage 1, Stage 2 and Stage 3 ECL provisions across the Loans and advances to customers portfolio.

The non-performing loan balance as at 31 December 2025 was €308m (31 December 2024: €382m). Refer to note 36 (iv) for aging analysis of non-performing loans.

31 December 2025	Loans and advances to customers €m	of which NPLs €m	NPL % of total loans %	ECL provisions			Total €m	Total ECL provisions as % of total loans %
				Stage 1 €m	Stage 2 €m	Stage 3 €m		
Residential:								
- Home loans	20,249	215	1.1%	14	61	81	156	0.8%
- Buy-to-let	376	43	11.4%	-	22	23	45	12.0%
Commercial*	557	21	3.8%	3	43	11	57	10.2%
Consumer finance	607	21	3.5%	8	17	18	43	7.1%
Finance leases and hire purchase receivables	472	8	1.7%	10	3	6	19	4.0%
Total gross loans	22,261	308	1.4%	35	146	139	320	1.4%
Impairment provision	(320)							
Deferred fees, discounts and business combination related fair value adjustments	308							
Balance as at 31 December 2025	22,249							

* The Group's SME mortgage lending is captured within the Commercial line above.

31 December 2024	Loans and advances to customers €m	of which NPLs €m	NPL % of total loans %	ECL provisions			Total €m	Total ECL provisions as % of total loans %
				Stage 1 €m	Stage 2 €m	Stage 3 €m		
Residential:								
- Home loans	19,539	259	1.3%	98	38	73	209	1.1%
- Buy-to-let	464	71	15.3%	2	43	31	76	16.4%
Commercial*	493	24	4.9%	5	36	9	50	10.1%
Consumer finance	553	20	3.6%	8	14	16	38	6.9%
Finance leases and hire purchase receivables	466	8	1.7%	10	3	6	19	4.1%
Total gross loans	21,515	382	1.8%	123	134	135	392	1.8%
Impairment provision	(392)							
Deferred fees, discounts and business combination related fair value adjustments	300							
Balance as at 31 December 2024	21,423							

* The Group's SME mortgage lending is captured within the Commercial line above.

21. Impairment provisions (continued)

A reconciliation of the provision for impairment losses or releases for Loans and advances to customers is as follows:

2025	Residential mortgages €m	Commercial* €m	Consumer and finance €m	Finance leases and hire purchase receivables €m	Total €m
Total by portfolio					
ECL as at 1 January 2025	285	50	38	19	392
Redemptions and repayments	(11)	(2)	(2)	(2)	(17)
Net remeasurement of loss allowance	(45)	(4)	4	(5)	(50)
Loan originations	4	13	6	8	31
Net movement excluding derecognition	(52)	7	8	1	(36)
Derecognition-disposals	(26)	-	-	-	(26)
Derecognition-repossessions	-	-	-	-	-
Derecognition-write offs**	(6)	-	(3)	(1)	(10)
Derecognition	(32)	-	(3)	(1)	(36)
ECL as at 31 December 2025***	201	57	43	19	320
Net movement excluding derecognition (from above)					(36)
Interest income booked but not recognised					(6)
Other Movements****					3
Write offs net of recoveries					-
Impairment write-back on customer Loans and advances for the year ended 31 December 2025					(39)

* The Group's SME mortgage lending is captured within the Commercial line above.

** The Group writes off an impaired financial asset (and the related impairment allowance), either partially or in full, when there is no realistic prospect of recovery. In circumstances where the net realisable value of any collateral has been determined and there is no reasonable expectation of further recovery, write-off may be earlier than collateral realisation.

*** Closing ECL incorporates ECL of €1m on loan commitments.

**** Includes provisions on loan commitments where there is no recognised financial asset (€2m) and costs in respect of deleveraging (€1m).

Notes to the Consolidated Financial Statements (continued)

21. Impairment provisions (continued)

2024	Residential mortgages €m	Commercial* €m	Consumer finance €m	Finance leases and hire purchase receivables €m	Total €m
Total by portfolio					
ECL as at 1 January 2024	451	66	33	20	570
Redemptions and repayments	(28)	-	-	-	(28)
Net remeasurement of loss allowance	(35)	(20)	3	(8)	(60)
Loan originations	28	14	5	8	55
Net movement excluding derecognition	(35)	(6)	8	-	(33)
Derecognition-disposals	(124)	(9)	-	-	(133)
Derecognition-repossessions	-	-	-	-	-
Derecognition-write offs**	(7)	(1)	(3)	(1)	(12)
Derecognition	(131)	(10)	(3)	(1)	(145)
ECL as at 31 December 2024***	285	50	38	19	392
Net movement excluding derecognition (from above)					(33)
Interest income booked but not recognised					(11)
Other movements****					13
Write offs net of recoveries					1
Impairment write-back on Loans and advances to customers for the year ended 31 December 2024					(30)

* The Group's SME mortgage lending is captured within the Commercial line above.

** The Group writes off an impaired financial asset (and the related impairment allowance), either partially or in full, when there is no realistic prospect of recovery. In circumstances where the net realisable value of any collateral has been determined and there is no reasonable expectation of further recovery, write-off may be earlier than collateral realisation.

*** Closing ECL incorporates ECL of €12m on loan commitments.

**** Includes impairment charge on deleveraging (€9m) and provisions on loan commitments where there is no recognised financial asset (€4m).

21. Impairment provisions (continued)

2025	Stage 1 €m	Stage 2 €m	Stage 3 €m	Total €m
Total by stage				
ECL as at 1 January 2025	123	134	135	392
Transfer to Stage 1	20	(19)	(1)	-
Transfer to Stage 2	(12)	22	(10)	-
Transfer to Stage 3	-	(6)	6	-
Stage transfers	8	(3)	(5)	-
Redemptions and repayments	(6)	(10)	-	(16)
Net remeasurement of loss allowance	(101)	5	44	(52)
Loan originations	11	20	1	32
Net movement excluding derecognition	(96)	15	45	(36)
Derecognition-disposals	-	-	(26)	(26)
Derecognition-repossessions	-	-	-	-
Derecognition-write offs*	-	-	(10)	(10)
Derecognition	-	-	(36)	(36)
ECL as at 31 December 2025**	35	146	139	320
Net movement excluding derecognition (from above)				(36)
Interest income booked but not recognised				(6)
Other Movements***				3
Write offs net of recoveries				-
Impairment write-back on Loans and advances to customers for the year ended 31 December 2025				(39)

* The Group writes off an impaired financial asset (and the related impairment allowance), either partially or in full, when there is no realistic prospect of recovery. In circumstances where the net realisable value of any collateral has been determined and there is no reasonable expectation of further recovery, write off may be earlier than collateral realisation.

** Closing ECL incorporates ECL of €1m on loan commitments.

*** Includes provisions on loan commitments where there is no recognised financial asset (€2m) and costs in respect of deleveraging (€1m).

Notes to the Consolidated Financial Statements (continued)

21. Impairment provisions (continued)

2024	Stage 1 €m	Stage 2 €m	Stage 3 €m	Total €m
Total by stage				
ECL as at 1 January 2024	165	164	241	570
Transfer to Stage 1	23	(22)	(1)	-
Transfer to Stage 2	(13)	22	(9)	-
Transfer to Stage 3	(1)	(10)	11	-
Stage transfers	9	(10)	1	-
Redemptions and repayments	(6)	(15)	(7)	(28)
Net remeasurement of loss allowance	(79)	(24)	43	(60)
Loan originations	34	20	1	55
Net movement excluding derecognition	(51)	(19)	37	(33)
Derecognition-disposals	-	-	(133)	(133)
Derecognition-repossessions	-	-	-	-
Derecognition-write offs*	-	(1)	(11)	(12)
Derecognition	-	(1)	(144)	(145)
ECL as at 31 December 2024**	123	134	135	392
Net movement excluding derecognition (from above)				(33)
Interest income booked but not recognised				(11)
Other Movements***				13
Write offs net of recoveries				1
Impairment write-back on Loans and advances to customers for the year ended 31 December 2024				(30)

* The Group writes off an impaired financial asset (and the related impairment allowance), either partially or in full, when there is no realistic prospect of recovery. In circumstances where the net realisable value of any collateral has been determined and there is no reasonable expectation of further recovery, write off may be earlier than collateral realisation.

** Closing ECL incorporates ECL of €12m on loan commitments.

*** Includes impairment charge on deleveraging (€9m) and provisions on loan commitments where there is no recognised financial asset (€4m).

Modified Financial Assets

There have been no significant modified financial assets for which the loss allowance has changed from lifetime to 12-month ECL at 31 December 2025 and 31 December 2024.

22. Interest in associated undertakings

	31 December 2025	31 December 2024
	€m	€m
Vianova DAC (previously named Clearpay DAC)	2	1
First Home Scheme Ireland	30	20
	32	21

The Group owns a non-controlling interest in Vianova DAC (previously named Clearpay DAC) (33%) as at 31 December 2025. This investment is accounted for under the equity method in the consolidated financial statements and has a carrying value of €2m at 31 December 2025 (31 December 2024: €1m). This investment will be increased or decreased by the Group's share of the profit or loss which will be assessed annually.

In 2024, the Group ceased recognising its investment in Synch Payments DAC as it was liquidated on 26 February 2024.

On 1 July 2022, the Group invested in First Home Scheme Ireland DAC along with the Irish Government, AIB and Bank of Ireland. First Home Scheme Ireland DAC is incorporated and operates in the Republic of Ireland providing equity support to future homeowners by taking a beneficial interest in residential dwellings which enables customers to purchase these residential dwellings. The participants fund these purchases, as well as costs, through a loan facility. The Group owns a non-controlling interest of 25% as 31 December 2025. This investment in associate is accounted for under the equity method in the consolidated financial statements and was initially recognised at cost (€11m) being the Group's agreed 13.5% contribution rate. During 2025, the investment was increased by €10m (31 December 2024: €4m).

The Group has presented summarised financial information of the First Home Scheme Ireland DAC in line with IFRS 12 below, as well as a reconciliation of the summarised financial information to the carrying value above.

	31 December 2025	31 December 2024
	€m	€m
Summarised Statement of financial position		
Current assets	60	41
Cash and cash equivalents	60	41
Non-current assets	365	226
Current liabilities	(1)	(1)
Non-current liabilities	(425)	(266)
Non-current financial liabilities	(425)	(266)
Summarised Income statement		
Other operating income*	18	13
Operating expenses	(7)	(7)
Finance expense	(11)	(6)
Reconciliation of summarised financial information to carrying value		
1 January	20	15
Share of loan facility**	1	2
Drawdowns of loan facility***	9	3
31 December	30	20

* Other operating income is a revenue equivalent for this associate.

** The Group's share of the loan facility represents the Group's share of the interest accrued on the loan facility and the Group's share of the fair value movement of the scheme.

*** The total drawdowns on the loan facility are disclosed in the notes to the First Home Scheme Ireland DAC financial statements. The amount above represents the Group's contributions.

In presenting details of the associates of the Group, the exemption permitted by Section 316 of the Companies Act 2014 has been availed of and the Group will annex a full listing of associates to its annual return to the Companies Registration Office.

Notes to the Consolidated Financial Statements (continued)

23. Property and equipment

2025	Land and buildings – measured under the revaluation model	Fixtures and fittings	Held at cost office and computer equipment	Right-of-use assets*		Total
				Leased buildings	Leased motor vehicles	
	€m	€m	€m	€m	€m	€m
Cost or valuation						
At 1 January	71	159	120	70	5	425
Additions	-	8	4	14	2	28
Revaluations	5	-	-	-	-	5
Depreciation write-back on revaluation	(1)	-	-	-	-	(1)
Disposals or cancellations	-	-	-	-	-	-
At 31 December	75	167	124	84	7	457
Accumulated depreciation						
At 1 January	-	(103)	(98)	(37)	(4)	(242)
Provided in the year	(1)	(6)	(5)	(14)	(1)	(27)
Eliminate on revaluation	1	-	-	-	-	1
At 31 December	-	(109)	(103)	(51)	(5)	(268)
Net book value at 31 December	75	58	21	33	2	189

* For further details on right-of-use assets refer to note 32.

Of the €5m net revaluation gain, €4m is included in the revaluation reserve in the SOCI and €1m impairment write-back is recognised on land and buildings in the income statement.

				Right-of-use assets*		
	Land and buildings – measured under the revaluation model	Fixtures and fittings	Held at cost office and computer equipment	Leased buildings	Leased motor vehicles	Total
2024	€m	€m	€m	€m	€m	€m
Cost or valuation						
At 1 January	86	147	118	65	3	419
Additions	-	12	2	5	2	21
Revaluations	(11)	-	-	-	-	(11)
Depreciation write-back on revaluation	(1)	-	-	-	-	(1)
Disposals or cancellations	(3)	-	-	-	-	(3)
At 31 December	71	159	120	70	5	425
Accumulated depreciation						
At 1 January	-	(93)	(87)	(31)	(3)	(214)
Provided in the year	(1)	(10)	(11)	(6)	(1)	(29)
Eliminate on revaluation	1	-	-	-	-	1
At 31 December	-	(103)	(98)	(37)	(4)	(242)
Net book value at 31 December	71	56	22	33	1	183

* For further details on right-of-use assets refer to note 32.

Of the €11m net revaluation loss, €11m is included in the revaluation reserve in the SOCI and no impairment write-back is recognised on land and buildings in the income statement.

23. Property and equipment (continued)

The net book value of land and buildings includes the following:

	31 December 2025	31 December 2024
	€m	€m
Land	25	24
Buildings - freehold fair value	50	47
Buildings - fixtures and fittings	48	45
Buildings - leasehold	43	44
	166	160

Buildings – leasehold includes €10m (31 December 2024: €11m) of fixtures and fittings within leased buildings.

Freehold land and buildings as at 31 December 2025 held at fair value was €75m (31 December 2024: €71m). The historic cost of land and buildings under the cost model is €41m (31 December 2024: €43m).

Revaluation measurement of Group's land and buildings

The Group's freehold land and buildings are stated at their revalued amounts, being the fair value at the date of revaluation less any accumulated depreciation recognised from the date of the latest revaluation. On the date of revaluation any accumulated depreciation is eliminated. The fair value measurements of the Group's freehold land and buildings as at 31 December 2025 and 31 December 2024 were performed by independent professional valuers having appropriate qualifications and recent experience in the fair value measurement of properties in the locations and categories being valued. The effective date of revaluation is 31 October 2025 and 31 October 2024.

The fair value of the freehold land and buildings was determined based on a market comparable approach that reflects recent transaction prices for similar properties using capitalisation yields ranging from 6.77% to 10.25%. There has been no change to the valuation techniques in 2025.

Details of the freehold land and buildings and information regarding the fair value hierarchy as defined in the Group's accounting policy as at 31 December 2025 and 31 December 2024 are as follows:

31 December 2025	Level 1	Level 2	Level 3	Total fair value
	€m	€m	€m	€m
Land	-	-	25	25
Buildings - freehold	-	-	50	50
	-	-	75	75
31 December 2024	Level 1	Level 2	Level 3	Total fair value
	€m	€m	€m	€m
Land	-	-	24	24
Buildings - freehold	-	-	47	47
	-	-	71	71

Notes to the Consolidated Financial Statements (continued)

23. Property and equipment (continued)

Key unobservable inputs

The following table summarises the valuation techniques and inputs used in the determination of freehold land and building values

31 December 2025	Cap Yield			Rent per sqm		
	%			€		
	Low	High weighted average		Low	High weighted average	
Freehold Land and Buildings						
Urban Centres	6.77%	8.25%	6.98%	223	1,700	641
Urban Other	7.50%	9.75%	8.15%	210	700	346
Rural	8.00%	10.25%	8.96%	108	269	207

31 December 2024	Cap Yield			Rent per sqm		
	%			€		
	Low	High weighted average		Low	High weighted average	
Freehold Land and Buildings						
Urban Centres	6.64%	8.50%	6.87%	237	1,700	626
Urban Other	7.50%	9.75%	8.15%	210	770	351
Rural	8.00%	10.50%	8.99%	108	269	202

Interrelationship between key unobservable inputs and fair value measurement.

The estimated fair value would increase/(decrease) if:

- capital yield were higher/(lower)
- the rent per square metre were higher/(lower)

24. Intangible assets

	31 December 2025			31 December 2024		
	Internally Generated	Separately Acquired	Total	Internally Generated	Separately Acquired	Total
	€m	€m	€m	€m	€m	€m
Software						
Cost						
At 1 January	442	6	448	355	5	360
Additions	106	1	107	87	1	88
At 31 December	548	7	555	442	6	448
Accumulated amortisation						
At 1 January	(232)	(3)	(235)	(171)	(2)	(173)
Provided in the year	(56)	(1)	(57)	(61)	(1)	(62)
At 31 December	(288)	(4)	(292)	(232)	(3)	(235)
Net book value at 31 December	260	3	263	210	3	213

Research and development expenditure in the period to 31 December 2025 was €26m (31 December 2024: €27m) and is included in note 7: Administrative, staff and other expenses (excluding exceptional items).

25. Deferred taxation

	31 December 2025	31 December 2024
	€m	€m
Deferred tax liabilities	(14)	(15)
Deferred tax assets	318	331
Net deferred tax assets	304	316

Net deferred tax assets are attributable to the following:

2025	At 1 January €m	Recognised in income statement €m	Recognised in other comprehensive income €m	At 31 December €m
Property and equipment (including right of use assets)	(13)	1	(1)	(13)
Unrealised gains/(losses) on assets/liabilities	(2)	-	2	-
Losses carried forward, generated/(utilised) in the period	323	(16)	-	307
Other temporary differences	4	1	-	5
Other Liabilities (including lease liabilities)	4	1	-	5
	316	(13)	1	304

2024	At 1 January €m	Recognised in income statement €m	Recognised in other comprehensive income €m	At 31 December €m
Property and equipment (including right of use assets)	(17)	-	4	(13)
Unrealised gains/(losses) on assets/liabilities	(1)	-	(1)	(2)
Losses carried forward, movements comprised of	323	-	-	323
- Losses generated/(utilised) in the period	-	(16)	-	(16)
- Losses previously unrecognised tax losses	-	16	-	16
Other temporary differences	-	4	-	4
Other Liabilities (including lease liabilities)	4	-	-	4
	309	4	3	316

The Group applied Deferred Tax related to Assets and Liabilities arising from a Single Transaction (Amendments to IAS 12) from 1 January 2023. Following the amendments, the Group has recognised a separate DTA in relation to its lease liabilities and a DTL in relation to its right-of-use assets.

In line with the requirements of IAS 12 "Deferred Tax Assets", Management and Directors formed the view that there should be sufficient future taxable profits within the PTSB legal entity against which PTSB tax losses carried forward can be used. Management and Directors have reviewed this position as at 31 December 2025 and remain of the view that it is appropriate to continue to recognise a DTA on the full quantum of tax losses carried forward in PTSB. This information is based on the following supporting evidence: (i) a review of the quantum of tax losses carried forward in PTSB in conjunction with forecasted profitability (the projections used having been approved by the Board of Directors). This review demonstrated that it is probable that there will be sufficient future taxable profits within PTSB against which the full quantum of tax losses carried forward can be utilised; (ii) the consideration of forecasting risks, including sensitivity analysis on the financial projections used (including an analysis of the effects of higher than expected impairment levels and lower than expected net interest margin). This analysis demonstrated, were certain adverse events to occur, that it would remain probable that there would be sufficient future taxable profits within PTSB against which the full quantum of tax losses carried forward could be utilised, albeit that the period of time over which such utilisation would occur would be extended; and (iii) the consideration of a number of other factors which may impact the utilisation of the tax losses including the macroeconomic environment, progress made on the Group's NPL strategy and the Group's financial position. These factors are set out in further details in note 2, Critical accounting estimates and judgements.

Notes to the Consolidated Financial Statements (continued)

25. Deferred taxation (continued)

Under current Irish tax legislation there is no time restriction on the utilisation of trading losses. Therefore, the tax losses carried forward in PTSB are available for utilisation against profits of the same trade in any future period. Also, the Directors are satisfied that taxable future profits should be available to recover the remaining DTA.

