



Reporting period
1/1/2024 – 31/12/2024

2025 Climate Change Response

AIB Group plc



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AIB Group Plc

2025 CDP Corporate Questionnaire 2025

Word version

Important: this export excludes unanswered questions

This document is an export of your organization's CDP questionnaire response. It contains all data points for questions that are answered or in progress. There may be questions or data points that you have been requested to provide, which are missing from this document because they are currently unanswered. Please note that it is your responsibility to verify that your questionnaire response is complete prior to submission. CDP will not be liable for any failure to do so.

[Read full terms of disclosure](#)

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C1. Introduction

(1.1) In which language are you submitting your response?

Select from:

☒ English

(1.2) Select the currency used for all financial information disclosed throughout your response.

Select from:

☒ EUR

(1.3) Provide an overview and introduction to your organization.

(1.3.1) Type of financial institution

Select from:

☒ Bank

(1.3.2) Organization type

Select from:

☒ Partially privately owned and partially state owned organization

(1.3.3) Description of organization

AIB Group p.l.c, the "Group", is a financial services group. The Group operates predominantly in Ireland and the United Kingdom. Our shares are quoted on the Irish and London stock exchanges and we are a member of the FTSE4Good Index. Our four core operating segments are Retail Banking, Climate Capital, Capital Markets and AIB UK. AIB is our principal brand across all our geographies. AIB provides a range of products and services to retail, business and corporate customers. AIB holds market-leading positions across key segments. Retail Banking supports our consumer and business customers with a comprehensive range of banking and financial services, delivered through our branch and digital channels with an expanded reach via EBS, Haven, Payzone, AIB life, AIB Merchant Services and Nifti. EBS is a predominantly mortgage-focused brand within AIB Group, helping thousands of customers buy their own homes in Ireland. It offers mortgage, personal banking, savings and investment products and services. Haven is our mortgage broker channel, providing mortgages through intermediaries on behalf of AIB Group. Goodbody offers wealth management, asset management and investment banking services with quality advice and exceptional client service at the core of its

offering. Payzone, a subsidiary of AIB Group, provides comprehensive payment solutions to more than 7,500 retail stores, more than 100 clients and more than 500,000 app users across Ireland. AIB life is a joint venture with Great-West Lifeco providing protection, pensions and investments to help customers on their path to financial security for the life they're after. AIB Merchant Services is an associate of the Group. It is one of Ireland's largest payment solution providers and one of Europe's largest e-commerce acquirers, with a global customer base. Nifti is an associate of the Group. NiftiBusiness assists companies in achieving their fleet management goals including the transition to more sustainable mobility solutions. Capital Markets, which includes Goodbody, serves the Group's large and medium-sized business customers as well as our private banking customers taking a partnership approach and providing deep-sector expertise combined with our comprehensive product 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. AIB UK operates in the two distinct markets of Great Britain and Northern Ireland. Across both regions AIB supports our corporate customers with sector-specific expertise. In Northern Ireland, we offer full service retail banking. Our purpose is empowering people to build a sustainable future, and sustainability remains at the heart of our Group strategy. The AIB Group strategy is centred on an informed view of our customers' needs and anchored in a progressive ESG agenda. With one year of the three year strategic cycle complete, we are progressing our three pillars at pace: Customer first, Greening our business and Operational efficiency and resilience. As a financial institution we have a role to play in combatting climate change through our lending and investment activities, recognising that significant investments are required globally to finance the green transition. Our ambition is for our own operations to be Net Zero by 2030 and for our lending portfolio to be Net Zero by 2050. To deliver on our decarbonisation ambition, we have sharpened our ESG principles across three pillars. On 17 June 2025 AIB successfully disposed of the remainder of the Irish State's shareholding in AIB Group plc meaning AIB is now privately owned.

[Fixed row]

(1.4) State the end date of the year for which you are reporting data. For emissions data, indicate whether you will be providing emissions data for past reporting years.

	End date of reporting year	Alignment of this reporting period with your financial reporting period	Indicate if you are providing emissions data for past reporting years
	12/31/2024	Select from: <input checked="" type="checkbox"/> Yes	Select from: <input checked="" type="checkbox"/> No

[Fixed row]

(1.4.1) What is your organization's annual revenue for the reporting period?

4928000000

(1.5) Provide details on your reporting boundary.

	Is your reporting boundary for your CDP disclosure the same as that used in your financial statements?
	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

(1.6) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.)?

ISIN code - bond

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ No

ISIN code - equity

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ Yes

(1.6.2) Provide your unique identifier

IE00BF0L3536

CUSIP number

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ No

Ticker symbol

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ No

SEDOL code

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ No

LEI number

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ Yes

(1.6.2) Provide your unique identifier

3U8WV1YX2VMUHH7Z1Q21

D-U-N-S number

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ No

Other unique identifier

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ No

[Add row]

(1.7) Select the countries/areas in which you operate.

Select all that apply

☒ Ireland

☒ United Kingdom of Great Britain and Northern Ireland

☒ United States of America

(1.9) What was the size of your organization based on total assets value at the end of the reporting period?

141266000000

(1.10) Which activities does your organization undertake, and which industry sectors does your organization lend to, invest in, and/or insure?

Banking (Bank)

(1.10.1) Activity undertaken

Select from:

☒ Yes

(1.10.3) Reporting the portfolio value and % of revenue associated with the portfolio

Select from:

- ☒ Yes, both the portfolio value and the % of revenue associated with it

(1.10.4) Portfolio value based on total assets

136464000000

(1.10.5) % of revenue

100

(1.10.6) Type of clients

Select all that apply

- ☒ Other, please specify :Exposed to all broad market sectors

(1.10.7) Industry sectors your organization lends to, invests in, and/or insures

Select all that apply

- | | |
|---|---|
| <input checked="" type="checkbox"/> Retail | <input checked="" type="checkbox"/> Manufacturing |
| <input checked="" type="checkbox"/> Apparel | <input checked="" type="checkbox"/> Infrastructure |
| <input checked="" type="checkbox"/> Services | <input checked="" type="checkbox"/> Power generation |
| <input checked="" type="checkbox"/> Materials | <input checked="" type="checkbox"/> International bodies |
| <input checked="" type="checkbox"/> Hospitality | <input checked="" type="checkbox"/> Transportation services |
| <input checked="" type="checkbox"/> Food, beverage & agriculture | |
| <input checked="" type="checkbox"/> Biotech, health care & pharma | |

Investing (Asset manager)

(1.10.1) Activity undertaken

Select from:

- ☒ No

Investing (Asset owner)

(1.10.1) Activity undertaken

Select from:

☒ No

Insurance underwriting (Insurance company)

(1.10.1) Activity undertaken

Select from:

☒ No

[Fixed row]

(1.24) Has your organization mapped its value chain?

(1.24.1) Value chain mapped

Select from:

☒ Yes, we have mapped or are currently in the process of mapping our value chain

(1.24.2) Value chain stages covered in mapping

Select all that apply

☒ Upstream value chain

☒ Portfolio

(1.24.3) Highest supplier tier mapped

Select from:

☒ Tier 1 suppliers

(1.24.4) Highest supplier tier known but not mapped

Select from:
☒ Tier 2 suppliers

(1.24.5) Portfolios covered in mapping

Select all that apply
☒ Banking (Bank)

(1.24.7) Description of mapping process and coverage

Our value chain encompasses a range of activities and stakeholder relationships, which we rely on to provide banking products and services. We have identified our key stakeholder groups along the upstream, own operations and downstream of our value chain, and, in line with the European Sustainability Reporting Standards (ESRS), we group them into either affected stakeholders, or general users of the sustainability statement. The nature of our business means that we have a complex value chain. It extends beyond direct contractual business relationships. For example, in our role as a lender we have direct relationships with our personal and business customers. Our business customers have their own value chains, through which we may be associated with impacts on the wider society and the environment. As an employer, we have a direct relationship with our own workforce, who are part of our own operations. As a regulated business, funded by debt and equity, and as a procurer of goods and services, we are connected to stakeholders in our upstream value chain, such as regulators, investors and suppliers. We encourage our suppliers to also report their carbon emissions through the CDP. In 2024, the number of suppliers who participated in reporting to CDP was 65, which represented 50% of the AIB suppliers invited. This description, which summarises our description of the mapping process and value chain parties, allowed us to fully understand our relationship with these parties and enabled us to continue with our double materiality assessment.

[Fixed row]

(1.24.1) Have you mapped where in your direct operations or elsewhere in your value chain plastics are produced, commercialized, used, and/or disposed of?

	Plastics mapping	Portfolios covered in mapping
	Select from:	Select all that apply

	Plastics mapping	Portfolios covered in mapping
	<input checked="" type="checkbox"/> Yes, we have mapped or are currently in the process of mapping plastics in our value chain	<input checked="" type="checkbox"/> Banking (Bank)

[Fixed row]

C2. Identification, assessment, and management of dependencies, impacts, risks, and opportunities

(2.1) How does your organization define short-, medium-, and long-term time horizons in relation to the identification, assessment, and management of your environmental dependencies, impacts, risks, and opportunities?

Short-term

(2.1.1) From (years)

0

(2.1.3) To (years)

1

(2.1.4) How this time horizon is linked to strategic and/or financial planning

Our double materiality assessment (DMA), as carried out in line with Corporate Sustainability Reporting Directive (CSRD) requirements, has considered Impacts, Risks and Opportunities (IROs) that arise through direct and indirect business relationships across our value chain, and across three different time horizons. Our DMA identified the sustainability matters we believe have the most impact for our stakeholders, including the risks and opportunities arising from our strategy and business model. Further analysis is undertaken to determine if material risks and opportunities result in current financial effects which require financial planning. For the purposes of identifying and reporting on our material IROs in the short-term time horizon, we have defined that time horizon as 'Up to 1 year'. This is in line with EFRAG guidance when performing a DMA.

Medium-term

(2.1.1) From (years)

1

(2.1.3) To (years)

5

(2.1.4) How this time horizon is linked to strategic and/or financial planning

Our DMA identified the sustainability matters we believe have the most impact for our stakeholders, including the risks and opportunities arising from our strategy and business model. Further analysis is undertaken to determine if material risks and opportunities result in anticipated financial effects which require financial planning. For the purposes of identifying and reporting on our material IROs in the medium-term time horizon, we have defined that time horizon as '1 to 5 years'. This is in line with EFRAG guidance when performing a DMA. We deviate from the medium- and long-term time horizons when reporting climate-related physical and transition risks. In line with the Regulatory Guidance from the European Banking Authority (EBA), we define long term as 10 years. Given that the ESRS does not permit a deviation from the 1-year short term horizon, the medium term defaults to 1 – 10 years.

Long-term

(2.1.1) From (years)

5

(2.1.2) Is your long-term time horizon open ended?

Select from:

☒ Yes

(2.1.4) How this time horizon is linked to strategic and/or financial planning

Our DMA, as carried out in line with CSRD requirements, has considered IROs that arise through direct and indirect business relationships across our value chain, and across three different time horizons. Our DMA identified the sustainability matters we believe have the most impact for our stakeholders, including the risks and opportunities arising from our strategy and business model. Further analysis is undertaken to determine if material risks and opportunities result in anticipated financial effects which require financial planning. For the purposes of identifying and reporting on our material IROs in the long-term time horizon, we have defined that time horizon as 5 years. This is in line with EFRAG guidance when performing a DMA. We deviate from the long-term time horizons when reporting climate-related physical and transition risks. In line with the Regulatory Guidance from the EBA, we define long term as 10 years.

[Fixed row]

(2.2) Does your organization have a process for identifying, assessing, and managing environmental dependencies and/or impacts?

	Process in place	Dependencies and/or impacts evaluated in this process
	Select from: <input checked="" type="checkbox"/> Yes	Select from: <input checked="" type="checkbox"/> Both dependencies and impacts

[Fixed row]

(2.2.1) Does your organization have a process for identifying, assessing, and managing environmental risks and/or opportunities?

	Process in place	Risks and/or opportunities evaluated in this process	Is this process informed by the dependencies and/or impacts process?
	Select from: <input checked="" type="checkbox"/> Yes	Select from: <input checked="" type="checkbox"/> Both risks and opportunities	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

(2.2.2) Provide details of your organization's process for identifying, assessing, and managing environmental dependencies, impacts, risks, and/or opportunities.

Row 1

(2.2.2.1) Environmental issue

Select all that apply

☒ Climate change

☒ Forests

- ☒ Water
- ☒ Plastics
- ☒ Biodiversity

(2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

Select all that apply

- ☒ Dependencies
- ☒ Impacts
- ☒ Risks
- ☒ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

- ☒ Direct operations
- ☒ Upstream value chain

(2.2.2.4) Coverage

Select from:

- ☒ Full

(2.2.2.5) Supplier tiers covered

Select all that apply

- ☒ Tier 1 suppliers
- ☒ Tier 2 suppliers

(2.2.2.7) Type of assessment

Select from:

- ☒ Qualitative and quantitative

(2.2.2.8) Frequency of assessment

Select from:

- ☒ Annually

(2.2.2.9) Time horizons covered

Select all that apply

- ☒ Short-term
- ☒ Medium-term
- ☒ Long-term

(2.2.2.10) Integration of risk management process

Select from:

- ☒ Integrated into multi-disciplinary organization-wide risk management process

(2.2.2.11) Location-specificity used

Select all that apply

- ☒ Local
- ☒ National

(2.2.2.12) Tools and methods used

Enterprise Risk Management

- ☒ Stress tests
- ☒ Other enterprise risk management, please specify :Heat-mapping, Business Environment Scan (BES), Transmission Channel Assessment (TCA), MRA

International methodologies and standards

- ☒ IPCC Climate Change Projections

Other

- ☒ Jurisdictional/landscape assessment
- ☒ Scenario analysis
- ☒ Other, please specify :ESG Questionnaire, Material Risk Assessment (MRA), Risk Appetite Statement (RAS), Risk and Control Assessment (RCA)

(2.2.2.13) Risk types and criteria considered

Acute physical

- ☒ Drought
- ☒ Wildfires
- ☒ Heat waves
- ☒ Cyclones, hurricanes, typhoons
- ☒ Heavy precipitation (rain, hail, snow/ice)
- ☒ Flood (coastal, fluvial, pluvial, ground water)
- ☒ Storm (including blizzards, dust, and sandstorms)

Chronic physical

- ☒ Heat stress
- ☒ Temperature variability

Policy

- ☒ Carbon pricing mechanisms
- ☒ Changes to national legislation
- ☒ Regulation of discharge quality/volumes
- ☒ Poor enforcement of environmental regulation
- ☒ Increased difficulty in obtaining operations permits
- ☒ Lack of globally accepted and harmonized definitions
- ☒ Changes to international law and bilateral agreements
- ☒ Increased difficulty in obtaining water withdrawals permit
- ☒ Mandatory water efficiency, conservation, recycling, or process standards
- ☒ Introduction of regulatory standards for previously unregulated contaminants

Market

- ☒ Changing customer behavior
- ☒ Uncertainty in the market signals
- ☒ Uncertainty about commodity origin and/or legality
- ☒ Availability and/or increased cost of raw materials
- ☒ Availability and/or increased cost of recycled or renewable content

- ☒ Inadequate access to water, sanitation, and hygiene services (WASH)
- ☒ Availability and/or increased cost of certified sustainable material
- ☒ Contraction of insurance markets, leaving clients exposed and changing the risk parameters of the credit
- ☒ Loss of clients due to a fund's poor environmental performance outcomes (e.g. if a fund has suffered climate-related write-downs)

Reputation

- ☒ Impact on human health
- ☒ Lending that could create or contribute to systemic risk for the economy
- ☒ Negative press coverage related to support of projects or activities with negative impacts on the environment (e.g. GHG emissions, deforestation & conversion, water stress)
- ☒ Stakeholder conflicts concerning water resources at a basin/catchment level
- ☒ Stigmatization of sector

Technology

- | | |
|---|--|
| <input checked="" type="checkbox"/> Transition to reusable products | <input checked="" type="checkbox"/> Data access/availability or monitoring systems |
| <input checked="" type="checkbox"/> Transition to recyclable plastic products | <input checked="" type="checkbox"/> Transition to lower emissions technology and products |
| <input checked="" type="checkbox"/> Transition to increasing recycled content | <input checked="" type="checkbox"/> Inability to increase yield of existing production areas |
| <input checked="" type="checkbox"/> Transition to increasing renewable content | <input checked="" type="checkbox"/> Transition to water intensive, low carbon energy sources |
| <input checked="" type="checkbox"/> Dependency on water-intensive energy sources products | <input checked="" type="checkbox"/> Transition to water efficient and low water intensity technologies and |

Liability

- ☒ Exposure to litigation
- ☒ Moratoria and voluntary agreement
- ☒ Non-compliance with regulations
- ☒ Regulation and supervision of environmental risk in the financial sector

(2.2.2.14) Partners and stakeholders considered

Select all that apply

- | | |
|---|---|
| <input checked="" type="checkbox"/> Customers | <input checked="" type="checkbox"/> Local communities |
|---|---|

- ☒ Employees
- ☒ Investors
- ☒ Suppliers
- ☒ Regulators

(2.2.2.15) Has this process changed since the previous reporting year?

Select from:

- ☒ No

(2.2.2.16) Further details of process

Our DMA identified the sustainability matters that we believe have the most impact for our stakeholders, including the dependencies, impacts, risks and opportunities arising from our strategy and business model. The DMA was conducted to comply with the CSRD reporting requirements for FY2024 and the Group is continuously working on integrating the DMA process, in terms of the overall planning, risk management and internal controls as applicable. The group's process includes assessment of both the risks posed by direct exposure to climate change & indirect exposure through customers & suppliers. Climate risk includes the impacts that the Group and its suppliers have on climate and the impact from climate on the Group and its customers and supplier. Our environmental assessment considers the potential negative impacts of the activities or actions of the Group, its customers or suppliers either directly or indirectly on the naturally occurring living and non-living components of the Earth. From the perspective of our own operations our most material environmental IROs relate to the management of climate change, the management our supplier relationships, and the decarbonisation of our own operations – details of the Group's approach in relation to these items can be found from page 63- 111 of the Sustainability section of the 2024 AFR. In addition to the DMA, the Group undertakes regular processes for the identification and assessment of climate and environment (C&E) impacts, risks and opportunities. These include: Material Risk Assessment ('MRA'), Risk and Control Assessments ('RCAs'), Transmission Channel Analysis, Business Environment Scans, 'House Views' on key sectors, compilation of Heatmaps, C&E Stress Testing and regulatory horizon scanning - Further details can be found from page 180 to 183 of the Risk Management section of the 2024 AFR. C&E Risk is actively managed through the C&E Risk Framework and Policy. The C&E Risk Framework sets out the principles, roles and responsibilities, governance arrangements and processes for C&E risk management across the Group. C&E risk is monitored through internal and external reporting across the Group. The primary internal risk report, the CRO report, dedicates a section to C&E risk providing the GRC and the BRC with relevant updates on the C&E risk profile. Monitoring and reporting of the C&E quantitative RAS metrics is conducted monthly. The escalation process, as stipulated under the RAS policy, is commenced in the event of a breach of either the RAS watch trigger or limit for any of the metrics. This ensures the Group's Board and Regulator are notified within an approved timeframe, when appropriate. In addition to RAS metrics, C&E Key Risk Indicators (KRIs) have been considered, across all material risk categories, based upon the impacts identified in the Transmission Channel Analysis and how these impacts would manifest. These KRIs are approved, reported and escalated through the appropriate governance pathways for the relevant material risk. Key Performance Indicators ('KPIs') monitors the C&E risk drivers aligned to the C&E materiality assessment. The materiality assessment focus efforts on managing C&E risks with particular regard to credit and operational risk. These are reported and monitored via the Strategic Outcome Report, amongst others.

[Add row]

(2.2.4) Does your organization have a process for identifying, assessing, and managing environmental dependencies and/or impacts related to your portfolio activities?

	Process in place covering this portfolio	Dependencies and/or impacts related to this portfolio evaluated in this process
Banking (Bank)	Select from: <input checked="" type="checkbox"/> Yes	Select from: <input checked="" type="checkbox"/> Both dependencies and impacts

[Fixed row]

(2.2.5) Does your organization have a process for identifying, assessing, and managing environmental risks and/or opportunities related to your portfolio activities?

	Process in place covering this portfolio	Risks and/or opportunities related to this portfolio are evaluated in this process	Is this process informed by the dependencies and/or impacts process?
Banking (Bank)	Select from: <input checked="" type="checkbox"/> Yes	Select from: <input checked="" type="checkbox"/> Both risks and opportunities	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

(2.2.6) Provide details of your organization's process for identifying, assessing, and managing environmental dependencies, impacts, risks, and/or opportunities related to your portfolio activities.

Banking (Bank)

(2.2.6.1) Environmental issue

Select all that apply

- ☒ Climate change

(2.2.6.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this portfolio

Select all that apply

- ☒ Dependencies
- ☒ Impacts
- ☒ Risks
- ☒ Opportunities

(2.2.6.3) % of portfolio covered by the assessment process in relation to total portfolio value

100

(2.2.6.4) Type of assessment

Select from:

- ☒ Qualitative and quantitative

(2.2.6.5) Industry sectors covered by the assessment

Select all that apply

- | | |
|---|---|
| <input checked="" type="checkbox"/> Retail | <input checked="" type="checkbox"/> Fossil Fuels |
| <input checked="" type="checkbox"/> Apparel | <input checked="" type="checkbox"/> Manufacturing |
| <input checked="" type="checkbox"/> Services | <input checked="" type="checkbox"/> Infrastructure |
| <input checked="" type="checkbox"/> Materials | <input checked="" type="checkbox"/> Power generation |
| <input checked="" type="checkbox"/> Hospitality | <input checked="" type="checkbox"/> Transportation services |
| <input checked="" type="checkbox"/> Food, beverage & agriculture | |
| <input checked="" type="checkbox"/> Biotech, health care & pharma | |

(2.2.6.6) Frequency of assessment

Select from:

☒ Annually

(2.2.6.7) Time horizons covered

Select all that apply

☒ Short-term

☒ Medium-term

☒ Long-term

(2.2.6.8) Integration of risk management process

Select from:

☒ Integrated into multi-disciplinary organization-wide risk assessment process

(2.2.6.9) Location-specificity used

Select all that apply

☒ Local

☒ National

(2.2.6.10) Tools and methods used

Select all that apply

☒ Internal tools/methods

☒ Scenario analysis

☒ Stress tests

☒ Other, please specify :Material Risk Assessment, Risk Appetite Statement, Root Cause Analysis, internally developed ESG Questionnaire, 3rd party supplied flood risk data, ENCORE tool, international Rating Agency Data.

(2.2.6.11) Risk type and criteria considered

Acute physical

☒ Drought

☒ Flood (coastal, fluvial, pluvial, ground water)

- ☑ Wildfires
- ☑ Heat waves
- ☑ Cyclones, hurricanes, typhoons
- ☑ Heavy precipitation (rain, hail, snow/ice)

Chronic physical

- ☑ Heat stress
- ☑ Temperature variability

Policy

- ☑ Carbon pricing mechanisms
- ☑ Changes to national legislation
- ☑ Regulation of discharge quality/volumes
- ☑ Poor enforcement of environmental regulation
- ☑ Increased difficulty in obtaining operations permits

Market

- ☑ Changing customer behavior
- ☑ Uncertainty in the market signals
- ☑ Uncertainty about commodity origin and/or legality
- ☑ Availability and/or increased cost of raw materials
- ☑ Availability and/or increased cost of recycled or renewable content
- ☑ Inadequate access to water, sanitation, and hygiene services (WASH)
- ☑ Availability and/or increased cost of certified sustainable material
- ☑ Contraction of insurance markets, leaving clients exposed and changing the risk parameters of the credit
- ☑ Loss of clients due to a fund's poor environmental performance outcomes (e.g. if a fund has suffered climate-related write-downs)

Reputation

- ☑ Impact on human health
- ☑ Lending that could create or contribute to systemic risk for the economy
- ☑ Negative press coverage related to support of projects or activities with negative impacts on the environment (e.g. GHG emissions, deforestation & conversion, water stress)

- ☑ Storm (including blizzards, dust, and sandstorms)

- ☑ Lack of globally accepted and harmonized definitions
- ☑ Changes to international law and bilateral agreements
- ☑ Increased difficulty in obtaining water withdrawals permit
- ☑ Mandatory water efficiency, conservation, recycling, or process standards
- ☑ Introduction of regulatory standards for previously unregulated contaminants

- ☒ Stakeholder conflicts concerning water resources at a basin/catchment level
- ☒ Stigmatization of sector

Technology

- ☒ Transition to reusable products
- ☒ Transition to recyclable plastic products
- ☒ Transition to increasing recycled content
- ☒ Transition to increasing renewable content
- ☒ Dependency on water-intensive energy sources
- ☒ Data access/availability or monitoring systems
- ☒ Transition to lower emissions technology and products
- ☒ Inability to increase yield of existing production areas
- ☒ Transition to water intensive, low carbon energy sources
- ☒ Transition to water efficient and low water intensity technologies and products

Liability

- ☒ Exposure to litigation
- ☒ Moratoria and voluntary agreement
- ☒ Non-compliance with regulations
- ☒ Regulation and supervision of environmental risk in the financial sector

(2.2.6.12) Partners and stakeholders considered

Select all that apply

- ☒ Customers
- ☒ Employees
- ☒ Suppliers
- ☒ Regulators
- ☒ Local communities
- ☒ Indigenous peoples

(2.2.6.13) Further details of process

Our DMA identified the sustainability matters that we believe have the most impact for our stakeholders (including our customers in our portfolio), including the dependencies, impacts, risks and opportunities arising from our strategy and business model. The DMA was conducted to comply with the CSRD reporting requirements for FY2024 and the Group is continuously working on integrating the DMA process, in terms of the overall planning, risk management and internal controls as applicable. The group's process includes assessment of both the risks posed by direct exposure to climate change & indirect exposure through customers

& suppliers. Climate risk includes the impacts that the Group and its suppliers have on climate and the impact from climate on the Group and its customers and supplier. Our environmental assessment considers the potential negative impacts of the activities or actions of the Group, its customers or suppliers either directly or indirectly on the naturally occurring living and non-living components of the Earth. We also manage and monitor material IROs related to our portfolio activities through enhanced due diligence processes. Our controls include extensive due diligence assessments of clients and other business partners. For example, as part of our C&E Risk due diligence, the ESG Questionnaire continues to be used in credit applications for borrowers identified as carrying increased transitional, environmental, social and/or governance-related risk. The ESG Questionnaire continues to be used in credit applications to gather client specific data and information for borrowers identified as carrying relatively high transitional, environmental, social and/or governance related risk where the new lending is over €/\$ 1 million. A transition risk heatmap is used to identify those sectors facing the highest transition risk that are in scope for the questionnaire. The questionnaire has both generic and sector specific questions on a range of topics from Climate & Environmental risk specific matters to social considerations such as human rights and diversity to determine an ESG risk rating. The questionnaire provides a better understanding of the ESG risk associated with the borrower and creates awareness among customers of the data that will be required from them around where they are in their ESG journey and their plans going forward.

