



# UN Principles for Responsible Banking

Progress Statement 2025



## Principle 1:

**Alignment**

Bank of Ireland operates predominantly in Ireland and the UK. The Group offers a wide range of products and services across Retail Banking, Corporate & Commercial Banking and Wealth & Insurance.

2025 marked the successful conclusion of the Group's 'Investing in Tomorrow' Sustainability strategy, and we closed the year and strategic cycle with strong momentum and delivery across all three pillars: Supporting the Green Transition, Enhancing Financial Wellbeing and Enabling our Colleagues to Thrive. Our efforts over the 2026 to 2028 cycle will focus on three new pillars, each of which builds on the strong progress we made during the previous strategic cycle: Supporting the Green Transition, Housing and Social Infrastructure and Social Inclusion.

To ensure our lending portfolios and practices are on a pathway that is aligned with the Paris Agreement goals, we use decarbonisation targets to 2030 approved by the globally recognised Science-based Targets initiative (SBTi) to track our progress covering all of the Group's own operations and 71% of our FY2020 baseline loan book. We also continue to deliver practical, meaningful ESG interventions, reflected in sustainable lending growth of 20% to €17.7 billion in 2025.

We continue to enhance the Financial Wellbeing of our customers, colleagues and society, focusing on empowering people with the knowledge and skills needed to make the most of their finances, whilst striving to leave no one behind on the journey to financial health and are a founding signatory to the UNPRB Commitment to Financial Health and Inclusion. The Group plays an important role in advocating on key social issues, including increasing housing supply, developing new lending products to support housing mobility, partnering with Government bodies to help small home builders scale, and committing significant capital to social and affordable housing.

Bank of Ireland's Human Rights Policy, approved in December 2024, is aligned with the highest international human rights standards including: the UN Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, OECD guidelines for Multinational Enterprises, International Labour Organisations Declaration on Fundamental Principles and Rights at Work.

Our approach to environmental action is informed by international frameworks and agreements, including the goals and targets outlined in the Kunming-Montreal Global Biodiversity Framework (GBF).

**Links & references**

Business model

Group Sustainability Strategy: FY25 Annual Report, page 19

ESRS S3 Affected Communities: FY25 Annual Report, page 191

Human Rights Policy

Management of Material IROs: FY25 Annual Report, page 124

### 3

## UN Principles for Responsible Banking

### Progress Statement 2025 - Bank of Ireland Group plc

#### Principle 2:

## Impact & Target Setting

In 2026, the Group refreshed its impact assessment using the UNEP FI tool, covering our €83 billion loan portfolio (as at 31 December 2025). There were no changes in scope for the 2025 impact assessment refresh. The Group has not yet set targets over its AUM. Climate and Finance/Equality & Justice remain the most significant impact areas, with SMART targets set. The Group refreshed its double materiality assessment in 2025 to inform CSRD reporting and also the Group's Sustainability Strategy, confirming Climate and Financial Health & Inclusion as material topics.

**Climate:** Our impact assessment indicated that climate is our most significant negative impact. The Group's CSRD-aligned Climate Transition Plan builds on existing commitments, including SBTs and sustainable finance targets. Progress against the SBTs and sustainable finance targets are outlined in detail in the Group's CSRD disclosures (linked below). In 2026, the Group will continue momentum on decarbonisation and plans to update targets for the 2026 to 2028 strategic cycle, aligned to government ambition.

At the end of 2025, the carbon emissions intensity for our Rol mortgage, commercial real estate (CRE) and electricity generation project finance portfolios are all progressing towards the 2030 targets. Further progress was achieved on the 2025 target for our Corporate lending customers (that was reached in 2024), with 46% having their own SBTs in place. Sustainability-related lending to households and businesses grew 20% to c.€17.7 billion at year end 2025, delivering our €15 billion 2025 target ahead of schedule and positioning us well for achieving our aim of providing €25 billion by 2028 (and €30 billion by 2030). At 31 December 2025, Sustainable Finance accounted for 21% of the Group's total loan portfolio. In 2025, we have reported for a second year, a full breakdown of our Financed Emissions related to our customer lending portfolio and corporate lending NACE categories. See pages linked below for details of the Group's Sustainable Financing, Financed Emissions and SBTs.