The total unrecognised DTA on carried forward tax losses at 31 December 2025 amounted to €8m (31 December 2024: €20m).

Included in the overall DTA is a DTA of €nil in relation to Permanent TSB Group Holdings plc (31 December 2024: €nil).

In accordance with IFRS these balances are recognised on an undiscounted basis.

Pillar 2 – minimum effective tax rate

In 2021 the Economic Co-operation and Development (OECD) released the 15% minimum effective tax rate ("Pillar 2") Model Rules. Pillar 2 legislation has been enacted in Ireland, effective 1 January 2024. The Group has performed an assessment of the Group's potential exposure to Pillar 2 income taxes. Based on the assessment performed, the Group is in scope of the Pillar 2 legislation for the Group's financial year beginning 1 January 2025. The Group will continue to assess the application of Pillar 2 legislation for future reporting periods. The Group has applied the IAS 12 temporary exception to the accounting for deferred taxes arising from the implementation of the Pillar 2 rules.

For year ended 31 December 2025, the Group has assessed its exposure to Pillar 2 top-up taxes and confirms that no current tax expense has been recognised in respect of Pillar 2 income taxes as a result of the application of the five year exclusion for large-scale domestic groups.

26. Deposits by banks

	31 December 2025	31 December 2024
	€m	€m
Placed by other banks and institutions on repurchase agreements	89	65
Other deposits	15	40
Deposits by banks	104	105

Securities which are sold under agreements to repurchase are secured by Irish and other eligible bonds. These agreements are completed under market standard Global Master Repurchase Agreements. The fair value of the financial assets pledged under existing agreement to repurchase is €89m at 31 December 2025 (31 December 2024: €371m). Other deposits include €15m (31 December 2024: €40m) of cash collateral placed with PTSB in relation to derivative positions and repurchase agreements.

27. Customer accounts

	31 December 2025	31 December 2024
	€m	€m
Term deposits	6,114	5,104
Demand deposits	7,717	7,520
Current accounts	9,544	9,187
Notice and other accounts	2,224	2,309
Customer accounts	25,599	24,120

All customer accounts above are held at amortised cost.

At 31 December 2025, the Group held corporate deposits of €1,570m (31 December 2024: €1,468m).

An analysis of the contractual maturity profile of customer accounts is set out in the liquidity risk section of note 36 of the consolidated financial statements.

28. Debt securities in issue

	31 December 2025 €m	31 December 2024 €m
At amortised cost		
Bonds and medium-term notes	1,723	1,731
	1,723	1,731
Maturity analysis		
Repayable in less than 1 year	56	56
Repayable in greater than 1 year but less than 5 years	1,667	1,168
Repayable in greater than 5 years	-	507
	1,723	1,731

Bonds and medium-term notes

€650m of Senior Unsecured Medium Term Notes are currently hedged for interest rate risk (31 December 2024: €1,650m). At 31 December 2025, debt securities in issue includes €9m hedge adjustment (31 December 2024: €33m). Further details are included in note 14 of the financial statements.

During 2025, interest rate swaps designated as hedging instruments for €1,000m of Debt securities in Issue were terminated. In accordance with IFRS 9, hedge accounting was discontinued from the termination date, as the hedging instruments ceased to exist.

On the termination date, the cumulative fair value hedge adjustment attributable to the hedged debt security was calculated and incorporated into the bond's amortisation schedule. This adjustment has been reflected in the EIR and will be amortised to the income statement over the remaining contractual life of the debt security.

29. Other liabilities

	31 December 2025 €m	31 December 2024 €m
Amounts falling due within one year		
PAYE and social insurance	6	6
Other taxation including deposit interest retention tax (DIRT)	12	12
Creditor accruals	72	67
Other*	9	9
Lease liability (see note 32 for further information on lease liabilities)	6	6
Total amounts falling due within one year	105	100
Amounts falling due greater than one year		
Lease liability (see note 32 for further information on lease liabilities)	26	29
Total amounts falling due greater than one year	26	29
Total other liabilities	131	129

* Other includes liability of €8m for Visa balances at 31 December 2025 (31 December 2024: €8m).

Notes to the Consolidated Financial Statements (continued)

30. Provisions

	2025				2024			
	Restructuring costs	Provision for legacy, legal and compliance liabilities	Other	Total	Restructuring costs	Provision for legacy, legal and compliance liabilities	Other	Total
	€m	€m	€m	€m	€m	€m	€m	€m
As at 1 January	1	17	28	46	2	13	25	40
Provisions made during the year	1	15	53	69	-	13	5	18
Write-back of provisions during the year	-	(1)	(4)	(5)	-	(3)	(2)	(5)
Provisions used during the year	(1)	(12)	(33)	(46)	(1)	(6)	-	(7)
As at 31 December	1	19	44	64	1	17	28	46

The provision at 31 December 2025 is €64m (31 December 2024: €46m) which is comprised of the following:

Restructuring costs

The Group has €0.4m provided for the Enterprise Transformation programme which began in 2020 (31 December 2024: €0.4m).

The Group remains a lessee on a non-cancellable lease over a property that it no longer occupies following a restructure in 2013. The remaining Restructuring provision of €0.5m primarily relates to dilapidation costs associated with this property (31 December 2024: €0.6m).

Provision for legacy, legal and compliance liabilities

As at 31 December 2025, the Group had provisions of €19m relating to legal, compliance and other costs of ongoing disputes in relation to legacy business issues (31 December 2024: €17m).

A provision of €15m was made during 2025 relating to legal, compliance and other costs of ongoing disputes in relation to legacy business issues. €2m of this relates to Expected Credit Loss (ECL) (31 December 2024: €4m) held against loan commitments (see note 41 for further detail; where the loan commitment relates to a loan already recognised as a finance asset, the ECL is recognised in Loans and advances to customers).

Management has exercised judgement in arriving at the estimated provision in respect of the potential liabilities.

Other

As at 31 December 2025, included in the provision of €44m (31 December 2024: €28m) are indemnities and guarantees provided by the Group, together with further costs relating to the purchasing and deleveraging of various asset portfolios.

During 2025, the Group provided for €35m in relation to a voluntary severance programme. Of this provision, €29m was utilised during 2025, with the remaining €6m expected to be utilised in 2026.

The Group also provided for €13.4m in 2025 for restoration, removal and disposal costs related to right-of-use lease assets in accordance with IFRS 16.

31. Subordinated liabilities

	31 December 2025	31 December 2024
	€m	€m
At amortised cost:		
Subordinated Tier 2 capital notes	347	257
	347	257
	31 December 2025	31 December 2024
	€m	€m
Maturity date		
Repayable in less than 1 year	1	3
Repayable in greater than 1 year but less than 5 years	-	-
Repayable in greater than 5 years	346	254
	347	257

Tier 2 capital notes – PTSBGH

In May 2021, PTSBGH issued €250m of Tier 2 capital notes at a fixed rate of 3% per annum. In September 2025, as part of a Liability Management exercise, c. 80% of the issued Tier 2 capital notes were redeemed. The remaining nominal balance of the issuance of €51m will mature on 19 August 2031 with a call date of any date from and including 19 May 2026 to and including 19 August 2026 with the call subject to approval of the regulatory authorities, with approval conditional on meeting the requirements of the Capital Requirements Regulation.

The interest rate will be reset, in the event that the securities are not called, on 19 August 2026 to Euro 5 year Mid Swap rate plus a margin of 3.221% per annum. The loan is subordinated and ranks as Tier 2 capital with interest paid annually in arrears on 19 August. The loan may be subject to the exercise of Irish Statutory loss absorption powers by the relevant resolution authority.

In September 2025, PTSBGH issued €300m of Tier 2 capital notes at a fixed rate of 3.875% per annum. The notes mature on 22 December 2035 with a call date of any date from and including 22 September 2030 to and including 22 December 2030 with the call subject to approval of the regulatory authorities, with approval conditional on meeting the requirements of the Capital Requirements Regulation.

The interest rate will be reset, in the event that the securities are not called, on 22 December 2030 to Euro 5 year Mid Swap rate plus a margin of 1.550% per annum. The loan is subordinated and ranks as Tier 2 capital with interest paid annually in arrears on 22 December. The loan may be subject to the exercise of Irish Statutory loss absorption powers by the relevant resolution authority.

The Tier 2 capital notes are currently hedged for interest rate risk. At 31 December 2025, subordinated liabilities contain a €2m hedge adjustment (31 December 2024: €5m). Further details on hedging are included in note 14 of the financial statements.

In the event of winding up of PTSBGH, the Tier 2 capital notes will be:

- junior in right of payment to all senior claims;
- pari passu with all other subordinated claims against PTSBGH which constitute, or would but for any applicable limitation on the amount of such capital constitute, Tier 2 capital notes or that rank or are expressed to rank pari passu with the obligations of PTSBGH under Tier 2 capital notes; and
- in priority to PTSBGH ordinary shares, preference shares, additional Tier 1 capital notes and junior subordinated obligations or other securities of PTSBGH which by law rank, or by their terms are expressed to rank, junior to the Tier 2 capital notes.

The Group did not have any defaults of principal or interest or other breaches with respect to its subordinated liabilities during the years ended 31 December 2025 and 31 December 2024.

Notes to the Consolidated Financial Statements (continued)

32. Leases

Right-of-use assets*	Land and buildings €m	Motor vehicles €m	Total €m
As at 1 January 2025	33	1	34
Additions	14	1	15
Lease exits and cancellations	-	-	-
Depreciation of right-of-use assets	(14)	(1)	(15)
Balance as at 31 December 2025	33	1	34

Right-of-use assets*	Land and buildings €m	Motor vehicles €m	Total €m
As at 1 January 2024	34	-	34
Additions	5	2	7
Lease exits and cancellations	-	-	-
Depreciation of right-of-use assets	(6)	(1)	(7)
Balance as at 31 December 2024	33	1	34

Lease liabilities*	Land and buildings €m	Motor vehicles €m	Total €m
As at 1 January 2025	34	1	35
Additions	2	1	3
Lease exits or cancellations	-	-	-
Repayment of lease liabilities	(5)	(1)	(6)
Balance as at 31 December 2025	31	1	32

Lease liabilities*	Land and buildings €m	Motor vehicles €m	Total €m
As at 1 January 2024	35	-	35
Additions	5	2	7
Lease exits or cancellations	-	-	-
Repayment of lease liabilities	(6)	(1)	(7)
Balance as at 31 December 2024	34	1	35

* Right-of-use assets are included in Property and equipment and lease liabilities are included in other liabilities.

32. Leases (continued)

	31 December 2025	31 December 2024
	€m	€m
Lease liabilities		
Maturity analysis - contractual undiscounted cash flows*		
Less than one year	7	6
One to five years	19	19
More than five years	8	12
Total undiscounted lease liabilities	34	37
Lease liabilities included in the SOFP	32	35
Current lease liability	6	6
Non-current lease liability	26	29

* The maturity analysis of undiscounted lease liabilities is disclosed in note 36.

Amounts recognised in income statement

	31 December 2025	31 December 2024
	€m	€m
Interest on lease liabilities*	(1)	(1)
Expenses relating to short-term leases	-	(1)
Depreciation of right-of-use assets	(15)	(7)
Total charge in income statement	(16)	(9)

* Interest expense on the lease liabilities amounted to €0.9m (31 December 2024: €0.6m) whereas expenses relating to short-term leases amounted to €0m (31 December 2024: €0.8m) and is included in Administrative, staff and other expenses (excluding exceptional items).

Amounts recognised in statement of cash flow

	31 December 2025	31 December 2024
	€m	€m
Operating cashflows:		
Short-term leases	-	(1)
Financing cashflows:		
Cash outflow for leases principal and interest	(6)	(7)
Total	(6)	(8)

As a lessee

(i) Real estate

The Group leases retail properties for its branch operations. The lease term of retail properties typically run for a period of 10-35 years. The Group does not have variable lease payments and its leases do not contain extension options.

(ii) Vehicles

The Group leases vehicles with lease terms of three to five years. The Group has no option to purchase the assets at the end of the contract term and it does not guarantee the residual value of the leased assets at the end of the contract term.

(iii) Sub-leases

The Group has no sub-leases as at 31 December 2025 (31 December 2024: no sub-leases). Further details on 'leases as a lessor' are included in note 1 of the financial statements.

Notes to the Consolidated Financial Statements (continued)

33. Share capital, reserves and other equity instruments

Share capital

Share capital is the funds raised as a result of a share issue and comprises the ordinary shares of the holding company Permanent TSB Group Holdings plc.

The holders of ordinary shares are entitled to receive dividends as declared from time to time and are entitled to one vote per share at meetings of the Group. All ordinary shares rank equally with regard to the Group's residual assets.

Authorised share capital

31 December 2025	31 December 2025
	Number of shares
	€m
Ordinary shares of €0.50 each	1,550,000,000
	775
31 December 2024	31 December 2024
	Number of shares
	€m
Ordinary shares of €0.50 each	1,550,000,000
	775

Issued share capital

The movement in the number of paid up ordinary shares is as follows:

Balances as at 31 December 2025	€ 0.50 Ordinary shares	Total
As at 1 January 2025	544,996,176	
Movement	-	
As at 31 December 2025	544,996,176	
Issued share capital (€m)	272	272
Shares held under employee benefit trust		4,580
% of authorised capital issued		35%
Balances as at 31 December 2024	€ 0.50 Ordinary shares	Total
As at 1 January 2024	545,589,119	
Movement*	(592,943)	
As at 31 December 2024	544,996,176	
Issued share capital (€m)	272	272
Shares held under employee benefit trust		4,580
% of authorised capital issued		35%

* In 2024 Permanent TSB Group Holdings plc completed a share buyback of 592,943 ordinary shares at a price of €1.74 per ordinary share totalling €1m. The shares were recognised as treasury shares upon repurchase and were subsequently cancelled. The nominal amount, €0.3m was transferred from share capital to the capital redemption reserve with the total repurchase amount of €1m being deducted from retained earnings in addition to €1m of related transaction costs. The number of ordinary shares in issue at 31 December 2025 was 544,996,176 (31 December 2024: €544,996,176).

33. Share capital, reserves and other equity instruments (continued)

Share Premium

The share premium reserve represents the excess of amounts received for share issues less associated issue costs over the par value of those shares of the Company.

Other Reserves

Revaluation reserve (Non-distributable)

The revaluation reserve is a non-distributable reserve comprising unrealised gains or losses, net of tax, on the revaluation of owner occupied properties.

Fair value reserve (Non-distributable)

The fair value reserve comprises:

- the cumulative net change in the fair value of equity securities measured at FVOCI; and
- the cumulative net change in the fair value of debt securities measured at FVOCI until the assets are derecognised or reclassified.

This amount is increased by the amount of loss allowance and is disposed of by the end of the year.

Other capital reserves (Non-distributable)

Other capital reserves includes €1,087m capital issued by the Company net of €7m capital redemption reserve arising from the repurchase and cancellation of shares and €224m incurred in the cancellation of the share capital and share premium of PTSB on the incorporation of the Company. €1m was transferred into the capital redemption reserve during 2024 as a result of the share buyback.

Retained earnings

Retained earnings include distributable and non-distributable earnings. This reserve represents the retained earnings of the holding Company and subsidiaries after consolidation adjustments.

€43m (2024: €43m) coupon interest on the AT1 securities was paid from this reserve during 2025.

Other equity instruments - Non-distributable

Additional tier 1 securities

	31 December 2025 €m	31 December 2024 €m
As at 1 January	368	368
Redemption during the period		
Additional Tier 1 Securities (issued 2020)	(123)	-
Profit	43	43
AT1 coupon paid	(43)	(43)
Additional tier 1 securities	245	368

On 26 October 2022, PTSBGH issued additional €250m AT1 Fixed Rate Reset Perpetual Temporary Write Down Securities. The transaction costs incurred were €5m. The first reset date for the fixed rate is 26 April 2028. The AT1 securities are perpetual and redeemable financial instruments with an interest rate of 13.25% which is paid on a semi-annual basis in arrears on 26 April and 26 October of each year, commencing on 26 April 2023. The Company may, at its sole discretion, redeem the AT1 securities in full on any day falling in the period commencing 26 October 2027 and the first reset date above and on every interest payment date thereafter (subject to the approval of the Supervisory Authority) at the prevailing principal amount together with accrued but unpaid interest. In addition, the securities are redeemable at the option of the Company for certain regulatory or tax reasons, subject to regulatory approval. On the first reset date on 26 April 2028, in the event the securities are not redeemed, interest will be reset to Euro 5 year Mid Swap rate plus a margin of 10.546% (converted from an annual to a semi-annual rate). The Company may elect at its full discretion at any time to cancel permanently (in whole or in part) the interest amount otherwise scheduled to be paid on an interest payment date.

Notes to the Consolidated Financial Statements (continued)

33. Share capital, reserves and other equity instruments (continued)

The Company may use such cancelled payments without restriction, including to make distributions or any other payments to the holders of its shares or any other securities issued by the Company. Any cancellation of interest payments will be permanent and on a non-cumulative basis and such cancellation will not give rise to or impose any restriction on the Company.

Under the EU (Bank Recovery and Resolution) Regulations 2015, these securities are loss absorbing at the point of non-viability.

On the occurrence of a trigger event, at any time, any accrued and unpaid interest up to (but excluding) the write down date shall be automatically and irrevocably cancelled, and the then Prevailing Principal Amount of each Security shall be automatically and irrevocably reduced by the write down amount. This will occur if the CET1 Capital Ratio of PTSB or the Group at any time falls below 7%. Subsequent to any write-down event the Company may, at its sole discretion, write-up some or all of the written-down principal amount of the AT1 instrument provided regulatory capital requirements and the securities rank behind the claims against the Group of all other subordinated and unsubordinated creditors.

On 25 November 2020, PTSBGH issued €125m nominal value of AT1 Perpetual Temporary Write Down Securities as part of a capital raise. The AT1 securities were redeemed in full on 25 November 2025, following the attainment of the required approval of the Supervisory Authority.

34. Analysis of other comprehensive income

The analysis of OCI below provides additional details regarding the information provided in the primary statements and should be read in conjunction with the consolidated SOCE.

31 December 2025	Revaluation reserve €m	Fair value reserve €m	Total €m
Other comprehensive income/(expense), net of tax			
Revaluation of property	3	-	3
Fair value reserve (equity instruments)	-	-	-
Change in fair value of equity instruments	-	-	-
Total other comprehensive income/(expense), net of tax	3	-	3

31 December 2024	Revaluation reserve €m	Fair value reserve €m	Total €m
Other comprehensive income/(expense), net of tax			
Revaluation of property	(7)	-	(7)
Fair value reserve (equity instruments)	-	-	-
Change in fair value of equity instruments	-	3	3
Total other comprehensive income/(expense), net of tax	(7)	3	(4)

35. Measurement basis and fair values of financial instruments

The Group's accounting policy on valuation of financial instruments is described in note 1. The table below sets out an overview of financial instruments held by the Group and their fair values.