[Add row]

(2.2.7) Are the interconnections between environmental dependencies, impacts, risks and/or opportunities assessed?

(2.2.7.1) Interconnections between environmental dependencies, impacts, risks and/or opportunities assessed

Select from:

☒ Yes

(2.2.7.2) Description of how interconnections are assessed

Our double materiality assessment (DMA) identified the sustainability matters that we believe have the most impact for our stakeholders (including our customers in our portfolio), including the dependencies, impacts, risks and opportunities arising from our strategy and business model. As well as reflecting both the impact and financial materiality perspectives, our DMA also considered the interconnections between the two, as prescribed by ESRS 1 and EFRAG's Materiality Assessment Implementation Guidance. After identifying impacts across the ESG pillars, we considered risks and opportunities, including factors that could trigger them, such as impacts, or dependencies on business relationships and natural resources. For example, the impact of transitioning our business model to support a low-carbon economy could lead to transition risks associated with exposure to high GHG emitting sectors, thus affecting financial materiality. At the same time, this transition presents opportunities to develop and finance green products, thereby growing our business. In addition, an example of where we considered external interdependencies is our financed emissions reduction targets where we used a decarbonisation reference scenario that aims to limit global warming to 1.5°C. This ambition is considered alongside external interdependencies, requiring a careful balance between strategic and transition risks. The world is not on track to limit global warming to 1.5°C, with the latest climate science suggesting a trajectory of greater than 2°C warming. This trajectory gap between global ambition and reality is also visible in AIB's year on-year performance against certain targets.

[Fixed row]

(2.2.8) Does your organization consider environmental information about your clients/investees as part of your due diligence and/or environmental dependencies, impacts, risks and/or opportunities assessment process?

	We consider environmental information
Banking (Bank)	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

(2.2.9) Indicate the environmental information your organization considers about clients/investees as part of your due diligence and/or environmental dependencies, impacts, risks and/or opportunities assessment process, and how this influences decision-making.

Banking (Bank)

(2.2.9.1) Environmental issues covered

Select all that apply

- ☒ Climate change
- ☒ Water

(2.2.9.2) Type of environmental information considered

Select all that apply

- ☒ CDP scores
 - ☒ Emissions data
 - ☒ TCFD disclosures
 - ☒ TNFD disclosures
- ☒ CDP questionnaire response
 - ☒ Emissions reduction targets
 - ☒ Science-Based Net-Zero Targets

- ☒ Climate transition plans

(2.2.9.3) Process through which information is obtained

Select all that apply

- ☒ Directly from the client/investee
- ☒ Data provider
- ☒ Public data sources

(2.2.9.4) Industry sectors covered by due diligence and/or risk assessment process

Select all that apply

- | | |
|---|---|
| <input checked="" type="checkbox"/> Retail | <input checked="" type="checkbox"/> Fossil Fuels |
| <input checked="" type="checkbox"/> Apparel | <input checked="" type="checkbox"/> Manufacturing |
| <input checked="" type="checkbox"/> Services | <input checked="" type="checkbox"/> Infrastructure |
| <input checked="" type="checkbox"/> Materials | <input checked="" type="checkbox"/> Power generation |
| <input checked="" type="checkbox"/> Hospitality | <input checked="" type="checkbox"/> Transportation services |
| <input checked="" type="checkbox"/> Food, beverage & agriculture | |
| <input checked="" type="checkbox"/> Biotech, health care & pharma | |

(2.2.9.5) % of portfolio covered by the process in relation to total portfolio value

100

(2.2.9.6) Total portfolio value covered by the process

136464000000

[Add row]

(2.4) How does your organization define substantive effects on your organization?

Risks

(2.4.1) Type of definition

Select all that apply

- ☒ Qualitative
- ☒ Quantitative

(2.4.2) Indicator used to define substantive effect

Select from:

- ☒ Credit risk

(2.4.3) Change to indicator

Select from:

- ☒ % decrease

(2.4.4) % change to indicator

Select from:

- ☒ Less than 1%

(2.4.6) Metrics considered in definition

Select all that apply

- ☒ Likelihood of effect occurring
- ☒ Other, please specify :Impact

(2.4.7) Application of definition

Credit risk is the biggest risk that the bank is exposed to, and the Group continues to be proactive in terms of adapting its credit risk management processes and policies to capture Climate/ ESG risks. In July 2020, AIB published our first list of Excluded Activities, an updated policy was approved by our Board in October 2020 and, since 29 January 2021, the Excluded Activities rules apply to all business customers with a Gross Connected Exposure of >£/€300k and who are relationship managed. This list has since been incorporated into our Group Credit Risk Policy, which supports the management of credit risk across the Group. Our excluded activities list sets out a range of business activities that are considered to be incongruent with Group strategy. The excluded activities include exploration, extraction and upgrading of oil sands projects; nuclear power generation; nuclear waste transportation, and decommissioning and/or final disposal of high-level nuclear waste.

The policy rule prohibits providing new money for any term lending facilities to businesses, or any of their subsidiaries, involved in the excluded business activities. This rule currently applies to all new business customers with a Gross Connected Exposure of >€£300k in high transition risk sectors and that are relationship managed. AIB has limited exposure to fossil fuels with <1% with less than of the loan book classified as fossil fuels (where a company is included as fossil fuels if more than 5% of revenues come from those activities). The ESG Questionnaire has been incorporated into the credit application process for customers in high and moderate transition risk sectors on new lending over €£1m, which have been identified as carrying increased transitional environmental, social and governance related risk. The ESG sectoral heat-map is used to identify the high risk sectors in scope for the questionnaire. The questionnaire has both generic and sector specific questions on a range of topics from Climate & Environmental risk specific matters to social considerations such as human rights and diversity to determine an ESG risk rating. The ESG questionnaire output is an additional factor for consideration in the credit decisioning process.

Opportunities

(2.4.1) Type of definition

Select all that apply

- ☒ Qualitative
- ☒ Quantitative

(2.4.2) Indicator used to define substantive effect

Select from:

- ☒ Revenue

(2.4.3) Change to indicator

Select from:

- ☒ % increase

(2.4.4) % change to indicator

Select from:

- ☒ 1-10

(2.4.6) Metrics considered in definition

Select all that apply

- ☒ Time horizon over which the effect occurs
- ☒ Likelihood of effect occurring
- ☒ Other, please specify :Impact

(2.4.7) Application of definition

Opportunities is considered in our DMA through the lens of financial materiality. As a result, revenue is used as an indicator when identifying, assessing and managing opportunities. Net interest income increased by 7% in FY2024. This increase benefitted from a growing balance sheet and the favourable impact of higher average interest rates partly offset by an increase in interest expense on customer accounts. Net interest margin (NIM) of 3.16%.

[Add row]

C3. Disclosure of risks and opportunities

(3.1) Have you identified any environmental risks which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

Climate change

(3.1.1) Environmental risks identified

Select from:

☒ Yes, both within our direct operations or upstream value chain, and within our portfolio

Forests

(3.1.1) Environmental risks identified

Select from:

☒ No

(3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

☒ Environmental risks exist, but none with the potential to have a substantive effect on our organization

(3.1.3) Please explain

Risks relating to forests were identified in our 2023 first full Double Materiality Assessment (DMA) when considering Biodiversity and Ecosystems as a material topic for AIB Group. However, through the DMA scoring process, this topic wasn't deemed as having had or having anticipated substantive effects on AIB.

Water

(3.1.1) Environmental risks identified

Select from:

☒ No

(3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

☒ Environmental risks exist, but none with the potential to have a substantive effect on our organization

(3.1.3) Please explain

Risks relating to water in our Own Operations were identified in our 2023 first full Double Materiality Assessment when considering Water and Marine Resources as a material topic for AIB Group. However, this topic wasn't deemed as having had or having anticipated substantive effects on AIB. AIB is satisfied that water is not a material environmental risk in its own operations. AIB is a financial institution operating through branches and offices in ROI, the USA and the UK. Based on the nature of these operations, AIB relies on municipal water networks for our water demand and uses wastewater networks controlled by a sanitary authority for the disposal of water. AIB has no emissions to water. In 2024, 0.4% of AIB's water withdrawn and consumed was from high water-stressed regions in GB (according to the WRI Aqueduct water risk atlas tool). As at 7 July 2025, according to the risk atlas tool, none of our operations in GB were located in an extremely high stressed region. None of our operations in Ireland (where we operate predominantly), the USA or Northern Ireland are located in a region of high/extremely high-water stress. We monitor areas of water stress through the tool provided by the World Resources Institute (WRI): www.wri.org/applications/aqueduct/water-risk-atlas/.

Plastics

(3.1.1) Environmental risks identified

Select from:

☒ No

(3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

☒ Environmental risks exist, but none with the potential to have a substantive effect on our organization

(3.1.3) Please explain

AIB is a financial institution and plastics is not a significant operating cost or a cost of sales. With circular economy principles in mind, our approach to waste management prioritises prevention and reduction, in line with the waste hierarchy, while increasing the quality of our segregated materials. We have made great strides in reducing single-use plastics, in particular, operating reusable take-away containers, including coffee cups and food containers.

[Fixed row]

(3.1.1) Provide details of the environmental risks identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

Climate change

(3.1.1.1) Risk identifier

Select from:

☒ Risk1

(3.1.1.3) Risk types and primary environmental risk driver

Acute physical

☒ Flooding (coastal, fluvial, pluvial, groundwater)

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☒ Banking (Bank) portfolio

(3.1.1.5) Risk type mapped to traditional financial services industry risk classification

Select all that apply

☒ Credit risk

(3.1.1.6) Country/area where the risk occurs

Select all that apply

- ☒ Ireland
- ☒ United Kingdom of Great Britain and Northern Ireland

(3.1.1.9) Organization-specific description of risk

Climate change is identified as a material topic through our DMA process. Climate & Environmental (C&E) Risk is also identified as a material principal risk for the Group through the risk management processes such as the MRA. By leveraging external studies, reports, global tools, regulatory guidelines and internal knowledge, a physical risk heatmap has been developed and is used to inform which physical risks are most prevalent to the Bank, and where these risks might crystallise. AIB has identified that flooding is the most material physical risk to the Group. The Group is exposed to the risk that flooding will adversely affect the value of properties, collateralising the Group's lending, causing an increase in credit provisioning to compensate.

(3.1.1.10) % of portfolio value vulnerable to this risk

Select from:

- ☒ 1-10%

(3.1.1.11) Primary financial effect of the risk

Select from:

- ☒ Increased credit risk

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

- ☒ Long-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

- ☒ About as likely as not

(3.1.1.14) Magnitude

Select from:

☒ Medium-low

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

AIB identified €0.57 bn in exposures as sensitive to Flood risk secured on commercial and residential immovable property. The impact of climate risk under various climate scenarios is assessed as part of the stress testing process within the Group. However, the impacts are not expected to manifest in the short-term and therefore there is no requirement to make any related adjustments to the financial statements. For more detail on how AIB assesses flood risk, please see the following detail. The Group has identified that flooding is the most material physical risk to the Group. The Group is exposed to the risk that flooding will adversely affect the value of properties collateralising the Group's lending. The Group's physical risk model assesses the potential impact of this risk. In 2023, the Group completed the development of an enhanced flood-risk model to support the quantification of flood-related risks. The newly developed model represents a significant step forward in terms of both granularity and flexibility relative to previous approaches which were based on the 2022 ECB Climate Stress test methodology. As a first step, the new model locates individual properties and overlays a series of flood maps corresponding to river, coastal and surface water flood events. This is repeated for a range of return periods (e.g. 1-in-20-year, 1-in-100 year) allowing for a probability distribution of flood levels to be calibrated for each property. The damage to each property for a given level of flooding is estimated based on building type and flood type. Estimates of rebuild costs and insurance coverage are overlaid to calculate the net cost of repair. Additional property price adjustments are applied to reflect the reduced desirability of properties that are prone to flooding. The model is used to determine both expected annual flood damage costs and the impact of hypothetical acute flood events. This approach can be applied to reflect current climate conditions or climate conditions as they are projected to be in the future under a range of science-based scenarios.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☒ Yes

(3.1.1.23) Anticipated financial effect figure in the long-term – minimum (currency)

0

(3.1.1.24) Anticipated financial effect figure in the long-term – maximum (currency)

565844801

(3.1.1.25) Explanation of financial effect figure

The minimum financial impact figure is 0, as there is a likelihood that the risk may never occur. The maximum financial impact figure of 566m represents the total value in exposures to non-financial corporates (NFC) and retail residential mortgages secured on immovable property that are exposed to physical flood risk as analysed in Template 5 of the Groups Pillar 3 disclosures In our Q4 2024 Pillar 3 report. AIB's Pillar 3 Template 5 provides a detailed breakdown of this 566m figure

where the Group analysed NFC and retail residential mortgages exposures secured on immoveable property exposed to chronic and acute climate related hazards.(i.e. 'Banking book Indicators of potential climate change physical risk Exposures subject to physical risk'). In order to comply with CRR 440a Pillar 3 disclosures, AIB identifies acute physical risk related to river flooding and chronic physical risk related to coastal flooding. Other physical risks such as landslides, tsunamis, wildfires, and extreme heat were identified as low risk for the portfolio and therefore discounted in the analysis.

(3.1.1.26) Primary response to risk

Policies and plans

☒ Increase insurance coverage

(3.1.1.27) Cost of response to risk

0

(3.1.1.28) Explanation of cost calculation

We have reported "Cost of response to risk" as 0 as responding to this risk is considered business as usual and, therefore, absorbed into our business as usual costs. As such, it is not currently possible to extract it separately.

(3.1.1.29) Description of response

With respect to understanding the current flood zone, AIB's residential mortgage lending process requires all properties to be insured. This is also the case for AIB's largest corporate real estate exposures.

[Add row]

(3.1.2) Provide the amount and proportion of your financial metrics from the reporting year that are vulnerable to the substantive effects of environmental risks.

Climate change

(3.1.2.1) Financial metric

Select from:

☒ Assets

(3.1.2.2) Amount of financial metric vulnerable to transition risks for this environmental issue (unit currency as selected in 1.2)

3513808313

(3.1.2.3) % of total financial metric vulnerable to transition risks for this environmental issue

Select from:

☒ 1-10%

(3.1.2.4) Amount of financial metric vulnerable to physical risks for this environmental issue (unit currency as selected in 1.2)

565844801

(3.1.2.5) % of total financial metric vulnerable to physical risks for this environmental issue

Select from:

☒ 1-10%

(3.1.2.7) Explanation of financial figures

The Group discloses on environmental, social and governance risks through our regulatory disclosures under Capital Requirements Regulation ("CRR"), Part Eight – Disclosures by Institutions and is prepared in compliance with Regulation (EU) 2021/637. AIB's Pillar 3 template 5 provides information on exposures in the banking book, including loans and advances, debt securities and equity instruments not held-for-trading and not held-for-sale, towards non-financial corporates (NFC) and retail residential mortgages, on loans collateralised with immovable property and on repossessed real estate collaterals, exposed to chronic and acute climate-related hazards. The Group have completed this template on a best-efforts basis in line with Regulation (EU) 2022/2453. The Group's exposure secured on both commercial immovable property and retail residential mortgages, which is sensitive to Physical Flood Risk, as at 31 December 2024 is 0.57bn. Furthermore, the Group has exposures secured on Commercial immovable property of 7.2bn as at 31 December 2024, of which 0.19bn (2.6%) is sensitive to Physical Flood Risk. Template 5 was expanded to include retail residential mortgages for the first time as at 31 December 2024. The Group has exposures secured on Residential immovable property of 37.8bn as at 31 December 2024, of which 0.38bn (1.0%) is sensitive to Physical Flood Risk. Please see AIB's Pillar 3 Template 5 for a detailed breakdown of the above figures, and where the Group analysed NFC and retail residential mortgages exposures secured on immovable property exposed to chronic and acute climate related hazards.(i.e. 'Banking book Indicators of potential climate change physical risk Exposures subject to physical risk'). €3,513,808,313 is the amount of lending (term and revolver) to sectors with higher transition risk in FY24, which is 5% of total lending. An ESG Questionnaire is required for all new lending over €/£/\$1m in high and moderate transition risk sectors, and for all annual reviews of Borrowers with an exposure over €/£/\$10m in high and moderate transition risk sectors. An ESG Questionnaire is also required for material waiver requests for Borrowers with limits over €/£/\$1m in high transition risk sectors.

[Add row]

(3.6) Have you identified any environmental opportunities which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

Climate change

(3.6.1) Environmental opportunities identified

Select from:

☒ Yes, we have identified opportunities, and some/all are being realized

Forests

(3.6.1) Environmental opportunities identified

Select from:

☒ No

(3.6.2) Primary reason why your organization does not consider itself to have environmental opportunities

Select from:

☒ Opportunities exist, but none anticipated to have a substantive effect on organization

(3.6.3) Please explain

For the time being, the Group has no substantive opportunities relating to forests that were identified in our double materiality assessment when considering Biodiversity and Ecosystems as a topic. Nature loss is a complex topic and the first step on our journey is to understand more clearly how our financing activities interact with nature and the ecosystem services it provides. We will continue to explore existing science and emerging frameworks to identify the most meaningful, comparable and robust strategy to report and measure our environmental impacts, dependencies, risk management of nature/biodiversity in our lending portfolio and corresponding opportunities.

Water

(3.6.1) Environmental opportunities identified

Select from:

☒ No

(3.6.2) Primary reason why your organization does not consider itself to have environmental opportunities

Select from:

☒ Opportunities exist, but none anticipated to have a substantive effect on organization

(3.6.3) Please explain

For the time being, the Group has no substantive opportunities relating to water that were identified identified in our double materiality assessment when considering Water and Marine Resources as a topic. We will continue to explore existing science and emerging frameworks to identify the most meaningful, comparable and robust strategy to report and measure our impacts, dependencies, risk management of water in our lending portfolio and corresponding opportunities.
[Fixed row]

(3.6.1) Provide details of the environmental opportunities identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☒ Opp1

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Capital flow and financing

☒ Access to new financing options

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☒ Banking portfolio

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☒ Ireland

(3.6.1.8) Organization specific description

To support the Group's Capital and Minimum Requirements for own Funds and Eligible Liabilities (MREL) and to align the banks funding strategy with its Sustainability strategy, in 2019, AIB became the first Irish bank to publish a Green Bond Framework. In 2020, AIB was the first Irish bank to issue a Green Bond, raising 1bn. AIB's Green Bond proceeds are used exclusively to finance projects that have a positive environmental impact – renewable energy generation, transmission and storage projects, green commercial and residential buildings, clean transportation, and circular economy and waste management projects. The Bank has since issued another five Green Bonds, bringing the total raised to 4.65bn, of which 650m was issued in 2024. At year end, the total allocation to Green Bond eligible projects was 6.15bn, of which 43% was to Green Buildings, 55% to Renewable Energy projects, 1% circular economy and waste management, and approximately 1% to clean transportation.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☒ Increased access to capital at lower/more favorable rates

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☒ The opportunity has already had a substantive effect on our organization in the reporting year

(3.6.1.12) Magnitude

Select from:

☒ Medium-high

(3.6.1.13) Effect of the opportunity on the financial position, financial performance and cash flows of the organization in the reporting period

AIB's Green Bond Programme enables the Bank to access funding at more favourable rates compared to traditional (unlabelled) bonds, owing to strong demand from sustainable investors, i.e. those who incorporate sustainability considerations into their investment decision making process. These investors are often willing to accept a lower return on investment in Green Bonds versus unlabelled bonds, of ~0 to 0.01%. The effect of this opportunity on AIB is it can reduce the Bank's overall cost of borrowing – a benefit commonly referred to as a “Greenium”. Furthermore, sustainable investors typically retain Green Bonds for longer periods, buying instruments to hold in ‘sustainable’ funds, such as Article 8 and 9 funds, to support their own investment and impact targets. This can result in a more stable investor base and a higher quality order book, at time of issuance, which can create greater price tension and potentially reduce the cost of borrowing further. For AIB's Green Bond portfolio, which stood at €4.65bn at year-end 2024, this could translate into an annual interest saving of up to €4.65m, depending on market conditions and investor appetite.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☒ Yes

(3.6.1.16) Financial effect figure in the reporting year (currency)

650000000

(3.6.1.23) Explanation of financial effect figures

The Green Bond programme afforded AIB access to funding at more competitive rates, reflecting strong demand from sustainability-oriented investors, through a “Greenium”. The funds raised through AIB's green bond issuance are used to (re)finance projects which have a positive environmental impact – renewable energy generation, transmission and storage projects, green commercial and residential buildings, clean transportation, and circular economy and waste management projects. AIB's Green Bond Report is produced annually and published on our Debt Investor website. At year-end 2024, AIB's Green Bond portfolio stood at €4.65bn, of which €650m was issued in the reporting year.

(3.6.1.24) Cost to realize opportunity

200000

(3.6.1.25) Explanation of cost calculation

Maintaining a Green Bond Framework entails internal (personnel) and external (SPOs, Assurance reports, Impact Reports, etc.) operating costs, although these are offset by the positive impact of Green Bond issuance on our MREL interest expense. It is not possible to provide the individual costs of each element as these are commercially sensitive. However, we have estimated that the total annualised incremental cost to realise this opportunity is 200K.

(3.6.1.26) Strategy to realize opportunity

The Green Bond Programme remains central to AIB's approach to financing the transition to a low-carbon and sustainable economy, allocating the net proceeds of issuance to projects which reduce emissions, protect ecosystems, or otherwise have a positive environmental impact, in line with the strategic objectives of Project Ireland 2040 and Ireland's Climate Action Plan. Since the launch of our Green Bond Framework in 2019, AIB has issued six Green Bonds, totalling €4.65bn, of which €650m was raised in May 2024. Case Study: In May 2024, AIB successfully raised €650m through the issuance of a Tier 2 Green Bond, with an 11-year maturity (callable after 6 years), at an interest rate (coupon) of 4.625%. The issuance attracted strong demand from over 220 investors, of which 50% incorporate sustainability in their investment decisions. The orderbook peaked at €3.5bn, the largest ever orderbook for a Green Tier 2 bond issued by a financial institution, allowing AIB to significantly tighten its pricing by 0.35%. This success demonstrates both the depth of investor interest for sustainable finance and AIB's own reputation as a climate action champion. Funding raised through AIB's Green Bond Programme supports the Group's ambition for €30bn in green or transition lending, as well as the target of 70% of new lending to be green or transition, by 2030. By maintaining regular and transparent reporting standards, including the annual publication of allocation and impact reports, AIB underscores its commitment to responsible finance. AIB intends to continue to leverage its Green Bond Programme to access funding at competitive rates, and to allocate said funding to sustainable projects, into the future.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☒ Opp2

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Capital flow and financing

☒ Access to new financing options

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☒ Banking portfolio

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☒ Ireland

(3.6.1.8) Organization specific description

The following opportunity was identified as material through our DMA process: As the global economy seeks to decarbonise and invest in green infrastructure, there is an opportunity for growth through green and transition financing. AIB's green and transition lending and Climate Capital segment were established to provide green and transition financing to support climate action. The investment required to finance the global transition to a low-carbon economy will need to increase to about \$9tn a year by 2030, according to estimates from the Climate Policy Initiative. The International Monetary Fund estimates that the cost for Ireland will amount to c.€20bn per annum over the next decade, much of which will come from the private sector. Recognising the importance of climate finance in funding the transition, AIB has been rapidly growing its green lending portfolio. Given the growing importance and complexity of infrastructure and energy requirements in the transition to a low-carbon economy, AIB has established the Climate Capital segment, that centralises our green energy-related activities across the Group to increase our capability, support business growth and demonstrate our position as a driving force in the transition to a sustainable future. Climate Capital is a fast-growing part of the bank's lending book and, with a strong focus on renewable energy assets that displace fossil fuel-fired generating assets, will help deploy AIB's €30bn green and transition lending.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

- ☒ Increased access to capital at lower/more favorable rates

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

- ☒ Short-term
- ☒ Medium-term
- ☒ The opportunity has already had a substantive effect on our organization in the reporting year

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

- ☒ Very likely (90–100%)

(3.6.1.12) Magnitude

Select from:

- ☒ Medium-high

(3.6.1.13) Effect of the opportunity on the financial position, financial performance and cash flows of the organization in the reporting period

The cumulative amount of green and transition lending drawdown is a measurement of total cumulative green lending over the period of 2019-2030, which is included in AIB's amount of green and transition lending and adheres to criteria outlined in the Sustainable Lending Framework (SLF). We provided €11.6bn of green lending between 2019 and 2023, and in 2024, we provided a further €5.1bn of green lending as we progress towards our target. This equates to 35% of total lending in 2024 being classified as green (from a 2019 baseline of 10%), in accordance with criteria outlined in the SLF. Delivering for our customers whilst steering finance towards green and transition activities is an important way in which we can support the transition to a more sustainable future. Our validated SBTi targets set a trajectory linked to our green lending ambition and science based target requirements.

