

# Sustainability Disclosures Tables



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# About the Sustainability Disclosures Tables (SDT)

## The SDT are for AIB Group plc.

AIB Group plc is a holding company listed on the main markets of the Euronext Dublin and London Stock Exchanges. For detail on our shares, please see our 2024 Annual Financial Report (AFR) on pages 387. The nature of the Group's relationship with the Irish Government is set out in note 46(f) Related party transactions – Summary of the relationship with the Irish Government, Annual Financial Report 2024.

Our headquarters are located at  
10 Molesworth Street, Dublin 2, Ireland.

Our main products and services are mortgages, personal, SME and corporate lending, payment services, credit card services and deposits. Where we provide non-core banking products, for example, general insurance, we typically partner with market leaders.

Our most significant operations are in Ireland and the United Kingdom where we operate a retail, corporate and business banking offering. Climate Capital specialises in lending to large scale renewable and infrastructure projects which are key drivers for sustainable economic growth across Ireland, the UK, Europe and North America through offices in Dublin, London and New York. Capital Markets also have a syndicated and international finance team based in New York.

## Entities Included in our SDT

A listing of the principal businesses and their locations that are included in the consolidated financial statement is provided in our AFR and are covered by the SDT.

Within AIB Group plc, the material subsidiaries as at 31 December 2024 are:

- Allied Irish Banks, p.l.c.
- AIB Mortgage Bank Unlimited Company
- EBS d.a.c.
- AIB Group (UK) p.l.c.

Further detail on our subsidiaries is available in the Financial Statements in our AFR.

The basis for including entities within the SDT is consistent with the Group's accounting policy for consolidation (including the treatment of non-controlling interests) as set out in note 1(d) of the Notes to the Consolidated Financial Statement, Financial Statements section of the AFR, except where specifically noted in the SDT.

We are continuously working to build and enhance our sustainability reporting capability, to meet our mandatory and voluntary reporting commitments. We report certain value chain and quantitative metrics by relying on data derived indirectly through third-party data providers or sector average values. This information may be estimated using estimation factors which may significantly affect the reported information. The Group cannot influence estimates and assumptions made by a third-party data provider. As real data becomes available and calculation methods develop, the quality of data will improve gradually. This means that figures in the sustainability statement may change over the coming years, and there may also be changes in figures from previous ESG reports. New guidance, industry standards and scientific research are anticipated, and we reserve the right to periodically review and update targets, methodologies and approaches and to restate baselines as necessary.

The entities downstream from AIB are our customers. Our lending portfolio is summarised in the AFR on pages 206.

## How to read the SDT

For full details on our Sustainability Reporting, see AIB Group plc Annual Financial Report, on pages 43 – 122.

The reporting period is 01 January to 31 December 2024. The publication date of the SDT is 5th March 2025. The contact point for questions about the SDT is: Paul.P.Scully2@aib.ie

The SDT is being published concurrently with our Financial Report to satisfy voluntary reporting and rating agency requirements. It includes content indexes and relevant supporting information for GRI, UNEP FI PRB, and the Equator Principles.

**GRI:** Each year the Group reports an annual GRI content index 'with reference' to the GRI Standards regarding general disclosures and our material topics. This signposts to the disclosures in the Financial Report, in most cases to the Sustainability Statement.

**UNEP FI PRB:** Each year the Group provides an update on AIB's progress against the Principles for Responsible Banking. UNEP FI have evolved the format for this year's report to an executive summary format however there are no changes to the underlying requirements.

**Equator Principles:** The Equator Principles is a risk management framework for financial institutions for determining, assessing and managing environmental and social risk in projects. The Equator Principles data is presented in the same way as the reporting cycle.

## Defined Terms

All capitalized terms not defined herein shall have the meanings ascribed to those in the AFR.

## Restatements

Any restatement of information is set out in notes accompanying the information.

## External Assurance

The Chief Strategy & Sustainability Officer requested an independent assurance process aligned to ISAE 3000 through Deloitte Ireland LLP (**Deloitte**).

Deloitte have provided assurance on the GRI Content Index and UNEPFI PRB: Progress Statement. These can be found on pages 3 to 4 and 6 to 8 respectively.

# GRI Content Index

## Statement of Use

AIB Group plc has reported the information cited in this Global Reporting Initiative (GRI) content index for the period 1 January 2024 to 31 December 2024 with reference to the GRI Standards.