(a) Measurement basis and fair value of financial instruments

31 December 2025	Note	Held at amortised cost €m	At fair value through OCI €m	At fair value through profit or loss €m	Designated as fair value hedges €m	Total carrying value €m	Fair value €m
Financial assets							
Cash at bank	12	75	-	-	-	75	75
Items in course of collection	12	25	-	-	-	25	25
Loans and advances to banks	13	1,719	-	-	-	1,719	1,719
Derivative financial instruments	14	-	-	-	24	24	24
Other assets	15	51	-	-	-	51	51
Debt securities	17	5,360	-	-	-	5,360	5,284
Equity securities	18	-	1	-	-	1	1
Loans and advances to customers	20	22,249	-	-	-	22,249	22,810
Financial liabilities							
Deposits by banks	26	104	-	-	-	104	104
Customer accounts	27	25,599	-	-	-	25,599	25,581
Derivative financial instruments	14	-	-	-	4	4	4
Debt securities in issue	28	1,714	-	-	9	1,723	1,802
Other financial liabilities	29	131	-	-	-	131	131
Subordinated liabilities	31	349	-	-	(2)	347	352
31 December 2024							
Financial assets							
Cash at bank	12	72	-	-	-	72	72
Items in course of collection	12	23	-	-	-	23	23
Loans and advances to banks	13	2,202	-	-	-	2,202	2,202
Derivative financial instruments	14	-	-	-	59	59	59
Other assets	15	7	-	-	-	7	7
Debt securities	17	4,327	-	-	-	4,327	4,253
Equity securities	18	-	9	-	-	9	9
Loans and advances to customers	20	21,423	-	-	-	21,423	21,456
Financial liabilities							
Deposits by banks	26	105	-	-	-	105	105
Customer accounts	27	24,120	-	-	-	24,120	24,062
Derivative financial instruments	14	-	-	-	-	-	-
Debt securities in issue	28	1,698	-	-	33	1,731	1,822
Other financial liabilities	29	129	-	-	-	129	129
Subordinated liabilities	31	252	-	-	5	257	250

The following table sets out the fair value of financial instruments that the Group holds at 31 December 2025. It categorises these financial instruments into the relevant level on the fair value hierarchy.

The fair values of financial instruments are measured according to the following fair value hierarchy:

- Level 1 – financial assets and liabilities measured using quoted market prices (unadjusted).
- Level 2 – financial assets and liabilities measured using valuation techniques which use observable inputs including quoted prices of financial instruments themselves or quoted prices of similar instruments – in either active or inactive markets.
- Level 3 – financial assets and liabilities measured using valuation techniques which use unobservable market data inputs.

Notes to the Consolidated Financial Statements (continued)

35. Measurement basis and fair values of financial instruments (continued)

Basis and fair values of financial instruments

31 December 2025	Note	Total Carrying value €m	Level 1 €m	Level 2 €m	Level 3 €m	Fair value €m
Financial assets						
Cash at bank	12	75	75	-	-	75
Items in course of collection	12	25	-	25	-	25
Loans and advances to banks	13	1,719	-	1,719	-	1,719
Derivative financial instruments	14	24	-	24	-	24
Debt securities	17	5,360	5,172	112	-	5,284
Equity securities	18	1	-	-	1	1
Loans and advances to customers	20	22,249	-	-	22,810	22,810
Financial liabilities						
Deposits by banks	26	104	-	104	-	104
Customer accounts	27	25,599	-	25,581	-	25,581
Derivative financial instruments	14	4	-	4	-	4
Debt securities in issue	28	1,723	-	1,802	-	1,802
Other financial liabilities	29	131	-	131	-	131
Subordinated liabilities	31	347	-	352	-	352
31 December 2024						
31 December 2024	Note	Total Carrying value €m	Level 1 €m	Level 2 €m	Level 3 €m	Fair value €m
Financial assets						
Cash at bank	12	72	72	-	-	72
Items in course of collection	12	23	-	23	-	23
Loans and advances to banks	13	2,202	-	2,202	-	2,202
Derivative financial instruments	14	59	-	59	-	59
Debt securities	17	4,327	4,145	108	-	4,253
Equity securities	18	9	7	-	2	9
Loans and advances to customers	20	21,423	-	-	21,456	21,456
Financial liabilities						
Deposits by banks	26	105	-	105	-	105
Customer accounts	27	24,120	-	24,062	-	24,062
Debt securities in issue	28	1,731	-	1,822	-	1,822
Other financial liabilities	29	129	-	129	-	129
Subordinated liabilities	31	257	-	250	-	250

35. Measurement basis and fair values of financial instruments (continued)

(b) Fair value measurement principles

The Group's accounting policy on valuation of financial instruments is described in note 1 and note 2 and contains details on the critical accounting estimates and judgements made by management in relation to the fair value measurement of financial instruments. The fair value of a financial instrument is defined as the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date.

Where possible, the Group calculates fair value using observable market prices in an active market. Where market prices are not available, fair values are determined using valuation techniques. These techniques are subjective in nature and may involve assumptions which are based upon Management's view of market conditions at year end, which may not necessarily be indicative of any subsequent fair value. Any minor changes in the assumptions used could have a significant impact on the resulting estimated fair values and, as a result, it may be difficult for the users to make a reasonable comparison of the fair value information disclosed in this note, against that disclosed by other financial institutions or to evaluate the Group's financial position and, therefore, are advised to exercise caution in interpreting these fair values. Also, the fair values disclosed above do not represent, nor should it be interpreted to represent, the underlying value of the Group as a going concern at the reporting date.

Financial assets and financial liabilities not subsequently measured at fair value

Other than derivative financial instruments and equity securities, all other financial assets and liabilities are not measured at fair value at the reporting date. A description of the methods and assumptions used to calculate fair values of these assets and liabilities is set out below.

Cash at bank

The fair value of these financial instruments is equal to their carrying value due to these instruments being repayable on demand and short-term in nature in an active market.

Items in course of collection

The fair value of these financial instruments is equal to their carrying value due to these instruments being repayable on demand and short-term in nature.

Loans and advances to banks

For the purposes of fair value valuation, Loans and advances to banks have been treated as cash and cash equivalents. These Loans and advances are repayable on demand and short-term in nature; hence, the fair value of each financial instrument is equal to their carrying value.

Loans and advances to customers

Loans and advances to customers are carried net of impairments. The Group uses a discounted cash flow valuation model to estimate the fair value for the ROI residential and commercial mortgages. Cash flows are discounted using the current weighted average interest rate based on the specific portfolio. The fair value calculation also takes into account loan impairment provisions at the balance sheet date. The carrying value of the consumer finance portfolio is considered equal to its fair value due to its short duration.

Debt securities (HTC securities)

Debt securities at 31 December 2025 are €5,360m (31 December 2024 €4,327m) and consist of HTC securities (Government and Covered securities). HTC securities are derived from observable inputs through independent pricing sources such as Bloomberg.

Deposits by banks/customer accounts

The estimated fair value of deposit liabilities and current accounts with no stated maturity which are repayable on demand (including non-interest bearing deposits), approximates to their carrying value. The estimated fair value of fixed-interest bearing deposits and other borrowings is based on discounted cash flows using interest rates for new deposits with similar remaining maturities.

Debt securities in issue/subordinated liabilities

The fair values of debt securities in issue/subordinated liabilities are derived from observable inputs through independent pricing sources such as Bloomberg. All instruments are hedged for interest rate risk. Further details on hedging are included in note 14 of the financial statements. Where a readily available market price is unavailable in relation to the instrument, an estimated price is calculated using observable market data for similar instruments. If observable market data is not available, an appropriate credit spread linked to similar instruments, is used within the valuation technique. The fair values of debt securities in issue and subordinated liabilities include the fair value hedge adjustment in relation to interest rate swaps. Since 2023, due to changes in market conditions, quoted prices in active markets are no longer available for these instruments. However, there is sufficient information available to measure the fair value of these instruments based on observable market inputs. Therefore, debt securities in issue and subordinated liabilities are now classified as Level 2 in the fair value hierarchy.

Notes to the Consolidated Financial Statements (continued)

35. Measurement basis and fair values of financial instruments (continued)

Financial assets and financial liabilities subsequently measured at fair value

On initial recognition, all financial instruments are measured at fair value. Derivative financial instruments are fair valued through profit or loss.

Derivative financial instruments

The fair values of derivatives are determined using valuation techniques such as discounted cash flow and pricing models which are commonly used by market participants. These valuations are provided by third party sources and the models used incorporate observable market inputs such as current interest rate, time to maturity, forward foreign exchange rates, yield curves and volatility measures.

Equity securities

The Group holds Series B preferred stock in Visa Inc. at 31 December 2025 with a value of €1m (31 December 2024: €9m). These were fair valued at Series A €nil and Series B €1m at 31 December 2025 (31 December 2024: €7m and €2m) and are recognised in the SOFP at FVOCI.

The fair values of the Series A preferred stock in Visa Inc. is classified as Level 1 and the fair value of the Series B preferred stock is classified as Level 3, as the valuation of these preferred stock includes inputs that are based on unobservable data.

Fair value measurements recognised in the SOFP

31 December 2025	Note	Level 1 €m	Level 2 €m	Level 3 €m	Total €m
Financial assets measured at fair value					
Derivative financial instrument	14	-	24	-	24
Equity instruments	18	-	-	1	1
Financial liabilities measured at fair value					
Derivative financial instrument	14	-	4	-	4
31 December 2024	Note	Level 1 €m	Level 2 €m	Level 3 €m	Total €m
Financial assets measured at fair value					
Derivative financial instrument	14	-	59	-	59
Equity instruments	18	7	-	2	9
Financial liabilities measured at fair value					
Derivative financial instrument	14	-	-	-	-

Reconciliation of level 3 fair value measurements of financial assets

	2025 €m	2024 €m
Equity Instruments		
As at 1 January	2	5
Revaluation movement in OCI – Fair value reserve (equity instruments)	(1)	4
Conversion of Series B preferred stock to Series A preferred stock	-	(7)
As at 31 December	1	2

There were no transfers between level 1, level 2 or level 3 of the fair value hierarchy during 2025 or 2024 for financial assets except for the conversion of Series B preferred stock to Series A preferred stock in 2024.

35. Measurement basis and fair values of financial instruments (continued)

Level 3 fair value measurements of financial liabilities

There were no transfers between level 1, level 2 or level 3 of the fair value hierarchy during 2025 or 2024 for financial liabilities.

Level 3 sensitivity analysis

The table below sets out information about significant unobservable inputs used in measuring financial instruments categorised as Level 3 in the fair value hierarchy.

Financial instruments

31 December 2025	Valuation technique	Significant unobservable inputs	Range of estimates for unobservable inputs	Fair value €m	Ranges of estimates changes in the fair value
Visa Inc. Series B Preferred Stock	Quoted market price (Discounted)*	Final share conversion rate	0 - 90%	1	0 - 90%

* Discount has been applied for illiquidity and the conversion rate variability of the Visa Inc. Series B Preferred stock.

31 December 2024	Valuation technique	Significant unobservable inputs	Range of estimates for unobservable inputs	Fair value €m	Ranges of estimates changes in the fair value
Visa Inc. Series B Preferred Stock	Quoted market price (Discounted)*	Final share conversion rate	0 - 90%	2	0 - 90%

* Discount has been applied for illiquidity and the conversion rate variability of the Visa Inc. Series B Preferred stock.

Significant unobservable inputs

Visa Inc. Series B preferred stock

The Series B preferred stock was fair valued at €1m at 31 December 2025 (31 December 2024: €2m) and is recognised in the SOFP at FVOCI.

Valuation Methodology: The Visa Inc. Class A Common stock price and conversion ratios were applied to the PTSB shareholding of Visa Inc. Series B preferred shares at 31 December 2025 and 31 December 2024. Future conversions are calculated using discounted cash follows. The stock was revalued at the year-end exchange rate.

Unobservable input: The unobservable inputs are the discount factor used to discount the future conversions of Series B preferred stock.

The Visa Inc. Series B preferred stock is denominated in US dollars and is exposed to FX risk.

Notes to the Consolidated Financial Statements (continued)

36. Financial risk management

Maximum exposure to credit risk before collateral held or other credit enhancements

The following table outlines the maximum exposure to credit risk before collateral held or other credit enhancements in respect of the Group's financial assets as at the SOFP date.

	Note	31 December 2025 €m	31 December 2024 €m
Cash at bank	12	75	72
Items in course of collection	12	25	23
Loans and advances to banks (iii)	13	1,719	2,202
Derivative financial instruments (ii)	14	24	59
Other assets	15	51	7
Debt securities (i)	17	5,360	4,327
Loans and advances to customers (iv)	20	22,249	21,423
		29,503	28,113
Commitments	41	1,554	1,618
		31,057	29,731

The following tables outline the Group's exposure to credit risk by asset class

(i) Debt securities

The Group is exposed to the credit risk on third parties where the Group holds debt securities (primarily sovereign debt). These exposures are subject to the limitations contained within Board approved policies, with sovereign debt restricted to those countries that have an External Credit Assessment Institution (ECAI) rating of investment grade.

The following table gives an indication of the level of creditworthiness of the Group's debt securities and is based on the ratings prescribed by Moody's Investor Services Limited and Standard and Poor's for Belgian covered bond. There are no impaired debt securities as at 31 December 2025 or at 31 December 2024.

	31 December 2025 €m	31 December 2024 €m
Rating		
Aaa	1,213	726
Aa1	340	292
Aa3	2,429	2,116
A3	1,137	439
Baa1	-	599
Baa2	241	-
Baa3	-	155
Total	5,360	4,327

36. Financial risk management (continued)

The following table discloses, by country, the Group's exposure to sovereign debt and corporate debt as at:

	31 December 2025	31 December 2024
	€m	€m
Country		
Ireland	1,604	1,524
EU	1,012	658
Spain	842	599
France	721	578
Austria	340	292
Portugal	295	439
Italy	241	155
Belgium	220	82
Netherlands	85	-
Total	5,360	4,327

(ii) Derivative financial instruments

The Group has executed standard ISDA agreements with all of its counterparties. The Group has also executed CSAs with all of its counterparties in respect of all derivative instruments to mitigate its credit risk. As part of these agreements, the Group exchanges collateral in line with movements in the market values of derivative positions daily. FX forward derivatives are settled gross. The Group manages its collateral derivative positions with counterparties on a net basis. The uncollateralised derivative positions are held with investment grade counterparties. The cumulative positive market value of derivative assets at 31 December 2025 was €24m (31 December 2024: €59m) which relates to fair value hedge interest rate swaps used to hedge interest rate risk on fixed rate debt securities in issue, subordinated liabilities, fixed rate retail mortgages and fixed rate retail deposits and trading interest rate swaps. See note 14 for further detail.

(iii) Loans and advances to banks

The Group has a policy to ensure that, where possible, Loans and advances to banks are held with investment grade counterparties with any exceptions subject to prior approval by the BRCC. The following table gives an indication of the level of creditworthiness of the Group's Loans and advances to banks and is based on credit ratings aligned to recognised External Credit Assessment Institutions, including Moody's and S&P.

	31 December 2025	31 December 2024
	€m	€m
Rating		
AAA	1,399	1,887
Aa1	-	23
Aa2	38	6
Aa3	157	125
A1	66	90
A2	59	71
Total	1,719	2,202

Notes to the Consolidated Financial Statements (continued)

36. Financial risk management (continued)

The following sections detail additional disclosures on asset quality.

(iv) Loans and advances to customers

Gross customer Loans and advances

The tables below outline total Loans and advances to customers for the Group analysed by home loan, buy-to-let, commercial, consumer finance and finance leases and hire purchase receivables.

	31 December 2025	31 December 2024
Measured at amortised cost	€m	€m
Residential mortgages:		
Home loan	20,249	19,539
Buy-to-let	376	464
Total residential mortgages	20,625	20,003
Commercial*	557	493
Consumer finance	607	553
Finance leases and hire purchase receivables	472	466
Total measured at amortised cost	22,261	21,515
Analysed by ECL staging:		
Stage 1	19,296	19,100
Stage 2	2,657	2,033
Stage 3	308	382
POCI	-	-
Total measured at amortised cost	22,261	21,515
Of which at the reporting date		
Neither past due nor Stage 3	21,910	21,081
Past due but not Stage 3	43	52
Stage 3	308	382
Total measured at amortised cost	22,261	21,515
Of which are reported as non-performing loans	308	382
Deferred fees, discounts and business combination related fair value adjustments	308	300

* The Group's SME mortgage lending is captured within the Commercial line above.

Past due but not Stage 3

The following tables provide an aged analysis of home loan, buy-to-let and commercial mortgages which are past due but not Stage 3 (excludes consumer finance and finance leases and hire purchase receivables).

31 December 2025	Home loans	Buy-to-let	Commercial*	Total
	€m	€m	€m	€m
0-30 days	21	2	1	24
31-60 days	6	-	-	6
61-90 days	3	-	-	3
Total past due not Stage 3	30	2	1	33
Fair value of collateral held	30	2	1	33

36. Financial risk management (continued)

Fair value of collateral held	Home loans €m	Buy-to-let €m	Commercial* €m	Total €m
0-30 days	21	2	1	24
31-60 days	6	-	-	6
61-90 days	3	-	-	3
Total past due not Stage 3	30	2	1	33

* The Group's SME mortgage lending is captured within the Commercial line above.

31 December 2024	Home loans €m	Buy-to-let €m	Commercial* €m	Total €m
0-30 days	24	1	2	27
31-60 days	4	-	-	4
61-90 days	7	-	-	7
Total past due not Stage 3	35	1	2	38
Fair value of collateral held	35	1	2	38

Fair value of collateral held	Home loans €m	Buy-to-let €m	Commercial* €m	Total €m
0-30 days	24	1	2	27
31-60 days	4	-	-	4
61-90 days	7	-	-	7
Total past due not Stage 3	35	1	2	38

* The Group's SME mortgage lending is captured within the Commercial line above.

Collateral held against residential mortgages is principally comprised of residential properties; their fair value has been estimated based upon the last actual valuation, adjusted to take into account subsequent movement in house prices and is capped at the lower of the loan balance or the valuation amount.

Non-performing loans

Non-performing loans (NPLs) are loans which are credit impaired or loans which are classified as defaulted in accordance with the Group's definition of default. The Group's definition of default considers objective indicators of default including the 90 days past due criterion, evidence of exercise of concessions or modifications to terms and conditions and is designed to be consistent with European Banking Authority (EBA) guidance on the definition of forbearance.

Foreclosed assets are assets held on the balance sheet which are obtained by taking possession of collateral or by calling on similar credit enhancements.

Notes to the Consolidated Financial Statements (continued)

36. Financial risk management (continued)

Non-performing assets are defined as NPLs plus foreclosed assets.

31 December 2025	Stage 3					Total €m
	Home loans €m	Buy-to-let €m	Commercial* €m	Consumer finance €m	Finance leases and hire purchase receivables €m	
NPL is < 90 days	98	17	15	4	3	137
NPL is > 90 days and < 1 year past due	41	1	1	6	2	51
NPL is 1-2 years past due	21	5	-	3	2	31
NPL is 2-5 years past due	30	13	1	3	1	48
NPL is > 5 years past due	25	7	4	5	-	41
POCI	-	-	-	-	-	-
Non-performing loans	215	43	21	21	8	308
Foreclosed assets	1	3	-	-	-	4
Non-performing assets	216	46	21	21	8	312
NPLs as % of gross loans	1.1%	11.4%	3.8%	3.5%	1.7%	1.4%

* The Group's SME mortgage lending is captured within the Commercial line above.

31 December 2024	Stage 3					Total €m
	Home loans €m	Buy-to-let €m	Commercial* €m	Consumer finance €m	Finance leases and hire purchase receivables €m	
NPL is < 90 days	113	29	17	6	4	169
NPL is > 90 days and < 1 year past due	55	10	-	4	2	71
NPL is 1-2 years past due	34	11	2	2	1	50
NPL is 2-5 years past due	30	12	1	3	1	47
NPL is > 5 years past due	27	9	4	5	-	45
POCI	-	-	-	-	-	-
Non-performing loans	259	71	24	20	8	382
Foreclosed assets	2	5	-	-	-	7
Non-performing assets	261	76	24	20	8	389
NPLs as % of gross loans	1.3%	15.3%	4.9%	3.6%	1.7%	1.8%

* The Group's SME mortgage lending is captured within the Commercial line above.

Non-performing loans as a percentage of total Loans and advances was 1.4% at 31 December 2025, down from 1.8% at 31 December 2024. The reduction reflects lower new default flows during the year and the sale of the non-performing Glas 3.1 loan portfolio.

Total portfolio loss allowance: SOFP

The tables below outline the ECL loss allowance total at 31 December 2025 and 31 December 2024 in respect of total customer Loans and advances.

The impairment write-back in respect of the total Loans and advances for year ended 31 December 2025 was €39m, compared to a €30m write-back for the year ended 31 December 2024.