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Our sustainability strategy is integrated with our overall Group strategy, with Sustainable Communities as a core pillar. To deliver on our decarbonisation ambition, we have sharpened our ESG principles across three pillars and the strategic pillar which shall have a substantive effect is "Greening our business" whereby AIB will mobilise capital to support climate action, be a catalyst for positive change and continue to build on our sustainability leadership. We have a cumulative amount of green and transition lending target of 30bn by 2030.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☒ Yes

(3.6.1.16) Financial effect figure in the reporting year (currency)

5100000000

(3.6.1.17) Anticipated financial effect figure in the short-term - minimum (currency)

0

(3.6.1.18) Anticipated financial effect figure in the short-term – maximum (currency)

0

(3.6.1.19) Anticipated financial effect figure in the medium-term - minimum (currency)

30000000000

(3.6.1.20) Anticipated financial effect figure in the medium-term - maximum (currency)

30000000000

(3.6.1.23) Explanation of financial effect figures

The cumulative amount of green and transition lending drawdown is a measurement of total cumulative green lending over the period of 2019-2030, which is included in AIB's amount of green and transition lending and adheres to criteria outlined in the SLF. We provided €11.6bn of green lending between 2019 and 2023, and in 2024, we provided a further €5.1bn of green lending as we progress towards our target. This equates to 35% of total lending in 2024 being classified as green (from a 2019 baseline of 10%), in accordance with criteria outlined in the SLF. Delivering for our customers whilst steering finance towards green and transition activities is an important way in which we can support the transition to a more sustainable future. Our validated SBTi targets set a trajectory linked to our green lending ambition and science-based target requirements. AIB doesn't disclose projected new lending for Green & Transition Lending (hence why we entered 0 for 'Anticipated financial effect of opportunity in short-term (min and max)), however we are on track to meet our €30bn target.

(3.6.1.24) Cost to realize opportunity

0

(3.6.1.25) Explanation of cost calculation

The costs associated with realising this opportunity are subsumed within our lending and BAU activities.

(3.6.1.26) Strategy to realize opportunity

We have developed a range of products and services to deliver on our strategic ambition to lend responsibly and decarbonise our loan book by 2050. Our Climate Capital segment is mobilised and growing, providing finance for renewable energy and sustainable infrastructure projects across Ireland, the UK, Europe and North America. Across our four segments, we intend to broaden our green product suite for personal, small and medium-sized enterprises (SME) and corporate customers. We plan to steadily increase new green and transition lending to reach our target of 70% of all new lending to be green and transition by 2030.
[Add row]

(3.6.2) Provide the amount and proportion of your financial metrics in the reporting year that are aligned with the substantive effects of environmental opportunities.

Climate change

(3.6.2.1) Financial metric

Select from:

☒ Assets

(3.6.2.2) Amount of financial metric aligned with opportunities for this environmental issue (unit currency as selected in 1.2)

5100000000

(3.6.2.3) % of total financial metric aligned with opportunities for this environmental issue

Select from:

☒ 31-40%

(3.6.2.4) Explanation of financial figures

In 2024, new green lending accounted for 5.1bn and 35% of all new lending was green.
[Add row]

C4. Governance

(4.1) Does your organization have a board of directors or an equivalent governing body?

(4.1.1) Board of directors or equivalent governing body

Select from:

☒ Yes

(4.1.2) Frequency with which the board or equivalent meets

Select from:

☒ More frequently than quarterly

(4.1.3) Types of directors your board or equivalent is comprised of

Select all that apply

☒ Executive directors or equivalent

☒ Non-executive directors or equivalent

(4.1.4) Board diversity and inclusion policy

Select from:

☒ Yes, and it is publicly available

(4.1.5) Briefly describe what the policy covers

The Board Diversity Policy sets out the approach to diversity on the Boards of AIB Group. The AIB Group Board recognises the benefits of having diversity in its composition. Diversity includes and makes use of differences in the skills, geographical and industry experience, background, nationality, ethnicity, gender, age, educational attainment and personal strengths of individual Directors and contributes to the Board's ability to provide effective challenge to Management and leadership and oversight of AIB Group. The skills considered as particularly important to the business of AIB Group include risk, accounting and audit, strategy, governance, leadership, capital and liquidity, retail banking, corporate banking, treasury management, culture, people management, digital and technology, legal, sustainability and stakeholder management. The Board is committed to achieving the most appropriate blend and balance of diversity possible over time. All

appointments to the Board are made on merit, against objective criteria determined by the Nomination and Corporate Governance Committee at the time and designed to ensure that the overall composition reflects an adequately diverse range of knowledge, skills and experience and at the same time respects the principle of equal opportunities.

(4.1.6) Attach the policy (optional)

board-diversity-policy-2025.pdf

[Fixed row]

(4.1.1) Is there board-level oversight of environmental issues within your organization?

Climate change

(4.1.1.1) Board-level oversight of this environmental issue

Select from:

☒ Yes

Forests

(4.1.1.1) Board-level oversight of this environmental issue

Select from:

☒ No, but we plan to within the next two years

(4.1.1.2) Primary reason for no board-level oversight of this environmental issue

Select from:

☒ Other, please specify :See next response

(4.1.1.3) Explain why your organization does not have board-level oversight of this environmental issue

In the reporting year, our focus has been expanding the board-level oversight of climate-related issues.

Water

(4.1.1.1) Board-level oversight of this environmental issue

Select from:

☒ No, but we plan to within the next two years

(4.1.1.2) Primary reason for no board-level oversight of this environmental issue

Select from:

☒ Other, please specify :See next response

(4.1.1.3) Explain why your organization does not have board-level oversight of this environmental issue

The Group has board-level oversight of environmental issues within our organisation, but in this particular case 'water' is not yet a substantive material issue.

Biodiversity

(4.1.1.1) Board-level oversight of this environmental issue

Select from:

☒ No, but we plan to within the next two years

(4.1.1.2) Primary reason for no board-level oversight of this environmental issue

Select from:

☒ Other, please specify :See next response

(4.1.1.3) Explain why your organization does not have board-level oversight of this environmental issue

The Group has board-level oversight of environmental issues within our organisation, but in this particular case 'biodiversity' is not yet a substantive material issue.
[Fixed row]

(4.1.2) Identify the positions (do not include any names) of the individuals or committees on the board with accountability for environmental issues and provide details of the board's oversight of environmental issues.

Climate change

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

- | | |
|---|--|
| <input checked="" type="checkbox"/> Board chair | <input checked="" type="checkbox"/> Chief Sustainability Officer (CSO) |
| <input checked="" type="checkbox"/> Director on board | |
| <input checked="" type="checkbox"/> Other C-Suite Officer | |
| <input checked="" type="checkbox"/> Board-level committee | |
| <input checked="" type="checkbox"/> Chief Executive Officer (CEO) | |

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

- ☒ Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

- ☒ Board Terms of Reference

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

- ☒ Scheduled agenda item in every board meeting (standing agenda item)

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

- | | |
|--|---|
| <input checked="" type="checkbox"/> Overseeing and guiding scenario analysis | <input checked="" type="checkbox"/> Reviewing and guiding innovation/R&D priorities |
|--|---|

- ☑ Overseeing the setting of corporate targets
- ☑ Monitoring progress towards corporate targets
- ☑ Overseeing and guiding value chain engagement
- ☑ Approving corporate policies and/or commitments
- ☑ Monitoring the implementation of a climate transition plan
- ☑ Overseeing and guiding the development of a business strategy
- ☑ Overseeing and guiding acquisitions, mergers, and divestitures
- ☑ Monitoring supplier compliance with organizational requirements
- ☑ Monitoring compliance with corporate policies and/or commitments
- ☑ Overseeing and guiding the development of a climate transition plan
- ☑ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities
- ☑ Approving and/or overseeing employee incentives
- ☑ Overseeing and guiding major capital expenditures
- ☑ Monitoring the implementation of the business strategy
- ☑ Overseeing reporting, audit, and verification processes

(4.1.2.6) Scope of board-level oversight

Select all that apply

- ☑ Risks and opportunities to our own operations
- ☑ Risks and opportunities to our banking activities
- ☑ The impact of our own operations on the environment
- ☑ The impact of our banking activities on the environment

(4.1.2.7) Please explain

The Board is responsible for promoting the Group's long-term sustainable performance. It approves the Group's strategy and financial and investment plans, which includes consideration of sustainability factors. As part of this responsibility, the Board approves the Group's sustainability targets during the strategic planning process. These targets are embedded into the financial planning process across the Group's core operating segments. The Board receives regular updates on the execution of the Group's sustainability strategy, enabling it to monitor performance against these targets. To support its oversight, the Board is assisted by multiple committees including the SBAC, which provides governance over sustainability matters and supports the execution of the Group's sustainable business strategy. Our Board Committees are regularly informed by Management and ExCo subcommittees. The Board's oversight of environmental issues is operationalised through the Double Materiality Assessment (DMA) process. The DMA process is governed by a formal structure that includes approval by the Sustainability Transformation Steering Committee. This committee is responsible for validating the material topics and their associated IROs. The overall process is overseen by our senior management through the Group Sustainability Committee (GSC) chaired by our Chief Sustainability Officer, which reviews, challenges and validates the results of the DMA. The outcome of the DMA are communicated to Sustainable Business Advisory Committee (SBAC) and Board Audit Committee (BAC) on an annual basis. In addition to the DMA, the Group undertakes regular processes for the identification and assessment of Climate and Environmental (C&E) impacts, risks and opportunities, including Material Risk Assessment. C&E Risk is a principal risk for AIB and it encompasses the financial and non-financial impacts on the Group

arising from climate change, environmental change and the transition to a sustainable economy. C&E Risk is actively managed through the C&E Risk Framework and Policy, and is monitored through internal and external reporting across the Group. The Board is ultimately responsible for the effective management of risks and for our system of internal controls. Opportunities are considered as part of strategic planning, including financial and investment plans. The monitoring and implementation of our Climate Transition Plan is embedded into our formal review and planning processes, including the Annual Business Review, which forms part of our Strategic, Financial and Investment Planning processes.

[Fixed row]

(4.2) Does your organization's board have competency on environmental issues?

Climate change

(4.2.1) Board-level competency on this environmental issue

Select from:

☒ Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

Select all that apply

- ☒ Consulting regularly with an internal, permanent, subject-expert working group
- ☒ Engaging regularly with external stakeholders and experts on environmental issues
- ☒ Integrating knowledge of environmental issues into board nominating process
- ☒ Regular training for directors on environmental issues, industry best practice, and standards (e.g., TCFD, SBTi)
- ☒ Having at least one board member with expertise on this environmental issue

(4.2.3) Environmental expertise of the board member

Experience

- ☒ Executive-level experience in a role focused on environmental issues

Forests

(4.2.1) Board-level competency on this environmental issue

Select from:

☒ Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

Select all that apply

- ☒ Consulting regularly with an internal, permanent, subject-expert working group
- ☒ Engaging regularly with external stakeholders and experts on environmental issues
- ☒ Integrating knowledge of environmental issues into board nominating process
- ☒ Regular training for directors on environmental issues, industry best practice, and standards (e.g., TCFD, SBTi)
- ☒ Having at least one board member with expertise on this environmental issue

(4.2.3) Environmental expertise of the board member

Experience

- ☒ Executive-level experience in a role focused on environmental issues

Water

(4.2.1) Board-level competency on this environmental issue

Select from:

☒ Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

Select all that apply

- ☒ Consulting regularly with an internal, permanent, subject-expert working group
- ☒ Engaging regularly with external stakeholders and experts on environmental issues
- ☒ Integrating knowledge of environmental issues into board nominating process
- ☒ Regular training for directors on environmental issues, industry best practice, and standards (e.g., TCFD, SBTi)
- ☒ Having at least one board member with expertise on this environmental issue

(4.2.3) Environmental expertise of the board member

Experience

☒ Executive-level experience in a role focused on environmental issues

[Fixed row]

(4.3) Is there management-level responsibility for environmental issues within your organization?

	Management-level responsibility for this environmental issue	Primary reason for no management-level responsibility for environmental issues	Explain why your organization does not have management-level responsibility for environmental issues
Climate change	Select from: <input checked="" type="checkbox"/> Yes	Select from:	Rich text input [must be under 2500 characters]
Forests	Select from: <input checked="" type="checkbox"/> No, but we plan to within the next two years	Select from: <input checked="" type="checkbox"/> Not an immediate strategic priority	Group has management level responsibility for all environmental issues, forests is not yet a substantive issue for Group.
Water	Select from: <input checked="" type="checkbox"/> No, but we plan to within the next two years	Select from: <input checked="" type="checkbox"/> Not an immediate strategic priority	Group has management level responsibility for all environmental issues, water is not yet a substantive issue for Group.
Biodiversity	Select from: <input checked="" type="checkbox"/> No, but we plan to within the next two years	Select from: <input checked="" type="checkbox"/> Not an immediate strategic priority	Group has management level responsibility for all environmental issues, biodiversity is not yet a substantive issue for Group.

[Fixed row]

(4.3.1) Provide the highest senior management-level positions or committees with responsibility for environmental issues (do not include the names of individuals).

Climate change

(4.3.1.1) Position of individual or committee with responsibility

Executive level

- ☒ Chief Executive Officer (CEO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

- ☒ Assessing environmental dependencies, impacts, risks, and opportunities
- ☒ Assessing future trends in environmental dependencies, impacts, risks, and opportunities
- ☒ Managing environmental dependencies, impacts, risks, and opportunities

Engagement

- ☒ Managing public policy engagement related to environmental issues
- ☒ Managing value chain engagement related to environmental issues

Policies, commitments, and targets

- ☒ Monitoring compliance with corporate environmental policies and/or commitments
- ☒ Measuring progress towards environmental corporate targets
- ☒ Measuring progress towards environmental science-based targets
- ☒ Setting corporate environmental policies and/or commitments
- ☒ Setting corporate environmental targets

Strategy and financial planning

- ☒ Developing a climate transition plan
- ☒ Implementing a climate transition plan
- ☒ Conducting environmental scenario analysis
- ☒ Managing annual budgets related to environmental issues
- ☒ Implementing the business strategy related to environmental issues
- ☒ Developing a business strategy which considers environmental issues

- ☒ Managing environmental reporting, audit, and verification processes
- ☒ Managing acquisitions, mergers, and divestitures related to environmental issues
- ☒ Managing major capital and/or operational expenditures relating to environmental issues
- ☒ Managing priorities related to innovation/low-environmental impact products or services (including R&D)

Other

- ☒ Providing employee incentives related to environmental performance

(4.3.1.3) Coverage of responsibilities

Select all that apply

- ☒ Dependencies, impacts, risks, and opportunities related to our banking activities
- ☒ Dependencies, impacts, risks and opportunities related to our own operations and/or upstream value chain

(4.3.1.4) Reporting line

Select from:

- ☒ Reports to the board directly

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

- ☒ More frequently than quarterly

(4.3.1.6) Please explain

Sustainability and climate action are clearly highlighted across the organisation as a CEO-priority. AIB Group Executive Leadership Team (ELT) is led by the CEO and includes the managing directors of our core operating segments. It provides input on the design, development and delivery of our purpose, strategy and values, and is responsible for our day-to-day operations. It also oversees the execution of the strategy agreed with the Board, as well as the operational management, compliance and performance of all of the Group's businesses. The ELT is responsible for maintaining an effective internal governance and control framework that includes a clear organisational structure, independent risk management, compliance and audit functions. The ELT works with and advises the CEO, ensuring a collaborative approach to decision making and collective ownership of strategy development and implementation, including promoting action to address performance issues. The CEO and Chief Strategy & Sustainability Officer are members of SBAC, who oversee the Group's performance as a sustainable business and delivery of AIB's sustainability strategy. The monitoring and implementation of our Climate Transition Plan is embedded into our formal review and planning processes, including

the Annual Business Review, which forms part of our Strategic, Financial and Investment Planning processes. From an oversight and governance perspective, our Climate Transition Plan's component parts are subject to review and approval through the Group's governance structure. We will provide an annual update on progress in implementing our Climate Transition Plan in our Sustainability Statement in our AFR, in addition to regular updates to GSC, SBAC and Board throughout the year.

[Add row]

(4.5) Do you provide monetary incentives for the management of environmental issues, including the attainment of targets?

Climate change

(4.5.1) Provision of monetary incentives related to this environmental issue

Select from:

☒ Yes

(4.5.2) % of total C-suite and board-level monetary incentives linked to the management of this environmental issue

13.3

(4.5.3) Please explain

The Group's variable remuneration scheme (the Scheme) is aligned with performance, and outcomes are assessed against Group-wide performance measures. The scheme comprises three financial measures, accounting for 60% of the award, and three non-financial measures accounting for the remaining 40%. The financial measures of underlying profit, RoTE and Costs, ensure a focus on key financial metrics for the business. The non-financial measures focusing on gender balance, green finance and customer satisfaction align with our ESG and customer agenda, and our commitment to making continued progress in these areas.

Forests

(4.5.1) Provision of monetary incentives related to this environmental issue

Select from:

☒ No, and we do not plan to introduce them in the next two years

(4.5.3) Please explain

AIB's short-term variable remuneration scheme focuses on delivery against group performance measures, including non-financial measures such as green financing, which underline the importance placed on our ESG agenda in line with Group Strategy. At present, forest-related environmental issues are not substantive for the Group, but should they become substantive issues they will be fully integrated into our ESG agenda.

Water

(4.5.1) Provision of monetary incentives related to this environmental issue

Select from:

☒ No, and we do not plan to introduce them in the next two years

(4.5.3) Please explain

AIB's short-term variable remuneration scheme focuses on delivery against group performance measures, including non-financial measures such as green financing, which underline the importance placed on our ESG agenda in line with Group Strategy. At present, water-related environmental issues are not substantive for the Group, but should they become substantive issues they will be fully integrated into our ESG agenda.

[Fixed row]

(4.5.1) Provide further details on the monetary incentives provided for the management of environmental issues (do not include the names of individuals).

Climate change

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☒ Chief Executive Officer (CEO)

(4.5.1.2) Incentives

Select all that apply

☒ Bonus – set figure

(4.5.1.3) Performance metrics

Targets

- ☒ Progress towards environmental targets
- ☒ Achievement of environmental targets

Strategy and financial planning

- ☒ Achievement of climate transition plan
- ☒ Other strategy and financial planning-related metrics, please specify :The non-financial measures relate to gender balance, customer satisfaction and green finance, and underline the importance placed on the ESG and customer agendas in line with the Group's strategy.

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

- ☒ Short-Term Incentive Plan, or equivalent, only (e.g. contractual annual bonus)

(4.5.1.5) Further details of incentives

Details of our variable remuneration scheme are noted above under question 4.5.

(4.5.1.6) How the position's incentives contribute to the achievement of your environmental commitments and/or climate transition plan

Certain elements of the CEO's incentives are directly aligned with the achievement of our environmental commitments and climate transition strategy. This alignment is embedded within our remuneration structure, which integrates sustainability performance metrics alongside traditional financial and operational targets. A portion of the CEO's variable compensation is linked to key environmental indicators, such as green finance. These metrics are reviewed annually by the Board's Remuneration and Sustainability Committees to ensure they remain ambitious, measurable, and aligned with AIB's climate roadmap. AIB also maintains transparency and accountability by publicly disclosing its executive remuneration policy and performance outcomes in our Annual Report, ensuring leadership remains accountable for delivering on the bank's climate and environmental objectives.

Climate change

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☒ Chief Financial Officer (CFO)

(4.5.1.2) Incentives

Select all that apply

☒ Bonus – set figure

(4.5.1.3) Performance metrics

Targets

☒ Progress towards environmental targets

☒ Achievement of environmental targets

Strategy and financial planning

☒ Achievement of climate transition plan

☒ Other strategy and financial planning-related metrics, please specify :The non-financial measures relate to gender balance, customer satisfaction and green finance, and underline the importance placed on the ESG and customer agendas in line with the Group's strategy.

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

☒ Short-Term Incentive Plan, or equivalent, only (e.g. contractual annual bonus)

(4.5.1.5) Further details of incentives

Details of our variable remuneration scheme are noted above under 4.5.

(4.5.1.6) How the position's incentives contribute to the achievement of your environmental commitments and/or climate transition plan

In relation to Group's CFO, again our remuneration structure integrates sustainability performance metrics alongside traditional financial and operational targets. A portion of the CFO's variable compensation is linked to key environmental indicators, such as measures focusing on green finance which align with our ESG and

customer agenda. These metrics are reviewed annually by the Board’s Remuneration and Sustainability Committees to ensure they remain ambitious, measurable, and aligned with AIB’s climate roadmap. AIB also maintains transparency and accountability by publicly disclosing its executive remuneration policy and performance outcomes in its Annual Report, ensuring that leadership remains accountable for delivering on the bank’s climate and environmental objectives.

[Add row]

(4.6) Does your organization have an environmental policy that addresses environmental issues?

	Does your organization have any environmental policies?
	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

(4.6.1) Provide details of your environmental policies.

Row 1

(4.6.1.1) Environmental issues covered

Select all that apply

☒ Climate change

(4.6.1.2) Level of coverage

Select from:

☒ Organization-wide

(4.6.1.3) Value chain stages covered

Select all that apply

- ☒ Direct operations
- ☒ Upstream value chain

(4.6.1.4) Explain the coverage

Our Environmental Policy applies group-wide, covering all AIB operations and subsidiaries in Ireland, the UK, and other markets. It ensures we manage direct and indirect environmental impacts responsibly, achieve continual improvement, and maintain ISO 14001 certification. The policy extends to our value chain: all Outsourced, Critical, and Important suppliers must attest annually to compliance, and our Responsible Supplier Code sets minimum standards. It also informs lending and investment, with exclusions for activities not aligned to our sustainability targets. There are no material geographical exclusions; the policy covers all operations under AIB's control. AIB is committed to sourcing 100% renewable electricity and achieving net zero in its own operations by 2030 and across its lending portfolio by 2050. AIB does not finance fossil fuel expansion or nuclear energy, as set out in its Excluded Activities List.

(4.6.1.5) Environmental policy content

Environmental commitments

- ☒ Commitment to comply with regulations and mandatory standards
- ☒ Commitment to take environmental action beyond regulatory compliance
- ☒ Other environmental commitment, please specify :achieve continual improvement of its environmental management system and to manage the direct and indirect environmental impact of our business in a responsible way, Minimise environmental impact by preventing polluting activities, reducing waste

Climate-specific commitments

- ☒ Other climate-related commitment, please specify :• Support initiatives to decarbonise our operations and to prevent, mitigate, adapt or respond to climate change • Encourage environmental protection and climate action among our stakeholders

(4.6.1.6) Indicate whether your environmental policy is in line with global environmental treaties or policy goals

Select all that apply

- ☒ Yes, in line with the Paris Agreement

(4.6.1.7) Public availability

Select from:

- ☒ Publicly available

(4.6.1.8) Attach the policy

Environmental_Policy.pdf

Row 2

(4.6.1.1) Environmental issues covered

Select all that apply

☒ Climate change

(4.6.1.2) Level of coverage

Select from:

☒ Organization-wide

(4.6.1.3) Value chain stages covered

Select all that apply

☒ Direct operations

(4.6.1.4) Explain the coverage

Our Energy Policy enables us carry out our business as energy efficiently as possible, reduce our carbon footprint and to achieve continuous improvement in energy performance. AIB is certified to the international standard ISO 50001:2018 for energy management.

(4.6.1.5) Environmental policy content

Environmental commitments

☒ Commitment to comply with regulations and mandatory standards

☒ Other environmental commitment, please specify :Conduct our business and operations as energy efficiently as possible, achieve continual improvement, consider energy efficiency as part of the life cycle cost.

(4.6.1.6) Indicate whether your environmental policy is in line with global environmental treaties or policy goals

Select all that apply

☒ Yes, in line with the Paris Agreement

(4.6.1.7) Public availability

Select from:

☒ Publicly available

(4.6.1.8) Attach the policy

energy-policy.pdf

[Add row]

(4.7) Does the policy framework for the portfolio activities of your organization include environmental requirements that clients/investees need to meet, and/or exclusion policies?