GRI Standard	Disclosure	Response/Location
<b>GRI 1 used</b>	GRI 1: Foundation 2021	GRI 1: Foundation 2021
<b>GRI 2: General Disclosures</b>	2-1 Organizational details	About the SDT, page 2
	2-2 Entities included in the organization's sustainability reporting	About the SDT, page 2
	2-3 Reporting period, frequency and contact point	About the SDT, page 2
	2-4 Restatements of information	About the SDT, page 2
	2-5 External assurance	About the SDT, page 2, Independent Assurance, page 10
	2-6 Activities, value chain and other business relationships	About the SDT, page 2, and Our Value Chain (page 48) and Management of our suppliers relationships (page 111-112), AFR
	2-7 Employees	Own Workforce (Equal Treatment & Opportunities for All), AFR, page 94
	2-8 Workers who are not employees	We do not currently report this information. We will look into how we can provide it in the future.
	2-9 Governance structure and composition	Governance Report, AFR, pages 126-134
	2-10 Nomination and selection of the highest governance body	Governance Report, AFR, pages 154-156
	2-11 Chair of the highest governance body	Governance Report, AFR, pages 134-137
	2-12 Role of the highest governance body in overseeing the management of impacts	Our Sustainability Governance (pages 51-53) and Governance and Oversight Report (pages 130-133), AFR
	2-13 Delegation of responsibility for managing impacts	Our Sustainability Governance, AFR, pages 51-53
	2-14 Role of the highest governance body in sustainability reporting	Our Sustainability Governance, AFR, pages 51-53
	2-15 Conflicts of interest	Governance Report, AFR, pages 134-137
	2-16 Communication of critical concerns	Culture & Reputation, AFR, pages 104-106
	2-17 Collective knowledge of the highest governance body	Our Sustainability Governance, AFR, pages 51-53
	2-18 Evaluation of the performance of the highest governance body	Governance Report, AFR, pages 134-137
	2-19 Remuneration policies	Governance Report, AFR, pages 157-166 and our Group Remuneration Policy at <a href="http://www.aib.ie/sustainability">www.aib.ie/sustainability</a>
	2-20 Process to determine remuneration	Governance Report, AFR, pages 157-166 and our Group Remuneration Policy at <a href="http://www.aib.ie/sustainability">www.aib.ie/sustainability</a>
	2-21 Annual total compensation ratio	Own Workforce (Equal Treatment & Opportunities for All), AFR, page 92
	2-22 Statement on sustainable development strategy	Chief Executive's Review, AFR, page 8
	2-23 Policy commitments	Sustainability Statement, AFR, pages 63-112. Our policies can be found at <a href="http://aib.ie/sustainability">aib.ie/sustainability</a>
	2-24 Embedding policy commitments	Sustainability Statement, AFR, pages 63-112. Our policies can be found at <a href="http://aib.ie/sustainability">aib.ie/sustainability</a>
	2-25 Processes to remediate negative impacts	Culture & Reputation, AFR, pages 104-106
	2-26 Mechanisms for seeking advice and raising concerns	Culture & Reputation, AFR, pages 104-106
	2-27 Compliance with laws and regulations	Corporate Governance Ethics & Accountability, AFR, pages 101-103
	2-28 Membership of associations	Our Stakeholder Engagement, AFR, page 49
	2-29 Approach to stakeholder engagement	Our Stakeholder Engagement, AFR, page 49
	2-30 Collective bargaining agreements	We recognise our colleagues' right to freedom of association and to participate constructively in dialogue with trade unions, with collective bargaining covering c.75% of employee base. This figure includes staff at level 1 to 3 in AIB ROI, NI and GB, and also Level 4 & 5 in AIB NI (including those on unpaid leave). Other levels are excluded, as are Payzone, Goodbody, EBS Tied Agents and external contractors.

## GRI Content Index *continued*

Across all of our material topics we have learned that proactive stakeholder engagement, adaptability, and transparent communication are essential for driving meaningful progress and long-term impact.

GRI Standard	Disclosure	Response/Location
<b>GRI 3: Material Topics</b>	3-1 Process to determine material topics	Our approach to the Double Materiality Assessment, AFR, pages 54-57
	3-2 List of material topics	Our Sustainability Strategy, AFR, page 46
	<b>Climate Change</b>	
	3-3 Management of material topics	Climate & Environmental Action, AFR, pages 63-79
	305-1 Direct (Scope 1) GHG emissions	Methodology for Calculating GHG Emissions, Climate & Environmental Action, AFR, pages 77-79
	305-2 Energy indirect (Scope 2) GHG emissions	Methodology for Calculating GHG Emissions, Climate & Environmental Action, AFR, pages 77-79
	305-3 Other indirect (Scope 3) GHG emissions	Methodology for Calculating GHG Emissions, Climate & Environmental Action, AFR, pages 77-79
	305-4 GHG emissions intensity	Methodology for Calculating GHG Emissions, Climate & Environmental Action, AFR, pages 77-79
	305-5 Reduction of GHG emissions	Methodology for Calculating GHG Emissions, Climate & Environmental Action, AFR, pages 77-79
	<b>Own Workforce (Equal treatment &amp; Opportunities for All)</b>	
	3-3 Management of material topics	Own Workforce (Equal Treatment & Opportunities for All), AFR, pages 90-94
	404-1 Average hours of training per year per employee	Our performance measures, Own Workforce (Equal Treatment & Opportunities for All), AFR, pages 93
	<b>Housing</b>	
	3-3 Management of material topics	Housing, AFR, pages 88-89
	FS-7 Monetary value of products and services designed to deliver a specific social benefit for each business line broken down by purpose.	Our performance measures, Housing, AFR, page 89
	<b>Financial Wellbeing</b>	
	3-3 Management of material topics	Financial Wellbeing, AFR, pages 85-87
	Bespoke: Number of customers onboarded for specific tailored financial product	Our performance measures, Financial Wellbeing, AFR, page 87
	<b>Culture and Reputation</b>	
	3-3 Management of material topics	Culture & Reputation, AFR, pages 104-106
	Bespoke: Code of Conduct training	Our performance measures, Culture & Reputation, AFR, pages 106
	<b>Cybersecurity and Data Protection</b>	
	3-3 Management of material topics	Cybersecurity & Data Protection, AFR, pages 107-110
	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Our performance measures, Cybersecurity & Data Protection, AFR, pages 110
	Bespoke: Cyber training	Our performance measures, Cybersecurity & Data Protection, AFR, pages 110
	<b>Corporate Governance, Ethics and Accountability</b>	
	3-3 Management of material topics	Corporate Governance Ethics & Accountability AFR, pages 101-103
	205-3 Confirmed incidents of corruption and actions taken	Our performance measures, Corporate Governance Ethics & Accountability, AFR, pages 103