	31 December 2025 €m	31 December 2024 €m
Loss allowance - SOFP		
Stage 1	35	123
Stage 2	146	134
Stage 3	139	135
Total loss allowance	320	392

36. Financial risk management (continued)

	31 December 2025	31 December 2024
	%	%
Provision coverage ratio*		
Stage 1	0.2%	0.6%
Stage 2	5.5%	6.6%
Stage 3	45.0%	35.4%
Total provisions/total loans	1.4%	1.8%

* Provision coverage ratio is calculated as loss allowance/impairment provision as a percentage of gross loan balance.

Origination profile

Loan origination profile of the residential mortgage loan portfolio before provision for impairment:

The table below illustrates that €1bn or 6% (31 December 2024: 8%) of the residential mortgage portfolio originated before 2006. Between 2006 and 2008 origination was €3bn or 14% (31 December 2024: 17%) of the residential mortgages. The remaining 80% (31 December 2024: 75%) of residential mortgages were originated between 2009 and 2025.

31 December 2025	Residential mortgages portfolio		Stage 3 residential mortgages portfolio	
	Number	Balance €m	Number	Balance €m
2002 and before	5,311	139	296	10
2003	3,694	153	123	8
2004	5,648	324	148	12
2005	8,555	678	264	24
2006	11,543	1,135	341	49
2007	9,931	1,111	354	56
2008	6,309	689	233	32
2009	1,928	172	49	4
2010	734	53	13	1
2011	677	51	7	1
2012	1,073	87	11	1
2013	1,435	127	14	1
2014	2,496	234	12	1
2015	3,463	355	37	3
2016	4,115	500	44	5
2017	5,064	690	51	6
2018	6,529	1,008	53	9
2019	8,295	1,401	63	10
2020	6,778	1,272	49	7
2021	7,745	1,646	39	7
2022	8,712	2,122	18	4
2023	8,073	2,063	18	4
2024	6,892	1,911	7	2
2025	9,162	2,704	2	1
Total	134,162	20,625	2,246	258

Notes to the Consolidated Financial Statements (continued)

36. Financial risk management (continued)

31 December 2024	Residential mortgages portfolio		Stage 3 residential mortgages portfolio	
	Number	Balance €m	Number	Balance €m
2001 and before	4,110	91	251	7
2002	2,549	93	112	5
2003	4,077	191	149	11
2004	6,125	386	173	13
2005	10,033	793	332	34
2006	12,520	1,326	496	76
2007	10,755	1,276	452	79
2008	6,776	779	279	42
2009	2,056	190	61	6
2010	852	58	14	1
2011	731	58	7	1
2012	1,143	98	13	1
2013	1,549	143	17	2
2014	2,646	263	14	2
2015	3,709	397	38	3
2016	4,362	557	38	5
2017	5,348	763	42	7
2018	6,911	1,116	56	8
2019	8,863	1,564	60	10
2020	7,394	1,475	47	6
2021	8,349	1,859	31	5
2022	9,415	2,416	14	3
2023	8,291	2,173	9	2
2024	7,047	1,938	4	1
Total	135,611	20,003	2,709	330

36. Financial risk management (continued)

Loan-to-value profile

Loan-to-value (LTV) of mortgage lending (index linked):

The LTV ratio is calculated at a property level and is the average of indexed property values in proportion to the outstanding loan balance. LTV is a key input to the impairment provisioning process. The tables below outline the composition of this ratio for the residential loan portfolio.

Actual and average LTVs across principal mortgage portfolios:

The tables below outline the weighted average LTVs for the total residential mortgage portfolios analysed across home loan and buy-to-let facilities by value. The weighted average LTV on the residential mortgage portfolios is 46% at 31 December 2025 compared to 48% at 31 December 2024.

31 December 2025	Home loans %	Buy-to-let %	Total %
Less than 50%	59%	60%	58%
50% to 70%	29%	25%	29%
71% to 90%	12%	9%	12%
91% to 100%	-	2%	1%
Subtotal	100%	96%	100%
101% to 110%	-	2%	-
111% to 120%	-	1%	-
121% to 130%	-	-	-
131% to 140%	-	-	-
141% to 150%	-	-	-
151% to 160%	-	-	-
161% to 170%	-	-	-
171% to 180%	-	-	-
Greater than 180%	-	1%	-
Subtotal	-	4%	-
Total	100%	100%	100%
Weighted average LTV:			
Stock of residential mortgages	46%	48%	46%
Residential mortgages originated in the year	65%	52%	65%
Stage 3 mortgages	50%	90%	56%

Notes to the Consolidated Financial Statements (continued)

36. Financial risk management (continued)

31 December 2024	Home loans %	Buy-to-let %	Total %
Less than 50%	54%	51%	54%
50% to 70%	33%	26%	33%
71% to 90%	13%	11%	12%
91% to 100%	-	4%	1%
Subtotal	100%	92%	100%
101% to 110%	-	2%	-
111% to 120%	-	2%	-
121% to 130%	-	1%	-
131% to 140%	-	-	-
141% to 150%	-	1%	-
151% to 160%	-	-	-
161% to 170%	-	-	-
171% to 180%	-	-	-
Greater than 180%	-	2%	-
Subtotal	-	8%	-
Total	100%	100%	100%
Weighted average LTV:			
Stock of residential mortgages	48%	56%	48%
Residential mortgages originated in the year	68%	51%	68%
Stage 3 mortgages	53%	106%	64%

36. Financial risk management (continued)

Analysis by LTV of the Group's residential mortgage lending which is neither past due nor Stage 3:

The tables below illustrate that 100% of residential home loan mortgages (31 December 2024: 100%) and 99% of residential buy-to-let mortgages (31 December 2024: 97%) that are neither past due nor stage 3 are in positive equity as at 31 December 2025.

31 December 2025	Home loans %	Buy-to-let %	Total %
Less than 50%	59%	66%	59%
50% to 70%	29%	26%	29%
71% to 90%	12%	6%	12%
91% to 100%	-	1%	-
Subtotal	100%	99%	100%
101% to 110%	-	1%	-
111% to 120%	-	-	-
121% to 130%	-	-	-
131% to 140%	-	-	-
141% to 150%	-	-	-
151% to 160%	-	-	-
161% to 170%	-	-	-
171% to 180%	-	-	-
Greater than 180%	-	-	-
Subtotal	-	1%	-
Total	100%	100%	100%
31 December 2024	Home loans %	Buy-to-let %	Total %
Less than 50%	54%	58%	54%
50% to 70%	33%	28%	33%
71% to 90%	13%	9%	13%
91% to 100%	-	2%	-
Subtotal	100%	97%	100%
101% to 110%	-	2%	-
111% to 120%	-	1%	-
121% to 130%	-	-	-
131% to 140%	-	-	-
141% to 150%	-	-	-
151% to 160%	-	-	-
161% to 170%	-	-	-
171% to 180%	-	-	-
Greater than 180%	-	-	-
Subtotal	-	3%	-
Total	100%	100%	100%

Notes to the Consolidated Financial Statements (continued)

36. Financial risk management (continued)

Analysis by LTV of the Group's residential mortgage lending which are classified as Stage 3:

The tables below illustrate that 93% of residential home loan mortgages (31 December 2024: 92%) and 76% of residential buy-to-let mortgages (31 December 2024: 68%) that are classified as Stage 3 are in positive equity as at 31 December 2025.

31 December 2025	Home loans	Buy-to-let	Total
	%	%	%
Less than 50%	60%	16%	53%
50% to 70%	23%	20%	23%
71% to 90%	8%	29%	11%
91% to 100%	2%	11%	3%
Subtotal	93%	76%	90%
101% to 110%	1%	7%	2%
111% to 120%	1%	8%	2%
121% to 130%	1%	1%	1%
131% to 140%	1%	1%	1%
141% to 150%	1%	1%	1%
151% to 160%	1%	1%	1%
161% to 170%	-	-	-
171% to 180%	-	-	-
Greater than 180%	1%	5%	2%
Subtotal	7%	24%	10%
Total	100%	100%	100%
	€m	€m	€m
Stage 3	215	43	258
31 December 2024	Home loans	Buy-to-let	Total
	%	%	%
Less than 50%	54%	12%	45%
50% to 70%	26%	18%	24%
71% to 90%	10%	21%	12%
91% to 100%	2%	17%	6%
Subtotal	92%	68%	87%
101% to 110%	2%	6%	3%
111% to 120%	2%	8%	3%
121% to 130%	1%	3%	1%
131% to 140%	-	1%	1%
141% to 150%	1%	1%	1%
151% to 160%	-	1%	-
161% to 170%	-	1%	-
171% to 180%	-	1%	-
Greater than 180%	2%	10%	4%
Subtotal	8%	32%	13%
Total	100%	100%	100%
	€m	€m	€m
Stage 3	259	71	330

36. Financial risk management (continued)

(v) Group portfolios: Collateral in possession

Collateral in possession occurs where the obligor either (i) voluntarily surrenders the property or (ii) the Group takes legal ownership due to the non-repayment of the loan facility. The following tables outline the main movements in this category during the year.

Stock of collateral in possession

	31 December 2025		31 December 2024	
	Number	Balance outstanding at transfer of ownership €m	Number	Balance outstanding at transfer of ownership €m
Residential collateral in possession				
Home loans	5	2	8	5
Buy-to-let	18	4	30	7
Total	23	6	38	12

Collateral in possession assets are sold as soon as practicable. These assets which total €4m as at 31 December 2025 (31 December 2024: €7m) are included in assets held for sale (see note 16 for further details).

During the year the ownership of no properties were transferred to the Group.

31 December 2025	Number of disposals	Balance outstanding at transfer of ownership €m	Gross sales proceeds €m	Costs to sell €m	Pre provisioning loss on sale* €m
Collateral in possession					
Home loans	3	3	2	-	1
Buy-to-let	12	3	1	-	2
Year ended 31 December 2025	15	6	3	-	3

* Calculated as gross sales proceeds less balance outstanding at transfer of ownership less costs to sell. These losses are provided for as part of the impairment provisioning process.

31 December 2024	Number of disposals	Balance outstanding at transfer of ownership €m	Gross sales proceeds €m	Costs to sell €m	Pre provisioning loss on sale* €m
Collateral in possession					
Home loans	2	1	1	-	-
Buy-to-let	22	6	4	-	2
Year ended 31 December 2024	24	7	5	-	2

* Calculated as gross sales proceeds less balance outstanding at transfer of ownership less costs to sell. These losses are provided for as part of the impairment provisioning process.

Notes to the Consolidated Financial Statements (continued)

36. Financial risk management (continued)

(vi) Additional disclosures on forborne loans

The Group operates a number of mechanisms which are designed to assist borrowers experiencing credit and loan repayment difficulties, which have been developed in accordance with the current Code of Conduct on Mortgages Arrears (CCMA).

The tables below analyse loans for which the Group has entered formal temporary and permanent forbearance arrangements with customers for the years ended 31 December 2025 and 2024.

(a) Weighted Average - LTV

LTV on total residential mortgages in forbearance

The below tables illustrate that 94% of residential home loan mortgages (31 December 2024: 94%) and 73% of residential buy-to-let mortgages (31 December 2024: 75%) that are in forbearance are in positive equity as at 31 December 2025.

31 December 2025	Home loans %	Buy-to-let %	Total %
Less than 50%	61%	24%	59%
50% to 70%	23%	19%	22%
71% to 90%	8%	26%	9%
91% to 100%	2%	4%	2%
Subtotal	94%	73%	92%
101% to 110%	1%	6%	2%
111% to 120%	-	15%	2%
121% to 130%	1%	-	1%
131% to 140%	1%	-	1%
141% to 150%	1%	-	-
151% to 160%	1%	2%	1%
161% to 170%	-	-	-
171% to 180%	-	-	-
Greater than 180%	1%	4%	1%
Subtotal	6%	27%	8%
Total	100%	100%	100%
Weighted average LTV:			
Stock of residential mortgages	50%	76%	52%
Residential mortgages originated in the year	60%	-	60%
Stage 3 mortgages	56%	84%	59%

36. Financial risk management (continued)

31 December 2024	Home loans %	Buy-to-let %	Total %
Less than 50%	54%	16%	49%
50% to 70%	27%	18%	26%
71% to 90%	10%	26%	12%
91% to 100%	3%	15%	4%
Subtotal	94%	75%	91%
101% to 110%	1%	3%	2%
111% to 120%	2%	9%	2%
121% to 130%	1%	3%	1%
131% to 140%	-	1%	1%
141% to 150%	1%	1%	1%
151% to 160%	-	2%	-
161% to 170%	-	1%	-
171% to 180%	-	-	-
Greater than 180%	1%	5%	2%
Subtotal	6%	25%	9%
Total	100%	100%	100%
Weighted average LTV:			
Stock of residential mortgages	52%	85%	57%
Residential mortgages originated in the year	72%	-	72%
Stage 3 mortgages	58%	94%	64%

(b) Forbearance arrangements - mortgages

The tables below set out the volume of loans for which the Group has entered formal temporary and permanent forbearance arrangements with customers as at 31 December 2025 and 31 December 2024.

(i) Residential home loan mortgages:

The incidence of the main type of forbearance arrangements for owner occupied residential mortgages is analysed below:

31 December 2025	All loans		Stage 3	
	Number	Balances €m	Number	Balances €m
Interest only	16	2	12	1
Reduced payment (less than interest only)	13	3	10	3
Reduced payment (greater than interest only)	607	85	337	48
Payment moratorium	58	7	39	4
Arrears capitalisation	443	48	297	31
Term extension	292	20	124	8
Hybrid*	148	18	101	11
Split mortgages**	61	8	61	8
Total	1,638	191	981	114

* Hybrid is a combination of two or more forbearance arrangements.

** Split mortgage is where a portion of outstanding debt is deferred until financial ability or circumstances improve.

Notes to the Consolidated Financial Statements (continued)

36. Financial risk management (continued)

31 December 2024	All loans		Stage 3	
	Number	Balances	Number	Balances
		€m		€m
Interest only	8	1	6	1
Reduced payment (less than interest only)	32	6	26	4
Reduced payment (greater than interest only)	842	117	416	61
Payment moratorium	65	9	45	6
Arrears capitalisation	550	59	348	38
Term extension	355	25	178	13
Hybrid*	150	15	118	12
Split mortgages**	74	10	74	10
Total	2,076	242	1,211	145

* Hybrid is a combination of two or more forbearance arrangements.

** Split mortgage is where a portion of outstanding debt is deferred until financial ability or circumstances improve.

The tables above reflect a decrease of 438 cases in the year to 31 December 2025 for the Group in the number of residential home loan mortgages in forbearance arrangements, a decrease of €51m. The average balance of forborne loans is €0.117m at 31 December 2025 (31 December 2024: €0.117m).

(ii) Residential buy-to-let mortgages:

The incidence of the main type of forbearance arrangements for residential buy-to-let mortgages is analysed below:

31 December 2025	All loans		Stage 3	
	Number	Balances	Number	Balances
		€m		€m
Interest only	5	2	4	2
Reduced payment (less than interest only)	-	-	-	-
Reduced payment (greater than interest only)	17	4	13	3
Payment moratorium	1	-	1	-
Arrears capitalisation	5	2	4	1
Term extension	16	2	7	1
Hybrid*	23	4	18	4
Split mortgages**	3	1	3	1
Total	70	15	50	12

* Hybrid is a combination of two or more forbearance arrangements.

** Split mortgage is where a portion of outstanding debt is deferred until financial ability or circumstances improve.

36. Financial risk management (continued)

31 December 2024	All loans		Stage 3	
	Number	Balances	Number	Balances
		€m		€m
Interest only	6	3	5	3
Reduced payment (less than interest only)	2	1	2	1
Reduced payment (greater than interest only)	46	11	34	9
Payment moratorium	4	1	4	1
Arrears capitalisation	10	3	7	2
Term extension	16	3	10	2
Hybrid*	34	11	24	7
Split mortgages**	4	1	4	1
Total	122	34	90	26

* Hybrid is a combination of two or more forbearance arrangements.

** Split mortgage is where a portion of outstanding debt is deferred until financial ability or circumstances improve.

The tables above reflect a decrease of 52 cases in the year to 31 December 2025 for the Group in the number of residential buy-to-let in forbearance arrangements, a decrease of €19m in balances. The average balance of forborne loans is €0.214m at 31 December 2025 (31 December 2024: €0.279m).

(iii) Commercial mortgages

The incidence of the main type of forbearance arrangements for commercial mortgages is analysed below:

Commercial mortgages*	31 December 2025		31 December 2024	
	Number	Balances	Number	Balances
		€m		€m
Interest only	-	-	1	-
Reduced payment (greater than interest only)	4	1	4	1
Payment moratorium	1	-	-	-
Arrears capitalisation	7	1	11	1
Term extension	5	1	5	1
Hybrid**	2	1	2	1
Split mortgages***	-	-	-	-
Total	19	4	23	4

* The Group's SME mortgage lending is captured within the table above.

** Hybrid is a combination of two or more forbearance arrangements.

*** Split mortgage is where a portion of outstanding debt is deferred until financial ability or circumstances improve.

The table above reflects a decrease of 4 cases in the year to 31 December 2025 for the Group in the number of commercial mortgages in forbearance arrangements, with balances remaining unchanged at €4m.

Notes to the Consolidated Financial Statements (continued)

36. Financial risk management (continued)

(c) Reconciliation of movement in forborne loans for all classes

The tables below provide an analysis of the movement of total forborne loans and Stage 3 forborne loans during the year. It outlines the number and balances of forbearance treatments offered, expired and loans paid down during the year.

(i) Reconciliation of movement of total forborne loans

31 December 2025	Residential mortgages				Commercial cases	Commercial balances*	Total cases	Total balances
	Home loans cases	Home loans balances	Buy -to-let cases	Buy-to-let balances				
		€m		€m		€m		€m
Opening balance 1 January 2025	2,076	242	122	34	23	4	2,221	280
New forbearance extended during the year**	276	37	4	-	2	1	282	38
Deleveraged loans	(159)	(22)	(24)	(10)	-	-	(183)	(32)
Exited forbearance								
- re-classified to Stage 3 non-forborne	(16)	(2)	(1)	-	-	-	(17)	(2)
- expired forbearance treatment	(392)	(44)	(19)	(6)	(1)	-	(412)	(50)
- expired loan paid down	(147)	(13)	(12)	(2)	(5)	-	(164)	(15)
Balance shift***	-	(7)	-	(1)	-	(1)	-	(9)
Closing balance of loans in forbearance as at 31 December 2025	1,638	191	70	15	19	4	1,727	210

* The Group's SME mortgage lending is captured within the Commercial line above.

** Balance movements are stated net of portfolio re-classification.

*** Balance movements in respect of loans which are in forbearance at the start and end of the year.

31 December 2024	Residential mortgages				Commercial cases	Commercial balances*	Total cases	Total balances
	Home loans cases	Home loans balances	Buy -to-let cases	Buy-to-let balances				
		€m		€m		€m		€m
Opening balance 1 January 2024	3,174	393	226	79	42	7	3,442	479
New forbearance extended during the year**	310	37	17	3	2	1	329	41
Deleveraged loans	(543)	(83)	(81)	(33)	(4)	(1)	(628)	(117)
Exited forbearance								
- re-classified to Stage 3 non-forborne	(5)	(1)	(1)	-	-	-	(6)	(1)
- expired forbearance treatment	(749)	(77)	(23)	(5)	(12)	(1)	(784)	(83)
- expired loan paid down	(111)	(17)	(16)	(9)	(5)	(2)	(132)	(28)
Balance shift***	-	(10)	-	(1)	-	-	-	(11)
Closing balance of loans in forbearance as at 31 December 2024	2,076	242	122	34	23	4	2,221	280

* The Group's SME mortgage lending is captured within the Commercial line above.