	Policy framework for portfolio activities include environmental requirements for clients/investees, and/or exclusion policies
Banking (Bank)	Select from: <input checked="" type="checkbox"/> Yes, our framework includes both policies with environmental client/investee requirements and environmental exclusion policies

[Fixed row]

(4.7.1) Provide details of the policies which include environmental requirements that clients/investees need to meet.

Banking (Bank)

(4.7.1.1) Environmental issues covered

Select all that apply

- ☒ Climate change
- ☒ Forests
- ☒ Water
- ☒ Biodiversity

(4.7.1.2) Type of policy

Select all that apply

- ☒ Engagement policy
- ☒ Other banking policy, please specify :Sustainable Lending Framework

(4.7.1.3) Public availability

Select from:

- ☒ Publicly available

(4.7.1.4) Attach the policy

Sustainable-Lending-Framework.pdf

(4.7.1.5) Value chain stages of client/investee covered by policy

Select from:

- ☒ Direct operations

(4.7.1.6) Industry sectors covered by the policy

Select all that apply

- | | |
|--|--|
| <input checked="" type="checkbox"/> Retail | <input checked="" type="checkbox"/> Manufacturing |
| <input checked="" type="checkbox"/> Apparel | <input checked="" type="checkbox"/> Infrastructure |
| <input checked="" type="checkbox"/> Materials | <input checked="" type="checkbox"/> Power generation |
| <input checked="" type="checkbox"/> Hospitality | <input checked="" type="checkbox"/> Transportation services |
| <input checked="" type="checkbox"/> Fossil Fuels | <input checked="" type="checkbox"/> Food, beverage & agriculture |

- ☒ Biotech, health care & pharma

(4.7.1.7) Commodities covered by the policy

Select all that apply

- ☒ Timber products
- ☒ Cattle products

(4.7.1.8) Commodity value chain stage covered by the policy

Select all that apply

- ☒ Production
- ☒ Processing
- ☒ Trading
- ☒ Manufacturing
- ☒ Retailing

(4.7.1.9) % of portfolio covered by the policy in relation to total portfolio value

100

(4.7.1.11) Explain how criteria coverage and/or exceptions have been determined

Eligibility criteria is as per Framework document.

(4.7.1.12) Requirements for clients/investees

Climate-specific commitments

- ☒ Commitment to net-zero emissions
- ☒ Commitment to 100% renewable energy
- ☒ Commitment to disclose Scope 1 emissions
- ☒ Commitment to disclose Scope 2 emissions
- ☒ Commitment to develop a climate transition plan
- ☒ Commitment to not invest in fossil-fuel expansion

Forests-specific commitments

☒ Commitment to no land clearance by burning or clearcutting

Additional references/Descriptions

☒ Other additional reference/description, please specify :Clients and investees may be required to meet specific criteria or take defined actions to align with sustainability objectives. These requirements can include commitments to net-zero emissions, circular economy strategies, or fossil fuel expansion.

(4.7.1.13) Measurement of proportion of clients/investees compliant with the policy

Select from:

☒ Yes

(4.7.1.14) % of clients/investees compliant with the policy

100

(4.7.1.15) % of portfolio value that is compliant with the policy

100

(4.7.1.16) Target year for 100% compliance

Select from:

☒ Already met

Banking (Bank)

(4.7.1.1) Environmental issues covered

Select all that apply

☒ Climate change

☒ Forests

☒ Biodiversity

(4.7.1.2) Type of policy

Select all that apply

☒ Other banking policy, please specify :Green Bond Framework

(4.7.1.3) Public availability

Select from:

☒ Publicly available

(4.7.1.4) Attach the policy

aib-green-bond-framework.pdf

(4.7.1.5) Value chain stages of client/investee covered by policy

Select from:

☒ Direct operations

(4.7.1.6) Industry sectors covered by the policy

Select all that apply

☒ Retail

☒ Services

☒ Materials

☒ Manufacturing

☒ Infrastructure

☒ Power generation

☒ Transportation services

(4.7.1.7) Commodities covered by the policy

Select all that apply

☒ Timber products

☒ Cattle products

(4.7.1.8) Commodity value chain stage covered by the policy

Select all that apply

- ☒ Production
- ☒ Processing
- ☒ Trading
- ☒ Manufacturing
- ☒ Retailing

(4.7.1.9) % of portfolio covered by the policy in relation to total portfolio value

100

(4.7.1.11) Explain how criteria coverage and/or exceptions have been determined

Eligibility criteria is as per Framework document.

(4.7.1.12) Requirements for clients/investees

Environmental commitments

- ☒ Commitment to stakeholder engagement and capacity building on environmental issues

Climate-specific commitments

- ☒ Commitment to 100% renewable energy
- ☒ Commitment to not invest in fossil-fuel expansion

(4.7.1.13) Measurement of proportion of clients/investees compliant with the policy

Select from:

- ☒ Yes

(4.7.1.14) % of clients/investees compliant with the policy

(4.7.1.15) % of portfolio value that is compliant with the policy

100

(4.7.1.16) Target year for 100% compliance*Select from:*☒ Already met**Banking (Bank)****(4.7.1.1) Environmental issues covered***Select all that apply*☒ Climate change☒ Forests**(4.7.1.2) Type of policy***Select all that apply*☒ Other banking policy, please specify :Excluded Activities List**(4.7.1.3) Public availability***Select from:*☒ Publicly available**(4.7.1.4) Attach the policy***aib-group-excluded-activities-policy.pdf***(4.7.1.5) Value chain stages of client/investee covered by policy**

Select from:

☒ Direct operations

(4.7.1.6) Industry sectors covered by the policy

Select all that apply

☒ Biotech, health care & pharma

☒ Fossil Fuels

☒ Materials

☒ Power generation

☒ Transportation services

(4.7.1.7) Commodities covered by the policy

Select all that apply

☒ Timber products

(4.7.1.8) Commodity value chain stage covered by the policy

Select all that apply

☒ Production

☒ Processing

☒ Trading

☒ Manufacturing

☒ Retailing

(4.7.1.9) % of portfolio covered by the policy in relation to total portfolio value

100

(4.7.1.11) Explain how criteria coverage and/or exceptions have been determined

Our Excluded Activities List includes a list of excluded business activities that are considered to be incompatible with Group strategy due to negative environmental impacts associated with activities including deforestation. It is prohibited to provide New Credit Exposures for any lending facilities to business customers (GCE

>€300K), where the customer, or any of its subsidiaries, are involved in the activities on the AIB Group Excluded Activities List. The list of excluded activities is publicly available. In addition, AIB also has a credit assessment due diligence process, whereby assets likely to have significant effects on the environment by virtue of their size, nature or location must undergo an environmental impact assessment (EIA) which will have to be submitted to competent authorities when applying for project development. AIB may rely on analysis provided by external parties, in addition to our own assessment. Please see rows above for further policy and framework details.

(4.7.1.12) Requirements for clients/investees

Environmental commitments

- ☒ Commitment to comply with regulations and mandatory standards
- ☒ Commitment to take environmental action beyond regulatory compliance
- ☒ Other environmental commitment, please specify :The Excluded activities list prohibits providing new money for term lending to businesses, or any of their subsidiaries, involved in the excluded business activities.

Forests-specific commitments

- ☒ Commitment to no land clearance by burning or clearcutting

(4.7.1.13) Measurement of proportion of clients/investees compliant with the policy

Select from:

- ☒ Yes

(4.7.1.14) % of clients/investees compliant with the policy

99

(4.7.1.15) % of portfolio value that is compliant with the policy

99

(4.7.1.16) Target year for 100% compliance

Select from:

- ☒ Within the next year

[Add row]

(4.7.2) Provide details of your exclusion policies related to industries, activities and/or locations exposed or contributing to environmental risks.

Banking (Bank)

(4.7.2.1) Type of exclusion policy

Select from:

☒ All coal

(4.7.2.2) Fossil fuel value chain

Select all that apply

☒ Upstream

☒ Midstream

☒ Downstream

(4.7.2.3) Year of exclusion implementation

2020

(4.7.2.4) Phaseout pathway

Select all that apply

☒ New business/investment for new projects

☒ New business/investment for existing projects

(4.7.2.5) Year of complete phaseout

2025

(4.7.2.6) Country/area the exclusion policy applies to

Select all that apply

- ☒ Ireland
- ☒ United Kingdom of Great Britain and Northern Ireland
- ☒ United States of America

(4.7.2.7) Description

In July 2020, AIB published its first list of Excluded Activities, an updated policy was then approved by our Board in October 2020 and, since 29 January 2021, the Excluded Activities rules apply to all business customers with a Gross Connected Exposure of /300k and who are relationship managed. This list has since been incorporated into our Group Credit Risk Policy, which supports the management of credit risk across the Group. Our excluded activities list sets out a range of business activities that are considered to be incongruent with Group strategy. Some of the excluded activities included in the list include: • Coal or oil-fired power generation (other than emergency or stand by oil generation) except where less than 25% of revenues are generated from this activity and only where there is a plan to move to sustainable fuels by 2025; • Onshore/offshore exploration, extraction or refining of Coal or Oil.

Banking (Bank)

(4.7.2.1) Type of exclusion policy

Select from:

- ☒ Oil from tar sands

(4.7.2.2) Fossil fuel value chain

Select all that apply

- ☒ Upstream
- ☒ Midstream
- ☒ Downstream

(4.7.2.3) Year of exclusion implementation

2020

(4.7.2.4) Phaseout pathway

Select all that apply

- ☒ New business/investment for new projects
- ☒ New business/investment for existing projects

(4.7.2.5) Year of complete phaseout

2025

(4.7.2.6) Country/area the exclusion policy applies to

Select all that apply

- ☒ Ireland
- ☒ United Kingdom of Great Britain and Northern Ireland
- ☒ United States of America

(4.7.2.7) Description

Full details of the excluded under question (4.7.2.7) Exploration, extraction and upgrading of oil sands projects is a key activity group which is included within the excluded activities list.

Banking (Bank)

(4.7.2.1) Type of exclusion policy

Select from:

- ☒ Fracked oil and gas

(4.7.2.2) Fossil fuel value chain

Select all that apply

- ☒ Upstream
- ☒ Midstream
- ☒ Downstream

(4.7.2.3) Year of exclusion implementation

2020

(4.7.2.4) Phaseout pathway

Select all that apply

- ☒ New business/investment for new projects
- ☒ New business/investment for existing projects

(4.7.2.5) Year of complete phaseout

2025

(4.7.2.6) Country/area the exclusion policy applies to

Select all that apply

- ☒ Ireland
- ☒ United Kingdom of Great Britain and Northern Ireland
- ☒ United States of America

(4.7.2.7) Description

Full details of the excluded under question (4.7.2.7) Fracked oil and gas is a key activity group which is included within the excluded activities list.

Banking (Bank)

(4.7.2.1) Type of exclusion policy

Select from:

- ☒ Other, please specify :Energy & Climate Action, Animal Welfare, Ecosystems Protection, Healthcare/Genetic Engineering, Adult Entertainment, Surveillance/Arms Related/Military

(4.7.2.3) Year of exclusion implementation

2021

(4.7.2.4) Phaseout pathway

Select all that apply

☒ New business/investment for new projects

(4.7.2.5) Year of complete phaseout

2025

(4.7.2.6) Country/area the exclusion policy applies to

Select all that apply

☒ Ireland

☒ United Kingdom of Great Britain and Northern Ireland

☒ United States of America

(4.7.2.7) Description

Full details of the excluded under question (4.7.2.7) Some excluded activities include: the exploration, extraction and upgrading of oil sands projects, nuclear power generation, nuclear waste transportation, the decommissioning and/or final disposal of high-level nuclear waste, onshore/offshore exploration, extraction or refining of coal or oil and natural gas fracking. The full list is publicly available at www.aib.ie/sustainability.

[Add row]

(4.8) Does your organization include covenants in financing agreements to reflect and enforce your environmental policies?

	Covenants included in financing agreements to reflect and enforce policies
	Select from:

	Covenants included in financing agreements to reflect and enforce policies
	<input checked="" type="checkbox"/> Yes

[Fixed row]

(4.8.1) Provide details of the covenants included in your organization's financing agreements to reflect and enforce your environmental policies.

Row 1

(4.8.1.1) Environmental issue

Select all that apply

- ☒ Climate change
- ☒ Forests
- ☒ Water
- ☒ Biodiversity

(4.8.1.2) Types of covenants used

Select all that apply

- ☒ A purpose or use of proceeds clause that refers to a taxonomy aligned activity
- ☒ Margin or pricing depends on sustainability criteria
- ☒ Legal mandate to obtain third party verification of sustainability criteria
- ☒ Covenants related to compliance with your environmental policies

(4.8.1.3) Asset class/product types covered by covenants

Select all that apply

- ☒ Asset finance
- ☒ Corporate loans
- ☒ Project finance
- ☒ Retail mortgages
- ☒ Corporate real estate

- ☒ Debt and equity underwriting

(4.8.1.4) Criteria for how covenants are applied

Select from:

- ☒ Selected clients

(4.8.1.5) % of clients covered by covenants

0

(4.8.1.6) % of portfolio covered in relation to total portfolio value

12

(4.8.1.7) Provide details on which environmental policies your covenants enforce and how

AIB's Sustainable Lending Framework (SLF) sets out the criteria for classifying and reporting green, transition and social lending, and is used to guide the origination and structuring of Sustainability-Linked Loans (SLLs). These loans include covenants that link loan terms to the achievement of predefined sustainability performance targets, which are aligned with AIB's sustainability strategy and environmental policies. The SLF supports the decarbonisation of our loan book and is applied across all lending segments. Under the SLF, borrowers are required to report on progress against agreed environmental KPIs, and failure to meet targets may result in pricing adjustments. The framework ensures that lending activities are consistent with AIB's Group Environmental Policy and Credit Risk Policy, including exclusions for activities that do not align with our strategy, such as fossil fuel expansion and nuclear energy. These covenants are embedded in corporate and project finance agreements and are reviewed by our Credit and Sustainability teams to ensure alignment with our ESG risk framework and regulatory expectations. The % of clients covered by covenants is not known however we disclose the % of portfolio covered in relation to total portfolio value as 12%.

[Add row]

(4.9) Does your organization offer its employees a pension scheme that incorporates environmental criteria in its holdings?

Climate change

(4.9.1) Pension scheme incorporates environmental criteria in its holdings

Select from:

☒ Yes, as the default investment strategy for all plans

(4.9.2) Describe how funds within the pension scheme are selected and how your organization ensures that environmental criteria are incorporated

ESG principles are taken into consideration in the passive equity options offered to scheme members. The Group provides a number of retirement benefit schemes. All defined benefit schemes were closed to future accrual from 31st December 2013 and all staff accrue pension benefits on a defined contribution basis from 1st January 2014. Each scheme member either selects their own investment strategy or avails of the default strategy. In either case, if equity funds are involved, ESG criteria is taken into consideration by the investment manager. Each scheme has a trustee board and AIB works with the trustees of each scheme to monitor the performance of investments. Although the Group has interaction with the trustees, it cannot direct the investment strategy of the schemes.

Forests

(4.9.1) Pension scheme incorporates environmental criteria in its holdings

Select from:

☒ Yes, as the default investment strategy for all plans

(4.9.2) Describe how funds within the pension scheme are selected and how your organization ensures that environmental criteria are incorporated

ESG principles are taken into consideration in the passive equity options offered to scheme members. The Group provides a number of retirement benefit schemes. All defined benefit schemes were closed to future accrual from 31st December 2013 and all staff accrue pension benefits on a defined contribution basis from 1st January 2014. Each scheme member either selects their own investment strategy or avails of the default strategy. In either case, if equity funds are involved, ESG criteria is taken into consideration by the investment manager. Each scheme has a trustee board and AIB works with the trustees of each scheme to monitor the performance of investments. Although the Group has interaction with the trustees, it cannot direct the investment strategy of the schemes.

Water

(4.9.1) Pension scheme incorporates environmental criteria in its holdings

Select from:

- ☒ Yes, as the default investment strategy for all plans

(4.9.2) Describe how funds within the pension scheme are selected and how your organization ensures that environmental criteria are incorporated

ESG principles are taken into consideration in the passive equity options offered to scheme members. The Group provides a number of retirement benefit schemes. All defined benefit schemes were closed to future accrual from 31st December 2013 and all staff accrue pension benefits on a defined contribution basis from 1st January 2014. Each scheme member either selects their own investment strategy or avails of the default strategy. In either case, if equity funds are involved, ESG criteria is taken into consideration by the investment manager. Each scheme has a trustee board and AIB works with the trustees of each scheme to monitor the performance of investments. Although the Group has interaction with the trustees, it cannot direct the investment strategy of the schemes.
[Fixed row]

(4.10) Are you a signatory or member of any environmental collaborative frameworks or initiatives?

(4.10.1) Are you a signatory or member of any environmental collaborative frameworks or initiatives?

Select from:

- ☒ Yes

(4.10.2) Collaborative framework or initiative

Select all that apply

- | | |
|--|---|
| <input checked="" type="checkbox"/> UN Global Compact | <input checked="" type="checkbox"/> UNEP FI Principles for Responsible Banking |
| <input checked="" type="checkbox"/> Equator Principles | <input checked="" type="checkbox"/> Global Reporting Initiative (GRI) Community Member |
| <input checked="" type="checkbox"/> Net Zero Banking Alliance | <input checked="" type="checkbox"/> Task Force on Climate-related Financial Disclosures (TCFD) |
| <input checked="" type="checkbox"/> Science-Based Targets Initiative (SBTi) | <input checked="" type="checkbox"/> World Business Council for Sustainable Development (WBCSD) |
| <input checked="" type="checkbox"/> Principles for Responsible Investment (PRI) | <input checked="" type="checkbox"/> Science-Based Targets Initiative for Financial Institutions (SBTi-FI) |
| <input checked="" type="checkbox"/> Other, please specify : World Economic Forum Stakeholder Capitalism Metrics | |

(4.10.3) Describe your organization's role within each framework or initiative

AIB Group plc is an active signatory and member of several leading environmental collaborative frameworks and initiatives, integrating them into our strategy, governance, and disclosures. As a signatory to the UN Global Compact, we uphold its Ten Principles and submit an annual Communication on Progress. Through the

Net-Zero Banking Alliance, we commit to align our lending and investment portfolios with net-zero emissions by 2050, operationalised via validated Science Based Targets covering 75% of our loan book as of end-2024. We report annually to CDP, using its platform to communicate our climate strategy and performance, and our disclosures are informed by materiality assessment and stakeholder engagement. As a signatory to the Equator Principles, we apply them to all relevant project finance lending across our markets, with annual reporting and ongoing staff training. As a member of the Science Based Targets initiative for Financial Institutions, we use the UNEP FI Portfolio Impact Analysis Tool to assess our impact and set SMART targets, such as €30bn in green lending by 2030 and over €6bn in new lending to first-time buyers by 2026. We are also a supporter of the Task Force on Climate-related Financial Disclosures (TCFD), reporting in line with its recommendations since 2020, and a member of the Global Reporting Initiative (GRI) Community, reporting in line with GRI Standards since 2019 with independent assurance of our disclosures.

[Fixed row]

(4.11) In the reporting year, did your organization engage in activities that could directly or indirectly influence policy, law, or regulation that may (positively or negatively) impact the environment?

(4.11.1) External engagement activities that could directly or indirectly influence policy, law, or regulation that may impact the environment

Select all that apply

☒ Yes, we engaged indirectly through, and/or provided financial or in-kind support to a trade association or other intermediary organization or individual whose activities could influence policy, law, or regulation

(4.11.2) Indicate whether your organization has a public commitment or position statement to conduct your engagement activities in line with global environmental treaties or policy goals

Select from:

☒ Yes, we have a public commitment or position statement in line with global environmental treaties or policy goals

(4.11.3) Global environmental treaties or policy goals in line with public commitment or position statement

Select all that apply

☒ Paris Agreement

(4.11.4) Attach commitment or position statement

[aib-group-plc-afr-report-2024.pdf](#)

(4.11.5) Indicate whether your organization is registered on a transparency register

Select from:

☒ Yes

(4.11.6) Types of transparency register your organization is registered on

Select all that apply

☒ Mandatory government register

(4.11.7) Disclose the transparency registers on which your organization is registered & the relevant ID numbers for your organization

AIB's Lobbying activity in Ireland (CRO - 24173) is publicly available here - <https://www.lobbying.ie/organisation/803/aib-group> AIB is also registered on the EU Transparency register REG Number - 885308748162-21

(4.11.8) Describe the process your organization has in place to ensure that your external engagement activities are consistent with your environmental commitments and/or transition plan

AIB ensures that its external engagement activities are aligned with its environmental commitments through a structured governance process. Engagements are reviewed to confirm consistency with AIB's sustainability strategy, including its commitments under the Net-Zero Banking Alliance, the UNEP FI Principles for Responsible Banking, and the Science Based Targets initiative. Oversight is provided by the Group Sustainability Committee, which ensures that all advocacy efforts support AIB's transition plan and broader environmental objectives.

[Fixed row]

(4.11.2) Provide details of your indirect engagement on policy, law, or regulation that may (positively or negatively) impact the environment through trade associations or other intermediary organizations or individuals in the reporting year.

Row 1

(4.11.2.1) Type of indirect engagement

Select from:

☒ Indirect engagement via a trade association

(4.11.2.4) Trade association

Europe

☒ Other trade association in Europe, please specify :UNEP FI

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☒ Climate change

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

☒ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☒ No, we did not attempt to influence their position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

Ambition to meet Global, EU and National Climate Action Targets / Plan. This is consistent with our own ambitions – the trajectory and 'how' this is achieved may differ on a case-by-case basis.

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

81325

(4.11.2.10) Describe the aim of this funding and how it could influence policy, law or regulation that may impact the environment

UNEP FI helps to transform the role of financial institutions in contributing to the transition to a sustainable economy. They help the finance industry contribute to the Sustainable Development Goals and align financing with the Paris Climate Agreement. AIB does not attempt to influence policy, law or regulation that may impact the environment.

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

☒ Yes, we have evaluated, and it is aligned

(4.11.2.12) Global environmental treaties or policy goals aligned with your organization's engagement on policy, law or regulation

Select all that apply

☒ Paris Agreement

[Add row]

(4.12) Have you published information about your organization's response to environmental issues for this reporting year in places other than your CDP response?

Select from:

☒ Yes

(4.12.1) Provide details on the information published about your organization's response to environmental issues for this reporting year in places other than your CDP response. Please attach the publication.

Row 1

(4.12.1.1) Publication

Select from:

- ☒ In mainstream reports, in line with environmental disclosure standards or frameworks

(4.12.1.2) Standard or framework the report is in line with

Select all that apply

- ☒ ESRS
- ☒ GRI
- ☒ TCFD

(4.12.1.3) Environmental issues covered in publication

Select all that apply

- ☒ Climate change
- ☒ Forests
- ☒ Water
- ☒ Biodiversity

(4.12.1.4) Status of the publication

Select from:

- ☒ Complete

(4.12.1.5) Content elements

Select all that apply

- | | |
|---|--|
| <input checked="" type="checkbox"/> Strategy | <input checked="" type="checkbox"/> Value chain engagement |
| <input checked="" type="checkbox"/> Governance | <input checked="" type="checkbox"/> Dependencies & Impacts |
| <input checked="" type="checkbox"/> Emission targets | <input checked="" type="checkbox"/> Biodiversity indicators |
| <input checked="" type="checkbox"/> Emissions figures | <input checked="" type="checkbox"/> Public policy engagement |
| <input checked="" type="checkbox"/> Risks & Opportunities | <input checked="" type="checkbox"/> Water pollution indicators |
| <input checked="" type="checkbox"/> Content of environmental policies | |

(4.12.1.6) Page/section reference

FY2024 Annual Financial Report: See our Sustainability Statement from Page 43.

(4.12.1.7) Attach the relevant publication

aib-group-plc-afr-report-2024.pdf

(4.12.1.8) Comment

N/A

Row 2

(4.12.1.1) Publication

Select from:

☒ In mainstream reports, in line with environmental disclosure standards or frameworks

(4.12.1.2) Standard or framework the report is in line with

Select all that apply

☒ GRI

☒ TCFD

☒ Other, please specify :UNEPFI, Equator Principles

(4.12.1.3) Environmental issues covered in publication

Select all that apply

☒ Climate change

☒ Water

(4.12.1.4) Status of the publication

Select from:

☒ Complete

(4.12.1.5) Content elements

- Select all that apply
- ☒ Content of environmental policies
 - ☒ Governance
 - ☒ Strategy
 - ☒ Commodity volumes
 - ☒ Water accounting figures

(4.12.1.6) Page/section reference

FY2024 Sustainability Disclosures Tables page 1-13.

(4.12.1.7) Attach the relevant publication

sustainability-disclosures-tables-2024.pdf

(4.12.1.8) Comment

N/A
[Add row]

C5. Business strategy

(5.1) Does your organization use scenario analysis to identify environmental outcomes?

Climate change

(5.1.1) Use of scenario analysis

Select from:

☒ Yes

(5.1.2) Frequency of analysis

Select from:

☒ Annually

Forests

(5.1.1) Use of scenario analysis

Select from:

☒ No, and we do not plan to within the next two years

(5.1.3) Primary reason why your organization has not used scenario analysis

Select from:

☒ Not an immediate strategic priority

(5.1.4) Explain why your organization has not used scenario analysis

Risks relating to forests were identified in our Double Materiality Assessment (DMA) when considering Biodiversity and Ecosystems as a material topic for AIB Group. However, through the DMA scoring, this topic wasn't deemed as having had or having anticipated substantive effects on AIB. Therefore, forests scenario analysis within the value chain has not been a strategic priority during the reporting year.