We have integrated the championing of agriculture and nature into the Group's 2026 to 2028 Sustainability Strategy to address the growing environmental issues relating to biodiversity loss, pollution and water. We are progressing a range of nature positive actions across our direct operations through biodiversity, water and circular economy action plans. We have begun a geospatial farm-level assessment of our agriculture loan book to better understand the nature-related dependencies, impacts, risks and opportunities associated with our financing activities, further outlined in Principle 3.

**Financial Health and Inclusion:** As a founding signatory of the UNPRB Commitment to Financial Health and Inclusion, in 2023, we published our targets to 2030. Our targets are focused on financial resilience, both day-to-day and life event, and supporting prioritised groups. For full detail of these targets and progress in 2025, please refer to the Group's CSRD disclosures linked below. Given the long-term nature of the targets, an interim plan was developed to the end of the 2023 to 2025 strategic cycle, referred to as the Group's 'Financial Wellbeing Ambition 2023 to 2025'. An interim measure taken to reach the targets, was the Group's partnership with two charities facilitated by Community Foundation Ireland, through which it delivered a pilot financial resilience programme helping marginalised women build financial confidence, with future opportunities for expansion being explored for 2026. We remain active in the UNPRB Healthy and Inclusive Economies Community of Practice, sharing learnings and developing best practice approaches. In 2025, we commenced an in-depth engagement working towards improving financial health measurement, working with Professor Elaine Kempson and the UNPRB team.

#### Links & references

Portfolio Composition: FY25 Annual Report, page 375  
Climate transition plan: FY25 Annual Report, page 140  
Sustainable Financing: FY25 Annual Report, page 156

Climate SBTs: FY25 Annual Report, page 160  
Financed Emissions: FY25 Annual Report, page 164  
UNPRB Financial Health and Inclusion targets: FY25 Annual Report, page 200  
Human Rights: FY25 Annual Report, pages 186, 190, 196  
DMA Refresh: FY25 Annual Report, page 123

## 4

### UN Principles for Responsible Banking

#### Progress Statement 2025 - Bank of Ireland Group plc

##### Principle 3:

## Clients & Customers

The Group's purpose is to help our customers, colleagues, shareholders and society to thrive. In 2025, the Group continued to support its customers' Green Transition with a suite of Green lending products. We work with our customers and suppliers to understand risks and impacts and ensure these are mitigated, and aim to steer our loan book in alignment with global goals on climate and the environment. We understand that the biggest impact we can have is through the finance and guidance that we provide to our customers.

Our customer engagement strategy integrates environmental objectives by aligning our loan book with global climate goals and prioritising high impact sectors such as Food & Agri, supported by sustainable finance products like Enviroflex, available through 15 co-op partnerships and the Irish Distillers Sustainability Programme. We strengthen environmental awareness through internal capability building, nature positive operational actions, external collaboration, and customer guidance delivered via our Green Hubs. To further support our Agri customers, we are piloting a partnership with environmental software company Senus to provide Farm Environmental Health Reviews, offering environmental insights and tailored action plans to guide farmers' sustainability improvements.

In 2025, we supported SME customers through the launch of Sustainable Business Coach, an easy-to-use digital platform designed to help Irish businesses understand sustainability in addition to hosting in-house SME workshops to assist business customers with their own sustainability strategies. The Group also collaborated on the second year of the Business in the Community All-Ireland Climate Literacy pilot.

Customers' financial wellbeing remains a key priority, and we have retained our #1 ranking for Financial Wellbeing in Ireland. We have expanded the Financial Wellbeing programme, and achieved a key milestone on the Group's youth financial literacy programme, with over 800,000 Irish primary and secondary school students taking part since 2017. We created a new, easy to navigate Financial Wellbeing hub which provides practical budgeting tools and resources to help build financial confidence.