** Balance movements are stated net of portfolio re-classification.

*** Balance movements in respect of loans which are in forbearance at the start and end of the year.

36. Financial risk management (continued)

(ii) Reconciliation of movement in forborne loans Stage 3

	Residential mortgages				Commercial cases	Commercial balances*	Total cases	Total balances
	Home loan cases	Home loan balances	Buy-to-let cases	Buy-to-let balances				
31 December 2025		€m		€m		€m		€m
Opening balance 1 January 2025	1,211	145	90	26	18	4	1,319	175
New Stage 3 forbearance extended during the year**	225	28	2	-	2	-	229	28
Deleveraged loans	(158)	(22)	(24)	(10)	-	-	(182)	(32)
Exited forborne Stage 3, now performing forborne	(221)	(26)	(7)	(3)	-	-	(228)	(29)
Exited forbearance								
- re-classified to Stage 3 non-forborne	(5)	(1)	(1)	-	-	-	(6)	(1)
- expired forbearance treatment	(3)	(1)	(2)	-	-	-	(5)	(1)
- expired loan paid down	(68)	(7)	(8)	(1)	(2)	-	(78)	(8)
Balance shift***	-	(2)	-	-	-	-	-	(2)
Closing balance of loans in forbearance as at 31 December 2025	981	114	50	12	18	4	1,049	130

* The Group's SME mortgage lending is captured within the Commercial line above.

** Balance movements are stated net of portfolio re-classification.

*** Balance movements in respect of loans which are in forbearance at the start and end of the year.

	Residential mortgages				Commercial cases	Commercial balances*	Total cases	Total balances
	Home loan cases	Home loan balances	Buy-to-let cases	Buy-to-let balances				
31 December 2024		€m		€m		€m		€m
Opening balance 1 January 2024	1,741	236	168	61	27	6	1,936	303
New Stage 3 forbearance extended during the year**	319	38	18	5	2	1	339	44
Deleveraged loans	(542)	(83)	(81)	(33)	(4)	(1)	(627)	(117)
Exited forborne Stage 3, now performing forborne	(272)	(30)	(9)	(2)	(3)	-	(284)	(32)
Exited forbearance								
- re-classified to Stage 3 non-forborne	(3)	(1)	-	-	-	-	(3)	(1)
- expired forbearance treatment	(11)	-	-	-	-	-	(11)	-
- expired loan paid down	(21)	(11)	(6)	(5)	(4)	(2)	(31)	(18)
Balance shift***	-	(4)	-	-	-	-	-	(4)
Closing balance of loans in forbearance as at 31 December 2024	1,211	145	90	26	18	4	1,319	175

* The Group's SME mortgage lending is captured within the Commercial line above.

** Balance movements are stated net of portfolio re-classification.

*** Balance movements in respect of loans which are in forbearance at the start and end of the year.

Notes to the Consolidated Financial Statements (continued)

36. Financial risk management (continued)

(vii) Funding profile

The amounts below for non-derivative financial liabilities is calculated using undiscounted cash flows which include an estimate of future interest payments. Derivative liabilities include contractual undiscounted cash flows on a gross basis if the instrument is settled gross and on a net basis if settled net.

The ALCo monitors sources of funding and their respective maturities with a focus on establishing a stable and cost effective funding profile. Excluding equity, the Group's funding profile as at the 31 December 2025 can be broken down into the below component parts:

	31 December 2025 %	31 December 2024 %
Customer accounts	92	91
Long-term debt	7	8
Short-term debt	1	1
	100	100

Long-term debt refers to debt with a maturity greater than 12 months from year-end and short-term debt is that which has a maturity of less than 12 months from year-end.

In accordance with IFRS 7, Financial Instruments: Disclosures, the following tables present the maturity analysis of financial liabilities on an undiscounted basis, by remaining contractual maturity at the SOFP date. These will not agree directly with the balances on the consolidated SOFP due to the inclusion of future interest payments.

31 December 2025	Up to 1 month €m	1-3 months €m	3-6 months €m	6-12 months €m	1-2 years €m	Over 2 years €m	Total €m
Liabilities							
Deposits by banks	104	-	-	-	-	-	104
Customer accounts	18,922	2,161	1,096	2,529	763	210	25,681
Debt securities in issue	8	16	24	49	97	1,767	1,961
Derivative financial instruments	1	-	-	-	-	3	4
Subordinated liabilities	1	2	3	7	13	449	475
Other financial liabilities	100	-	2	3	6	21	132
Total liabilities	19,136	2,179	1,125	2,588	879	2,450	28,357
31 December 2024	Up to 1 month €m	1-3 months €m	3-6 months €m	6-12 months €m	1-2 years €m	Over 2 years €m	Total €m
Liabilities							
Deposits by banks	105	-	-	-	-	-	105
Customer accounts	18,051	1,593	949	2,031	967	631	24,222
Debt securities in issue	8	16	24	49	97	1,864	2,058
Derivative financial instruments	-	-	-	-	-	-	-
Subordinated liabilities	1	1	2	4	7	285	300
Other financial liabilities	95	-	2	3	6	25	131
Total liabilities	18,260	1,610	977	2,087	1,077	2,805	26,816

The maturity analysis for credit commitments and guarantees are presented in Note 41.

36. Financial risk management (continued)

When managing the Group's liquidity and funding profile, for products where the contractual maturity date may be different from actual behaviour, the Group uses statistical methodologies to manage liquidity on an expected or behaviourally adjusted basis.

The following table details the Group's liquidity analysis for derivative instruments that do not qualify as hedging instruments. The table has been drawn up based on the undiscounted contractual net cash inflows and outflows on derivative instruments that settle on a net basis and the undiscounted gross inflows and outflows on those derivatives that require gross settlement. When the amount payable or receivable is not fixed, the amount disclosed has been determined by reference to the projected interest rates from the yield curves at the end of the reporting year.

31 December 2025	Up to 1 month €m	1-3 months €m	3-6 months €m	6-12 months €m	1-2 years €m	Over 2 years €m	Total €m
Gross settled:							
FX forwards							
- inflow	49	-	-	-	-	-	49
- outflow	(50)	-	-	-	-	-	(50)
Balance at 31 December 2025	(1)	-	-	-	-	-	(1)
31 December 2024	Up to 1 month €m	1-3 months €m	3-6 months €m	6-12 months €m	1-2 years €m	Over 2 years €m	Total €m
Gross settled:							
FX forwards							
- inflow	52	-	-	-	-	-	52
- outflow	(52)	-	-	-	-	-	(52)
Balance at 31 December 2024	-	-	-	-	-	-	-

Notes to the Consolidated Financial Statements (continued)

36. Financial risk management (continued)

(viii) Interest rate gap position

Gap analysis is a technique for measuring the Group's interest rate risk exposure beginning with a maturity/re-pricing schedule that distributes interest sensitive assets, liabilities, and derivative positions into "time bands" according to their maturity (if fixed rate), time remaining to their next re-pricing (if floating rate) or behavioural convention in order to identify any sources of significant mismatches. The December 2025 IRRBB profile below also includes interest cash flows based on the next re-price date i.e. one month's interest included for variable rate products and interest until the end of the fixed rate period for fixed rate products. The Non Maturity Deposits are assumed to have a maximum behavioural maturity of 7 years. These will not agree directly with the balances on the consolidated SOFP due to the inclusion of future interest payments.

A summary of the Group's EUR interest rate gap position is as follows:

Interest rate re-pricing

31 December 2025	Not more than 3 months €m	Over 3 months but not more than 6 months €m	Over 6 months but not more than 1 year €m	Over 1 year but not more than 5 years €m	Over 5 years €m	Total €m
Assets	9,169	1,226	2,447	15,039	3,193	31,074
Liabilities	(7,455)	(1,861)	(3,729)	(13,076)	(4,470)	(30,591)
Derivatives	(1,156)	278	7	1,001	-	130
Interest rate re-pricing gap	558	(357)	(1,275)	2,964	(1,277)	613
Cumulative interest rate re-pricing gap	558	201	(1,074)	1,890	613	

31 December 2024	Not more than 3 months €m	Over 3 months but not more than 6 months €m	Over 6 months but not more than 1 year €m	Over 1 year but not more than 5 years €m	Over 5 years €m	Total €m
Assets	10,261	1,156	2,494	13,437	2,314	29,662
Liabilities	(6,347)	(1,657)	(3,650)	(13,491)	(4,367)	(29,512)
Derivatives	(1,843)	51	-	2,049	-	257
Interest rate re-pricing gap	2,071	(450)	(1,156)	1,995	(2,053)	407
Cumulative interest rate re-pricing gap	2,071	1,621	465	2,460	407	

36. Financial risk management (continued)

Sensitivity analysis

The following table outlines the sensitivity of the Group's NII to a change in interest rates. The NII sensitivity is calculated on a constant balance sheet basis in line with the EBA Guidelines on Interest Rate Risk in the Banking Book (EBA 2022/03).

31 December 2025	100bps m	200bps m
Upwards	10	19
Downwards	(12)	(23)
31 December 2024	100bps m	200bps m
Upwards	19	38
Downwards	(14)	(29)

37. Capital management

The core objective of the Group's capital management policy is to ensure that the Group complies with its regulatory capital requirements and maintains sufficient capital to cover its business risks and support its strategy. The Group has an established Internal Capital Adequacy Assessment Process (ICAAP) to ensure that it is adequately capitalised against the inherent risks to which its business operations are exposed and to maintain an appropriate level of capital to meet the minimum capital requirements. The Board has overall responsibility for the completeness and implementation of the ICAAP. The ICAAP is subject to review and evaluation by the Regulator.

The management of capital within the Group is monitored on an ongoing basis by the Board and various Executive and Board Committees in accordance with Board approved policy.

The Group's regulatory capital comprises of three Tiers:

- CET1 Capital, consisting of ordinary share capital, share premium, retained earnings and other regulatory adjustments relating to items that are included in equity but are treated differently for capital adequacy purposes;
- Tier 1 Capital, consisting of CET1 capital and qualifying convertible perpetual financial instruments with discretionary coupons; and
- Total Capital, consisting of Tier 1 capital and qualifying subordinated liabilities, revaluation reserves and other regulatory capital adjustments.

The Group's 31 December 2025 regulatory Pillar 2 Requirement (P2R) reduced by -0.25% to 3.00% (31 December 2024: 3.25%) and an Other Systemically Important Institution (O-SII) buffer of 0.5% is effective 1 January 2025.

The Group's 31 December 2025 regulatory CET1 capital requirement is 10.69% (31 December 2024: 10.33%). The CET1 ratio requirement of 10.69% consists of Pillar 1 minimum requirement of 4.50% (31 December 2024: 4.50%), P2R of 1.69%* (31 December 2024: 1.83%), Capital Conservation Buffer (CCB) of 2.50% (31 December 2024: 2.50%), Countercyclical Buffer (CCyB) of 1.50% (31 December 2024: 1.50%) and the application of a 0.50% O-SII buffer (31 December 2024: Nil).

The Group's Total Capital requirement of 15.50% at 31 December 2025 (31 December 2024: 15.25%) consists of Pillar 1 minimum requirement of 8.00% (31 December 2024: 8.00%), P2R of 3.00% (31 December 2024: 3.25%), CCB of 2.50% (31 December 2024: 2.50%), CCyB of 1.50% (31 December 2024: 1.50%) and O-SII buffer of 0.50% (31 December 2024: Nil).

These requirements exclude Pillar 2 Guidance (P2G) which is not publicly disclosed.

* 56.25% of P2R must be made up of CET1

Notes to the Consolidated Financial Statements (continued)

38. Current/non-current assets and liabilities

The following table provides an analysis of certain asset and liability line items as at 31 December 2025 and 31 December 2024. The analysis includes amounts expected to be recovered or settled no more than 12 months after the SOFP date (current) and more than 12 months after the SOFP date (non-current).

		31 December 2025			31 December 2024		
	Note	Current	Non-current	Total	Current	Non-current	Total
		€m	€m	€m	€m	€m	€m
Assets							
Cash and balances at central banks	12	75	-	75	72	-	72
Items in the course of collection	12	25	-	25	23	-	23
Loans and advances to banks	13	1,719	-	1,719	2,202	-	2,202
Derivative financial instruments	14	14	10	24	-	59	59
Other assets	15	51	-	51	7	-	7
Assets classified as held for sale	16	5	-	5	12	-	12
Debt securities	17	653	4,707	5,360	138	4,189	4,327
Equity securities	18	-	1	1	-	9	9
Prepayments and contract assets	19	168	-	168	63	-	63
Loans and advance to customers	20	3,659	18,590	22,249	2,685	18,738	21,423
Liabilities							
Deposits by banks including central banks	26	104	-	104	105	-	105
Customer accounts	27	24,640	959	25,599	22,557	1,563	24,120
Derivative financial instruments	14	1	3	4	-	-	-
Debt securities in issue	28	56	1,667	1,723	56	1,675	1,731
Other liabilities	29	105	26	131	100	29	129
Accruals		12	-	12	12	-	12
Provisions	30	29	35	64	13	33	46
Subordinated liabilities	31	1	346	347	3	254	257

39. Transfer of financial assets

In the ordinary course of business, the Group enters into transactions that result in the transfer of financial assets of Loans and advances to customers and debt securities. In accordance with note 1.5 (vii), the transferred financial assets continue to be either recognised in their entirety or to the extent of the Group's continuing involvement, or are derecognised in their entirety.

The Group transfers financial assets primarily through the following transactions:

1. sale and repurchase of securities; and
2. securitisation activities in which Loans and advances to customers are sold to Structured Entities (SEs) that in turn issue notes to investors which are collateralised by purchased assets.

(a) Transferred financial assets that are not derecognised in their entirety

Sale and repurchase agreements

Sale and repurchase agreements are transactions in which the Group sells a security and simultaneously agrees to repurchase it (or an asset that is substantially the same) at a fixed price on a future date. The Group continues to recognise the securities in their entirety in the Statement of Financial Position as Loans and advances to customers (note 20) and debt securities (note 17) because it retains substantially all the risks and rewards of ownership. The cash consideration received is recognised as a financial asset and a financial liability is recognised for the obligation to pay the repurchase price. As the Group sells the contractual rights to the cash flows of the securities it does not have the ability to use or pledge as collateral the transferred assets during the term of the arrangement. The carrying value of repurchase agreements at 31 December 2025 is €89m (31 December 2024: €65m).

39. Transfer of financial assets (continued)

Securitisations

The Group sells Loans and advances to customers to SEs that in turn issue notes to investors which are collateralised by the purchased assets. For the purpose of disclosure in this note, a transfer of such financial assets may arise if the Group sells assets to a consolidated SE, the transfer of financial assets is from the Group (that includes the consolidated SE) to investors in the notes issued by the SE. The transfer is in the form of the Group assuming an obligation to pass cash flows from the underlying assets to investors in the notes.

Although the Group does not own more than half of the voting power of the Fastnet entities, it has the power to control the relevant activities of the SE and the ability to affect the variable returns of the investee and hence these SEs are consolidated. In these cases, the consideration received from the investors in the notes in the form of cash is recognised as a financial asset and a corresponding financial liability is recognised. Therefore, the Group is exposed to substantially all the risks and rewards of ownership including credit and market risk of the transferred assets.

When the Group transfers assets as part of the securitisation transactions it does not have the ability to use or pledge as collateral the transferred assets during the term of the arrangement.

The table below sets out an overview of carrying amounts and fair values related to transferred financial assets that are not derecognised in their entirety and associated liabilities.

	31 December 2025		31 December 2024	
	Sale and repurchase agreements	Securitisations	Sale and repurchase agreements	Securitisations
	€m	€m	€m	€m
Carrying amount of assets	90	-	377	-
Carrying amount of associated liabilities	89	-	365	-
Liabilities that have recourse only to the transferred financial assets				
Fair value of assets	89	-	371	-
Fair value of associated liabilities	89	-	365	-
Net position	-	-	6	-

(b) Transferred financial assets that are derecognised in their entirety

The Group has not transferred any financial assets that were derecognised in their entirety where the Group has continuing involvement in a transferred asset.

40. Offsetting financial assets and financial liabilities

In accordance with IAS 32, Financial Instruments: Presentation, the Group reports financial assets and financial liabilities on a net basis on the SOFP only if there is a legally enforceable right to set off the recognised amounts and there is an intention to settle on a net basis, or to realise the asset and settle the liability simultaneously. This is disclosed in the table below in the "Effect of offsetting on the SOFP" section.

The gross amounts of derivative assets and liabilities and their net amounts disclosed in the below tables have been measured in the SOFP at fair value.

The tables below also disclose (in the "Related amounts not offset in the SOFP" section) the impact of master netting agreements and other similar agreements on all derivative financial instruments and similar financial instruments that are subject to master netting agreements or similar agreements, but do not qualify for netting on the balance sheet. The similar financial instruments include securitisations and sale and repurchase agreements. The similar agreements include global master repurchase agreements. It highlights the amounts that could be potentially offset on the SOFP and those amounts covered by collateral placed with or by counterparties to these trades.

The tables highlight the amounts that have been offset on the SOFP and those amounts covered by collateral placed with or by counterparties to these trades. It does not highlight where right of offset is available in the event of a default, as allowed under ISDA master agreements.

Notes to the Consolidated Financial Statements (continued)

40. Offsetting financial assets and financial liabilities (continued)

The tables below also provide analysis of derivative financial assets and liabilities and repurchase and reverse repurchase agreements subject to offsetting, enforceable master netting agreements and global master repurchase agreements:

	31 December 2025					
	Effect of offsetting on the SOFP			Related amounts not offset in the SOFP		
	Gross financial assets/ (liabilities) recognised €m	Gross financial (liabilities)/assets offset €m	Net amounts reported on the SOFP €m	Financial instruments €m	Cash collateral €m	Net amount €m
Assets						
Derivative financial instruments	24	-	24	-	(15)	9
	24	-	24	-	(15)	9
Liabilities						
Derivative financial instruments	(4)	-	(4)	-	-	(4)
Repurchase Agreements	89	-	89	(89)	-	-
	85	-	85	(89)	-	(4)

	31 December 2024					
	Effect of offsetting on the SOFP			Related amounts not offset in the SOFP		
	Gross financial assets/ (liabilities) recognised €m	Gross financial (liabilities)/assets offset €m	Net amounts reported on the SOFP €m	Financial instruments €m	Cash collateral €m	Net amount €m
Assets						
Derivative financial instruments	59	-	59	-	(39)	20
Reverse Repurchase Agreements	300	(300)	-	-	(1)	(1)
	359	(300)	59	-	(40)	19
Liabilities						
Derivative financial instruments	-	-	-	-	-	-
Repurchase Agreements	365	(300)	65	(65)	-	-
	365	(300)	65	(65)	-	-

41. Commitments and Contingencies

The table below provides the contractual amounts of irrevocable capital commitments. Even though these obligations are not recognised in SOFP they do involve credit risk. The maximum exposure to credit loss under commitments is the contractual amount of the instrument in the event of non-performance by the other party where all counter claims, collateral or security prove worthless. The transfer of economic resources is uncertain and cannot be reasonably measured to be recognised on the SOFP.

Credit commitments	31 December 2025 €m	31 December 2024 €m
Guarantees and irrevocable letters of credit	2	2
Commitments to extend credit		
- less than 1 year	1,509	1,573
- 1 year and over	43	43
Total commitments to extend credit	1,552	1,616
Total credit commitments	1,554	1,618

Other contingencies

The Group, like all other banks, is subject to litigation in the normal course of its business. Based on legal advice, other than matters referred to in note 30, the Group does not believe that any such litigation will have a material effect on its income statement or SOFP.

A number of different statutory and regulatory bodies, including the CBI, commenced investigations into a series of transactions involving deposits placed by Irish Life Assurance plc with Irish Bank Resolution Corporation (formerly Anglo Irish Bank) (on 31 March 2008, 26 September 2008, 29 September 2008 and 30 September 2008). While these investigations commenced a number of years ago, they were put on hold pending the determination of criminal proceedings against a number of individuals in respect of the same transactions. The Group understands that those criminal proceedings have concluded and so the Group is waiting to see if the investigations, which, from the Group's perspective, have been dormant for some time will now be re-commenced.

As part of the agreement in August 2011 to dispose of Irish Life International Limited, the Group provided certain indemnities and warranties to the purchaser under a number of identified scenarios. If the Group is required to make any reimbursements under these identified scenarios, the impact on the financial statements could be material. Based on the facts currently known, it is not practicable at this time to predict the final outcome this could have, nor the timing and possible impact on the Group.