# Sustainability Data Tables

## Operations Data

Water and waste in our operations	Group			Ireland			United Kingdom			United States of America		
	2023	2022	2021	2023	2022	2021	2023	2022	2021	2023	2022	2021
Waste consumption (metric tonnes)												
Total waste used/recycled/sold	527	587	522	501	551	486	21	36	35	4	0	1
Total waste disposed	250	216	216	233	211	201	12	4	14	5	1	1
Waste landfilled	5	1	1	0	0		0	0		5	1	1
Waste incinerated with energy recovery	242	213	212	233	211	201	9	2	11	0	0	
Waste incinerated without energy recovery	0	0	0	0	0		0	0		0	0	
Waste otherwise disposed	0	0	0	0	0		0	0		0	0	
Waste with unknown disposal method	3	2	3	0	0		3	2	3	0	0	
Total waste generated	776	803	738	735	762	688	33	40	49	9	1	1
Water use - Operations												
Water consumed & withdrawn (megalitres)	69	81	77	65	76	72	3	4	3	0	0	2

Notes:

Figures are rounded.

Source: Company information.

Waste Notes

Waste data is reported one year in arrears. Data from 2022 onwards incorporates Goodbody locations.

Water Notes

Water data is reported one year in arrears. Data from 2022 onwards incorporates Goodbody locations.

We are reporting discharged water as water consumed. There are no other sources of withdrawals. Water use is measured based on utility bills from water utility providers. Where data is not available it is extrapolated using intensity figures.

# UNEP FI PRB: Progress Statement – AIB 2024

## Principle 1 Alignment

### Content

AIB Group operates predominantly in Ireland and the United Kingdom. We are implementing our strategy at pace, prioritising activity that enables the Group to deliver our strategic commitments and unlock value for our customers and our business.

Our sustainability strategy is integrated with our overall Group strategy, with Sustainable Communities as a core pillar. It aligns with the three strategic areas of focus which place an enhanced focus on serving our customers across the Group, greening the business and driving greater operational efficiency.

We achieved greening the business through continued growth in green finance, delivered by strong performance in mortgages to energy-efficient homes, green mortgage products and lending for green buildings and renewable energy projects. We plan to steadily increase new green and transition lending, to reach our target of 70% of all new lending being green by 2030.

We contribute to meeting the national need for housing by financing housing developments, and offering finance to purchase homes, in societies in which we operate. Access to housing is a critical issue for our communities, wider society and future generations. We help to improve the availability and affordability of housing through several key initiatives and actions. These include supporting social and affordable housing programmes, and funding new developments. We lend to first time buyers and finance social housing that benefits the wider community.

For a breakdown of our loan portfolio please see Risk Management section of our AFR on page 206.

### Links & references

In our Annual Financial Report, please see:  
Our sustainability strategy, pages 46 - 47  
Our material impacts, risks and opportunities pages 58 - 62  
2.1.2 Credit risk - credit profile of the loan portfolio, page 206

## Principle 2 Impact & Target Settings

### Content

The scope of AIB's impact analysis is on our Retail, Capital Markets in the Republic of Ireland (RoI) and Corporate Banking in the United Kingdom, and Climate Capital activities. The impact analysis is based on data from September 2024 activities as they relate to the totality of our primary geographic footprint, ie RoI and the UK.

The output of the tool has identified Climate and Housing as significant impact areas for AIB. Each of these significant impact areas are material topics for AIB pursuant to our Double Materiality Assessment.

Climate – finance new green lending to support the transition to a low-carbon economy and is aligned to SDG 13 'Climate Action', where 'CO2 emissions per capita' is a key metric. In a national context, the Climate Action and Low Carbon Development Bill 2021 requires a 51% reduction in national GHG emissions by 2030 and for Ireland to achieve net zero by 2050.

Housing – providing finance to support social and affordable housing is aligned to SDG 11 'Sustainable Cities and Communities'. In a national context, the Irish Government's 'Housing for All' Plan is targeting to build 33,000 new homes annually between 2021 and 2030 to address affordability and supply issues.

### Progress Indicators

SMART Target - Climate: In 2019, we launched our Climate Action Fund, with an ambition to lend €5bn over a five-year period. Due to exceptional demand, this doubled to €10bn in 2021 and it has now increased to €30bn by 2030. AIB have allocated a total of €16.6bn in cumulative climate action fund lending since 2019.

SMART Target - Housing: We have made a commitment to deliver more than €6bn of cumulative new lending to first-time buyers by 2026. In 2024, we made substantial progress by providing €2.79bn in new lending to first-time buyers.

### Links & references

In our Annual Financial Report, please see:  
Climate and Environmental Action, Our Performance Measures, pages 72  
Housing, Our Performance Measures, pages 89

## Principle 3 Clients & Customers

### Content

Our purpose is to empower people to build a sustainable future and in doing so, we support the transition to a low-carbon future by building long term resilience and sustainability for our customers and society.

We aim to put people at the centre of everything we do. We make sure that our colleagues feel supported and empowered in work every day, that we continue to fulfil our customer-first focus, and that we make a positive economic contribution to our communities.

In line with our strategic commitment to support customers in the transition to a sustainable future, our Climate Action Fund provides green lending and finances energy efficiency infrastructure and technology development for climate change mitigation and adaptation solutions.