Water

(5.1.1) Use of scenario analysis

Select from:

☒ No, and we do not plan to within the next two years

(5.1.3) Primary reason why your organization has not used scenario analysis

Select from:

☒ Not an immediate strategic priority

(5.1.4) Explain why your organization has not used scenario analysis

Risks relating to water in our Own Operations were identified in our Double Materiality Assessment when considering Water and Marine Resources as a material topic for AIB Group. However, this topic wasn't deemed as having had or having anticipated substantive effects on AIB. Therefore, water scenario analysis within the value chain has not been a strategic priority during the reporting year.

[Fixed row]

(5.1.1) Provide details of the scenarios used in your organization's scenario analysis.

Climate change

(5.1.1.1) Scenario used

Climate transition scenarios

☒ NGFS scenarios framework, please specify :Transition Scenario: Paris Aligned

(5.1.1.3) Approach to scenario

Select from:

☒ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☒ Portfolio

(5.1.1.5) Risk types considered in scenario

Select all that apply

☒ Acute physical

☒ Chronic physical

☒ Policy

(5.1.1.6) Temperature alignment of scenario

Select from:

☒ 1.5°C or lower

(5.1.1.7) Reference year

2024

(5.1.1.8) Timeframes covered

Select all that apply

☒ Other, please specify :Forecast is available for annual intervals out till 2027

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☒ Climate change (one of five drivers of nature change)

Regulators, legal and policy regimes

☒ Global regulation

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

The scenario analysis is based on several key assumptions and constraints. It assumes that governments implement climate policies either in a structured and anticipated manner (Paris-Aligned scenario) or abruptly and unexpectedly (Sudden Realisation scenario), both aiming to limit warming to well below 2°C. Macroeconomic assumptions include the impact of energy price increases and the responsiveness of the economy to climate policy. National-level variables such as emissions intensity by sector and energy usage are embedded in the modelling. AIB works with Oxford Economics in relation to climate scenarios. A constraint arises from merging Oxford Economics' (OE) historical data with AIB's forecasts, which introduces minor base effects and discrepancies in the constructed baseline. These are marginal, and AIB's economic view remains strongly reflected. Uncertainties include the timing and severity of policy implementation and the economic response to carbon pricing. In 2024, AIB continued its engagement with OE to manage and update bespoke climate scenarios for transition risk analysis. OE used the Network for Greening the Financial System (NGFS) long-term scenarios as a foundation and developed short-term scenarios with AIB input. The Paris-Aligned scenario, based on the NGFS Orderly Transition pathway, assumes timely and anticipated climate policy implementation, with sharp energy price increases but limited economic disruption due to expected policy signals and green investment opportunities. The Sudden Realisation scenario, based on the NGFS Disorderly Transition pathway, models a delayed but abrupt policy shift, resulting in greater economic impact due to unanticipated carbon-reduction levies and taxes. These scenarios were integrated into AIB's Internal Capital Adequacy Assessment Process (ICAAP) framework to assess credit risk and capital adequacy.

(5.1.1.11) Rationale for choice of scenario

The Group quantifies potential transition risk using internally developed models centred on carbon emissions charges. Two scenarios are used: a Paris-aligned scenario, which assumes carbon emissions in a carefully structured way, that governments pursue incentives to reduce and a Sudden Realisation scenario, which assumes that limited actions have taken place and that a 'shock' arises from an unstructured and significant implementation of carbon-reduction levies and taxes. These scenarios are relevant to assessing the Group's resilience to climate-related changes and uncertainties, particularly the impact on the creditworthiness of customers. The scenarios are applied to both Retail and Non-Retail portfolios, using Building Energy Ratings and NACE sector emissions data respectively. The stress tests were included in the ICAAP process (approved in 2024), which provided assurance that the Group had adequate capital to withstand these risks. The scenarios are used to assess the impact of environmental issues on lending activities, which is where the most material impact of climate stresses affects the Group.

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☒ RCP 6.0

(5.1.1.2) Scenario used SSPs used in conjunction with scenario

Select from:

☒ No SSP used

(5.1.1.3) Approach to scenario

Select from:

- ☒ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

- ☒ Portfolio

(5.1.1.5) Risk types considered in scenario

Select all that apply

- ☒ Acute physical
☒ Chronic physical
☒ Policy
☒ Market

(5.1.1.6) Temperature alignment of scenario

Select from:

- ☒ 2.5°C - 2.9°C

(5.1.1.7) Reference year

2024

(5.1.1.8) Timeframes covered

Select all that apply

- ☒ Other, please specify :AIB Climate scenarios are available at 5-year intervals until 2100

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Climate change (one of five drivers of nature change)

Regulators, legal and policy regimes

☑ Global regulation

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

The Group's scenario analysis incorporates key assumptions, uncertainties, and constraints across both transition and physical climate risks. Assumptions include the application of climate-related scenarios to the Group's credit and treasury portfolios, with a focus on the loan book where the most material impacts are expected. Scenario testing enables the Group to assess the interconnectedness of risks, considering not only direct physical risks but also transition risks arising from shifts in market dynamics, investor sentiment and regulatory landscapes. Physical risk assumptions are grounded in IPCC Representative Concentration Pathways (RCPs 2.6 to 8.5), which project varying levels of CO₂ concentration and temperature anomalies through 2100. The Group's enhanced flood-risk model assumes property-level exposure to river, coastal, and surface water flooding, with damage estimated using building type, flood type, and rebuild costs. Uncertainties include the timing and severity of climate-related policy changes, the evolution of physical climate impacts, and the indirect macroeconomic effects such as interest rate trajectories. Constraints include the flood model's inability to estimate joint probabilities of flooding across multiple properties, which is mitigated by applying geographically consistent stress scenarios. The scenario analysis currently excludes direct upstream impacts and non-credit transmission channels. The analysis covers all customer loans and advances on the balance sheet and informs broader stress testing.

(5.1.1.11) Rationale for choice of scenario

Flooding has been identified as the most material physical risk to the Group, both as an acute and chronic threat. This risk arises from the potential negative impact on the creditworthiness of our customers, particularly in relation to property-related exposures. To address this, we have developed and rolled out an enhanced flood-risk model during 2024, which marks a significant advancement in both granularity and flexibility compared to previous approaches. The model is designed to quantify flood risk across a range of climate scenarios, including high-emissions futures extending to 2100, and is grounded in science-based pathways developed by the IPCC. In line with regulatory expectations and industry guidance, our approach is aligned with the EBA 2021 ESG Risk Management guidance and our CRR449a Pillar 3 disclosure. Specifically, for our commercial and residential exposures secured by immovable property, we assess "sensitivity" to physical risk under an adverse climate scenario, defined as a high-emissions pathway (corresponding to what is commonly referred to as RCP 8.5) to 2035, and a 1:100 risk of a flood event. The threshold for "sensitive" exposures is set at a 1% flooding risk (1:100) under this adverse scenario. While our model is capable of assessing flood risk under a variety of climate futures, for regulatory disclosure and stress testing purposes we focus on this high-emissions scenario, as it provides a robust and conservative basis for understanding potential impacts. This approach supports the tracking of physical risk for our key property portfolios and informs our ongoing stress testing efforts, helping to assess the materiality of flood risk over the short-, medium-, and long-term. Our methodology is subject to further evolution as industry practices and supervisory expectations develop. Overall, this scenario analysis is directly relevant to the resilience of our business strategy, as it enables us to assess the impact of environmental issues on lending activities—where climate-related physical risks are most likely to affect the Group. By embedding these insights into our risk management and financial planning, we ensure that our strategy remains robust in the face of climate-related uncertainties.

Climate change

(5.1.1.1) Scenario used

Climate transition scenarios

☒ NGFS scenarios framework, please specify :Transition Scenario: Sudden Realisation

(5.1.1.3) Approach to scenario

Select from:

☒ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☒ Portfolio

(5.1.1.5) Risk types considered in scenario

Select all that apply

☒ Acute physical

☒ Chronic physical

☒ Policy

(5.1.1.6) Temperature alignment of scenario

Select from:

☒ 1.5°C or lower

(5.1.1.7) Reference year

2024

(5.1.1.8) Timeframes covered

Select all that apply

☒ Other, please specify :Forecast is available for annual intervals out till 2027

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☒ Climate change (one of five drivers of nature change)

Regulators, legal and policy regimes

☒ Global regulation

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

The scenario analysis is based on several key assumptions and constraints. It assumes that governments implement climate policies either in a structured and anticipated manner (Paris-Aligned scenario) or abruptly and unexpectedly (Sudden Realisation scenario), both aiming to limit warming to well below 2C. Macroeconomic assumptions include the impact of energy price increases and the responsiveness of the economy to climate policy. National-level variables such as emissions intensity by sector and energy usage are embedded in the modelling. A constraint arises from merging Oxford Economics' (OE) historical data with AIB's forecasts, which introduces minor base effects and discrepancies in the constructed baseline. These are marginal, and AIB's economic view remains strongly reflected. Uncertainties include the timing and severity of policy implementation and the economic response to carbon pricing. In 2024, AIB continued its engagement with OE to manage and update bespoke climate scenarios for transition risk analysis. OE used the Network for Greening the Financial System (NGFS) long-term scenarios as a foundation and developed short-term scenarios with AIB input. The Paris-Aligned scenario, based on the NGFS Orderly Transition pathway, assumes timely and anticipated climate policy implementation, with sharp energy price increases but limited economic disruption due to expected policy signals and green investment opportunities. The Sudden Realisation scenario, based on the NGFS Disorderly Transition pathway, models a delayed but abrupt policy shift, resulting in greater economic impact due to unanticipated carbon-reduction levies and taxes. These scenarios were integrated into AIB's ICAAP framework to assess credit risk and capital adequacy.

(5.1.1.11) Rationale for choice of scenario

The Group quantifies potential transition risk using internally developed models centred on carbon emissions charges. Two scenarios are used: a Paris-aligned scenario, which assumes carbon emissions in a carefully structured way, that governments pursue incentives to reduce and a Sudden Realisation scenario, which assumes that limited actions have taken place and that a 'shock' arises from an unstructured and significant implementation of carbon-reduction levies and taxes. These scenarios are relevant to assessing the Group's resilience to climate-related changes and uncertainties, particularly the impact on the creditworthiness of customers. The scenarios are applied to both Retail and Non-Retail portfolios, using Building Energy Ratings and NACE sector emissions data respectively. The stress tests were included in the ICAAP process (approved in 2024), which provided assurance that the Group had adequate capital to withstand these risks. The scenarios are used to assess the impact of environmental issues on lending activities, which is where the most material impact of climate stresses affects the Group.

Climate change

(5.1.1.1) Scenario used

Climate transition scenarios

☒ IEA NZE 2050

(5.1.1.3) Approach to scenario

Select from:

☒ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☒ Portfolio

(5.1.1.5) Risk types considered in scenario

Select all that apply

☒ Acute physical

☒ Chronic physical

☒ Policy

(5.1.1.6) Temperature alignment of scenario

Select from:

☒ 1.5°C or lower

(5.1.1.7) Reference year

2021

(5.1.1.8) Timeframes covered

Select all that apply

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Climate change (one of five drivers of nature change)

Regulators, legal and policy regimes

☑ Global regulation

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

The Net Zero Emissions by 2050 (NZE) Scenario is designed to show what is needed across the main sectors by various actors, and by when, for the world to achieve net-zero energy-related and industrial process CO₂ emissions by 2050. The scenario is built on several key assumptions. It assumes that all countries co-operate towards achieving net-zero emissions worldwide, working together in an effective and mutually beneficial way, and recognising the different stages of economic development of countries and regions, and the importance of ensuring a just transition. It also assumes an orderly transition across the energy sector, including ensuring the security of fuel and electricity supplies at all times, minimising stranded assets where possible and aiming to avoid volatility in energy markets. The NZE incorporates concrete action on the energy-related United Nations Sustainable Development Goals related to achieving universal energy access by 2030 and delivering a major reduction in air pollution. It is consistent with around a 50% chance of limiting the long-term average global temperature rise to 1.5 °C without a temperature overshoot. However, the scenario is subject to several uncertainties. There are many possible paths to achieve net-zero CO₂ emissions globally by 2050 and many uncertainties that could affect any of them. Much depends, for example, on the pace of innovation in new and emerging technologies, the extent to which citizens are able or willing to change behaviour, the availability of sustainable bioenergy and the extent and effectiveness of international collaboration. The absence of behaviour change, restrictions on bioenergy use and failure to develop fossil fuel CCUS would each raise investment to meet net-zero emissions by USD 4–15 trillion. These areas were selected because the assumptions made about them involve a high degree of uncertainty and because of their critical contributions to achieve net-zero emissions by 2050. The NZE is also subject to important constraints. It does not rely on action in areas other than the energy sector, but limiting climate change does require such action. The level of bioenergy use in the NZE takes account of these constraints: bioenergy demand in 2050 is around 100 EJ. The expanded use of feedstocks and arable land to produce these biofuels can conflict with food production. Advanced bioenergy accounts for the vast majority of bioenergy supply in the NZE by 2050.

(5.1.1.11) Rationale for choice of scenario

As part of setting science-based targets AIB used the IEA NZE 2050 scenario as the decarbonisation reference for setting its baseline physical emissions intensity targets for both its Residential Mortgages and Commercial Real Estate (CRE) portfolios because it aligns with a 1.5°C global warming pathway and is recognised as a scientifically robust benchmark for climate-aligned financial planning. The IEA NZE 2050 scenario also complements national policy assumptions, such as Ireland's Climate Action Plan, which forecasts shifts in building energy ratings and grid decarbonisation—factors that directly influence emissions in the mortgage and CRE sectors.

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☒ RCP 2.6

(5.1.1.2) Scenario used SSPs used in conjunction with scenario

Select from:

☒ No SSP used

(5.1.1.3) Approach to scenario

Select from:

☒ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☒ Portfolio

(5.1.1.5) Risk types considered in scenario

Select all that apply

☒ Acute physical

☒ Chronic physical

☒ Policy

(5.1.1.6) Temperature alignment of scenario

Select from:

☒ 1.6°C - 1.9°C

(5.1.1.7) Reference year

2024

(5.1.1.8) Timeframes covered

Select all that apply

☒ Other, please specify :AIB Climate scenarios are available at 5-year intervals until 2100

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☒ Climate change (one of five drivers of nature change)

Regulators, legal and policy regimes

☒ Global regulation

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

The Group's scenario analysis incorporates key assumptions, uncertainties, and constraints across both transition and physical climate risks. Assumptions include the application of climate-related scenarios to the Group's credit and treasury portfolios, with a focus on the loan book where the most material impacts are expected. Scenario testing enables the Group to assess the interconnectedness of risks, considering not only direct physical risks but also transition risks arising from shifts in market dynamics, investor sentiment and regulatory landscapes. Physical risk assumptions are grounded in IPCC Representative Concentration Pathways (RCPs 2.6 to 8.5), which project varying levels of CO₂ concentration and temperature anomalies through 2100. The Group's enhanced flood-risk model assumes property-level exposure to river, coastal, and surface water flooding, with damage estimated using building type, flood type, and rebuild costs. Uncertainties include the timing and severity of climate-related policy changes, the evolution of physical climate impacts, and the indirect macroeconomic effects such as interest rate trajectories. Constraints include the flood model's inability to estimate joint probabilities of flooding across multiple properties, which is mitigated by applying geographically consistent stress scenarios. The scenario analysis currently excludes direct upstream impacts and non-credit transmission channels. The analysis covers all customer loans and advances on the balance sheet and informs broader stress testing.

(5.1.1.11) Rationale for choice of scenario

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IPCC. In line with regulatory expectations and industry guidance, our approach is aligned with the EBA 2021 ESG Risk Management guidance and our CRR449a Pillar 3 disclosure. Specifically, for our commercial and residential exposures secured by immovable property, we assess “sensitivity” to physical risk under an adverse climate scenario, defined as a high-emissions pathway (corresponding to what is commonly referred to as RCP 8.5) to 2035, and a 1:100 risk of a flood event. The threshold for “sensitive” exposures is set at a 1% flooding risk (1:100) under this adverse scenario. While our model is capable of assessing flood risk under a variety of climate futures, for regulatory disclosure and stress testing purposes we focus on this high-emissions scenario, as it provides a robust and conservative basis for understanding potential impacts. This approach supports the tracking of physical risk for our key property portfolios and informs our ongoing stress testing efforts, helping to assess the materiality of flood risk over the short-, medium-, and long-term. Our methodology is subject to further evolution as industry practices and supervisory expectations develop. Overall, this scenario analysis is directly relevant to the resilience of our business strategy, as it enables us to assess the impact of environmental issues on lending activities—where climate-related physical risks are most likely to affect the Group. By embedding these insights into our risk management and financial planning, we ensure that our strategy remains robust in the face of climate-related uncertainties.

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☒ RCP 4.5

(5.1.1.2) Scenario used SSPs used in conjunction with scenario

Select from:

☒ No SSP used

(5.1.1.3) Approach to scenario

Select from:

☒ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☒ Portfolio

(5.1.1.5) Risk types considered in scenario

Select all that apply

- ☒ Acute physical
- ☒ Chronic physical
- ☒ Policy

(5.1.1.6) Temperature alignment of scenario

Select from:

- ☒ 2.0°C - 2.4°C

(5.1.1.7) Reference year

2024

(5.1.1.8) Timeframes covered

Select all that apply

- ☒ Other, please specify :AIB Climate scenarios are available at 5-year intervals until 2100

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

- ☒ Climate change (one of five drivers of nature change)

Regulators, legal and policy regimes

- ☒ Global regulation

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

The Group's scenario analysis incorporates key assumptions, uncertainties, and constraints across both transition and physical climate risks. Assumptions include the application of climate-related scenarios to the Group's credit and treasury portfolios, with a focus on the loan book where the most material impacts are expected. Scenario testing enables the Group to assess the interconnectedness of risks, considering not only direct physical risks but also transition risks arising from shifts in market dynamics, investor sentiment and regulatory landscapes. Physical risk assumptions are grounded in IPCC Representative Concentration Pathways (RCPs 2.6 to 8.5), which project varying levels of CO₂ concentration and temperature anomalies through 2100. The Group's enhanced flood-risk model assumes property-level

exposure to river, coastal, and surface water flooding, with damage estimated using building type, flood type, and rebuild costs. Uncertainties include the timing and severity of climate-related policy changes, the evolution of physical climate impacts, and the indirect macroeconomic effects such as interest rate trajectories. Constraints include the flood model's inability to estimate joint probabilities of flooding across multiple properties, which is mitigated by applying geographically consistent stress scenarios. The scenario analysis currently excludes direct upstream impacts and non-credit transmission channels. The analysis covers all customer loans and advances on the balance sheet and informs broader stress testing.

(5.1.1.11) Rationale for choice of scenario

Flooding has been identified as the most material physical risk to the Group, both as an acute and chronic threat. This risk arises from the potential negative impact on the creditworthiness of our customers, particularly in relation to property-related exposures. To address this, we have developed and rolled out an enhanced flood-risk model during 2024, which marks a significant advancement in both granularity and flexibility compared to previous approaches. The model is designed to quantify flood risk across a range of climate scenarios, including high-emissions futures extending to 2100, and is grounded in science-based pathways developed by the IPCC. In line with regulatory expectations and industry guidance, our approach is aligned with the EBA 2021 ESG Risk Management guidance and our CRR449a Pillar 3 disclosure. Specifically, for our commercial and residential exposures secured by immovable property, we assess "sensitivity" to physical risk under an adverse climate scenario, defined as a high-emissions pathway (corresponding to what is commonly referred to as RCP 8.5) to 2035, and a 1:100 risk of a flood event. The threshold for "sensitive" exposures is set at a 1% flooding risk (1:100) under this adverse scenario. While our model is capable of assessing flood risk under a variety of climate futures, for regulatory disclosure and stress testing purposes we focus on this high-emissions scenario, as it provides a robust and conservative basis for understanding potential impacts. This approach supports the tracking of physical risk for our key property portfolios and informs our ongoing stress testing efforts, helping to assess the materiality of flood risk over the short-, medium-, and long-term. Our methodology is subject to further evolution as industry practices and supervisory expectations develop. Overall, this scenario analysis is directly relevant to the resilience of our business strategy, as it enables us to assess the impact of environmental issues on lending activities—where climate-related physical risks are most likely to affect the Group. By embedding these insights into our risk management and financial planning, we ensure that our strategy remains robust in the face of climate-related uncertainties.

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☒ RCP 8.5

(5.1.1.2) Scenario used SSPs used in conjunction with scenario

Select from:

☒ No SSP used

(5.1.1.3) Approach to scenario

Select from:

☒ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☒ Portfolio

(5.1.1.5) Risk types considered in scenario

Select all that apply

☒ Acute physical

☒ Chronic physical

☒ Policy

(5.1.1.6) Temperature alignment of scenario

Select from:

☒ 4.0°C and above

(5.1.1.7) Reference year

2024

(5.1.1.8) Timeframes covered

Select all that apply

☒ Other, please specify :AIB Climate scenarios are available at 5-year intervals until 2100

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☒ Climate change (one of five drivers of nature change)

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

The Group's scenario analysis incorporates key assumptions, uncertainties, and constraints across both transition and physical climate risks. Assumptions include the application of climate-related scenarios to the Group's credit and treasury portfolios, with a focus on the loan book where the most material impacts are expected. Scenario testing enables the Group to assess the interconnectedness of risks, considering not only direct physical risks but also transition risks arising from shifts in market dynamics, investor sentiment and regulatory landscapes. Physical risk assumptions are grounded in IPCC Representative Concentration Pathways (RCPs 2.6 to 8.5), which project varying levels of CO₂ concentration and temperature anomalies through 2100. The Group's enhanced flood-risk model assumes property-level exposure to river, coastal, and surface water flooding, with damage estimated using building type, flood type, and rebuild costs. Uncertainties include the timing and severity of climate-related policy changes, the evolution of physical climate impacts, and the indirect macroeconomic effects such as interest rate trajectories. Constraints include the flood model's inability to estimate joint probabilities of flooding across multiple properties, which is mitigated by applying geographically consistent stress scenarios. The scenario analysis currently excludes direct upstream impacts and non-credit transmission channels. The analysis covers all customer loans and advances on the balance sheet and informs broader stress testing.

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[Add row]

(5.1.2) Provide details of the outcomes of your organization's scenario analysis.

Climate change

(5.1.2.1) Business processes influenced by your analysis of the reported scenarios

Select all that apply

- ☒ Risk and opportunities identification, assessment and management
- ☒ Strategy and financial planning
- ☒ Resilience of business model and strategy
- ☒ Capacity building
- ☒ Target setting and transition planning

(5.1.2.2) Coverage of analysis

Select from:

- ☒ Portfolio

(5.1.2.3) Summarize the outcomes of the scenario analysis and any implications for other environmental issues

Transition Risk: The scenario analysis confirmed that AIB holds sufficient capital to absorb potential transition risks under both structured and abrupt policy change scenarios, as validated in the 2024 ICAAP. These findings support strategic planning by identifying vulnerable sectors and customer segments, while reinforcing the Group's financial flexibility to respond to emerging climate-related risks. The analysis used two climate scenarios over a three-year horizon: a Paris-aligned scenario with gradual incentives, and a Sudden Realisation scenario with abrupt carbon pricing. These were translated into macroeconomic drivers and applied to the Group's balance sheet using the ICAAP credit stress testing engine. For Retail, carbon taxes were modelled against income and BER-linked mortgage affordability; for Non-Retail, sector-based emissions charges were used to simulate reduced profitability. While no immediate financial statement adjustments were required, the analysis highlighted the importance of monitoring policy shifts and customer exposure. Though focused on transition risk, the use of BER and sectoral emissions data also supports future integration of broader environmental issues such as energy efficiency and biodiversity. The analysis covered the full portfolio, with differentiation between Retail and Non-Retail exposures, and implicitly considered geographic exposure through national BER and sectoral emissions data. IEA NZE 2050 Transition Scenario: The key results of the IEA NZE scenario included defined Science Based Targets to 2030 for the Residential Mortgage and Electricity Generation portfolios including associated lending targets and strategies for AIB. The Board approved the validated financed emissions targets covering 75% of customer loans (as at 31.12.2021). The investment planning process was informed by the net zero trajectory, to meet targets to 2030 and beyond. Throughout 2024, we undertook a process to enhance the quality of our data alongside our decarbonisation models and methodologies, reflecting our commitment to more accurately measure emissions. As a result of this effort, we are revising our 2021 baseline for CRE from 135 kgCO₂e/m² to 116 kgCO₂e/m², while maintaining our current IEA pathway. This adjustment allows us to present a more accurate representation of our progress to date, while retaining our emissions reduction target of 67% by 2030. Physical Risk (RCP): AIB Group's scenario analysis has yielded key insights into the materiality of climate-related risks, particularly flooding, which has been identified as the most significant physical risk to the Group. The analysis is grounded in science-based scenarios, including IPCC Representative Concentration Pathways (RCPs) 2.6 to 8.5, and focuses on short-, medium-, and long-term horizons. A newly developed flood-risk model enables the Group to quantify expected annual damage at the

property level by overlaying flood maps for various return periods and applying rebuild cost estimates. This model supports the Group's ICAAP and broader stress testing framework, which integrates climate and environmental risks into the business model, capital adequacy planning, and financial resilience assessments. The outcomes of the scenario analysis have informed the Group's understanding of credit risk exposure across its loan portfolio and highlighted the need for timely mitigation actions. While the model enhances granularity, a known constraint is its inability to estimate joint flood probabilities across multiple properties, which is addressed through geographically consistent stress narratives. Although the analysis currently excludes upstream supply chain risks and other direct transmission channels, it provides a robust foundation for evaluating the Group's resilience and strategic response to climate-related challenges. No implications for other environmental issues beyond climate-related flooding and transition risks were identified in the current scope.