Like other banks, in the normal course of business, customers bring complaints to the Financial Services and Pensions Ombudsman (FSPO) in relation to a variety of issues. The Group considers the applicability of FSPO decisions and findings to other customers in similar circumstances. The Group provides for any issues that might arise, where based on legal advice, the Directors believe that it is more likely than not that an outflow of resources embodying economic benefits, will be required to settle a present obligation arising from a past event. The Group has no such present obligation arising from FSPO complaints, however it will continue to keep FSPO complaints and decisions under review to assess if they identify any issues which could be of broader impact to other customers. Based on the facts currently known and the current stages that the FSPO's complaints process is at, it is not practicable at this time to predict the final outcome of FSPO complaints, nor the timing and possible impact on the Group.

As at 31 December 2025 ECL of €6m (31 December 2024: €4m) held against loan commitments are recognised in Provisions (note 30), except where the loan commitment relates to a loan already recognised as a financial asset. In this case the ECL is recognised in Loans and advances to customers (note 20).

On 1 July 2022, the Group invested in First Home Scheme Ireland DAC, along with the State, AIB and Bank of Ireland. The Group committed €54m in funding to the First Home Scheme Ireland DAC. €30m was recognised in the SOFP in respect of the scheme as at 31 December 2025 (31 December 2024: €20m).

Notes to the Consolidated Financial Statements (continued)

42. Related Parties

Related parties include individuals and entities that can exercise significant influence on operational and financial policies of the Group.

The Group has a related party relationship with its Directors, Senior Executives, the Group's pension schemes, the Minister for Finance and with the Irish Government and Irish Government related entities on the basis that the Irish Government is deemed to have control over the Group.

(a) Directors' and Secretary's interest

The interests of the Directors and the Company Secretary, including interests of their close family members in the share capital of the Company are as follows:

Number of beneficial ordinary shares held		31 December 2025	31 December 2024
	Position	Ordinary shares	Ordinary shares
Julie O'Neill	Chairperson	20,000	20,000
Eamonn Crowley	Chief Executive Officer	50,000	50,000
Nicola O'Brien (retired 29 August 2024)	Chief Financial Officer	-	-
Barry D'Arcy (appointed 25 February 2025)	Chief Financial Officer	-	-
Conor Ryan	Company Secretary	10	10
Ronan O'Neill (retired 30 July 2025)	Non-Executive Director	-	-
Donal Courtney (retired 01 October 2024)	Non-Executive Director	-	-
Ruth Wandhöfer	Non-Executive Director	-	-
Marian Corcoran	Non-Executive Director	4,500	4,500
Paul Doddrell	Non-Executive Director	4,046	4,046
Celine Fitzgerald	Non-Executive Director	6,227	6,227
Anne Bradley	Non-Executive Director	6,227	6,227
Catherine Moroney	Non-Executive Director	7,462	7,462
Rick Gildea	Non-Executive Director	-	-
Hugh O'Donnell (appointed 08 April 2025)	Non-Executive Director	-	-

Conor Ryan, as trustee of the employee benefit trust set up under the terms of the long-term incentive plan, has non-beneficial interest in 4,580 shares held in the plan (31 December 2024: 4,580).

There were no transactions in the above Directors' and Secretary's interests between 31 December 2025 and 04 March 2026.

Details of the Directors' remuneration is included in the Directors' Remuneration Report on pages 121 to 125.

42. Related parties (continued)

(b) Transactions with key management personnel

Key management personnel are those persons having authority and responsibility for planning, directing and controlling the activities of the Group. Key management personnel include Non-Executive Directors, Executive Directors and members of the Executive Committee (ExCo). The Executive Directors and members of the ExCo are listed below:

Members of the ExCo at 31 December 2025	
Eamonn Crowley	Chief Executive
Barry D'Arcy	Chief Financial Officer
Patrick Farrell	Chief Retail Banking Officer
Tom Hayes	Chief Technology Officer
Ger Mitchell	Chief Customer and People Officer
Andrew Walsh	Chief Legal Counsel
Peter Vance	Chief Operations Officer
Leontia Fannin	Chief Sustainability & Corporate Affairs Officer
Fiona McMahon	Chief Risk Officer

During the year ended 31 December 2025, the following key management personnel changes occurred:

Barry D'Arcy was appointed Chief Financial Officer on 25 February 2025; Hugh O'Donnell was appointed Non-Executive Director on 08 April 2025 and Fiona McMahon was appointed Chief Risk Officer on 11 August 2025.

Ronan O'Neil retired as a Non-Executive Director on 30 July 2025.

Non-Executive Directors are compensated by way of fees. In certain circumstances, expenses incurred by Non-Executive Directors during the normal course of business are paid by the Group and are included in taxable benefits. The compensation of Executive Directors and members of the ExCo comprises salary and other benefits together with pension benefits. Previously they also participated in the Group's profit sharing, share option schemes and long-term incentive plans. No awards have been issued under these schemes and plans since 2008.

Number of key management personnel as at year end is as follows:

	31 December 2025	31 December 2025
Non-Executive Directors	9	9
Executive Directors and Senior Management	9	8
	18	17

(b) (i) Total compensation to Executive and Non-Executive Directors is as follows:

	Year ended 31 December 2025 €'000	Year ended 31 December 2024 €'000
Fees	1,007	1,038
Taxable benefits	5	3
Salary and other benefits	978	789
Loss of office payments*	-	172
Pension benefits		
- defined contribution	162	140
Total	2,152	2,142

* Relates to payments to former CFO

Notes to the Consolidated Financial Statements (continued)

42. Related parties (continued)

Total compensation to other key management personnel is as follows:

	Year ended 31 December 2025 €'000	Year ended 31 December 2024 €'000
Taxable benefits	8	4
Salary and other benefits	2,754	2,709
Pension benefits		
- defined contribution	413	397
Total	3,175	3,110

In 2025, the Chief Financial Officer, Barry D'Arcy, has confirmed that his son completed a student/summer work placement with the Group. The Chairperson has further confirmed that their daughter-in-law is employed by the Group. There were no connected persons to key management personnel employed by the group during 2024

(b) (ii) Balances and transactions with key management personnel:

In the normal course of its business, the Group had loan balances and transactions with key management personnel and their connected persons. The loans are granted on normal commercial terms and conditions with the exception of certain home loans where Executive Directors and Senior Managers may avail of subsidised loans on the same terms as other eligible management of the Group. All of the loans in the scope of the related party guidelines as outlined under the Companies Act 2014, the Central Bank Related Party lending code 2013 and IAS 24 Related party disclosures are secured, and all interest and principal due at the SOFPn date has been repaid on schedule and therefore, no provision for loan impairment is required. Total outstanding balances of loans, credit cards, overdrafts and deposits are as follows:

	31 December 2025 €'000	31 December 2024 €'000
Balances		
Loans	2,588	1,734
Unsecured credit card balances and overdrafts	13	48
Deposits	2,503	1,209

	Year ended 31 December 2025 €'000	Year ended 31 December 2024 €'000
Transactions during the year		
Loan advances	999	56
Loan repayments	143	302
Interest received on loans	92	46
Interest paid on deposits	(40)	(7)

42. Related parties (continued)

Loans to Directors

31 December 2025	Balance as at 1 Jan	Advances during the year	Principal repaid	Principal drawn	Balance as at 31 Dec	Interest paid	Maximum balance
	€'000	€'000	€'000	€'000	€'000	€'000	€'000
Ronan O'Neill* (retired 30 July 2025)	866	-	12	60	914	25	926
Eamonn Crowley**	40	61	48	-	53	6	101
Catherine Moroney*	13	-	5	-	8	1	13
	919	61	65	60	975	32	1,040

* Represents a loan for a person connected with this Director in accordance with section 307(3) of the Companies Act 2014.

** Represents a loan made directly to this Director in accordance with section 307(3) of the Companies Act 2014.

31 December 2024	Balance as at 1 Jan	Advances during the year	Principal repaid	Principal drawn	Balance as at 31 Dec	Interest paid	Maximum balance
	€'000	€'000	€'000	€'000	€'000	€'000	€'000
Ronan O'Neill*	629	250	13	-	866	27	879
Eamonn Crowley**	2	40	2	-	40	-	42
Catherine Moroney*	-	17	4	-	13	1	17
	631	307	19	-	919	28	938

* Represents a loan for a person connected with this Director in accordance with section 307(3) of the Companies Act 2014.

** Represents a loan made directly to this Director in accordance with section 307(3) of the Companies Act 2014.

(c) Irish Government and Irish Government related entities

The Minister for Finance continues to be the majority shareholder of the Group (and the ultimate controlling party per IAS 24). The Irish Government is recognised as a related party as the Government is deemed to have control over the Group as defined by IAS 24. The Group has applied the amended IAS 24 which exempts an entity from the related party disclosure requirements in respect of the Government and Government related entities unless transactions are individually or collectively significant. In the normal course of business, the Group has entered into transactions with the Government and Government related entities involving deposits and senior debt.

The following are transactions and balances between the Group and the Government and Government related entities that are collectively significant:

- The Group holds securities issued by the Government of €1,604m (31 December 2024: €1,524m).
- The Group had an investment in associated undertakings of €30m for the year ended 31 December 2025 involving participants that are deemed related parties due to the common ownership by the Government. The amount and nature is referenced in note 22.
- The Group entered into banking transactions in the normal course of business with local Government and Semi-State Institutions such as local authorities and county councils. These transactions principally include the granting of loans, the acceptance of deposits and clearing transactions.
- A bank levy imposed by the Government through the Finance Bill 2014 is payable in the second half of each calendar year. A bank levy payable to government, is provided for on the occurrence of the event identified by the legislation that triggers the obligation to pay the levy. In 2025, the amount recognised in the income statement was €23m (31 December 2024: €23m).

(d) Other related party transactions

- At 31 December 2025 the Company had an intercompany balance of €1,723m (31 December 2024: €1,731m) with its principal subsidiary PTSB plc relating to the MREL issuance.
- In November 2020, PTSB Group made an investment of €123m in PTSB plc. This investment was through the issuance of AT1 securities by the Company and was redeemed in full on 25 November 2025, following the attainment of the required approval of the Supervisory Authority. In October 2022, PTSB Group made an additional investment of €245m in PTSB plc through the issuance of AT1 securities by the Company.
- In May 2021, PTSB plc borrowed €250m from the Group at a fixed rate of 3% per annum plus a margin of 0.181% per annum which matures on 19 August 2031. The loan is subordinated and ranks as Tier 2 capital notes with interest paid annually in arrears on 19 August.

Notes to the Consolidated Financial Statements (continued)

43. Principal subsidiary undertakings and interest in subsidiaries and structured entities

Under IFRS 10 'Consolidated financial statements', the Group has control over an entity when it has the power to direct relevant activities that significantly affect the investee return, it is exposed or has rights to variable returns from its involvement in the investee and has the ability to affect those returns through its powers over the entity.

A subsidiary is considered material if the value of the consolidated total assets at the end of the financial year of the subsidiary and the entities it controls (if any) is more than 1% of the total assets of the Group.

The key subsidiary of the parent meeting the criteria outlined above is:

Name and registered office	Nature of business	Incorporated in	% of ordinary shares held
Held directly by the company:			
Permanent TSB plc			
56-59 St. Stephen's Green, Dublin 2	Retail banking	Ireland	100

In presenting details of the principal subsidiary undertakings, the exemption permitted by section 315 (a) (i) of the Companies Act 2014 in relation to disclosing related undertaking net assets or profit or loss, has been availed of, and the Company will annex a full listing of Group undertakings to its annual return to the Companies Registration Office.

The reporting date for each of the Group's principal subsidiary entities is 31 December.

The principal country of operation of each company is the country in which it is incorporated.

The registered office of Permanent TSB Group Holdings plc is 56-59 St. Stephen's Green, Dublin 2.

(a) Company's interest in subsidiary undertakings

The Company is the ultimate holding company of the Group while PTSB is a 100% subsidiary of the Company. The investment in PTSB is carried at the recoverable amount in the holding company SOFP.

At 31 December 2025 the investment amounted to €1,960m (31 December 2024: €2,083m). The Group carried out an impairment assessment using a combination of internal group models and externally available data to inform their view of the recoverable amount of investment. As the VIU was higher than the carrying value, in line with IAS 36, no additional impairment charge was taken (31 December 2024: €263m). See Company SOFP on page 397 for further details.

(b) Structured entities (SEs)

A structured entity is an entity in which voting or similar rights are not the dominant factor in deciding control. SEs are generally created to achieve a narrow and well-defined objective with restrictions around their on-going activities. Depending on the Group's power to direct the relevant activities of the investee and its exposure or rights to variable returns from its involvement in the investee and the ability to use its power over the investee to affect the amount of the investor's return, it may consolidate the entity.

Control and voting rights

The Directors of the individual SEs are independent of the Group and neither the Group nor any of its subsidiaries have voting rights in the share capital of these entities. The Group initiated the setup of these SEs and, as architect dictated the terms relating to the operation of these SEs. The Group, as administrator, provides services to the individual SEs. The Group, as administrator, has power to:

- exercise rights, powers and discretions of the issuers in relation to the mortgage loans and their related security and to perform its duties in relation to the mortgage loans and their related securities; and
- to do or cause to be done any and all other things which it reasonably considers necessary, convenient or incidental to the administrator of the mortgage loans and their related security or the exercise of such rights, powers and discretions.

The key activities performed by the Group's subsidiaries as administrator is:

- to manage the credit risk associated with the mortgages contained in the individual SEs; and
- to determine and set rates of interest applicable to loans on each rate setting date in accordance with the terms of the loans and negotiate the cost of funds associated with these mortgages which may result in a variable return in the entity.

43. Principal subsidiary undertakings and interest in subsidiaries and structured entities (continued)

These two items highlight the power the Group has to direct the relevant activities of these entities that significantly affect the investee returns and the ability to use its power to affect variable returns of investors.

The Group provides funding to each of these vehicles by way of a subordinated loan and has an entitlement to deferred consideration. The Group is exposed to the variable returns of the SEs through the subordinated loan and the deferred consideration.

The Group currently has four SEs in issue in the ROI the details of which are outlined below.

	Sub loan provided
SEs setup with Residential Mortgages	
- Fastnet Securities 16 DAC	✓
- Fastnet Securities 17 DAC	✓
- Fastnet Securities 18 DAC	✓
- Fastnet Securities 19 DAC	✓

Although the Group does not own more than half of the voting power, it has the power to control the relevant activities of the SE and the ability to affect the variable returns of the investee and hence these SEs are consolidated. In these cases, the consideration received from the investors in the notes in the form of cash is recognised as a financial asset and a corresponding financial liability is recognised.

At 31 December 2025, restricted cash of €158m (31 December 2024: €180m) relates to cash held by the Group's securitisation.

44. Reporting currency and exchange rates

The consolidated financial statements are presented in millions of Euro.

The following table shows the closing and average rates used by the Group for the current year-end and prior year-end:

	31 December 2025	31 December 2024
€ / £ exchange rate		
Closing	0.8726	0.8292
Average	0.8569	0.8450
€ / US\$ exchange rate		
Closing	1.1750	1.0389
Average	1.1318	1.0808

45. Events after the reporting period

Subsequent to the SOFP date, as outlined in note 15, the Glas 3.1 sale proceeds were received.

On 21 January 2026, the Group announced that the Central Bank of Ireland had approved the Group's redeveloped suite of IRB mortgage models. The models became operational on 30 January 2026.

After the balance sheet date, the Board of Directors proposed a dividend of €10m (1.835 cent per share) in respect of the financial year ended 31 December 2025. The proposed dividend is subject to approval by shareholders at the Company's AGM and if approved, the dividend will be paid on 19 May 2026.

No other items, transactions or events that would materially impact the consolidated financial statements and require adjustment or disclosure to these consolidated financial statements have occurred between the reporting date of 31 December 2025 and the date of the approval of these financial statements by the Board of Directors on 4 March 2026.

Company Financial Statements

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Company Statement of Financial Position

As at 31 December 2025

	Notes	31 December 2025 €m	31 December 2024 €m
Assets			
Loans and advances to banks	B	2,073	1,956
Investment in subsidiary	C	1,960	2,083
Total assets		4,033	4,039
Liabilities			
Debt securities in issue	D	1,715	1,698
Other liabilities		3	3
Subordinated liabilities	E	349	252
Total liabilities		2,067	1,953
Equity			
Share capital	F	272	272
Share premium	F	804	804
Retained earnings	F	645	642
Shareholders' equity		1,721	1,718
Other equity instruments	F	245	368
Total equity		1,966	2,086
Total liabilities and equity		4,033	4,039

The accompanying notes form an integral part of these financial statements.

The Company's profit for the financial year determined in accordance with IFRS was €46m (2024: €216m loss).

On behalf of the Board:

Julie O'Neill
Chairperson

Eamonn Crowley
Chief Executive

Barry D'Arcy
Chief Financial Officer

Conor Ryan
Company Secretary

Company Statement of Changes in Equity

For the year ended 31 December 2025

Company	Share capital €m	Share premium €m	Retained earnings €m	Attributable to equity holders of the parent	Other equity instrument €m	Total €m
Balance at 1 January 2024	273	804	903	1,980	368	2,348
Loss for the year ended 2024	-	-	(259)	(259)	43	(216)
Other comprehensive income, net of tax	-	-	-	-	-	-
Total comprehensive income for the year	-	-	(259)	(259)	43	(216)
Transactions with equity holders of the Bank, recorded directly in equity:						
Buyback of ordinary shares	(1)	-	(2)	(3)	-	(3)
AT1 coupon paid	-	-	-	-	(43)	(43)
Total contributions by and distributions to owners	(1)	-	(2)	(3)	(43)	(46)
Balance as at 31 December 2024	272	804	642	1,718	368	2,086
Balance as at 1 January 2025	272	804	642	1,718	368	2,086
Profit for the year ended 2025	-	-	3	3	43	46
Other comprehensive income, net of tax	-	-	-	-	-	-
Total comprehensive income for the year	-	-	3	3	43	46
Transactions with equity holders of the Bank, recorded directly in equity:						
Redemption of other equity instruments	-	-	-	-	(123)	(123)
AT1 coupon paid	-	-	-	-	(43)	(43)
Total contributions by and distributions to owners	-	-	-	-	(166)	(166)
Balance as at 31 December 2025	272	804	645	1,721	245	1,966

Company Statement of Cash Flows

For the year ended 31 December 2025

		31 December 2025 €m	31 December 2024 €m
Cash flows from operating activities:			
Operating profit/(loss) before taxation		46	(217)
Adjusted for non-cash items and other adjustments:		(46)	217
		-	-
Increase in operating assets:			
Loans and advances to banks	B	10	(92)
Increase/(decrease) in operating liabilities:			
Debt securities in issue	D	(97)	99
Net cash inflow/(outflow) from operating activities before tax		(87)	7
Tax paid		-	-
Net cash inflow/(outflow) from operating activities		(87)	7
Cash flow from investing activities			
Investments in subsidiary undertakings	C	167	46
Net cash flow from investing activities		167	46
Cash Flow from Financing Activities			
Proceeds from T2 issuances		298	-
AT1 redemption		(125)	-
T2 partial redemption		(199)	-
Share buyback		-	(2)
Interest paid on Tier 2 capital notes		(11)	(8)
AT1 coupon payment		(43)	(43)
Net cash flow from financing activities		(80)	(53)
Increase/(decrease) in cash and cash equivalents		-	-
Analysis of changes in cash and cash equivalents			
Cash and cash equivalents as at 1 January		-	-
Increase/(decrease) in cash and cash equivalents		-	-
Cash and cash equivalents as at 31 December		-	-

Net cash flows from operating activities includes interest/dividends received of €276m (2024: €153m), interest paid of €108m (2024: €105m) and dividends paid of €43m (2024: €43m).