In fostering long term resilience within the societies in which we operate we help to improve the availability and affordability of housing through several key initiatives and actions. These include supporting social and affordable housing programmes, and funding new developments. We also support our retail customers to have access to more environmentally friendly and economically efficient housing through different green products, such as our green mortgage offerings.

### Progress Indicators

SMART Target - Climate: In 2019, we launched our Climate Action Fund, with an ambition to lend €5bn over a five-year period. Due to exceptional demand, this doubled to €10bn in 2021 and it has now increased to €30bn by 2030. AIB have allocated a total of €16.6bn in cumulative climate action fund lending since 2019.

SMART Target - Housing: We have made a commitment to deliver more than €6bn of cumulative new lending to first-time buyers by 2026. In 2024, we made substantial progress by providing €2.79bn in new lending to first-time buyers.

### Links & references

In our Annual Financial Report, please see:  
Climate and Environmental Action, Our Performance Measures, pages 72  
Housing, Our Performance Measures, pages 89

## UNEP FI PRB: Progress Statement *continued*

### Principle 4 Stakeholders

#### Content

Stakeholders' views, interests and expectations are integral to our strategy and business model. To understand our stakeholders' views and serve their best interests, the Group engages with them through a range of regular engagement channels, including our due diligence processes, as well as through industry representative groups.

Throughout 2024, the Board continued engaging directly with key stakeholders, including our colleagues, customers, suppliers, investors, regulators and the wider society and community. It received management reports and updates on stakeholder matters. Information on the key engagement outcomes and how they informed the Group's strategic decisions is included in Section 172 Statement and Stakeholder Engagement from page 135 in the Governance Report.

Additionally, in 2023 as part of the DMA process we have engaged with our key stakeholders, the outcome of which was communicated to the respective ExCo and Board Committees. In 2024, we reviewed the DMA and concluded that the foundational work from 2023 continues to provide a reliable basis for our sustainability reporting and strategic decision-making processes. This process is outlined in 'Our approach to the Double Materiality Assessment' on page 56 of our AFR.

Through this process, we identified the issues of most importance to them as to what should be the focus for AIB strategically. Our SMART Targets in climate and housing are aligned to these outcomes.

#### Links & references

In our Annual Financial Report, please see:  
Our Approach to the Double Materiality Assessment, pages 54 - 57  
Climate and Environmental Action, Our Performance Measures, pages 72  
Housing, Our Performance Measures, pages 89

### Principle 5 Governance & Culture

#### Content

The AIB Board is responsible for promoting the long-term sustainable performance of the Group, setting the Group's strategic aims and risk appetite to support the strategy.

The Sustainable Business Advisory Committee (SBAC) oversees the Group's performance as a sustainable business and delivery of AIB's sustainability strategy, and is the overarching Board Advisory Committee responsible for the guidance of our sustainability agenda.

The Board Risk Committee (BRC) receives updates regarding the effectiveness of the Group's policies and programmes, which relate to identifying, managing and mitigating ESG risks, including climate risk, in connection with the Group's operations and ensuring compliance with regulatory requirements and industry standards.

The Board Audit Committee (BAC) assists and advises the Board in fulfilling its independent oversight responsibilities.

#### Progress Indicators

Our remuneration policies and practices support our strategy and values and promote long-term sustainable success.

Ensuring all our employees are aware of and understand the expectations of the Code of Conduct through annual mandatory training. In 2024, the completion rate of this training was 95%.

#### Links & references

In our Annual Financial Report, please see:  
Our Sustainability Governance, pages 51 - 53

### Principle 6 Transparency & Accountability

#### Content

AIB has undertaken several initiatives and actions to foster a culture of responsible banking among employees.

Our Inclusion & Diversity Code sets out the principles we live by and underpins new policies and handbooks introduced on Domestic Violence and Abuse, Menopause and Family Leave, and a year-round employee engagement calendar of diversity awareness and educational events. An Inclusion & Diversity (I&D) Council oversees the governance of I&D activity aligned with our strategy.

Regarding Gender diversity we have continued to make progress on our gender diversity target. We target between 40% and 60% of female representation in ExCo and management, which is underpinned by the Equileap annual Gender Equality Global Report and Ranking's definition of 'gender balance'. In addition, AIB has an ongoing target for Board of a minimum of 40% female representation.

AIB have mandatory training whereby all our employees are required to complete our annual mandatory online learning curriculum.

#### Links & references

In our Annual Financial Report, please see:  
Our Sustainability Reporting, Societal & Workforce Progress pages 90 - 94



# UNEP FI PRB: Basis of Preparation

## The 2024 progress statement for implementation of the Principles for Responsible Banking (PRB) has been prepared in line with the PRB Guidance document and progress statement.

The purpose of this document is to provide a progress statement that gives an accurate, balanced and transparent view of AIB's implementation of each of the six principles under the PRB Framework as at 31 December 2024. This will allow us to measure progress on implementation in a consistent manner.

The open questions in the progress statement allow banks the flexibility to disclose the progress they make, considering the diverse business models and various contextual differences in which banks operate.

AIB's 2024 progress statement for implementation of the PRB makes use of information disclosed in our Annual Financial Report 2024.

To provide further clarity of the progress statement, we provide supplementary information below detailing the basis of preparation and methodologies which inform the selected responses.