[Fixed row]

(5.2) Does your organization's strategy include a climate transition plan?

(5.2.1) Transition plan

Select from:

☒ Yes, we have a climate transition plan which aligns with a 1.5°C world

(5.2.3) Publicly available climate transition plan

Select from:

☒ Yes

(5.2.7) Mechanism by which feedback is collected from shareholders on your climate transition plan

Select from:

☒ We have a different feedback mechanism in place

(5.2.8) Description of feedback mechanism

Engagement with all our stakeholders is a high priority. Stakeholder views, interests and expectations are integral to our strategy and business model, and Board considers them in all its deliberations. To understand our stakeholders' views and best serve their interests, we engage through regular engagement channels, including due diligence processes, as well as through industry representative groups. Throughout 2024, the Board engaged directly with key stakeholders, including our colleagues, customers, suppliers, investors, regulators and the wider society and community, and the Board received management reports and updates on stakeholder matters.

(5.2.9) Frequency of feedback collection

Select from:

☒ Annually

(5.2.10) Description of key assumptions and dependencies on which the transition plan relies

Overall, a large portion of the decarbonisation levers that may enable us to realise our sustainability ambition of our lending portfolio to be Net Zero by 2050 are outside our direct control, such as government policy and the speed with which the electricity grid transition to renewables. For example, when setting decarbonisation reference scenarios and targets for our CRE and Residential Mortgage portfolios, we have relied on the projections set out in the Government's Climate Action Plan regarding building stock shifts from C+ rated properties to A or B rated properties through obsolescence, new builds and retrofit. We have also considered the projected decarbonisation of the Irish energy grid and the decrease in building energy-related emissions that would result. In light of these factors, we do not expect to make linear progress towards our targets each year. Similar to our peers, we recognise the challenges of implementing our strategy due to the evolving policy landscape, stringent regulatory requirements, ESG data limitations and the global struggle to stay on track for limiting long-term global warming to 1.5 degrees Celsius

(5.2.11) Description of progress against transition plan disclosed in current or previous reporting period

This reporting year is the first year that we have disclosed our Climate Transition Plan (Climate TP). Implementation of our plan is at an early stage. Our Climate TP brings all elements of our climate focused transition planning journey to date into one consolidated and forward-focused plan for future action - based on a strong foundation of measurement, evidence, transparency and disclosure, with a clear eye on what must happen next. Our Climate TP outlines our strategic ambitions; ESG risks associated with the transition and how we will manage them; levers and enablers in place to realise our decarbonisation ambitions; our targets and metrics across governance, operations and finance; and how we will ensure oversight, management and accountability for this Climate TP. In this way, we aim to reach our important sustainability KPIs and maintain a leading sustainability role, so we can support and empower more people to build a more sustainable future. We began reducing our own operational emissions in 2016 and, in 2020, AIB became the first Irish bank to make decarbonisation commitments, including our commitment to decarbonise our own operations by 2030 and our customer lending portfolios by 2050. We have set SBTi-validated targets for 75% of our loan book and in April 2023 were the first bank in the world to receive SBTi approved maintenance targets for electricity generation. We are also aiming for 70% of our new lending to be green or transition by 2030. Progress towards our decarbonisation is trending in the right direction, while 35% of all new lending was classified as green or transition in 2024. In funding and resourcing our transition, AIB has set an ambition to deploy €30bn in green and transition lending by 2030 and for 70% of new lending to be green or transition by this time. In addition, we have continued to raise funds for the transition through green and social bonds, giving us the proceeds to support even more sustainable projects.

(5.2.12) Attach any relevant documents which detail your climate transition plan (optional)

aib-group-plc-afr-report-2024 (1).pdf

(5.2.13) Other environmental issues that your climate transition plan considers

Select all that apply

☒ Biodiversity

(5.2.14) Explain how the other environmental issues are considered in your climate transition plan

In recent years, we have further developed our approach to C&E to more clearly articulate our nature strategy and to integrate nature considerations into both our business strategy and risk management approach. Nature considerations are location specific and often site-specific. AIB has carried out detailed mapping exercises to identify any own premises located in areas of biodiversity sensitivity. In addition, a business environment scan has been carried out to understand risks to our business as well as areas where AIB and our customers have greatest potential impact on nature and dependencies on specific ecosystem services (e.g. fresh water, soil quality). Understanding Nature risks, impacts and dependencies is complex. Best practice continues to evolve as will AIB's approach. With regard to the degradation of ecosystems and biodiversity loss and their potential reflective influence with climate-related risks, we are also considering the development of metrics and targets that could further assist our focus in protecting nature and biodiversity.

[Fixed row]

(5.3) Have environmental risks and opportunities affected your strategy and/or financial planning?

(5.3.1) Environmental risks and/or opportunities have affected your strategy and/or financial planning

Select from:

☒ Yes, both strategy and financial planning

(5.3.2) Business areas where environmental risks and/or opportunities have affected your strategy

Select all that apply

☒ Products and services

☒ Upstream/downstream value chain

☒ Investment in R&D

☒ Operations

[Fixed row]

(5.3.1) Describe where and how environmental risks and opportunities have affected your strategy.

Products and services

(5.3.1.1) Effect type

Select all that apply

- ☒ Risks
- ☒ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

- ☒ Climate change

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

Growing regulatory pressure, consumer awareness, and the tangible impacts of climate change have significantly increased demand for sustainable financial products and services. In response, AIB recognises its long-term role in financing Ireland's transition to a low-carbon economy. For example, we set an ambitious target to provide €30bn in new green and transition lending by 2030, supporting national and global decarbonisation efforts. This strategic shift is driven by both risk (e.g., transition risk, regulatory change, reputational risk) and opportunity (e.g., new market segments, customer demand for green products, increased asset valuations). To deliver real, transformative action, we established Climate Capital, a dedicated green financing division focused on renewables technology across North America, the UK, and Europe, complementing our Retail Banking, Capital Markets, and AIB UK segments. Our green and transition products now serve personal, SME, and corporate customers, with a focus on energy, climate, and infrastructure projects. AIB was the first Irish bank to publish a Green Bond Framework (2019) and issue a Green Bond (2020), raising €4.65bn to date, including €650m in 2024. By the end of 2024, green lending accounted for 35% of all new lending, and Green Mortgages represented 53% of overall mortgage lending. We have also expanded our green mortgage offerings across three brands (AIB, EBS, Haven), launched the AIB Green Personal Loan and Haven Green Mortgage, and enhanced our propositions to support home retrofits and energy efficiency. Strategic decisions—such as scaling green lending, issuing green bonds, and investing in new product development—are made through robust governance, informed by materiality assessment, stakeholder engagement, and the mitigation hierarchy, ensuring AIB can both manage climate-related risks and capture emerging opportunities in the evolving financial landscape.

Upstream/downstream value chain

(5.3.1.1) Effect type

Select all that apply

- ☒ Risks
- ☒ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

☒ Climate change

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

We employ a broad range of suppliers across multiple categories, with 4,003 active suppliers on our database and we transacted with 2528 of these in 2024. Active suppliers are all suppliers that have been paid within the last 12 months. Since 2016 we have been encouraging our top tier suppliers to disclose carbon emissions details through CDP and encouraged them to join us in our pledge to do more. The suppliers were invited directly to join CDP reporting and AIB's supplier relationship management team supported the supplier in registration. In 2024, the number of suppliers who participated in reporting to the CDP was 65, which represented 50% of the AIB suppliers invited. AIB suppliers must adhere to all legal obligations in each jurisdiction in which they operate or provide services (e.g. environmental and labour law), as well as any specific requirements included in our own policies. Key suppliers must attest annually to key policies (or clauses in them that are relevant to our supply chain). These include our Code of Conduct, Conflicts of Interest policy, Anti-Bribery & Corruption policy, Data Protection policy, Speak Up policy and our Human Rights Commitment. In 2020 we launched our Responsible Supplier Code which sets out our expectations of suppliers, and includes the responsible and ethical behaviours we look for in the companies with whom we do business. Based on our Code of Conduct, the Responsible Supplier Code also references our Anti-Bribery & Corruption policy, Conflicts of Interests policy, Human Rights Commitment and our Speak Up policy. As such, we will only do business with suppliers that adhere to this Code; we require evidence that our suppliers have an ESG plan in place or are working towards putting one in place; and all successful suppliers are required to join the Supplier Financial Qualification System (SFQS).

Investment in R&D

(5.3.1.1) Effect type

Select all that apply

☒ Risks

☒ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

☒ Climate change

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

Ireland's Climate Action Plan has set a ten year ambition to decarbonise five key sectors of the economy – electricity, transport, built environment, industry and agriculture. We see a key role for AIB in helping to address the environmental issues where we operate and in providing finance to support our customers (existing and new and across all our operations) – to decarbonise in these sectors. Case Studies: The Group has considered energy efficiency and energy saving as key

elements in reducing CO₂ emissions. Key initiatives to meet these targets are incorporated in our property and fleet strategies, our energy purchasing decisions (such as our virtual Corporate Power Purchase Agreement), and actions taken to continuously increase our energy efficiency (e.g. increasing our real-time energy monitoring capabilities). In relation to our property, we are continuously improving our existing branch and office building estate to reduce its energy consumption, carbon footprint and reliance on fossil fuels. Lighting across our estate is set to be more efficient through a multi-year LED upgrade programme. Installation on a broad spectrum of lighting infrastructure will bring energy and cost reduction – typically, LEDs provide an energy reduction of 40-60% – in addition to a better operating environment for staff and customers, and a lower maintenance requirement. In addition this programme aligns with the continual improvement of energy efficiency as per the ISO 50001 International Standard and fully supports our Net Zero Operational ambition by reducing Scope 2 GHG emissions. To date an investment of c. 2.4m has been allocated to this programme in order to enhance the working environment of the upgraded locations, and reduce operational costs, energy consumption and related carbon emissions.

Operations

(5.3.1.1) Effect type

Select all that apply

- ☒ Risks
- ☒ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

- ☒ Climate change

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

As a bank our building network spans Ireland as well as having a presence in the UK and the USA. While we are not operating in an emissions intensive sector, we recognise our property portfolio nonetheless could have a significant footprint if not actively managed. Since 2018 we have embarked on a strategic review of our operations starting with those based in older, inefficient buildings – and any new buildings we intend to occupy must have high energy efficiency and limited environmental impact. Case study: In October 2024 AIB announced it is investing €40million to upgrade the majority of its 170 strong branch network, itself the largest of any financial institution in the country. The branch upgrade will cover 112 branches nationwide, including 35 refurbishments. It will incorporate investment in banking halls and ATMs. The investment programme will also enhance the sustainability of the branch buildings and reduce AIB's overall operational carbon emissions by a further 10 per cent. When combined with the certified renewable electricity generated from two dedicated solar farms in Wexford, this will help deliver on AIB's objective to be net zero by 2030 in terms of the emissions it generates itself and from the energy it procures.

[Add row]

(5.3.2) Describe where and how environmental risks and opportunities have affected your financial planning.

Row 1

(5.3.2.1) Financial planning elements that have been affected

Select all that apply

- | | |
|---|--|
| <input checked="" type="checkbox"/> Assets | <input checked="" type="checkbox"/> Capital allocation |
| <input checked="" type="checkbox"/> Revenues | <input checked="" type="checkbox"/> Capital expenditures |
| <input checked="" type="checkbox"/> Direct costs | |
| <input checked="" type="checkbox"/> Indirect costs | |
| <input checked="" type="checkbox"/> Access to capital | |

(5.3.2.2) Effect type

Select all that apply

- ☒ Risks

(5.3.2.3) Environmental issues relevant to the risks and/or opportunities that have affected these financial planning elements

Select all that apply

- ☒ Climate change

(5.3.2.4) Describe how environmental risks and/or opportunities have affected these financial planning elements

AIB has publicly communicated ambitions to achieve net zero and increase our proportion of sustainable lending in our customer lending portfolio. In 2022, we set financed emissions targets for three sectors using a Sector Decarbonisation Approach (SDA) – i) Residential Mortgages; ii) Commercial Real Estate; and iii) Electricity Generation, and a fourth Corporate Portfolio Coverage Target, all of which have been validated by SBTi. A significant proportion of the decarbonisation levers are outside of AIB's direct control, and, as such, we rely on regulation, policy, technology adoption, market trends and consumer behaviours. Progress towards the achievement of our targets will help us mitigate Climate & Environmental risks and achieve our ambition of net zero and increase our sustainable lending. We measure, monitor and report the targets and associated business actions whilst acknowledging that progress may not be linear on a year-on-year basis given the reliance on external developments. Additionally, we consider the financial effects of climate and environment on our business within three key processes in particular: Revenue Consideration: As part of our business and financial planning, each AIB business area is required to assess how meeting climate targets will impact projected revenues. This includes evaluating opportunities for growth in sustainable lending, such as financing energy efficiency measures and supporting customers transitioning to a low-carbon economy. Our ambition of €30bn of new lending from 2019-2025 is a key enabler in generating future revenue streams aligned with climate goals. Direct Cost Consideration: The financial impact of our decarbonisation strategy includes direct costs such as investments in internal systems for

emissions tracking, compliance with climate-related regulations, and operational adjustments needed to align with net-zero targets. These are factored into our strategic planning to ensure alignment with the Paris Agreement and long-term business sustainability. Indirect Cost Consideration: We also account for indirect costs arising from external dependencies, including regulatory changes, evolving market expectations, technology adoption, and shifts in consumer behaviour. These factors influence our scenario analysis and risk assessments, which include both short- and long-term transition and physical climate risks. These analyses help us understand potential financial exposures and inform strategic decisions.

[Add row]

(5.10) Does your organization use an internal price on environmental externalities?

	Use of internal pricing of environmental externalities	Environmental externality priced
	Select from: <input checked="" type="checkbox"/> Yes	Select all that apply <input checked="" type="checkbox"/> Carbon

[Fixed row]

(5.10.1) Provide details of your organization's internal price on carbon.

Row 1

(5.10.1.1) Type of pricing scheme

Select from:

☒ Other, please specify :In accordance with the ECB guide on climate related and environmental risks which set out key expectations regarding loan pricing, AIB considers Climate and Environmental risk factors as part of its approach to risk pricing.

(5.10.1.2) Objectives for implementing internal price

Select all that apply

- ☒ Drive energy efficiency
- ☒ Stress test investments

- ☒ Influence strategy and/or financial planning
- ☒ Inform credit risk assessments for new loans

- ☒ Drive low-carbon investment
- ☒ Reduce upstream value chain emissions
- ☒ Identify and seize low-carbon opportunities
- ☒ Use an internal price for corporate engagement/stewardship purposes
- ☒ Incentivize consideration of climate-related issues in decision making
- ☒ Incentivize consideration of climate-related issues in risk assessment
- ☒ Inform credit risk assessments for renewals of terms for existing loans
- ☒ Identify and evaluate financing opportunities
- ☒ Setting and/or achieving of climate-related policies and targets
- ☒ Inform credit risk assessments for existing loans or credit lines

(5.10.1.3) Factors considered when determining the price

Select all that apply

- ☒ Scenario analysis
- ☒ Benchmarking against peers
- ☒ Existing or pending legislation
- ☒ Alignment to scientific guidance
- ☒ Alignment to international standards
- ☒ Social cost of climate-related impact
- ☒ Price/cost of renewable energy procurement
- ☒ Price with substantive impact on business decisions

(5.10.1.4) Calculation methodology and assumptions made in determining the price

AIB has strategically mobilized significant capital in favour of climate risk mitigation activities through AIB Climate Capital. We implement a process which optimises regulatory capital for lending in this area which meets Banking regulation criteria (CRR 501a). A number of green and transition products are available to AIB customers, for example, green mortgages offering attractive pricing to raise awareness and encourage adoption, reduced margin on sustainability-linked loans for large corporates where progress is made in line with transition plans, and reduced margin for development funding which is eligible for an external accreditation. Internal funds transfer pricing rules provide for reduced funding costs for loans eligible as Green or Social bond collateral. The energy efficiency of residential property (as measured via EPC certificates) reflects transition risk in our book and is therefore also a factor in determining capital to be held for new mortgages, which in turn feeds into pricing through Return on Capital calculations.

(5.10.1.5) Scopes covered

Select all that apply

- ☒ Scope 3, Category 15 – Investments

(5.10.1.6) Pricing approach used – spatial variance

Select from:

☒ Other, please specify :In accordance with the ECB guide on climate related and environmental risks which set out key expectations regarding loan pricing, AIB considers Climate and Environmental risk factors as part of its approach to risk pricing.

(5.10.1.8) Pricing approach used – temporal variance

Select from:

☒ Other, please specify :In accordance with the ECB guide on climate related and environmental risks which set out key expectations regarding loan pricing, AIB considers Climate and Environmental risk factors as part of its approach to risk pricing.

(5.10.1.10) Minimum actual price used (currency per metric ton CO2e)

0

(5.10.1.11) Maximum actual price used (currency per metric ton CO2e)

0

(5.10.1.12) Business decision-making processes the internal price is applied to

Select all that apply

☒ Operations

☒ Procurement

☒ Remuneration

☒ Product and R&D

☒ Risk management

☒ Capital expenditure

☒ Opportunity management

☒ Value chain engagement

(5.10.1.13) Internal price is mandatory within business decision-making processes

Select from:

☒ Yes, for all decision-making processes

(5.10.1.14) % total emissions in the reporting year in selected scopes this internal price covers

100

(5.10.1.15) Pricing approach is monitored and evaluated to achieve objectives

Select from:

☒ Yes

(5.10.1.16) Details of how the pricing approach is monitored and evaluated to achieve your objectives

The cumulative green and transition lending drawdown is a measurement of total cumulative green lending over the period of 2019-2030, which is included in AIB's green and transition lending and adheres to criteria outlined in AIB's Sustainable Lending Framework. We provided €11.6bn of green lending between 2019 and 2023, and in 2024, we provided a further €5.1bn of green lending as we progress towards our target. In line with our strategic commitment to supporting customers in the transition to a sustainable future, AIB provides green lending and finances energy efficiency infrastructure and technology development for climate change mitigation and adaptation solutions. We also acknowledge that our financed emissions have negative impacts on climate change. These are linked to our lending activities and exposures to certain high GHG-emitting sectors, and we have therefore committed to greening our business and decarbonising our loan book by setting financed emission targets and integrating ESG criteria into our lending and investment strategies.

[Add row]

(5.11) Do you engage with your value chain on environmental issues?

	Engaging with this stakeholder on environmental issues	Environmental issues covered
Clients	Select from: <input checked="" type="checkbox"/> Yes	Select all that apply
Suppliers	Select from: <input checked="" type="checkbox"/> Yes	Select all that apply <input checked="" type="checkbox"/> Climate change
Smallholders	Select from: <input checked="" type="checkbox"/> Yes	Select all that apply
Investors and shareholders	Select from: <input checked="" type="checkbox"/> Yes	Select all that apply <input checked="" type="checkbox"/> Climate change

	Engaging with this stakeholder on environmental issues	Environmental issues covered
Other value chain stakeholders	<i>Select from:</i> <input checked="" type="checkbox"/> Yes	<i>Select all that apply</i> <input checked="" type="checkbox"/> Climate change

[Fixed row]

(5.11.3) Provide details of your environmental engagement strategy with your clients.

Row 1

(5.11.3.1) Type of clients

Select from:

☒ Clients of Banks

(5.11.3.2) Environmental issues covered by the engagement strategy

Select all that apply

☒ Climate change

(5.11.3.3) Type and details of engagement

Capacity building

☒ Support clients to set their own environmental commitments across their operations

Financial incentives

☒ Provide financial incentives for progress against climate-related targets

(5.11.3.4) % of client-associated scope 3 emissions as reported in question 12.1.1

Select from:

☒ Unknown

(5.11.3.5) % of portfolio covered in relation to total portfolio value

Select from:

☒ 51-75%

(5.11.3.6) Explain the rationale for the coverage of your engagement

We want to encourage our customers to go green. As we aim to reach net zero across our customer portfolio, we do this by providing a range of products and services that will enable our customers to reduce their own carbon emissions. AIB has a suite of green products and propositions that support our customers in building a sustainable future. These actions relate to our responsible lending policies, which govern the provision of a range of products to support climate change mitigation activities and support us in managing our material impacts, risks, and opportunities. We offer Green Mortgages across AIB, EBS and Haven, with favourable interest rates available for energy efficient homes. All three entities provide Green Mortgages to homes with a BER of between A1 and B3 to new and existing mortgage customers, including customers seeking to switch their mortgage. We offer green loans to personal customers who are looking to make a lifestyle change in their home or transport options. As an example, Nifti, our joint venture with Nissan Ireland Ltd for both business and personal customers, offers an alternative to owning a car, with new car-leasing options including electric and hybrid vehicles. We are committed to supporting businesses of all sizes. Through our partnership with the SBCI, we offer the Growth and Sustainability Loan Scheme. This is a long-term, low-cost loan scheme to support our customers in business and agriculture. AIB also places great importance on educating customers and clients along their sustainability journeys. Sustainability is complex and everyone is trying to make better choices when faced with many challenges, including the cost of living. Educating customers is central to supporting their transitions, as well as deploying our green and transition lending, achieving our green and transition lending targets, our financed emissions reduction targets and reducing C&E risk. We also have a SBTi validated Corporate Portfolio Coverage target, an engagement target, which aims to drive the adoption of SBTi aligned targets and emissions reductions across large corporates in all sectors. We established this target in 2021 to increase the proportion of our corporate loan book covered by emissions reduction targets from 12% to 54% by 2030 from a 2021 baseline. The target scope covers 12% of our loan book. In 2024, we increased our % portfolio coverage to 27%.

(5.11.3.7) Describe how you communicate your engagement strategy to your clients and/or to the public

We collaborate with our customers by advising them on their transition pathway through dedicated sustainability champions, an in-house Sustainability Research function, customer events and webinars and an enhanced sustainability advisory services offering, provided via Goodbody Clearstream. We have dedicated educational resources, available on our website, to support our customers in building a more sustainable future, such as: Sector Sustainability Guides and the AIB Green Living Hub. Additionally, our commitment to educating our customers is reflected in our 'SME Steps to Sustainability' resource for SME businesses to guide them to take sustainable action. We developed this resource in 2024, following conversations with SME customers and in partnership with many colleagues supporting SMEs across AIB. We also publish reports on our website of research carried out, such as the AIB Homes Retrofit Report, which highlights retrofit options, generous grants and competitively priced loans available to consumers wishing to improve their homes' energy efficiency. AIB also have a well-established approach to sustainability disclosures. Our CSRD Sustainability Statement lies within our Annual Financial Report and provides progress updates on all sustainability related targets and actions taken. Our Sustainability Statement goes through limited assurance and is a reliable source of accurate information for our clients.

(5.11.3.8) Attach your engagement strategy

aib-group-plc-afr-report-2024[1].pdf

(5.11.3.9) Staff in your organization carrying out the engagement

Select all that apply

☒ Other, please specify :All staff. For our Corporate Portfolio Coverage target, customer-facing staff in AIB's Capital Markets Climate Capital team. Sustainability Performance Team prepare the sustainability disclosures.

(5.11.3.10) Roles of individuals at the portfolio organizations you seek to engage with

Select all that apply

☒ Other, please specify :Customers

(5.11.3.11) Effect of engagement, including measures of success

AIB have an ambition that 70% of all new lending will be green or transition by 2030, and that our €30bn Climate Action Fund will be fully deployed. We provided €11.6bn of green lending between 2019 and 2023, and in 2024, we provided a further €5.1bn of green lending as we progress towards our target of deploying €30bn in green and transition finance by 2030. This equates to 35% of total new lending in 2024 being classified as green (from a 2019 baseline of 10%), in accordance with criteria outlined in our Sustainable Lending Framework. 53% of all new mortgage lending across the Group was to energy efficient homes in 2024. Delivering for our customers whilst steering finance towards green and transition activities is an important way in which we can reduce our C&E risks and support the transition to a more sustainable future. We also reduce C&E risk by engaging with our customers through our ESG Questionnaire. An ESG Questionnaire is required for all new lending over €/£/\$1m in high and moderate transition risk sectors, and for all annual reviews of Borrowers with an exposure over €/£/\$10m in high and moderate transition risk sectors. An ESG Questionnaire is also required for material waiver requests for Borrowers with limits over €/£/\$1m in high transition risk sectors. Progress against our SBTi validated Corporate Portfolio Coverage target is tracked internally and disclosed externally using a % portfolio coverage metric. Success is measured based on total exposures to in-scope large corporates with SBTi validated targets in place, aligning with SBTi guidance. AIB's % portfolio coverage in 2024 is largely on track at 27%, increasing from a % portfolio coverage of 16% in 2023. To drive progress against our target and to encourage our customers to set science based emissions reduction targets, client engagement is undertaken as part of AIB's ESG Questionnaire, used in credit applications for borrowers identified as carrying increased transitional, environmental, social and/or governance related risk where new lending is over €/£ 1 million.