For further detail on the material impacts, risks and opportunities related to our Customers, please see the ESRS S4 Consumers and end-users topic in the FY25 Annual Report.

#### Links & references

Sustainable finance propositions: FY25 Annual Report, pages 156 to 157  
Senus Farm Environmental Health Reviews pilot partnership  
Sustainability Exclusion List

Bank of Ireland Business Banking Sustainable Finance Framework  
ESRS S4 Consumers and end-users: FY25 Annual Report, page 198  
Customer Commitment

**Principle 4:****Stakeholders**

The Group maintains ongoing engagement with its stakeholders through a range of established communication channels such as surveys, social media, meetings, and working groups. Insights gathered from these interactions are incorporated into the Group's overall Strategy and business model.

To facilitate the Board's understanding of the views of major shareholders, Directors receive an Investor Relations update from management at all scheduled Board meetings. As part of the DMA in 2024, the Group undertook an extensive engagement with internal and external stakeholders. In 2025, a Double Materiality Assessment (DMA) refresh was conducted. Details of our DMA, including the 2025 refresh, are detailed per pages linked below.

The strategy across the Group recognises the importance of employees to its success. The Group's people strategy prioritises building a future ready workforce, creating a differentiated colleague experience and simplifying ways of working. In 2025, 82% (2024: 85%) of eligible Group employees participated in the Group's annual 'Open View' employee engagement survey. Open View 2025 results show strong culture embedding across the Group with a continued focus required on drivers of engagement. Insights from the Open View 2025 all colleague survey are shared with business owners, and inform decision making on areas such as culture, performance development, wellbeing, recognition, and I&D, to identify specific opportunities and resultant action planning at Group and local levels. The Group's 2026 Culture Action Plan will respond to Open View insights.

As an institution which is critically important to Ireland's economic progress and prosperity, both as a leading provider of lending to customers, businesses and corporates and as a major employer, the Group will continue to engage with all stakeholders on the future development of the sector.

Since 2023, we have been members of the TNFD Forum and partners of the Partnership for Biodiversity Accounting Financials (PBAF). Through our partnerships and voluntary commitments, we have supported the co-creation of guidance to support Banks on various Nature-related themes, including the PRB Nature Target Setting guidance, and 'Navigating Pollution: A Blueprint for the Banking Sector'.

**Links & references**

Culture: FY25 Annual Report, page 205

How the Board engaged with Stakeholders: FY25 Annual Report, page 67

Double materiality assessment: FY25 Annual Report, page 121 to 123

ESRS S1 Own Workforce: FY25 Annual Report, page 180

Human Rights Policy

PRB Nature Target Setting Guidance

Navigating Pollution: A Blueprint for the Banking Sector

**Principle 5:****Governance & Culture**

The BoIG plc Board is collectively responsible for the long term sustainable success of the Group and for ensuring there is a strong corporate governance structure in place, which is aligned with the Group's strategy and purpose. Full details of the Group's governance framework is outlined in the Sustainability Statement in the FY25 Annual Report.

There have been no significant changes to the governance structure and remuneration scheme compared to last year.

To promote a culture of responsible banking, the Group recognises the importance of developing sustainability-related skills and expertise across the organisation. As outlined in the Sustainability Statement, the Board draws on expertise both internally and externally, in order to adequately assess ESG risks and opportunities.

'All colleague' training on Sustainability was launched in 2023, and continued in 2025. The Group's sustainability training is informed by ongoing analysis of industry standards and peer benchmarking to assess the Group's comparative position. Training solutions are tailored across four colleague cohorts at all-colleague, divisional, senior leadership and Board level to meet the different training requirements.

The 2025 Group performance scheme operated on a similar basis to the 2024 scheme, with awards subject to overall Group performance (assessed against a mix of financial and non-financial criteria, including profit and related metrics, affordability, customer and ESG, with the overall pool subject to risk assessment) and individual performance.