### Principle 2 | Impact & Target Setting Scope

When selecting the scope, which is the basis for our impact analysis, we considered the lending portfolio for our key business units across our ROI and UK markets, as defined in our 'About the SDT' section (see page 2). Assumptions were made and documented for what data was used for either Consumer or Institutional. As a result, Group Services and CFO data were excluded from the impact analysis due to immateriality.

Our impact analysis is based on data from September 2024 activities, related to the totality of our primary geographic footprints, i.e. the ROI, the UK and Northern Ireland, which together, comprises over 90% of the Groups banking activities. AIB has not included a separate submission of North America/rest of world. Individually they contribute <5% of the Groups concentration by location.

### Portfolio composition

In order to analyse our portfolio composition, we used September 2024 month end data for defined scope and applied the PRB Tool and methodology, including its predefined NACE codes used to categorise exposure by segment. We used version 3 of the UNEP FI Principles for Responsible Banking Portfolio Impact Analysis Tool to complete our analysis; this version of the tool did not require reporting by sectors and industries. However, we provide a breakdown of our loan book by sector as at 31 December 2024 on page 206 in our AFR.

### Context

In analysing key challenges and priorities and determining our most significant impact areas, we applied the PRB tool and methodology, including its context module with guidance on key societal needs.

Based on the nature of our business and the breakdown of our loan book, we have determined as a financial institution that the two most significant impact areas for AIB to address are climate change and housing.

### Performance measurement

Housing was selected as a material topic by our stakeholders, while climate and environmental related issues were ranked in the top six issues. We contribute to meeting the national need for housing by financing housing developments, and offering finance to purchase homes, in societies in which we operate. Providing finance to social and affordable housing is a key way to increase our positive impact against these high national needs. For further context around our stakeholder engagement and materiality assessment, see pages 49 - 50 and 54 - 62 in our AFR.

We recognise we have a long-term role to play in providing the finance required to transition to a sustainable economy. Our Climate Action Fund provides green lending and finances energy efficiency infrastructure and technology development for climate change mitigation and adaptation solutions.

**Data disclaimer:** We report certain value chain and quantitative metrics by relying on data derived indirectly through third-party data providers or sector average values. This information may be estimated using estimation factors which may significantly affect the reported information. The Group cannot influence estimates and assumptions made by a third-party data provider. As real data becomes available and calculation methods develop, the quality of data will improve gradually. This means that figures in the sustainability statement may change over the coming years, and there may also be changes in figures from previous ESG reports. New guidance, industry standards and scientific research are anticipated, and we reserve the right to periodically review and update targets, methodologies and approaches and to restate baselines as necessary.

### Target setting: Baseline

#### SMART Target Climate:

In 2019, we launched our Climate Action Fund, with an ambition to lend €5bn over a five-year period. Due to exceptional demand, this doubled to €10bn in 2021 and it has now increased to €30bn by 2030. See the Climate Action Fund metrics in our AFR on page 72.

#### SMART Target Housing:

We have made a commitment to deliver more than €6bn of cumulative new lending to first time buyers from 2024- 2026. In 2024 we made substantial progress by providing €2.79bn in new lending to first time buyers. See the Housing metrics in our AFR on page 89.



# Equator Principles

**The Equator Principles is a risk management framework for financial institutions for determining, assessing and managing environmental and social risk in projects.**

The Equator Principles is primarily intended to provide a minimum standard for due diligence to support responsible decision making. In October 2021, AIB signed up to the Equator principles. As a signatory to the Equator Principles, all lending under AIB's Group Project Finance Policy is required to comply with the Equator Principles, and, therefore, AIB conduct assessments for environmental and social risks in line with the Equator Principles and relevant International Finance Corporation (IFC) Performance Standards. Under the Equator Principles, projects can be categorized as A, B+, B or C. Projects that are

deemed to be a Category A & B+ are projects with potential significant environmental and social risk, whereas Category B & C projects have limited adverse and minimal adverse environmental and social risk, respectively. AIB successfully implemented the Equator Principles across the relevant business units in A in 2023. In 2024, training continues to be rolled out to all Relationship Managers that lend to projects that are in scope for the Equator Principles. AIB is submitting Equator Principles reporting for FY2024 for all the applicable loan commitments made in the period.

Number of Project Finance Transactions					Group 2024
Sector		Cat. A	Cat. B+	Cat. B	Cat. C
	Mining				
	Infrastructure				1
	Oil & Gas				
	Power	1		13	
	Other				
Region	Americas	1		9	1
	Europe, Middle East, Africa			4	
	Asia Pacific				
Country designation	Designated country	1		13	1
	Non-designated country				
Independent review	Yes	1		13	1
	No				
Total number of projects		1		13	1

# Independent Assurance

## Independent assurance in respect of GRI Content Index and UNEP FI PRB: Progress Statement.

### Deloitte.

Independent limited assurance engagement on the GRI Reporting ('GRI Content Index') prepared by AIB Group plc (the "Group" or "AIB") for the year ended 31 December 2024, with reference to the Global Reporting Initiative Standards (the "GRI Standards").

#### What we looked at: scope of our work

Our assurance engagement was conducted, in accordance with 'International Standard on Assurance Engagements 3000 (Revised) Assurance Engagements Other than Audits or Reviews of Historical Financial Information ("ISAE 3000 (Revised)") issued by the International Auditing and Assurance Standards Board ("IAASB"), to report to AIB on whether the GRI Content Index prepared by AIB for 31 December 2024 (the 'Subject Matter') is prepared with reference to the Global Reporting Initiative ('GRI') Standard's reporting guidelines (the 'GRI Standards' or the 'Applicable Criteria').