(5.11.3.12) Escalation process for engagement when dialogue is failing

Select from:

☒ Yes, we have an escalation process

(5.11.3.13) Describe your escalation process

While we strive to always provide the most positive experience for our customers, we will not always get it right. When this happens, we believe in accountability. Customers and the wider community can engage with us through our complaint management process, where their grievances are treated with confidentiality and respect. AIB has a structured escalation process in place through its Complaints Management Policy, which governs how customer grievances, including those related to environmental concerns, are handled. If a customer or member of the wider community raises a concern, they can engage with AIB through multiple channels—online, by post, or by phone. Where possible, complaints are resolved quickly at a local level. If not, they are escalated to the Centralised Complaints Management team for further investigation. If negative impacts do arise for our customers, AIB has a process in place and channels are available online, by post or by phone, to remediate negative impacts via the complaint management system. Where possible, we resolve complaints quickly at a local level. Otherwise, they are forwarded to our Centralised Complaints Management team. We use root cause analysis to examine, track and monitor complaints. These processes and channels are governed by our Complaints Management Policy. The policy outlines the roles and responsibilities, governance requirements and minimum standards required for effective complaints management to provide the best outcomes for our customers, in line with our regulatory obligations.

[Add row]

(5.11.7) Provide further details of your organization's supplier engagement on environmental issues.

Climate change

(5.11.7.2) Action driven by supplier engagement

Select from:

☒ Upstream value chain transparency and human rights

(5.11.7.3) Type and details of engagement

Capacity building

☒ Support suppliers to set their own environmental commitments across their operations

Information collection

☒ Collect environmental risk and opportunity information at least annually from suppliers

☒ Collect GHG emissions data at least annually from suppliers

Innovation and collaboration

☒ Other innovation and collaboration activity, please specify :AIB hosted a Supplier Summit in 2024 to discuss new challenges, opportunities and face to face networking with the backdrop of empowering people to build a sustainable future.

(5.11.7.4) Upstream value chain coverage

Select all that apply

☒ Tier 1 suppliers

(5.11.7.5) % of tier 1 suppliers by procurement spend covered by engagement

Select from:

☒ 1-25%

(5.11.7.6) % of tier 1 supplier-related scope 3 emissions covered by engagement

Select from:

☒ 1-25%

(5.11.7.9) Describe the engagement and explain the effect of your engagement on the selected environmental action

AIB engages Tier 1 suppliers through capacity building, data collection, and collaboration to support environmental action. We ask every tender and current suppliers to attest to our Responsible Supplier Code which sets out our expectations of our suppliers and the minimum standards they must meet regarding human rights, health and safety, supply chains, inclusion and diversity, and responsible and sustainable business. We support suppliers in setting their own environmental commitments by encouraging CDP disclosure, with 50% of invited suppliers reported in 2024. Through our ESG Questionnaire, we collect annual data on GHG emissions, climate risks, and ESG policies, providing a baseline and roadmap for improvement for a number of suppliers. This enables us to benchmark suppliers, identify risks and opportunities, and align values. Our SRM standard encapsulates best practice which promotes mutually beneficial relationships, coupled with effective risk management. In November 2024, we welcomed our top 100 suppliers to a Supplier Summit in Molesworth Street. The purpose of the Summit was to strengthen collaboration, align our suppliers with our purpose, and reinforce their critical role in helping us achieve our strategic goals across Customer First, Greening the Business and Operational Efficiency. These actions contribute to our sustainability strategy by embedding ESG into procurement and supporting suppliers to improve their environmental performance.

(5.11.7.11) Engagement is helping your tier 1 suppliers engage with their own suppliers on the selected action

Select from:

☒ Yes

[Add row]

(5.11.8) Provide details of any environmental smallholder engagement activity

Row 1

(5.11.8.1) Commodity

Select from:

☒ Timber products

(5.11.8.2) Type and details of smallholder engagement approach

Capacity building

☒ Disseminate technical materials

☒ Organize capacity building events

(5.11.8.3) Number of smallholders engaged

0

(5.11.8.4) Effect of engagement and measures of success

Often times forestry is a partial activity on a smallholding/farm. Ireland has a national vision for the role of our forests and trees to 2050, and part of realising that vision is the Forestry Programme 2023-2027. As part of this approach, we have introduced strong supports for small scale planting on farms through the Native Tree Area Scheme for areas of up to 1 hectare. The incentives provide a great way for farmers to dip the toe in forestry to see what a positive addition to the farm system it can be. Additionally, through our Group wide Sustainable Lending Framework (SLF) AIB has committed to support Sustainable Agriculture, Forestry and Fishing. This demonstrates support of the UN SDG 15 (Life on Land) and 12 (Responsible Consumption and Production). The Green eligibility criteria for Forestry are as follows: - Land purchase for forestry establishment or existing forestry plantation - Forestry activities undertaken in compliance with Sustainable Forestry Management (SFM) requirements and certified by recognised bodies e.g. Forest Stewardship Council (FSC), Programme for the Endorsement of Forestry (PEFC). AIB partnered with Coillte and Forestry Partners in the past to plant 90,000 native Irish trees. We continue to ensure we are capturing opportunities in this important biodiversity theme. Due to the nature of forestry being a partial activity on a smallholding or farm, it is not possible to get an accurate indication of number of smallholders engaged and measures of success regarding timber.

Row 2

(5.11.8.1) Commodity

Select from:

☒ Cattle products

(5.11.8.2) Type and details of smallholder engagement approach

Capacity building

- ☒ Disseminate technical materials
- ☒ Offer on-site technical assistance and extension services
- ☒ Organize capacity building events

Smallholder financing

- ☒ Use of government subsidized financing schemes

Smallholder insurance

- ☒ Provide financial incentives for sustainable practices

(5.11.8.3) Number of smallholders engaged

30000

(5.11.8.4) Effect of engagement and measures of success

In terms of the effect of AIB's engagement in farming, our specialist Agriculture team has the experience, understanding and track record of supporting the sector so it can continue to develop and thrive sustainably. It comprises 15 people based around the country, including a Head of Sustainability for Agriculture, Food & Fishing. It provides strong, objective farm financial and technical analysis on individual farm cases as needed. AIB produces a biannual ezine "Agri Matters " for our customers interested in the latest developments and news from Ireland's agriculture sector. This ezine is circulated to 30,000 customers and Agri industry personnel, and is intended to bolster our support of this sector, offering tailored economic and investment information, while profiling customers with interesting success stories. We also share information from our partners, including Teagasc, which is currently running a regular feature on its Signpost programme, an advisory programme supporting climate and sustainability actions on farms. AIB is the exclusive financial institution partner with the Farm Zero C project, based in Shinagh, West Cork. Farm Zero C, a joint project with Carbery, the West Cork-based international food ingredients company, and BiOrbic, Ireland's National Bioeconomy Research Centre, aims to create an economically viable, climate neutral model for Irish dairy farming. This project brings together a group of research and industry experts in a world-first attempt to come up with a farm-level solution for a global problem, and we will support it every step of the way. A progress report was published in 2024, which included the following updates: • There has been a 27% reduction in the carbon footprint of Farm Zero C over six years (2018 to 2023). • Almost all of the chemical nitrogen fertiliser spread on the farm (96.5% in 2023) is now protected urea (46% N). This supports a reduction in ammonia emissions by over 70%, it has also proven cost effective per kg of chemical nitrogen applied with equivalent amounts of grass grown. • An automated dosing system using GasAbate by

Glasport Bio has been implemented to enhance the effectiveness of slurry, reducing both methane and ammonia emissions. •
reduced chemical nitrogen use from 248 kg/ha in 2018 to 114 kg/ha in 2023, a 54% reduction.
[Add row]

The farm has significantly

(5.11.9) Provide details of any environmental engagement activity with other stakeholders in the value chain.

Climate change

(5.11.9.1) Type of stakeholder

Select from:

☒ Other value chain stakeholder, please specify :As part of our DMA process, we engaged with customers, investors and suppliers, representatives of industry associations and non-governmental organisations.

(5.11.9.2) Type and details of engagement

Other

☒ Other, please specify :We engaged with customers, investors and suppliers through surveys. We engaged through working sessions with representatives of industry associations and non-governmental organisations in relation to the interests and views of the wider community.

(5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:

☒ Unknown

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

We carried out a DMA process to identify and assess our material sustainability matters from an impact and financial materiality perspective. We engaged some stakeholder groups to provide inputs on impact materiality, while others assessed topics from both impact and financial materiality perspectives. We determined this based on assumptions about their level of expertise and the stakeholder group category. Affected stakeholders provided input from an impact materiality perspective, while users of the sustainability statement provided input from both impact and financial materiality perspectives. We tailored the assessment process to internal and external stakeholders, and their expertise levels, to ensure effective engagement and reliable DMA outcomes. Our colleagues assessed the IROs for each topic across impact and financial materiality parameters (as detailed below in steps 3 and 4). External stakeholders provided their input on material topics on a scale of 0 – 5, ranging from not material to critical. The results were first calculated within each stakeholder group and then consolidated by taking a weighted average across all

stakeholder groups. We assigned weightings to each stakeholder group. To support the prioritisation of material IROs, all scores were consolidated in an overall scale of 0 – 5, ranging from none, minimal, informative, important, significant and critical. We set our materiality threshold to include topics ranked from the high end of important up to critical. IROs scoring above this threshold and the associated topics are deemed to be material. As detailed in step 5 below, the results were validated by internal stakeholders and representatives of external stakeholder groups, and then reviewed, challenged and approved through the GSC.

(5.11.9.6) Effect of engagement and measures of success

As a result of the DMA process we have identified seven material topics. Climate change is identified as a material topic, both from an impact and financial materiality perspective. The Group is continuously working on integrating the DMA process, including the identification of risks and opportunities, in terms of the overall planning, risk management and internal controls as applicable. In 2024, we began a new three-year strategic cycle and our Climate Capital segment became fully operational. We reviewed the DMA, as required by the ESRS, and concluded that the foundational work from 2023 continues to provide a reliable basis for our sustainability reporting and strategic decision-making processes.

Climate change

(5.11.9.1) Type of stakeholder

Select from:

☒ Investors and shareholders

(5.11.9.2) Type and details of engagement

Education/Information sharing

☒ Share information on environmental initiatives, progress and achievements

☒ Other education/information sharing, please specify :Attend ESG focused Investor events/meetings.

Innovation and collaboration

☒ Collaborate with stakeholders in creation and review of your climate transition plan

☒ Other innovation and collaboration, please specify :On request arrange meetings with AIB's Chief Strategy and Sustainability officer. Investor Relations provide invites to Investors to attend the annual Sustainability Conference.

Other

☒ Other, please specify :Investor Relations extend invite to Investors to provide input on the Bank's materiality exercise.

(5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:

☒ Unknown

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

Our rationale for engaging with our investors and shareholders is to inform and educate them on AIB’s sustainability strategy and provide a progress update. ESG investors are informed through our well-established approach to transparent sustainability disclosures. Our CSRD Sustainability Statement lies within our Annual Financial Report and provides progress updates on all sustainability related targets and actions taken. Our Sustainability Statement goes through limited assurance and is a reliable source of accurate information for our investors and shareholders. We also participate in and provide thought leadership and knowledge-sharing sessions. The eighth AIB Sustainability Conference opened Climate Finance Week in November 2024. With 11,481 hybrid attendees, it was the largest event to date, hosting impactful conversations with global figures and providing further opportunity for AIB to engage with investors and shareholders.

(5.11.9.6) Effect of engagement and measures of success

Following our investor meetings on the updates to the Green and Social Bond Frameworks we have seen an increase in the number of quality ESG funds, including new ‘dark green’ investors, participating in our green bond issuances demonstrating strong recognition of AIB’s ESG credentials. Recent Green Bond issuances are significantly oversubscribed with a tighter price achieved known as ‘the Greenium’. In recent years, the Group’s ESG bond issuance has supported €6.4bn of green and social collateral, with €0.65bn of that being issued in 2024. Of the €6.4bn in ESG Bonds issued to date, €4.65bn of these are green bonds. These proceeds contribute to the financing of projects with clear environmental and climate action benefits.

[Add row]

C6. Environmental Performance - Consolidation Approach

(6.1) Provide details on your chosen consolidation approach for the calculation of environmental performance data.

	Consolidation approach used	Provide the rationale for the choice of consolidation approach
Climate change	Select from: <input checked="" type="checkbox"/> Operational control	<i>The operational control approach has been taken to account for 100% of the GHG emissions from within our operations.</i>
Forests	Select from: <input checked="" type="checkbox"/> Operational control	<i>Forests is not yet a substantive material issue for the Group.</i>
Water	Select from: <input checked="" type="checkbox"/> Operational control	<i>Water is not yet a substantive material issue for the Group.</i>
Plastics	Select from: <input checked="" type="checkbox"/> Operational control	<i>Plastics is not yet a substantive material issue for the Group.</i>
Biodiversity	Select from: <input checked="" type="checkbox"/> Operational control	<i>Biodiversity is not yet a substantive material issue for the Group.</i>

[Fixed row]

C7. Environmental performance - Climate Change

(7.1) Is this your first year of reporting emissions data to CDP?

Select from:

☒ No

(7.1.1) Has your organization undergone any structural changes in the reporting year, or are any previous structural changes being accounted for in this disclosure of emissions data?

	Has there been a structural change?
	Select all that apply <input checked="" type="checkbox"/> No

[Fixed row]

(7.1.2) Has your emissions accounting methodology, boundary, and/or reporting year definition changed in the reporting year?

(7.1.2.1) Change(s) in methodology, boundary, and/or reporting year definition?

Select all that apply

☒ Yes, a change in methodology

(7.1.2.2) Details of methodology, boundary, and/or reporting year definition change(s)

In this reporting year, we refined our GHG emissions methodology to improve data accuracy and transparency. Updates were made to selected Scope 3 categories, including employee commuting and working from home (WFH) and water-related emissions. These updates were based on improved and more representative activity data and calculations, while emission factors remained unchanged. These changes enhance the accuracy and completeness of our Scope 3 reporting. For Scope 2 emissions, we have incorporated Guarantees of Origin (GoO) into our market-based accounting to reflect the renewable energy sourced through our Virtual Power Purchase Agreement (vPPA). This ensures our Scope 2 reporting accurately represents our decarbonisation strategy and renewable procurement efforts.
[Fixed row]

(7.1.3) Have your organization's base year emissions and past years' emissions been recalculated as a result of any changes or errors reported in 7.1.1 and/or 7.1.2?

(7.1.3.1) Base year recalculation

Select from:

☒ No, because the impact does not meet our significance threshold

(7.1.3.3) Base year emissions recalculation policy, including significance threshold

In accordance with the GHG Protocol, a material misstatement is deemed to be that returning a variance of greater than or equal to 5%. This applies to the baseline year and all subsequent reported years. In instances where, due to a change in calculation methodology, a structural change to the organisation or improvements in data accuracy, our emissions are materially misstated, AIB will update these figures in the subsequent annual reporting.

(7.1.3.4) Past years' recalculation

Select from:

☒ No

[Fixed row]

(7.2) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.

Select all that apply

☒ ISO 14064-1

- ☒ IEA CO2 Emissions from Fuel Combustion
- ☒ The Greenhouse Gas Protocol: Scope 2 Guidance
- ☒ US EPA Emissions & Generation Resource Integrated Database (eGRID)
- ☒ The Greenhouse Gas Protocol: Corporate Value Chain (Scope 3) Standard
- ☒ The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)
- ☒ US EPA Center for Corporate Climate Leadership: Indirect Emissions From Purchased Electricity
- ☒ US EPA Center for Corporate Climate Leadership: Direct Emissions from Stationary Combustion Sources
- ☒ Defra Environmental Reporting Guidelines: Including streamlined energy and carbon reporting guidance, 2019
- ☒ Other, please specify :Supply Chain Greenhouse Gas Emission Factors for US Industries and Commodities. U.S. Environmental Protection Agency. US EPA Center for Corporate Climate Leadership (Indirect Scope 3 emissions), SEAI, AIB (European Residual Mix) and CRU (SEM)

(7.3) Describe your organization's approach to reporting Scope 2 emissions.

	Scope 2, location-based	Scope 2, market-based	Comment
	<i>Select from:</i> <input checked="" type="checkbox"/> We are reporting a Scope 2, location-based figure	<i>Select from:</i> <input checked="" type="checkbox"/> We are reporting a Scope 2, market-based figure	n/a

[Fixed row]

(7.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1, Scope 2 or Scope 3 emissions that are within your selected reporting boundary which are not included in your disclosure?

Select from:

- ☒ No

(7.5) Provide your base year and base year emissions.

Scope 1

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

4784

(7.5.3) Methodological details

Scope 1 emissions were calculated using: A Corporate Accounting and Reporting Standard, Revised Edition (the GHG Protocol) and the UK Government's emission conversion factors for greenhouse gas company reporting (2019). The organisational boundary of AIB was defined as the company's operations and activities in Ireland, the UK and the US. Emissions were calculated from activities under AIB's operational control. We selected a 2019 baseline for our operational emissions targets as neither 2020 nor 2021 reflected a standard year's operation due to pandemic-related reductions.

Scope 2 (location-based)

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

10025

(7.5.3) Methodological details

Scope 2 (location-based) emissions were calculated using The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard, Revised Edition (the GHG Protocol); the UK Government's emission conversion factors for greenhouse gas company reporting (2019); CRU (SEM) and the International Energy Agency electricity emissions factors (2019). The organisational boundary of AIB was defined as the company's operations and activities in Ireland, the UK and the US. Emissions were calculated from activities under AIB's operational control. We selected a 2019 baseline for our operational emissions targets as neither 2020 nor 2021 reflected a standard year's operation due to pandemic-related reductions.

Scope 2 (market-based)

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

64

(7.5.3) Methodological details

Scope 2 (market-based) emissions were calculated using The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard, supplier-based emission factors and the EPA USA residual mix emission factors. The organisational boundary of AIB was defined as the company's operations and activities in Ireland, the UK and the US. Emissions were calculated from activities under AIB's operational control. We selected a 2019 baseline for our operational emissions targets as neither 2020 nor 2021 reflected a standard year's operation due to pandemic-related reductions.

Scope 3 category 1: Purchased goods and services

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

488

(7.5.3) Methodological details

Scope 3 PGAS emissions were calculated using The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard, the UK Government's emission conversion factors for greenhouse gas company reporting (2019) and CEDA. The organisational boundary of AIB was defined as the company's operations and activities in Ireland, the UK and the US. Emissions were calculated from activities under AIB's operational control.

Scope 3 category 2: Capital goods

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

129.0

(7.5.3) Methodological details

Scope 3 Capital Goods emissions were calculated using The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard and CEDA. The organisational boundary of AIB was defined as the company's operations and activities in Ireland, the UK and the US. Emissions were calculated from activities under AIB's operational control

Scope 3 category 3: Fuel-and-energy-related activities (not included in Scope 1 or 2)

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

5512.0

(7.5.3) Methodological details

Scope 3 Category 3 emissions were calculated using The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard, Revised Edition (the GHG Protocol); the UK Government's emission conversion factors for greenhouse gas company reporting (2019) and the International Energy Agency electricity emissions factors (2019). The organisational boundary of AIB was defined as the company's operations and activities in Ireland, the UK and the US. Emissions were calculated from activities under AIB's operational control.

Scope 3 category 4: Upstream transportation and distribution

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

As a financial institution, we are not involved in manufacturing activities. Our financial services are not physical products. These services are only linked to monetary transactions. Emissions related to upstream transportation and distribution are considered not material for the distribution of our services.

Scope 3 category 5: Waste generated in operations

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

199.0

(7.5.3) Methodological details

Scope 3 Category 3 emissions were calculated using The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard and Revised Edition (the GHG Protocol); the UK Government's emission conversion factors for greenhouse gas company reporting (2019) The organisational boundary of AIB was defined as the company's operations and activities in Ireland, the UK and the US. Emissions were calculated from activities under AIB's operational control.

Scope 3 category 6: Business travel

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

3845.0

(7.5.3) Methodological details

Scope 3 Category 3 emissions were calculated using The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard and Revised Edition (the GHG Protocol); the UK Government's emission conversion factors for greenhouse gas company reporting (2019) The organisational boundary of AIB was defined as the company's operations and activities in Ireland, the UK and the US. Emissions were calculated from activities under AIB's operational control.

Scope 3 category 7: Employee commuting

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

4287.0

(7.5.3) Methodological details

Scope 3 Category 3 emissions were calculated using The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard and Revised Edition (the GHG Protocol); the UK Government's emission conversion factors for greenhouse gas company reporting (2019) The organisational boundary of AIB was defined as the company's operations and activities in Ireland, the UK and the US. Emissions were calculated from activities under AIB's operational control.

Scope 3 category 8: Upstream leased assets

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Emissions associated from the operation of assets that are leased by AIB were included in Scope 1 and Scope 2 disclosed in previous sections. We calculated the emissions from these renting properties as if it were AIB owned properties. A new disclosure in this section will lead to emissions being double-counted.

Scope 3 category 9: Downstream transportation and distribution

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

As a financial institution, AIB is not involved in manufacturing activities. Our financial services are not physical products. These services are only linked to monetary transactions. Emissions related to downstream transportation and distribution are considered not relevant for the distribution of our services.

Scope 3 category 10: Processing of sold products

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

AIB is a financial services provider. This Scope 3 category is not applicable to us as we don't have any manufacturing operations. Our financial services are not physical products. These "products" are only linked to monetary transactions that do not require processing.

Scope 3 category 11: Use of sold products

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

The reason to consider this category not relevant is that AIB is a financial services provider. We don't have any manufacturing operations. AIB financial services are not physical products. These "sold products" are online services or intangible products therefore making this source of emissions not relevant.

Scope 3 category 12: End of life treatment of sold products

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

AIB is a financial services provider. We don't have any manufacturing operations. AIB financial services are not physical products. These are online services or intangible products that don't require and end of life treatment, therefore making this source of emissions not relevant

Scope 3 category 13: Downstream leased assets

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

In 2019, AIB did not lease assets to a third party, therefore these emissions were considered not relevant

Scope 3 category 14: Franchises

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

These Scope 3 emissions are not applicable as AIB does not have any franchises.

Scope 3: Other (upstream)

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

AIB has not identified any additional upstream emissions not already reported in other categories

Scope 3: Other (downstream)

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

AIB has not identified any additional downstream emissions not already reported in other categories

[Fixed row]

(7.6) What were your organization's gross global Scope 1 emissions in metric tons CO2e?

Reporting year

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

2945

(7.6.3) Methodological details

Emissions were calculated using The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard and Revised Edition; the UK Government's emission conversion factors for greenhouse gas company reporting, SEAI, IPPC, US EPA Center for Corporate Climate Leadership: Direct Emissions from Stationary Combustion Sources. The organisational boundary of AIB was defined as the company's operations and activities in Ireland, the UK and the US. Emissions were calculated from activities under AIB's operational control.

[Fixed row]

(7.7) What were your organization's gross global Scope 2 emissions in metric tons CO2e?

Reporting year

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

4440

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e)

511

(7.7.4) Methodological details

The organisational boundary of AIB was defined as the company's operations and activities in Ireland, the UK and the US. Emissions were calculated from activities under AIB's operational control. Emissions were calculated in line with GHG Protocol Scope 2 guidance. Location Based emissions were calculated using country-specific grid average emissions factors. As per: the UK Government's emission conversion factors for greenhouse gas company reporting, SEM (CRU) and USA EPA eGrid. Market Based emissions reflect our contractual instruments, including GoOs obtained through our virtual Power Purchase Agreement (vPPA), supplier-based emission factors and residual mix factors (the European residual mix (AIB) and Green e-residual emissions (US)) where no specific instruments were available.
[Fixed row]

(7.8) Account for your organization's gross global Scope 3 emissions, disclosing and explaining any exclusions.

Purchased goods and services

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

2785

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Average data method

☒ Spend-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

(7.8.5) Please explain

AIB use supplier water bills, and total spend on paper consumption to calculate these emissions. Within this category we also report emissions from data centres (co-located facilities not operated by AIB). Water: Water data shows only water supplied to AIB Group. Emissions factors used are based on DEFRA 2024 guidelines. Paper: Paper consumption is based on total spend per AIB division. Total emissions for paper were estimated using an economic input-output model which has used

emissions factors from the "Supply Chain Greenhouse Gas Emission Factors for US Industries and Commodities. U.S. Environmental Protection Agency". Data Centre: These are emissions associated with the energy use of the co-located datacentres. CRU (SEM) conversion factors used. The bank is analysing and studying the reliability and availability of more data related to this category to determine the incorporation of its emissions in subsequent years. AIB is a member of the CDP Supply Chain Programme.

Capital goods

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

1441

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Spend-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

(7.8.5) Please explain

Capital Goods is comprised of IT equipment. Total emissions for IT are estimated using an economic input-output model which has used emission factors from the "Supply Chain Greenhouse Gas Emission Factors for US Industries and Commodities. U.S. Environmental Protection Agency".