Reconciliation of liabilities arising from financing activities

	31 December 2025	31 December 2024
1 January	252	252
Financing cash flows:		
Interest paid on Tier 2 capital notes	(11)	(8)
T2 issuance	298	-
T2 redemption	(199)	-
Interest accrued on Tier 2 capital notes	9	8
31 December	349	252

Notes to the Company Financial Statements

A. Accounting policies

The accounting policies adopted by Permanent TSB Group Holdings plc ('Company') are the same as those of the Group as set out in note 1 to the consolidated financial statements where applicable. These financial statements reflect the financial position of the Company only and do not consolidate the results of any subsidiaries.

The individual financial statements of the ultimate holding company, Permanent TSB Group Holdings plc have also been prepared in accordance with IFRS as adopted by the EU and comply with those parts of the Companies Act 2014. In accordance with section 304 (2) of the Companies Act 2014, the Company is availing of the exemption from presenting its individual income statement to the Annual General Meeting and from filing it with the Registrar of Companies.

B. Loans and advances to banks

	31 December 2025	31 December 2024
	€m	€m
Held at amortised cost		
Funds placed with subsidiary, Permanent TSB plc ('PTSB')	2,074	1,958
ECL allowance	(1)	(2)
Loans and advances to banks	2,073	1,956

Funds placed with the principal subsidiary, PTSB are stage 1 under IFRS 9. The ratings for PTSB are as follows:

- Moody's: Long-Term Rating "A1" with Outlook "Stable"; and
- Fitch's: Long-Term Rating "BBB+" with Outlook "Stable".

In September 2025, the Company subscribed to the €300m of Subordinated loan issued by PTSB to meet the subsidiary's internal MREL requirements, which represents down streaming of the proceeds raised by the Company via the external Subordinated Tier 2 capital note issuance. The terms of the Subordinated loan were a placement at a base rate of 3.875% plus a margin of 0.18% per annum maturing on 22 December 2035. The interest is received annually in arrears on 22 December.

In April 2024, the Company subscribed to the €500m of Senior Unsecured Medium Term Note issued by PTSB to meet the subsidiary's internal MREL requirements, which represents down streaming of the proceeds raised by the Company via the external Senior Unsecured issuance. The terms of the Non-Preferred Senior loan were a placement at a base rate of 4.25% plus a margin of 0.18% per annum maturing on 10 July 2030. The interest is received annually in arrears on 10 July.

In June 2023, the Company subscribed to the €500m of Senior Unsecured Medium Term Note issued by PTSB to meet the subsidiary's internal MREL requirements, which represents down streaming of the proceeds raised by the Company via the external Senior Unsecured issuance. The terms of the Non-Preferred Senior loan were a placement at a base rate of 6.625% plus a margin of 0.18% per annum maturing on 30 Jun 2029. The interest is received annually in arrears on 30 June.

In April 2023, the Company subscribed to the €650m of Senior Unsecured Medium Term Note issued by PTSB to meet the subsidiary's internal MREL requirements, which represents down streaming of the proceeds raised by the Company via the external Senior Unsecured issuance. The terms of the Non-Preferred Senior loan were a placement at a base rate of 6.625% plus a margin of 0.155% per annum maturing on 25 Apr 2028. The interest is received annually in arrears on 25 April.

During 2021, the Company subscribed to the €250m of Subordinated loan issued by PTSB to meet the subsidiary's internal MREL requirements, which represents down streaming of the proceeds raised by the Company via the external Subordinated Tier 2 capital note issuance. The terms of the Subordinated loan were a placement at a base rate of 3% plus a margin of 0.181% per annum.

In September 2025, as part of a Liability Management Exercise by PTSBGH, 80% of the external issued Subordinated Tier 2 capital note and associated Subordinated loan to PTSB plc were redeemed. The residual balance of the loan of €51m will mature on 19 August 2031. The interest is received annually in arrears on 19 August.

The maximum exposure to credit risk for financial assets carried at amortised costs at 31 December 2025 is €2,073m (31 December 2024: €1,956m).

The expected credit losses on these placements were €1m at 31 December 2025 (31 December 2024: €2m).

C. Investment in subsidiary

	31 December 2025	31 December 2024
	€m	€m
At 1 January	2,083	2,346
Impairment of investment	-	(263)
AT1 securities redeemed during 2025	(123)	-
At 31 December	1,960	2,083

The Company is the ultimate holding company of the Group while PTSB is a 100% subsidiary of the Company. The investment in PTSB is carried at the recoverable amount in the holding company's statement of financial position. At 31 December 2025 the investment amounted to €1,960m (31 December 2024: €2,083m).

The Company carries its investment in its subsidiary undertaking at cost and reviews whether there is any indication of impairment at each reporting date. Impairment testing involves comparing the carrying value of the investment to its recoverable amount. The recoverable amount is the higher of the investment's fair value or its VIU.

An impairment charge arises if the carrying value exceeds the recoverable amount and where the carrying value is not supported by the estimated discounted future cash flows of the underlying business. The recoverable amount of the investment is the higher of its fair value less costs to sell or its VIU. The recoverable amount based on the VIU was €1,968m, therefore no additional impairment or material writeback of prior years' impairment is required for the year ended 31 December 2025 (31 December 2024: impairment charge €263m). The VIU calculation considers the future free cash flows following the repayment of any amounts due on the Loans and advances to banks.

While the recoverable amount based on the VIU exceeds market capitalisation at the 31 December 2025, the depressed share price is the result of the overall subdued banking environment currently in which the entity operates along with various entity specific factors that affect the liquidity of the shares.

The VIU is the present value of the future free cash flows expected to be derived from the investment, based upon a VIU calculation that discounts expected pre-tax free cash flows at a discount rate appropriate to the investment. The discount rate used for the 2025 VIU calculation was 13.5% (31 December 2024: 11.5%).

See note 2 to the consolidated financial statements for a sensitivity analysis on the key assumptions used in the calculation.

The Company invested €123m of additional capital in its principal subsidiary PTSB that it raised through issuance of Additional Tier 1 Securities on 25 November 2020. The AT1 securities were redeemed in full on 25 November 2025.

D. Debt securities in issue

	31 December 2025	31 December 2024
	€m	€m
At amortised cost		
Bonds and medium-term notes	1,715	1,698
	1,715	1,698
Maturity analysis		
Repayable in less than 1 year	56	56
Repayable in greater than 1 year but less than 5 years	1,659	1,145
Repayable in greater than 5 years	-	497
	1,715	1,698

Notes to the Company Financial Statements (continued)

E. Subordinated liabilities

	31 December 2025	31 December 2024
	€m	€m
At amortised cost		
Subordinated Tier 2 Notes	349	252
	349	252
Maturity analysis		
Repayable in less than 1 year	1	3
Repayable in greater than 5 years	348	249
	349	252

Tier 2 capital notes – PTSBGH

In May 2021, PTSBGH issued €250m of Tier 2 capital notes at a fixed rate of 3% per annum. The notes mature on 19 August 2031 with a call date of any date from and including 19 May 2026 to and including 19 August 2026 with the call subject to approval of the regulatory authorities, with approval conditional on meeting the requirements of the Capital Requirements Regulation.

The interest rate will be reset, in the event that the securities are not called, on 19 August 2026 to Euro 5 year Mid Swap rate plus a margin of 3.221% per annum. The loan is subordinated and ranks as Tier 2 capital with interest paid annually in arrears on 19 August. The loan may be subject to the exercise of Irish Statutory loss absorption powers by the relevant resolution authority.

In September 2025, as part of a Liability Management exercise, 80% of the Tier 2 Capital notes has been redeemed. The remaining nominal balance of the issuance is €51m. The notes mature on 19 August 2031 with a call date of any date from and including 19 May 2026 to and including 19 August 2026 with the call subject to approval of the regulatory authorities, with approval conditional on meeting the requirements of the Capital Requirements Regulation.

In September 2025, PTSBGH issued €300m of Tier 2 capital notes at a fixed rate of 3.875% per annum. The notes mature on 22 December 2035 with a call date of any date from and including 22 September 2030 to and including 22 December 2030 with the call subject to approval of the regulatory authorities, with approval conditional on meeting the requirements of the Capital Requirements Regulation.

The interest rate will be reset, in the event that the securities are not called, on 22 December 2030 to Euro 5 year Mid Swap rate plus a margin of 1.550% per annum. The loan is subordinated and ranks as Tier 2 capital with interest paid annually in arrears on 22 December (short 1st coupon period). The loan may be subject to the exercise of Irish Statutory loss absorption powers by the relevant resolution authority.

In the event of winding up of PTSBGH, the Tier 2 capital notes will be:

- junior in right of payment to all Senior Claims;
- pari passu with all other subordinated claims against PTSBGH which constitute, or would but for any applicable limitation on the amount of such capital constitute, Tier 2 capital notes or that rank or are expressed to rank pari passu with the obligations of PTSBGH under Tier 2 capital notes; and
- in priority to PTSBGH ordinary shares, preference shares, additional Tier 1 capital notes and junior subordinated obligations or other securities of PTSBGH which by law rank, or by their terms are expressed to rank, junior to the Tier 2 capital notes.

F. Share capital and reserves

The share capital of Permanent TSB Group Holdings plc is detailed in note 33 to the consolidated financial statements, all of which relates to Permanent TSB Group Holdings plc.

G. Related parties

Related parties include individuals and entities that can exercise significant influence on operational and financial policies of the Group.

The Group has a related party relationship with its Directors, Senior Executives, the Group's pension schemes, the Minister for Finance and with the Irish Government and Irish Government related entities on the basis that the Irish Government is deemed to have control over the Group.

Related parties of Permanent TSB plc include subsidiary undertakings, associated undertakings, joint undertakings, post-employment benefit schemes, key management personnel and connected parties. The Irish Government is also considered a related party by virtue of its effective control of Permanent TSB. See note 42 of the consolidated financial statements for further details.

At 31 December 2025, the Company had an intercompany balance of €1,715m (31 December 2024: €1,698m) with its principal subsidiary PTSB relating to the MREL issuance and €252m (31 December 2024: €252m) relating to Tier 2 capital issuances.

H. Audit Fees

€0.05m audit fees were paid to the auditors, KPMG, for services related to the audit of the separate financial statements of PTSBGH during the year to 31 December 2025 (31 December 2024: €0.05m).

General Information

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Alternative Performance Measures

The financial performance of the Group is assessed by Management using various financial measures, some of which are not defined by IFRS and do not have a standard guidance for calculation. Therefore, these measures may not be directly comparable to other peers. Management believes that these measures provide useful information in assessing the Group's financial performance. Preference should be given to IFRS measures over non-IFRS measures when assessing financial performance of the Group.

The definitions and calculation methodology for the Alternative Performance Measures noted below are consistent with the prior year.

1. Underlying profit

The underlying profit is the measure of adjusted profits realised by the Group. This measure is used by the Group for its strategic planning process and reflects the true economic substance of the Group's financial performance. The table below details the calculation of underlying profit. Exceptional items and non-recurring items are excluded from the operating expenses as Management considers these items as non-reflective of core operating costs.

	Year ended 31 December 2025 €m	Year ended 31 December 2024 €m
Operating profit before taxation per IFRS income statement	128	159
Voluntary severance and other	42	(2)
Exceptional impairment arising from deleveraging of loans	-	2
Non-IFRS adjustments		
Other non-recurring items*	5	21
Underlying profit per management income statement	175	180

* Full breakdown of Other non-recurring items in Financial Review table 5.

Management's definition of underlying profit excludes exceptional items and other items that Management view as non-recurring. In the current year, non-recurring items include additional provision relating to legacy legal cases.

2. Exceptional and Other Non-Recurring Items

A reconciliation of exceptional items as set out in the financial statements and exceptional and other non-recurring items as set out in the Financial Review is detailed below.

		31 December 2025 €m	31 December 2024 €m
Voluntary severance and other	Note 9	42	(2)
Exceptional impairment write-back arising from deleveraging of loans	Income Statement	-	2
Exceptional items		42	-
Other non-recurring items	Financial Review	5	21
Exceptional and other non-recurring items	Financial Review	47	21

Alternative Performance Measures (continued)

3. Adjusted cost income ratio

Adjusted cost income ratio is calculated as: operating expenses (excluding exceptional, other non-recurring items and regulatory charges) divided by total operating income. Management considers adjusted cost income ratio to be an important metric to assess the profitability of the Group after adjusting for non-controllable costs.

	Source/Cross Reference	31 December 2025 €m	31 December 2024 €m
Total operating expenses	Income Statement	566	545
Voluntary severance and other	Note 9	(42)	(2)
Non-recurring items (included within total operating expenses)	Table 5 Financial Review	(5)	(12)
Bank levy	Note 8	(23)	(23)
Regulatory charges	Note 8	(2)	(10)
Total operating expenses (excluding exceptional, other non-recurring items and regulatory charges)	Financial Review	494	498
Total operating income	Income statement	655	672
Adjusted cost income ratio		75%	74%

4. Headline cost income ratio

Total operating expenses (excluding exceptional items) divided by total operating income. The difference between adjusted cost to income ratio and headline cost income ratio is due to regulatory charges and bank levy.

	Source/Cross Reference	31 December 2025 €m	31 December 2024 €m
Total operating expenses	Income statement	566	545
Voluntary severance and other	Note 9	(42)	(2)
Non-recurring items (included in total operating expenses)	Financial review	(5)	(12)
Total operating expenses (excluding exceptional and other non-recurring items)		519	531
Total operating income	Income statement	655	672
Headline cost income ratio	Financial review	79%	79%

5. CET 1 fully loaded basis*

Total common equity tier 1 capital on a fully loaded basis divided by total risk weighted assets on a fully loaded basis. CET1 ratio provides an insight into how well the Bank can withstand financial stress and remain solvent.

	Source/Cross Reference	31 December 2025 €m	31 December 2024 €m
Common equity tier 1	Capital Management	1,739	1,684
Risk weighted assets	Capital Management	10,936	11,494
CET 1 fully loaded	Capital Management	15.9%	14.7%

* The full year profits recognised in the year end capital ratios remain subject to approval by the Regulator.

6. Leverage ratio*

The leverage ratio is calculated by dividing Tier 1 capital by gross balance sheet exposures (total assets and off balance sheet exposures). Leverage ratios give an insight to the Group's financial health and its capability to meet its financial liabilities and obligations.

		31 December 2025	31 December 2024
	Source/Cross Reference	€m	€m
Tier 1 Capital	Capital Management	1,984	2,052
Gross balance sheet exposures			
Leverage ratio exposure measure		30,523	28,847
Leverage ratio	Capital Management	6.5%	7.1%

* The full year profits recognised in the year end capital ratios remain subject to approval by the Regulator.

7. Liquidity coverage ratio (LCR)

Calculated based on the Commission Delegated Regulation (EU) 2015/61. The Group uses this measure to assess the resistance of the liquidity profile of the Group over a 30 day stressed horizon.

		31 December 2025	31 December 2024
	Source/Cross Reference	€m	€m
Liquidity coverage ratio	Financial Review	277%	255%

8. Net stable funding ratio (NSFR)

Defined as the ratio of available stable funding to required stable funding. The NSFR is a liquidity standard requiring banks to hold sufficient stable funding over a 1 year time horizon. A minimum 100% requirement became binding in June 2022.

		31 December 2025	31 December 2024
	Source/Cross Reference	€m	€m
Net stable funding ratio (minimum 100%)	Financial Review	163%	166%

9. Loan to deposit ratio (LDR)

Ratio of loans and advances to customers compared to customer accounts as presented in the statement of financial position. LDR reflects the Group's ability to cover loan losses and withdrawals by its customers. Management considers LDR to be an important metric for assessing liquidity.

		31 December 2025	31 December 2024
	Source/Cross Reference	€m	€m
Loans and advances to customers	Note 20	22,249	21,423
Customer accounts	Note 27	25,599	24,120
Loan to deposit ratio		87%	89%

Alternative Performance Measures (continued)

10. Net interest margin (NIM)

NIM is derived by dividing the net interest income by the average interest earning assets. Management considers NIM to be an important operating metric and reflects the differential yield over the average interest earning assets and cost of funding those assets.

		31 December 2025	31 December 2024
	Source/Cross Reference	€m	€m
Net interest income	Income Statement	590	612
Total average interest earning assets	Table 2 - Financial Review	28,952	27,686
Net interest margin (NIM)		2.03%	2.20%

11. Non-performing loans (NPLs)

NPLs are loans which are credit impaired or loans which are classified as defaulted in accordance with the Group's definition of default. Management considers NPLs to be an important metric as it reflects the risk profile of the Group.

		31 December 2024	31 December 2023
	Source/Cross Reference	€m	€m
Residential:			
- Home loans	Note 21	215	259
- Buy to let	Note 21	43	71
Commercial	Note 21	21	24
Consumer finance	Note 21	21	20
Finance leases and hire purchase receivables	Note 21	8	8
Non-performing loans		308	382

12. Foreclosed assets

Foreclosed assets are defined as assets held on the balance sheet, which are obtained by taking possession of collateral or by calling on similar credit enhancements.

		31 December 2025	31 December 2024
	Source/Cross Reference	€m	€m
Foreclosed assets	Note 36	4	7

13. Non-performing assets (NPAs)

NPAs are NPLs plus foreclosed assets.

Foreclosed assets are defined as assets held on the balance sheet, which are obtained by taking possession of collateral or by calling on similar credit enhancements.

		31 December 2025	31 December 2024
	Source/Cross Reference	€m	€m
Non-performing loans	Note 21	308	382
Foreclosed assets	Note 36	4	7
Non-performing assets		312	389

14. Return on Shareholder equity (ROE) / Return on Tangible Equity (ROTE)

ROE is profit after tax less AT1 coupons paid (before exceptional and non-recurring items) expressed as a percentage of total average equity. ROTE is profit after tax less AT1 coupons paid (before exceptional and non-recurring items) expressed as a percentage of targeted CET1 capital.

		31 December 2025	31 December 2024
	Source/Cross Reference	€m	€m
Profit for the year after tax	Income Statement	114	162
AT1 coupons paid	SOCIE	(43)	(43)
Exceptional items and other non-recurring items (after tax)	Table 5 - Financial Review	41	18
Tax exceptional		-	(16)
Attributable earnings		112	121
Total average equity	Table 2 - Financial Review	2,506	2,457
Return on shareholder equity		4.5%	4.9%
Average RWA	Capital Management	10,990	11,521
Average RWA * c. 14% CET1		1,532	1,621
Return on Tangible Equity		7.3%	7.5%

15. Risk weighted assets (RWAs)

RWAs are the Group's assets or off balance sheet exposures, weighted according to risk.

		31 December 2025	31 December 2024
	Source/Cross Reference	€m	€m
Risk weighted assets	Capital Management	10,936	11,494

16. Total capital ratio*

The total capital ratio is the ratio of a bank's total capital (Tier 1 and Tier 2 capital) to its RWAs.

		31 December 2025	31 December 2024
	Source/Cross Reference	€m	€m
Tier 1 Capital	Capital Management	1,984	2,052
Tier 2 Capital	Capital Management	298	292
Total Capital	Capital Management	2,282	2,344
Risk weighted assets	Capital Management	10,936	11,494
Total capital ratio	Capital Management	20.9%	20.4%

* The full year profits recognised in the year end capital ratios remain subject to approval by the Regulator.

Alternative Performance Measures (continued)

17. Average interest earning assets

Interest earning assets include loans and advances to banks, loans and advances to customers, debt securities and derivative assets.

Average balances on interest earning assets are calculated as the average of the monthly interest earning asset balances from December 2024 to December 2025, thirteen months in total.

		31 December 2025	31 December 2024
	Source/Cross Reference	€m	€m
Average interest earning assets			
Loans and advances to banks	Table 2 - Financial Review	2,247	2,610
Loans and advances to customers	Table 2 - Financial Review	21,795	21,221
Debt securities and derivative assets	Table 2 - Financial Review	4,910	3,855
Total average interest earning assets		28,952	27,686

18. Average interest bearing liabilities

Interest bearing liabilities include customer accounts, deposits by banks, debt securities in issue, and lease liabilities.

Average balances on interest bearing liabilities are calculated as the average of the monthly interest bearing liabilities balances from December 2024 to December 2025, thirteen months in total.