Please note that this scope did not include assurance of the underlying data.

#### Limited assurance conclusion

##### What we found: our assurance conclusion

Based on the limited assurance procedures set out below, and the evidence we obtained, nothing has come to our attention that causes us to believe that the GRI Content Index prepared by AIB for the financial year ended 31 December 2024 has not been prepared, in all material respects, with reference to the GRI Standards.

#### What standards we used: basis of our work, criteria used and level of assurance

We carried out limited assurance procedures in accordance with ISAE 3000 (Revised) on whether AIB's GRI Content Index is prepared with the application of the relevant requirements of the GRI Standards when preparing a report with reference to the GRI Standards.

For the purpose of this limited assurance engagement, the information in scope of our engagement is the information referred to within the GRI Content Index.

Our understanding of the systems and controls relevant to the information within the GRI Content Index was obtained through inquiry and formed the basis of our assurance approach. Internal controls comprise of the control environment and the control procedures. The nature and extent of our procedures varied according to identification of areas of greater than normal risk of material misstatement and our assessment of AIB's systems for collection of the data underpinning the GRI Content Index.

Our work on a limited assurance engagement does not involve testing the operating effectiveness of controls over the underlying data, nor do we seek to obtain an understanding of systems and controls beyond those relevant to the GRI Content Index.

As a limited assurance engagement, the nature, timing and extent of evidence-gathering procedures are less in extent than for a reasonable assurance engagement, and therefore substantially less assurance is obtained than in a reasonable assurance engagement. Our procedures do not constitute an audit performed in accordance with International Standards of Auditing (Ireland) and accordingly we do not express an audit opinion on any elements of the GRI Content Index.

#### What we did: key limited assurance procedures

To form our conclusion, the procedures we performed included the following:

- Interviewing management and those with operational responsibility for sustainable business performance to assess if the GRI Content Index is prepared with reference to the GRI Standards.
- Gaining an understanding of the key structures, processes, procedures and controls relating to the preparation of the GRI Content Index.
- Performing procedures to analyse and assess the key structures, processes, procedures and controls relating to the preparation of the GRI Content Index.
- Evaluating whether the approach undertaken by management for the material sustainability issues relevant to the GRI as reported in the GRI Content Index are consistent with our overall knowledge and experience of sustainability management and performance at AIB; and
- Reviewing the content of the information within the GRI Content Index against the findings of the above procedures.

#### Inherent Limitations

The Applicable Criteria and the nature of the Subject Matter allow for different, but acceptable, measurement methodologies to be adopted which may result in variances between entities. The adopted measurement methodologies may also impact comparability of the GRI information reported by different organisations and from year to year within an organisation as methodologies develop.

The procedures performed only relate to the period under review, and do not provide assurance in relation to any future period or past dates outside of this period as changes to systems or controls subsequent to the period covered by our assurance report may alter the validity of our conclusion.

#### Our independence and competence in providing limited assurance to AIB

In conducting our engagement, we complied with the independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including international independence standards) related to assurance engagements issued by the International Ethics Standards Board for Accountants ("IESBA Code"). This code is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality, and professional behaviour. The fundamental principles of ethics establish the standard of behaviour expected of a professional accountant.

We applied the International Standard on Quality Management 1 ("ISQM 1"), issued by the IAASB. Accordingly, we maintained a comprehensive system of quality including documented policies and procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements.

#### Roles and responsibilities

##### AIB:

The Directors of AIB are responsible for the provision of information and decision-making in connection with this limited assurance engagement. In addition, the Directors are responsible for the following:

- The preparation of the GRI Content Index, and the statements contained within it, with reference to the GRI Standards.
- Determining AIB's objectives in respect of sustainability performance and for establishing and maintaining appropriate performance management and internal control systems from which the reported information is derived.
- Provision of reasonable and sufficient access and making available all reasonably necessary records, correspondence, and information to allow the successful completion of this limited assurance engagement.
- Provision of such explanations and evidence that we consider necessary to allow the successful completion of this limited assurance engagement.
- Designing, implementing, and maintaining internal processes and controls over content within the GRI Content Index to ensure that it is free from material misstatement, including whether due to fraud or error.
- Provision of access to relevant sections of the Annual Financial Report (AFR) 2024, as referenced in the GRI Content Index.
- Ensuring that adequate procedures are put in place to complete the GRI Content Index in a complete and accurate fashion.

AIB are due to publish the GRI Content Index as a separate document on their website. Our assurance engagement does not provide assurance on the maintenance and integrity of the website, including controls used to achieve this, and in particular on whether any change occurred to the GRI Content Index since first approval. These matters are the responsibility of the Directors, but no control procedures can provide absolute assurance in this area. The publishing of our assurance report will in no way extend our responsibilities to any parties other than the Directors.

##### Deloitte:

Our responsibility is to:

- Independently express a conclusion on whether anything has come to our attention, based on our assurance procedures, on whether the GRI Content Index has been prepared with reference to the Applicable Criteria including: Planning and performing procedures to obtain sufficient appropriate evidence in order to express an independent limited assurance conclusion on the preparation of the GRI Content Index by AIB with reference to the GRI Standards.
- Communicate matters that may be relevant to the preparation of the GRI Content Index with reference to the GRI Standards to the appropriate party including identified or suspected non-compliance with laws and regulations, fraud or suspected fraud, and any unsupported bias identified in the preparation of the GRI Content Index.
- Report our conclusion in the form of an independent limited assurance report to AIB.