**Links & references**

Governance: FY25 Annual Report, page 118

Remuneration report: FY25 Annual Report, page 103

Sustainability-related skills and expertise: FY25 Annual Report: page 119

**Principle 6:****Transparency & Accountability**

The Group published its second Sustainability Statement under the CSRD in March 2026, as part of the Group's FY25 Annual Report. The Group's SMART targets in respect of SBTs, sustainable finance and Financial Health and Inclusion were included within the Sustainability Statement. Limited assurance was provided by KPMG on the Sustainability Statement.

The Group also reports under TCFD and engages with a number of ESG Rating agencies, including CDP's annual climate change questionnaire.

**Links & references**

KPMG limited assurance statement: FY25 Annual Report, page 219

TCFD compliance statement: FY25 Annual Report, page 222

Mandatory and voluntary commitments: FY25 Annual Report, page 158

## Basis of preparation

As a signatory to the Principles for Responsible Banking (PRB), Bank of Ireland has committed to implementing the six Principles of the PRB Framework and is required to annually report its progress in this regard.

The Group's 2025 Progress Statement has been prepared using the PRB Progress Statement for Signatories template which is required to be used from November 2024 onwards. The template provides guidance on the information that should be disclosed in order to provide an overview of the progress made in the reporting year in implementing the Principles, ensuring transparency and accountability.

In accordance with the intended design of the template, the statement has been prepared on the basis that a summarised update on progress made during the reporting year is provided along with a reference to the relevant information. Where no changes occurred in the reporting year, this is disclosed and a reference to existing information provided. The majority of the relevant information referenced in the statement is located in the Group's 2025 CSRD disclosures in the FY25 Annual Report. References are also provided to frameworks and policies that can be accessed on the Group's website.

Further detail on the basis of preparation and methodology adopted in completing the template is detailed below.

### 1. Impact Analysis

The impact analysis to identify the Group's most significant impact areas and determine priority areas for target-setting was carried out using the UNEP FI Impact Analysis tool and methodology. An initial impact analysis was carried out in 2020 which informed the development of the Group's Sustainability Strategy. The impact analysis was refreshed in subsequent years, and again in 2025, to ensure our strategy remains consistent with the Group's most significant impact areas.

Version 3 of the Portfolio Impact Analysis Tool for Banks was used to perform the 2025 analysis. NACE codes were used to break down the portfolio by industry classification in order to determine sector-level exposure. The scope of the analysis included the consumer and, corporate and commercial lending portfolios in our primary geographies of Ireland and the UK. Based on data at 31 December 2025, which was used in the analysis, this represents over 93% of the Group's total lending portfolio (consumer: 69.4% and business and corporate: 23.9%).

### 2. Target Setting

Based on the UNEP FI Impact Analysis tool and methodology, the Group identified 'Availability, accessibility, affordability, quality of resources & services', 'Healthy economies', 'Livelihood', 'Socio-economic convergence', 'Biodiversity & healthy ecosystems', 'Circularity' and 'Climate Stability' as significant impact areas. In determining priority



areas for the purposes of target-setting, the Group selected 'Availability, accessibility, affordability, quality of resources & services' and 'Climate Stability' as its two most significant impact areas; the specific sub-topics being Finance/Equality & Justice and Climate. Given that the retail division makes up a large proportion of the Bank's business, and with its commitments to Financial Wellbeing and sustainable finance, the Bank is well positioned to make the most significant impacts in these areas.

### 3. Target Implementation and Monitoring

Bank of Ireland, as co-lead of the UNPRB working group on Financial Health and Inclusion, developed a framework, key principles and guidance documentation for signatory banks to measure core indicators to support external reporting of financial health and inclusion metrics, and against which progress will be measured. The Group's

targets under the UNPRB 'Commitment to Financial Health and Inclusion' were published by the UNEP FI in accordance with this framework in July 2023. Detail of the progress towards meeting these targets is included in the Sustainability Statement, referenced in the template.

The Group has set science-based emission reduction targets which were validated by the SBTi in December 2022. We have developed tracking and data capabilities to facilitate regular and transparent measurement and reporting of our progress. Sustainable finance targets and initiatives that contribute to meeting these targets are also reported on in the FY25 Annual Report, referenced in the template.