		31 December 2025	31 December 2024
	Source/Cross Reference	€m	€m
Average interest bearing liabilities			
Customer accounts	Table 2 - Financial Review	25,093	23,541
Debt securities in issue and derivative liabilities	Table 2 - Financial Review	1,677	1,686
Lease liabilities	Table 2 - Financial Review	33	34
Subordinated liabilities	Table 2 - Financial Review	279	250
Deposits by banks	Table 2 - Financial Review	164	567
Total average interest bearing liabilities		27,246	26,078

19. Average yield on average interest earning assets

Average yield on average interest earnings assets is defined as the average interest income on interest earning assets, divided by the total average interest earning assets balances.

Average interest income on interest earning assets is calculated as the average of the interest income arising on each of the interest earning assets from December 2024 to December 2025, thirteen months in total.

		31 December 2025	31 December 2024
	Source/Cross Reference	€m	€m
Average interest income on interest earning assets			
Loans and advances to customers	Table 2 - Financial Review	736	747
Debt securities and derivative assets	Table 2 - Financial Review	99	65
Loans and advances to banks	Table 2 - Financial Review	43	87
Total average interest income from interest-earning assets		878	899
Total average earning assets	Table 2 - Financial Review	28,952	27,686
Average yield on average interest earning assets		3.03%	3.25%

20. Average rate on average interest bearing liabilities

Average rate on average interest bearing liabilities is defined as average interest expense on interest bearing liabilities divided by the total average interest bearing liabilities balances.

Average interest expense on interest bearing liabilities is calculated as the average of the interest expense arising on each of the interest bearing liabilities from December 2024 to December 2025, thirteen months in total.

		31 December 2025	31 December 2024
	Source/Cross Reference	€m	€m
Average interest expense on interest bearing liabilities			
Customer accounts	Table 2 - Financial Review	184	139
Debt securities in issue	Table 2 - Financial Review	92	115
Lease liabilities	Table 2 - Financial Review	1	1
Subordinated liabilities	Table 2 - Financial Review	7	9
Deposits by banks	Table 2 - Financial Review	4	23
Total average interest income on interest bearing liabilities		288	287
Total average bearing liabilities	Table 2 - Financial Review	27,246	26,078
Average rate on average interest bearing liabilities		1.06%	1.10%

21. NPLs as % of gross loans (NPL ratio)

NPLs as % of gross loans are defined as NPLs divided by gross loans and advances to customers. Management considers NPLs as % of gross loans to be an important metric as it reflects the risk profile of the Group.

		31 December 2025	31 December 2024
	Source/Cross Reference	€m	€m
Non-performing loans	Note 21	308	382
Gross loans and advances to customers	Note 21	22,261	21,515
NPLs as % of gross loans		1.4%	1.8%

22. Average equity attributable to owners

This is an average of the equity position of each individual month from December 2024 to December 2025, thirteen months in total. Management considers average equity attributable to owners to be an important metric for assessing profitability and generation of returns from its investments.

		31 December 2025	31 December 2024
	Source/Cross Reference	€m	€m
Average equity attributable to owners	Table 2 - Financial Review	2,506	2,457

Abbreviations

The following information has not been subject to audit by the Group's Independent Auditor.

ALCo Asset and Liability Committee
AFS Available For Sale
AGM Annual General Meeting
AIMRO Association of Irish Market Research Organisations
ALM Asset Liability Management
API Application Programming Interfaces
ASAI Advertising Standards Association of Ireland
AT1 Additional Tier 1
BAC Board Audit Committee
BCM Business Continuity Management
BITCI Business in the Community Ireland
BP Basis for Preparation
BRCC Board Risk and Compliance Committee
BRRD Banking Recovery and Resolution Directive
BTL Buy-to-let
C&M Classification & Measurement
CAC Capital Adequacy Committee
CBI Central Bank of Ireland
CCB Capital Conservation Buffer
CCMA Code of Conduct on Mortgage Arrears
CCyB Counter Cyclical Buffer
CDF Career Development Framework
CEO Chief Executive Officer
CFO Chief Financial Officer
CET 1 Common Equity Tier 1
CFP Contingency Funding Plan
CODM Chief Operating Decision Maker
CPI Consumer Price Index
CRD IV Capital Requirements Directive IV
CRE Commercial Real Estate
CRO Chief Risk Officer
CRR Capital Requirements Regulation
CSAs Credit Support Annex
CSO Central Statistics Office
CSR Corporate Social Responsibility
CVA Credit Valuation Adjustment
DDI Debt to Disposable Income
DGS Deposit Guarantee Scheme
DIRT Deposit Interest Retention Tax
DoF Department of Finance
DTA Deferred Tax Asset
DVA Debit Valuation Adjustment
EAR Earnings at Risk
EBA European Banking Authority
EC European Commission
ECAI External Credit Assessment Institution
ECB European Central Bank
ECL Expected Credit Loss
EIR Effective Interest Rate
ELG Eligible Liabilities Guarantee
ESG Environmental Social Governance
ESMA European Securities and Markets Authority
ESRI Economic & Social Research Institute
EU European Union

EV Economic Valuation
EWI Early Warning Indicator
ExCo Executive Committee
FIA Financial Incentives Agreement
FLI Forward looking information
FSP Formal Sale Process
FSPO Financial Services and Pensions Ombudsman Bureau of Ireland
FTE Full Time Equivalent
FVOCI Fair value through other comprehensive income
FVTPL Fair value through profit or loss
FX Foreign Exchange
GCC Group Credit Committee
GDP Gross Domestic Product
GIA Group Internal Audit
GPPC Global Public Policy Committee
GRC Group Risk Committee
GRMA Group Risk Management Architecture
GRMF Group Risk Management Framework
HFT Held for Trading
HICP Harmonised Index of Consumer Prices
HPI House Price Index
HTC Hold to Collect
HTC&S Hold to Collect and Sell
HQLA High Quality Liquid Assets
IAS International Accounting Standards
IASB International Accounting Standards Board
IBCB Irish Banking Culture Board
IBNR Incurred But Not Reported
ICAAP Internal Capital Adequacy Assessment Process
IFRIC International Financial Reporting Standards Interpretations Committee
IFRS International Financial Reporting Standards
IIA Institute of Internal Auditors
ILAAP Internal Liquidity Adequacy Assessment Process
IMF International Monetary Fund
IOB Institute of Banking
IOM Isle of Man
IPP Integrated Planning Process
IRB Internal rating based approach
IRBB Interest Rate Risk in the Banking Book
ISA International Standards on Auditing
ISDA International Swaps and Derivatives Association
LCR Liquidity Coverage Ratio
LDR Loan to Deposit Ratio
LGD Loss Given Default
L&R Loans and Receivables
LSI Less Significant Institution
LTIP Long Term Incentive Plan
LTV Loan to value
MCO Maximum Cumulative Outflow
MGC Model Governance Committee
MREL Minimum Requirement for own funds and Eligible Liabilities
MRP Mortgage Redress Programme

MTN Medium Term Note
MTP Medium Term Plan
NCU Newbridge Credit Union
NII Net Interest Income
NIM Net Interest Margin
NPL Non-Performing Loan
NPS Net Promoter Score
NSFR Net Stable Funding Ratio
OCI Other Comprehensive Income
OTC Over the counter
P2G Pillar 2 Guidance
P2R Pillar 2 Requirement
PBI PBI Limited (formerly Permanent Bank International Limited)
PD Probability of Default
PDH Principal Dwelling House
POCI Purchased or Originated Credit Impaired
PSD2 Payment Services Directive 2
PTSB Permanent TSB plc.
PTSBGH Permanent TSB Group Holding plc.
PwC PricewaterhouseCoopers
RAF Risk Appetite Framework
RAS Risk Appetite Statement
RCA Root Cause Analysis
RCSA Risk and Control Self Assessment
RMBS Residential Mortgage Backed Securities
RNPS Relationship Net Promoter Score
ROI Republic of Ireland
RP Restructuring Plan
RPA Robotic Process Automation
RPPI Residential Property Price Index
RWA Risk Weighted Assets
SBCI Strategic Banking Corporation of Ireland
SE Structured Entities
SEAI Sustainable Energy Authority of Ireland
SEI Social Entrepreneurs Ireland
SFS Standard Financial Statement
SFT Securities Financing Transaction
SICR Significant increase in Credit Risk
SID Senior Independent Director
SME Small and medium sized enterprises
SOFP Statement of Financial Position
SPP Strategic Performance Priorities
SPPI Solely Payments of Principle and Interest
SPV Special Purpose Vehicle
SREP Supervisory Review & Evaluation Process
SSM Single Supervisory Mechanism
TCPID Trinity Centre for People with Intellectual Disabilities
TLTRO Targeted Long-Term Refinancing Operations
TME Tracker Mortgage Examination
TRIM Targeted Review of Internal Models
UK United Kingdom
VIP Values in Practice
VIU Value in Use
VSS Voluntary Severance Scheme
WTO World Trade Organisation

The following information has not been subject to audit by the Group's Independent Auditor.

AFS Available for sale (AFS) are non derivative financial investments that are designated as available for sale and are not classified as a (i) loan receivable (ii) held to maturity investments or (iii) financial assets at fair value through profit or loss.

ALCo Asset and Liability Committee

ALCO Asset and Liability Committee

Arrears Arrears relates to any interest or principal payment on a loan which has not been received on its due date. When customers are behind in fulfilling their obligations with the result that an outstanding loan is unpaid or overdue, they are said to be in arrears.

Basel III Basel III is a global, voluntary regulatory framework on bank capital adequacy, stress testing and market liquidity risk.

Basis point One hundredth of a per cent (0.01%), so 100 basis points is 1%. It is the common unit of measure for interest rates and bond yields.

Brexit is an abbreviation of the term "British Exit". It refers to the United Kingdom's withdrawal from the European Union.

Buy-to-let Residential mortgage loan provided to purchase residential investment property to rent it out.

CET 1 ratio Ratio of a bank's core equity capital compared to its total risk-weighted assets.

Company Permanent TSB Group Holdings plc or PTSBGH

Commercial property Commercial property lending focuses primarily on the following property segments:

- a) Apartment complexes;
- b) Develop to sell;
- c) Office projects;
- d) Retail projects;
- e) Hotels; and
- f) Selective mixed-use projects and special purpose properties.

Common Equity Tier 1 Common Equity Tier 1 (CET1) capital is recognised as the highest quality component of capital. It is subordinated to all other elements of funding, absorbs losses as and when they occur, has full flexibility of dividend payments and has no maturity date. It is predominately comprised of common shares; retained earnings; undistributed current year earnings; but may also include non-redeemable, non-cumulative preferred stock.

Concentration risk The risk that any single (direct or indirect) exposure or group of exposures has the potential to produce losses large enough to threaten the institution's health or its ability to maintain its core business.

Contractual Maturity Date on which a scheduled payment is due for settlement and payable in accordance with the terms of a financial instrument.

Cost to income ratio Total operating expense divided by total operating income.

Credit Default Risk The event in which companies or individuals will be unable to make the required payments on their debt obligations.

CRD Capital Requirements Directives (CRD) is statutory law implemented by the European Union for capital adequacy. CRD have introduced a supervisory framework in the European Union which reflects the Basel II and Basel III rules on capital measurement and capital standards.

Credit-related commitments Commitments to extend credit, standby letters of credit, guarantees and acceptances which are designed to meet the requirements of the customers.

Credit risk The risk of loss resulting from a counterparty being unable to meet its contractual obligations to the Group in respect of loans or other financial transactions.

Credit Risk Mitigation Methods to reduce the credit risk associated with an exposure by the application of credit risk mitigants. Examples include: collateral; guarantee; and credit protection.

CVA Credit Valuation Adjustment (CVA) is the difference between the risk-free portfolio value and the true portfolio value that takes into account the possibility of a counterparty's default.

Customer accounts Money deposited with the Group by counterparties other than banks and classified as liabilities. This includes various types of unsecured deposits, credit current and notice accounts.

Debt securities Instruments representing certificates of indebtedness of credit institutions, public bodies and other undertakings. Debt securities can be secured or unsecured.

Debt securities in issue Transferable certificates of indebtedness of the Group to the bearer of the certificates. They include commercial paper, certificates of deposit, bonds and medium-term notes.

Default When a customer fails to make timely payment of interest or principal on a debt security or to otherwise comply with the provisions of a bond indenture. Depending on the materiality of the default, if left unmanaged it can lead to loan impairment.

DVA Debt Valuation Adjustments (DVA) an adjustment made by an entity to the valuation of over-the-counter derivative liabilities to reflect, within fair value, the entity's own credit risk.

Eurozone The Eurozone, of 21 of the 27 European Union (EU) member states which have adopted the euro (€) as their common currency and sole legal tender. The other nine members of the European Union continue to use their own national currencies. The Eurozone consists of Austria, Belgium, Bulgaria, Croatia, Cyprus, Estonia, Finland, France, Germany, Greece, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, the Netherlands, Portugal, Slovakia, Slovenia and Spain..

Exposure at Default Exposure at default (EAD) is the gross exposure under a facility upon default of an obligor.

Fair value The price that would be received to sell an asset, or paid to transfer a liability, in an orderly transaction between market participants at the measurement date.

Definitions (continued)

Forbearance Forbearance occurs when a borrower is granted a temporary or permanent concession, or agreed change to a loan, for reasons relating to the actual or apparent financial stress or distress of that borrower. Forbearance strategies are employed in order to improve the management of customer relationships, maximise collection opportunities and, if possible, avoid foreclosure or repossession. Such arrangements can include extended payment terms, a temporary reduction in interest or principal repayments, payment moratorium and other modifications.

Foreclosed assets Foreclosed assets are defined as assets held on the balance sheet and obtained by taking possession of collateral or by calling on similar credit enhancements.

Foreign currency exchange risk The risk of volatility in earnings resulting from the retranslation of foreign currency (e.g. Sterling and US dollar) denominated assets and liabilities from mismatched positions.

GDP Gross Domestic Product (GDP) is a monetary measure of the value of all final goods and services produced in a period of time (quarterly or yearly). GDP estimates are commonly used to determine the economic performance and standard of living of a whole country or region, and to make international comparisons.

Group Permanent TSB plc Group Holdings plc and its subsidiary undertakings.

Guarantee A formal pledge by the Group to pay debtor's obligation in case of default.

HTM Held to maturity (HTM) non derivative financial assets with fixed or determinable payments and fixed maturity that an entity has the positive intention and ability to hold to maturity.

Home loan A loan provided by a bank, secured by a borrower's primary residence or second home.

Hybrid A combination of two or more forbearance arrangements.

ICAAP Internal Capital Adequacy Assessment Process (ICAAP) is a supervisory review and an evaluation process to assess the Group's own calculations and the adequate capital which Group considers necessary to cover the risks they take and which they are exposed to.

ILAAP Internal Liquidity Adequacy Assessment Process (ILAAP) is a supervisory review and an evaluation process to assess the Group's own calculations and the adequate liquidity which the Group consider necessary to cover the risks they take and which they are exposed to.

IRBA The Internal Ratings Based Approach (IRBA) allows banks to use their own estimated risk parameters for the purpose of calculating regulatory capital for credit risk to estimate probability of default (PD), loss given default (LGD), exposure at default (EAD), maturity (M) and other parameters required to arrive at the total risk weighted assets (RWA).

ISDA Master Agreements A standard agreement used in over-the-counter derivatives transactions. The ISDA Master Agreement, published by the International Swaps and Derivatives Association (ISDA), is a document that outlines the terms applied to a derivatives transaction between two parties. Once the two parties agree to the standard terms, they do not have to renegotiate each time a new transaction is entered into.

Loan to deposit ratio The ratio of loans and receivables compared to customer accounts, as presented in the statement of financial position.

LCR Liquidity Coverage Ratio (LCR) is the ratio to ensure that bank has an adequate amount of high quality liquid assets in order to meet short-term obligations under a stress scenario lasting for 30 days. Credit institutions are obliged to hold a minimum of 100% of their full LCR, as per CRD IV.

LGD Loss Given Default (LGD) is the share of an asset that is lost when a borrower defaults on a loan.

Liquidity risk The risk that the Group may experience difficulty in financing its assets and/or meeting its contractual obligations as and when they fall due, without incurring excessive cost.

LTV Loan to Value (LTV) is a lending risk assessment ratio of mortgage amount to value of property.

Market risk The risk of change in fair value of a financial instrument due to adverse movements in equity prices, property prices, interest rates or foreign currency exchange rates.

Medium term notes Medium term notes (MTNs) are debt notes issued by the Group which usually mature in five to ten years. They can be issued on a fixed or floating coupon basis.

NAMA National Asset Management Agency (NAMA) was established in 2009 as one of a number of initiatives taken by the Irish Government to address the Irish financial crisis and the deflation of the Irish bubble.

NII Net Interest Income (NII) is the difference between interest earned on assets and interest paid on liabilities.

NIM Net Interest Margin (NIM) is a performance metric that measures the difference between interest income generated on lending and the amount of interest paid on borrowings relative to the amount of interest-earning assets.

Non-performing assets Non-performing assets are defined as NPLs plus foreclosed assets.

NPLs Non-performing loans are loans which are credit impaired or loans which are classified as defaulted, in accordance with the Group's definition of default. The Group's definition of default considers objective indicators of default including the 90 days past due criterion, evidence of exercise of concessions or modifications to terms and conditions; and are designed to be consistent with European Banking Authority (EBA) guidance on the definition of forbearance.

NSFR Net Stable Funding Ratio (NSFR) is designed to act as a minimum enforcement mechanism to complement the shorter term focused liquidity coverage ratio.

Operational Risk The risks inherently present in the Group's business, including the risk of direct or indirect loss resulting from inadequate or failed internal and external processes or systems and human error, fraud, or from external events.

PD Probability of Default (PD) is a financial term describing the likelihood that a borrower will be unable to meet its debt obligations.

Repurchase agreement A short term funding agreement that allows a borrower to create a collateralised loan by selling a financial asset to a lender. As part of the agreement, the borrower commits to repurchase the security at a date in the future repaying the proceeds of the loan. For the counterparty to the transaction, it is termed a reverse repurchase agreement or a reverse repo.

RMBS Residential Mortgage Backed Securities (RMBS) are debt obligations that represent claims to the cash flows from pools of mortgage loans, most commonly on residential property.

RWAs Risk weighted assets (RWAs) is a measure of amount of bank's assets or off-balance sheet exposures which are weighted according to risk on prescribed rules and formulas as defined in the under Basel Banking Accord.

Securitisation Securitisation is the process of taking an illiquid asset, or group of assets, and through financial engineering, transforming them into a security.

Settlement Risk The risk that the Group delivers a sold asset or cash to a counterparty and then does not receive the corresponding cash or purchased asset as expected.

SSM The Single Supervisory Mechanism (SSM) is a mechanism which has granted the European Central Bank (ECB) a supervisory role to monitor the financial stability of banks based in participating states. The main aims of the SSM are to ensure the safety and soundness of the European banking system and to increase financial integration and stability in Europe.

SPE/SPV Special purpose entity (SPE) is a legal entity which can be a limited company or a limited partnership created to fulfil specific or temporary objectives. SPEs are typically used by companies to isolate the firm from financial risk. This term is used interchangeably with SPV (Special Purpose Vehicle).

Stress testing A technique used to evaluate the potential effects on an institution's financial condition of an exceptional but plausible event and/or movement in a set of financial variables.

Structured securities Structured securities are complex lending arrangements created to meet needs that cannot be met from traditional financial instruments available in the markets, through the structuring of assets or debt issues in accordance with customer and/or market requirements. Structured debt securities have the potential to decrease risk, create liquidity, and increase yield.

Tier 1 capital A term used to describe the capital adequacy of a bank. Tier 1 capital is core capital; this includes equity capital and disclosed reserves.

Tier 2 capital Tier 2 capital is supplementary bank capital that includes items such as revaluation reserves, undisclosed reserves, hybrid instruments and subordinated term debt.

Tracker mortgage A mortgage which follows the base rate of interest set by the European Central Bank and will be fixed at a certain percentage above this rate.

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