## Independent Assurance *continued*

### Use of our assurance report

Our assurance report is made solely to the Directors of AIB, in accordance with ISAE 3000 (Revised) and our agreed terms of engagement for the purpose of the Directors' governance and stewardship. Our work was undertaken so that we might state to the Directors of AIB those matters we have agreed to state to them in our assurance report and for no other purpose. Without assuming or accepting any responsibility or liability in respect of our assurance report to any party other than AIB, we acknowledge that the Directors of AIB may make our assurance report publicly available for others wishing to have access to it strictly on a non-reliance basis to the extent of a need to know only and for information purposes only (and without creating any duty or liability to them on Deloitte's part), which does not and will not affect or extend for any purpose or on any basis our responsibilities. It is AIB's responsibility to ensure that any and all such publications truly, accurately and completely reflect Deloitte's assurance report.

To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than AIB for our reports or for the conclusions we will form in same.



Eileen Healy  
Partner  
For and on behalf of Deloitte Ireland LLP

Date: 4 March 2025

## Deloitte.

### Independent limited assurance engagement on AIB Group plc Bank's Responsible Banking Progress Statement under the United Nations Environment Program Finance Initiative Principles for Responsible Banking Framework

#### What we looked at: scope of our work

AIB engaged Deloitte to perform independent limited assurance reporting over the Selected Information (the "Subject Matter") included within the Responsible Banking Progress Statement, as required by the United Nations Environment Program ("UNEP") Finance Initiative ("UNEP FI") Principles for Responsible Banking ("PRB") Framework, as prepared by AIB Group plc ("AIB", the "Group") (the "Responsible Banking Progress Statement" or the "UNEPI PRB: Summary template") for the year ended 31 December 2024.

#### What we found: our assurance conclusion

Based on the limited assurance procedures set out below and the evidence we obtained, nothing has come to our attention that causes us to believe that the Selected Information is not prepared, in all material respects, in accordance with the Applicable Criteria and the Basis of Reporting.

#### Selected information

The requirements, for the preparation and publishing of Selected Information within a Responsible Banking Progress Statement ("Subject Matter") in respect of the PRB Framework are established by the 'Principles for Responsible Banking Guidance for Transparency' (November 2024). For the purpose of our assurance engagement and with due regard to the UNEP FI Guidance for Assurance Providers: Providing Limited Assurance for Reporting (Version 2) published by the UNEP FI as best practice, the Applicable Criteria for the engagement is defined as the following sections of the 'Principles for Responsible Banking Guidance for Transparency' (November 2024):

- Principle 2: Impact & Target Setting (Impact Analysis);
- Principle 2: Impact & Target Setting (Target Setting);
- Principle 2: Impact & Target Setting (Target implementation – action and transition plans); and
- Principle 5: Governance & Culture (Governance structure for implementation of principles) (together, the "Applicable Criteria").

The following requirements from the Responsible Banking Progress Statement are considered the 'Selected Information' for the purpose of this engagement:

- Principle 2: Impact & Target Settings
- Principle 5: Governance & Culture

The Selected Information for AIB is presented in the Sustainability Disclosure Table for the year ended 31 December 2024, along with the Basis of Reporting.

The following requirements from the Responsible Banking Progress Statement do not form part of this independent limited assurance engagement:

- Principle 1: Alignment.
- Principle 3: Clients & Customers.
- Principle 4: Stakeholders.
- Principle 6: Transparency & Accountability.

#### What standards we used: basis of our work, criteria used and level of assurance

Our assurance engagement was conducted in accordance with International Standard on Assurance Engagements 3000 (Revised) 'Assurance Engagements Other than Audits or Reviews of Historical Financial Information' ("ISAE 3000 (Revised)") issued by the International Auditing and Assurance Standards Board ("IAASB"). ISAE 3000 (Revised) requires that we review the processes, systems and competencies used to compile the Selected Information, on which we provide limited assurance. Our understanding of the systems and controls relevant to the Selected Information was obtained through inquiry and formed the basis of our assurance approach. Internal controls comprise the control environment and the control procedures.



## Independent Assurance *continued*

Our work on a limited assurance engagement does not involve testing the operating effectiveness of controls over the underlying data, nor do we seek to obtain an understanding of systems and controls beyond those relevant to the Selected Information.

As a limited assurance engagement, the nature, timing and extent of evidence-gathering procedures is less in extent than for a reasonable assurance engagement, and therefore substantially less assurance is obtained than in a reasonable assurance engagement. Our procedures did not constitute an audit performed in accordance with International Standards of Auditing (Ireland) and accordingly we do not express an audit opinion on any elements of the Annual Financial Report 2024.

### What we did: key limited assurance procedures

Our procedures were informed with due regard to the UNEP FI Guidance for Assurance Providers: Providing Limited Assurance for Reporting (Version 2) as best practice. To form our conclusion, the procedures we performed included the following:

- Through inquiries of management, obtained an understanding of AIB, its environment, the processes and information systems relevant to the preparation of the Selected Information sufficient to identify and assess risks of material misstatement in the Selected Information, and provide a basis for designing and performing procedures to respond to assessed risks and to obtain limited assurance to support a conclusion.
- In respect of Principle 2 (Impact analysis), we checked that AIB's business areas and scope are clearly described. We reconciled portfolio composition to management information and checked that challenges and priorities have been analysed, including the rationale for business areas where the analysis was not performed. We also checked that AIB has disclosed the method for determining its impact areas and has selected what was determined as the two most significant areas of impact. For the two impact areas where performance has been measured, we reconciled to published information referenced in the response and to supporting management information. Finally, we checked to supporting evidence, including to meeting minutes, that the stated governance process was followed.
- In respect of Principle 2 (Target Setting), we checked that AIB sets targets for its significant impact areas as applicable and that the targets are linked to those impact areas. We checked that AIB has identified frameworks to align with and explain how targets contribute to relevant goals. Further, for the impact areas where targets have been set, we checked that the base year for climate targets is no more than two full reporting years prior to the year when the targets have been set and that the targets are Specific, Measurable, Achievable, Relevant and Time-bound.
- In respect of Principle 2 (Target implementation – action and transition plans), we obtained and reviewed supporting evidence to assess whether disclosures within the selected responses in AIB's Responsible Banking Progress Statement reflect AIB's assessment of the stage of implementation of Principle 2 (Target implementation – action and transition plans) and the stage of monitoring of that implementation.
- In respect of Principle 5 (Governance structure for implementation of the principles), we checked consistency of supporting evidence, including organisation charts and meeting minutes, with that of the disclosures of AIB's governance structure. We checked that there is oversight over the implementation and monitoring and that the structure is in line with existing governance structures as defined by AIB. Further, we checked that the Board of Directors obtained information on AIB's stage of implementation of the Principles for Responsible Banking on an annual basis.

### Inherent Limitations

The Applicable Criteria, Basis of Reporting and the nature of the Selected Information allow for different, but acceptable, measurement methodologies to be adopted which may result in variances between entities. The adopted measurement methodologies may also impact comparability of the Selected Information reported by different organisations and from year to year within an organisation as methodologies develop.

Further, the procedures performed only related to the period under review, and do not provide assurance in relation to any future period or past date as changes to systems or controls subsequent to the period covered by our report may alter the validity of our conclusion.

### Our independence and competence in providing limited assurance to AIB

In conducting our engagement, we complied with the independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including international independence standards) related to assurance engagements issued by the International Ethics Standards Board for Accountants ("IESBA Code"). This code is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality, and professional behaviour. The fundamental principles of ethics establish the standard of behaviour expected of a professional accountant.

We apply the International Standard on Quality Management 1 ("ISQM 1") issued by the IAASB. Accordingly, we maintained a comprehensive system of quality including documented policies and procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements.

### Roles and responsibilities

#### AIB:

AIB are responsible for the provision of information and decision-making in connection with its limited assurance engagement. In addition, AIB are also responsible for:

- The preparation and approval of the Responsible Banking Progress Statement together with AIB's Basis for Reporting relating to the Responsible Banking Progress Statement.
- AIB selecting and establishing the Applicable Criteria underpinning the Selected Information and as set out in the UNEP FI Responsible Banking Progress Statement and Principles for Responsible Banking Guidance for Transparency.
- AIB preparing, measuring, presenting and reporting the Selected Information in accordance with the Applicable Criteria.
- AIB designing, implementing, and maintaining internal processes and controls over information relevant to the preparation of the Selected Information to ensure that they are free from material misstatement, including whether due to fraud or error.
- AIB providing sufficient and reasonable access and making available all necessary records, correspondence, information and explanations to allow the successful completion of this limited assurance engagement.
- Confirming through written representations all information relevant to the limited assurance engagement has been provided and that the measurement or evaluation of the underlying subject matter in the Responsible Banking Progress Statement is undertaken against the Applicable Criteria.

AIB are to publish the Responsible Banking Progress Statement as a separate document on the website. Our assurance engagement does not provide assurance on the maintenance and integrity of the website, including controls used to achieve this, and in particular on whether any change occurred to the Responsible Banking Progress Statement since first approval. These matters are the responsibility of the Directors, but no control procedures can provide absolute assurance in this area. The publishing of our report will in no way extend our responsibilities to any parties other than the Directors.

#### Deloitte:

Our responsibility is to:

- Plan and perform procedures to obtain sufficient appropriate evidence in order to express an independent limited assurance conclusion on the Selected Information.
- Communicate matters that may be relevant to the Selected Information to the appropriate party including identified or suspected non-compliance with laws and regulations, fraud or suspected fraud, and any unsupported bias in the preparation of the Selected Information.
- Report our conclusion in the form of an independent limited Assurance Report to AIB

#### Use of our report

Our Assurance Report is made solely to the Directors of AIB, for the purpose of the Directors' governance and stewardship in accordance with ISAE 3000 (Revised) and our agreed terms of engagement. Our work has been undertaken so that we might state to the Directors of AIB those matters we have agreed to state to them in our report and for no other purpose. Without assuming or accepting any responsibility or liability in respect of our report to any party other than AIB, we acknowledge that the Directors of AIB may make our Assurance Report publicly available for others wishing to have access to it strictly on non-reliance basis to the extent of a need to know only and for information purposes only (and without creating any duty or liability to them on Deloitte's part), which does not and will not affect or extend for any purpose or on any basis our responsibilities.

To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than AIB Group plc and the Directors of AIB Group plc as a body, for our work, for this report, or for the conclusions we have formed.

The Applicable Criteria and Basis of Reporting were designed for the purposes of AIB Group plc preparing and publishing a Responsible Banking Progress Statement under the UNEP FI Principles for Responsible Banking Framework, and as a result the Selected Information may not be suitable for another purpose.



Eileen Healy  
Partner  
For and on behalf of Deloitte Ireland LLP

Date: 4 March 2025



**For the life you're after**

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