Fuel-and-energy-related activities (not included in Scope 1 or 2)

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

2379

(7.8.3) Emissions calculation methodology

Select all that apply

- ☒ Average data method
- ☒ Distance-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

(7.8.5) Please explain

WTT & TD emissions associated with AIB's energy use. Fuel and energy related activities includes all well-to-tank emissions and transmission and distribution loss emissions associated with all energy consumed by AIB. This was calculated using the Scope 1 and 2 fuel data (natural gas, diesel, kerosene, gas oil), Scope 2 electricity data, and Scope 3 business travel and commuting data, and applying the DEFRA and IEA Well-to-tank and transmission and distribution loss conversion factors.

Upstream transportation and distribution

(7.8.1) Evaluation status

Select from:

- ☒ Not relevant, explanation provided

(7.8.5) Please explain

As a financial institution, we are not involved in manufacturing activities. Our financial services are not physical products. These services are only linked to monetary transactions. Emissions related to upstream transportation and distribution are considered not material for the distribution of our services.

Waste generated in operations

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

22

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Waste-type-specific method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

(7.8.5) Please explain

Waste data is provided by our waste service providers and the use of water bills allows us to calculate water treatment emissions. Waste calculated categories include data gathered from the following waste streams: MSW mixed municipal waste, dry mixed recyclables, food & compost waste, C&D waste, C&I waste, cardboard waste, timber waste, paper waste, metal waste, water treatment waste, WEEE waste, grease trap waste, waste refrigerant gases and used cooking oil. Waste to landfill, waste recycled, waste recovered and waste composted were measured in tonnes on site. Relevant emissions factors sourced from DEFRA 2024 were used to calculate emissions.

Business travel

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

2656

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Distance-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

(7.8.5) Please explain

Business travel is divided into the following sections: air travel, bus travel, taxi, rail travel, ferry travel, car mileage and hotel stays. Relevant emissions factors sourced from DEFRA 2024 were used to calculate emissions. Business travel data is captured from suppliers and internal expenses management systems. As per best practice we have included hotel stays within the scope of business travel emissions.

Employee commuting

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

16470

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Average data method

☒ Distance-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

A WFH & Commuting survey was reissued to employees in Ireland and the UK to improve the accuracy of activity data, obtaining information of commuting travel patterns and WFH habits, including frequency and typical work set up. This survey was updated from previous years to improve accuracy of data collection, which has resulted in an increase of emissions year-on-year. In relation to commuting: Information collected in these jurisdictions is utilised to determine % of employees using each travel method and to calculate the distance per method of transport across the year. To account for the commuting of our US employees, the U. S. Census Bureau, 2023 American Community Survey was used to identify average journey times, journey distances and modes of travel for that region. Working from Home emissions were included for the first time, using a methodology informed by the Ecoact White Paper and DESNZ guidance, by applying factors for typical energy consumption per remote day. The relevant emission factors were sourced from DESNZ, the EPA Center for Corporate Climate Leadership, SEAI and residual mix data from Green-e and AIB.

Upstream leased assets

(7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

(7.8.5) Please explain

Emissions associated from the operation of assets which are leased by AIB have been included in Scope 1 and Scope 2 disclosed in previous sections. We calculated the emissions from these rental properties as if it were AIB owned properties. A new disclosure in this section will lead to emissions being double-counted.

Downstream transportation and distribution

(7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

(7.8.5) Please explain

As a financial institution, AIB is not involved in manufacturing activities. Our financial services are not physical products. These services are only linked to monetary transactions. Emissions related to downstream transportation and distribution are considered not relevant for the distribution of our services.

Processing of sold products

(7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

(7.8.5) Please explain

AIB is a financial services provider. This Scope 3 category is not applicable to us as we don't have any manufacturing operations. Our financial services are not physical products. These "products" are only linked to monetary transactions that do not require processing.

Use of sold products

(7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

(7.8.5) Please explain

The reason to consider this category not relevant is that AIB is a financial services provider. We don't have any manufacturing operations. AIB financial services are not physical products. These "sold products" are online services or intangible products therefore making this source of emissions not relevant.

End of life treatment of sold products

(7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

(7.8.5) Please explain

AIB is a financial services provider. We don't have any manufacturing operations. AIB financial services are not physical products. These are online services or intangible products that don't require and end of life treatment, therefore making this source of emissions not relevant

Downstream leased assets

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

56

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Average data method

☒ Fuel-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Scope 1 emissions from the lessee are estimated based on floor area occupied and building utility consumption. Scope 2 emissions from the lessee are calculated as per sub-metering information.

Franchises

(7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

(7.8.5) Please explain

These Scope 3 emissions are not applicable as AIB does not have any franchises.

Other (upstream)

(7.8.1) Evaluation status

Select from:
☒ Not relevant, explanation provided

(7.8.5) Please explain

AIB has not identified any additional upstream emissions not already reported in other categories

Other (downstream)

(7.8.1) Evaluation status

Select from:
☒ Not relevant, explanation provided

(7.8.5) Please explain

AIB has not identified any additional downstream emissions not already reported in other categories
[Fixed row]

(7.9) Indicate the verification/assurance status that applies to your reported emissions.

	Verification/assurance status
Scope 1	Select from: <input checked="" type="checkbox"/> Third-party verification or assurance process in place

	Verification/assurance status
Scope 2 (location-based or market-based)	<i>Select from:</i> <input checked="" type="checkbox"/> Third-party verification or assurance process in place
Scope 3	<i>Select from:</i> <input checked="" type="checkbox"/> Third-party verification or assurance process in place

[Fixed row]

(7.9.1) Provide further details of the verification/assurance undertaken for your Scope 1 emissions, and attach the relevant statements.

Row 1

(7.9.1.1) Verification or assurance cycle in place

Select from:

☒ Annual process

(7.9.1.2) Status in the current reporting year

Select from:

☒ Complete

(7.9.1.3) Type of verification or assurance

Select from:

☒ Limited assurance

(7.9.1.4) Attach the statement

(7.9.1.5) Page/section reference

2

(7.9.1.6) Relevant standard

Select from:

☒ ISO14064-3

(7.9.1.7) Proportion of reported emissions verified (%)

100

[Add row]

(7.9.2) Provide further details of the verification/assurance undertaken for your Scope 2 emissions and attach the relevant statements.

Row 1

(7.9.2.1) Scope 2 approach

Select from:

☒ Scope 2 location-based

(7.9.2.2) Verification or assurance cycle in place

Select from:

☒ Annual process

(7.9.2.3) Status in the current reporting year

Select from:

☒ Complete

(7.9.2.4) Type of verification or assurance

Select from:

☒ Limited assurance

(7.9.2.5) Attach the statement

AIB - GHG Emissions FY2024_ Limited Verification Statement v1.2_HJ_250826.pdf

(7.9.2.6) Page/ section reference

2

(7.9.2.7) Relevant standard

Select from:

☒ ISO14064-3

(7.9.2.8) Proportion of reported emissions verified (%)

100

Row 2

(7.9.2.1) Scope 2 approach

Select from:

☒ Scope 2 market-based

(7.9.2.2) Verification or assurance cycle in place

Select from:

☒ Annual process

(7.9.2.3) Status in the current reporting year

Select from:

☒ Complete

(7.9.2.4) Type of verification or assurance

Select from:

☒ Limited assurance

(7.9.2.5) Attach the statement

AIB - GHG Emissions FY2024_ Limited Verification Statement v1.2_HJ_250826.pdf

(7.9.2.6) Page/ section reference

2

(7.9.2.7) Relevant standard

Select from:

☒ ISO14064-3

(7.9.2.8) Proportion of reported emissions verified (%)

100
[Add row]

(7.9.3) Provide further details of the verification/assurance undertaken for your Scope 3 emissions and attach the relevant statements.

Row 1

(7.9.3.1) Scope 3 category

Select all that apply

- ☒ Scope 3: Capital goods
- ☒ Scope 3: Business travel
- ☒ Scope 3: Employee commuting
- ☒ Scope 3: Downstream leased assets
- ☒ Scope 3: Purchased goods and services
- ☒ Scope 3: Waste generated in operations
- ☒ Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2)

(7.9.3.2) Verification or assurance cycle in place

Select from:

- ☒ Annual process

(7.9.3.3) Status in the current reporting year

Select from:

- ☒ Complete

(7.9.3.4) Type of verification or assurance

Select from:

- ☒ Limited assurance

(7.9.3.5) Attach the statement

AIB - GHG Emissions FY2024_ Limited Verification Statement v1.2_HJ_250826.pdf

(7.9.3.6) Page/section reference

2

(7.9.3.7) Relevant standard

Select from:

- ☒ ISO14064-3

(7.9.3.8) Proportion of reported emissions verified (%)

100

[Add row]

(7.10) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?

Select from:

☒ Decreased

(7.10.1) Identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined), and for each of them specify how your emissions compare to the previous year.

Change in renewable energy consumption

(7.10.1.1) Change in emissions (metric tons CO₂e)

0

(7.10.1.2) Direction of change in emissions

Select from:

☒ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

As indicated in 7.10.2, our calculations are based on a location-based Scope 2 figure, so a change in renewables do not affect the total.

Other emissions reduction activities

(7.10.1.1) Change in emissions (metric tons CO2e)

275

(7.10.1.2) Direction of change in emissions

Select from:

☒ Decreased

(7.10.1.3) Emissions value (percentage)

4

(7.10.1.4) Please explain calculation

The emissions total (275 tonnes) is derived from the emissions of reduction activities/projects implemented in 7.55.2. These emissions are then divided by total Scope 1&2 from 2023 (7,834 tonnes) x100. $-275/7834 \times 100 = -3.51\%$ (rounded to -4%)

Divestment

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:

☒ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

Not applicable

Acquisitions

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:

☒ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

Not applicable

Mergers

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:

☒ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

Not applicable

Change in output

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:

☒ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

Not applicable

Change in methodology

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:

☒ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

Not applicable

Change in boundary

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:

☒ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

Not applicable

Change in physical operating conditions

(7.10.1.1) Change in emissions (metric tons CO2e)

78

(7.10.1.2) Direction of change in emissions

Select from:

☒ Increased

(7.10.1.3) Emissions value (percentage)

(7.10.1.4) Please explain calculation

As per Ireland's weather agency (Met Eireann), 2024 recorded approx. 5-10% more Heating Degree Days (HDD) compared to 2023, indicating a colder heating season. Using Dublin's Airport as reference (to reflect the weather station closer to our key head office buildings - larger energy consumers) in 2024, we had 77 additional HDD (a 4% increase) According to SEAI guidance, an increase of this magnitude drives a weather-uptick in heating energy use of around the same percentage. We applied a 4% increase to our heating related emissions in 2023 (1,962 tCO₂) resulting in an increase of 78tCO₂. $1962 * (4/100) = 78 \text{ tCO}_2$. These emissions are then divided by total Scope 1&2 from 2023 (7,834 tonnes) x100. $-78/7834 * 100 = 1\% \text{ increase}$

Unidentified

(7.10.1.1) Change in emissions (metric tons CO₂e)

252

(7.10.1.2) Direction of change in emissions

Select from:

☒ Decreased

(7.10.1.3) Emissions value (percentage)

3

(7.10.1.4) Please explain calculation

The emissions total (252 tonnes) is derived from the remaining unidentified emissions (YOY reduction change = Increase due to change in physical conditions - (Reduction from Energy Initiatives + Unidentified emission) // $-449 = 78 - (275 + X)$. The variable X has the value of 252. These emissions are then divided by total Scope 1&2 from 2023 (7,384 tCO₂e) x100. $-252/7,384 * 100 = -3.22\%$ (rounded to 3%). These unidentified emissions are due to a) EF updates and b) behavioural changes (increased awareness through staff on promoting "conservation of energy in buildings"). The proportion of emissions attributed to a and b above is unknown. Therefore these emissions are reported under the "unidentified changes" category instead of other table categories.

Other

(7.10.1.1) Change in emissions (metric tons CO₂e)

0

(7.10.1.2) Direction of change in emissions

Select from:

☒ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

Not applicable

[Fixed row]

(7.10.2) Are your emissions performance calculations in 7.10 and 7.10.1 based on a location-based Scope 2 emissions figure or a market-based Scope 2 emissions figure?

Select from:

☒ Location-based

(7.23) Is your organization able to break down your emissions data for any of the subsidiaries included in your CDP response?

Select from:

☒ Yes

(7.23.1) Break down your gross Scope 1 and Scope 2 emissions by subsidiary.

Row 1

(7.23.1.1) Subsidiary name

(7.23.1.2) Primary activity

Select from:

☒ Other financial

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☒ LEI number

(7.23.1.9) LEI number

54930061N57ORAEPGX16

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

180

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

274

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

136

(7.23.1.15) Comment

Under SI 2018/1155, the Streamlined Energy & Carbon Reporting ('SECR') regulations, AIB UK discloses annually the energy consumption and related carbon emissions which result directly from its operations - see the AIB Group (UK) p.l.c. Annual Financial Report at <https://aib.ie/content/dam/frontdoor/investorrelations/docs/resultscentre/annualreport/2024/aib-group-uk-plc-annual-financial-report-2024.pdf> Please note the data reported covered 9 months actual and 3 months extrapolated. The figures above reflect full 12 months to 31.12.2024, and are reflected in the independently verified statement covering the GHG emissions for AIB Group.

Row 2

(7.23.1.1) Subsidiary name

EBS

(7.23.1.2) Primary activity

Select from:

☒ Other financial

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☒ LEI number

(7.23.1.9) LEI number

549300QSOR6M20VUB380

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

44

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

170

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

20

(7.23.1.15) Comment

EBS is a predominantly mortgage-focused brand within AIB Group, helping thousands of customers buy their own homes in Ireland. It offers mortgage, personal banking, savings and investment products and services

Row 3

(7.23.1.1) Subsidiary name

Goodbody

(7.23.1.2) Primary activity

Select from:

☒ Other financial

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☒ LEI number

(7.23.1.9) LEI number

6354001L71G3SXS7OE16

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

86

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

96

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

76

(7.23.1.15) Comment

Goodbody offers wealth management, asset management and investment banking services with quality advice and exceptional client service at the core of its offering

Row 4

(7.23.1.1) Subsidiary name

AIB US

(7.23.1.2) Primary activity

Select from:

☒ Other financial

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☒ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

15

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

63

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

63

(7.23.1.15) Comment

AIB US is not a "subsidiary" as such but a branch for accounting treatment. As AIB US is not a separate legal entity it does not have a LEI.
[Add row]

(7.29) What percentage of your total operational spend in the reporting year was on energy?

Select from:

☒ More than 0% but less than or equal to 5%

(7.30) Select which energy-related activities your organization has undertaken.

	Indicate whether your organization undertook this energy-related activity in the reporting year
Consumption of fuel (excluding feedstocks)	Select from: <input checked="" type="checkbox"/> Yes
Consumption of purchased or acquired electricity	Select from: <input checked="" type="checkbox"/> Yes
Consumption of purchased or acquired heat	Select from: <input checked="" type="checkbox"/> Yes
Consumption of purchased or acquired steam	Select from: <input checked="" type="checkbox"/> No
Consumption of purchased or acquired cooling	Select from: <input checked="" type="checkbox"/> No
Generation of electricity, heat, steam, or cooling	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

(7.30.1) Report your organization's energy consumption totals (excluding feedstocks) in MWh.

Consumption of fuel (excluding feedstock)

(7.30.1.1) Heating value

Select from:

☒ HHV (higher heating value)

(7.30.1.2) MWh from renewable sources

131.74

(7.30.1.3) MWh from non-renewable sources

13774.02

(7.30.1.4) Total (renewable + non-renewable) MWh

13905.76

Consumption of purchased or acquired electricity

(7.30.1.1) Heating value

Select from:

☒ Unable to confirm heating value

(7.30.1.2) MWh from renewable sources

18350.42

(7.30.1.3) MWh from non-renewable sources

1458.91

(7.30.1.4) Total (renewable + non-renewable) MWh

19809.33

Consumption of purchased or acquired heat

(7.30.1.1) Heating value

Select from:

☒ Unable to confirm heating value

(7.30.1.2) MWh from renewable sources

0

(7.30.1.3) MWh from non-renewable sources

6.41

(7.30.1.4) Total (renewable + non-renewable) MWh

6.41

Consumption of self-generated non-fuel renewable energy

(7.30.1.1) Heating value

Select from:

☒ Unable to confirm heating value

(7.30.1.2) MWh from renewable sources

0

(7.30.1.4) Total (renewable + non-renewable) MWh

0.00

Total energy consumption

(7.30.1.1) Heating value

Select from:

☒ Unable to confirm heating value

(7.30.1.2) MWh from renewable sources

18482.16

(7.30.1.3) MWh from non-renewable sources

15239.33

(7.30.1.4) Total (renewable + non-renewable) MWh

33721.49

[Fixed row]

(7.30.16) Provide a breakdown by country/area of your electricity/heat/steam/cooling consumption in the reporting year.

Ireland

(7.30.16.1) Consumption of purchased electricity (MWh)

18375.43

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

18375.43

United Kingdom of Great Britain and Northern Ireland

(7.30.16.1) Consumption of purchased electricity (MWh)

1276.9

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

6.41

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

1283.31

United States of America

(7.30.16.1) Consumption of purchased electricity (MWh)

156.99

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

156.99

[Fixed row]

(7.45) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.

Row 1

(7.45.1) Intensity figure

0.0000015

(7.45.2) Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)

7385

(7.45.3) Metric denominator

Select from:

☒ unit total revenue

(7.45.4) Metric denominator: Unit total

4928

(7.45.5) Scope 2 figure used

Select from:

☒ Location-based

(7.45.6) % change from previous year

10

(7.45.7) Direction of change

Select from:

☒ Decreased

(7.45.8) Reasons for change

Select all that apply

☒ Other emissions reduction activities

☒ Change in revenue

(7.45.9) Please explain

The reduction in our tCO2/unit total revenue emissions intensity figure (10% lower) has been driven largely by a combination of an increase in revenue and a reduction in our Scope 1 and 2 emissions. Our revenue increased by 4% (from 4,722m to 4,928m), whilst our Scope 1 and 2 emissions decreased from 7,834 tCO2e to 7,385 tCO2e (-6%). This decrease in emissions intensity is partially linked to emission reduction initiatives (full list outlined in question 7.55.2).

Row 2

(7.45.1) Intensity figure

5.4e-8

(7.45.2) Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)

7385

(7.45.3) Metric denominator

Select from:

☒ Other, please specify :Total assets

(7.45.4) Metric denominator: Unit total

136464

(7.45.5) Scope 2 figure used

Select from:

☒ Location-based

(7.45.6) % change from previous year

5.5

(7.45.7) Direction of change

Select from:

☒ Decreased

(7.45.8) Reasons for change

Select all that apply

☒ Other emissions reduction activities

☒ Other, please specify :Total assets (in million)

(7.45.9) Please explain

The reduction in CO2/unit of total assets (in million) is based upon a slight increase in the value of total assets (in million) and a decrease in our location based emissions due to emissions reductions activities which took place through out the year.

[Add row]

(7.52) Provide any additional climate-related metrics relevant to your business.

Row 1

(7.52.1) Description

Select from:

☒ Energy usage

(7.52.2) Metric value

6.4

(7.52.3) Metric numerator

31658

(7.52.4) Metric denominator (intensity metric only)

4928

(7.52.5) % change from previous year

5

(7.52.6) Direction of change

Select from:

☒ Decreased

(7.52.7) Please explain

The 5% reduction in energy usage has been driven largely by a combination of an increase in total revenue and a reduction in our energy use. Our revenue increased by 4% (from 4,722m to 4,928m), whilst our energy use decreased from 32,035 MWh to 31,658 MWh (-1%). This decrease in energy intensity is partially linked to emission reduction initiatives (full list outlined in question 7.55.2). Note1: Energy Usage KPI -> MWh/unit of total revenue (m). Note 2: Energy usage excludes energy consumption from mobile combustion.

[Add row]

(7.53) Did you have an emissions target that was active in the reporting year?

Select all that apply

☒ Absolute target

☒ Portfolio target

(7.53.1) Provide details of your absolute emissions targets and progress made against those targets.

Row 1

(7.53.1.1) Target reference number

Select from:

☒ Abs 3

(7.53.1.2) Is this a science-based target?

Select from:

☒ Yes, and this target has been approved by the Science Based Targets initiative

(7.53.1.3) Science Based Targets initiative official validation letter

Target language and summary AIB Group plc with date.pdf

(7.53.1.4) Target ambition

Select from:

☒ 1.5°C aligned

(7.53.1.5) Date target was set

04/05/2023

(7.53.1.6) Target coverage

Select from:

☒ Organization-wide

(7.53.1.7) Greenhouse gases covered by target

Select all that apply

☒ Carbon dioxide (CO₂)

☒ Methane (CH₄)

☒ Nitrous oxide (N₂O)

☒ Hydrofluorocarbons (HFCs)

(7.53.1.8) Scopes

Select all that apply

☒ Scope 1

(7.53.1.11) End date of base year

12/31/2019

(7.53.1.12) Base year Scope 1 emissions covered by target (metric tons CO₂e)

4800

(7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO₂e)

0.000

(7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO₂e)

4800.000

(7.53.1.33) Base year Scope 1 emissions covered by target as % of total base year emissions in Scope 1

100

(7.53.1.53) Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes

100

(7.53.1.54) End date of target

12/31/2027

(7.53.1.55) Targeted reduction from base year (%)

33.6

(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)

3187.200

(7.53.1.57) Scope 1 emissions in reporting year covered by target (metric tons CO2e)

2885

(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

2885.000

(7.53.1.78) Land-related emissions covered by target

Select from:

☒ Yes, it covers land-related emissions/removals associated with bioenergy and non-land related emissions (e.g. non-FLAG SBT with bioenergy)

(7.53.1.79) % of target achieved relative to base year

118.74

(7.53.1.80) Target status in reporting year

Select from:

☒ Underway

(7.53.1.82) Explain target coverage and identify any exclusions

AIB Group validated near-term science-based reduction targets with the Science Based Targets initiative (SBTi). Our Scope 1 target is disclosed here as ABS 3. Regarding Scope 2 emissions, AIB committed to increase annual sourcing of renewable electricity to 100% by 2030 from 2019 baseline. Note 1: Data from our locations in ROI (AIB, Payzone and EBS), UK (AIB NI and AIB GB), as well as our US locations have been considered. Note 2: This is a company-wide target but since Goodbody was only consolidated for the final 4 months of 2021, its emissions were excluded in the GHG inventory or associated targets for submissions to SBTi Note 3: This target meets a 4.2 % absolute annual emissions reduction between 'Base year' and 'Target year'. Note 4: The target boundary includes biogenic land-related emissions and removals from bioenergy feedstock. Baseyear (Scope 1: 4,784 tCO₂e, Biogenic emissions: 16 tCO₂e), Reporting Year (Scope 1: 2,858 tCO₂e, Biogenic emissions: 27 tCO₂e). Note 5: We selected a 2019 baseline for our operational emissions targets as neither 2020 nor 2021 reflected a standard year's operation due to pandemic-related reductions. Note 6: During 2022, AIB implemented a hybrid working policy which governs working from home. Part of the energy reduction across AIB Group can be attributed to reduced operational capacity within our buildings. Note 7: For more information see C.6.1, C6.3 and C6.5a Note 8: PFC and SF6 are process related emissions not related to AIB activities. NF3 is used in a relatively small number of industrial processes not related to AIB direct emissions.

(7.53.1.83) Target objective

This target was established as short-term target to our 2030 operational Net Zero ambition.

(7.53.1.84) Plan for achieving target, and progress made to the end of the reporting year

The Group has considered energy efficiency and energy savings as key elements to decarbonise it's operations, with embedded decarbonisation actions in its Property & Fleet Strategies. The following initiatives have contributed to the reduction of our Scope 1 emissions: a) Implementation of an ISO 50001 Energy Management System across the Group. Standardised controls and operating procedures are in place for every location. We are continuously upgrading our branch and office buildings to improve their energy efficiency. One example of this is our investment in our Branch Network "Greener Branches Refurbishments Programme" launched in 2024. In addition, the Group continued our phased approach to transitioning our fleet, which is on track for full electrification by 2027.

(7.53.1.85) Target derived using a sectoral decarbonization approach

Select from:

☒ No

[Add row]

(7.53.4) Provide details of the climate-related targets for your portfolio.

Row 1

(7.53.4.1) Target reference number

Select from:

☒ Por1

(7.53.4.2) Target type

Select from:

☒ Sector Decarbonization Approach (SDA)

(7.53.4.4) Methodology used when setting the target

Select from:

☒ SBTi for Financial Institutions

(7.53.4.5) Date target was set

04/05/2023

(7.53.4.6) Target is set and progress against it is tracked at

Select from:

☒ Asset class level

(7.53.4.9) Portfolio

Select from:

☒ Banking (Bank)

(7.53.4.10) Asset classes covered by the target

Select all that apply

☒ Real estate

☒ Other, please specify :Residential Real Estate

(7.53.4.11) Sectors covered by the target

Select all that apply

☒ Retail

(7.53.4.12) Target type: Absolute or intensity

Select from:

☒ Intensity

(7.53.4.14) % of portfolio emissions covered by the target

55

(7.53.4.15) % of asset class emissions covered by the target

100

(7.53.4.16) Metric (or target numerator if intensity)

Select from:

☒ Other, SDA metric please specify :kgCO2e

(7.53.4.17) Target denominator

Select from:

☒ Meters squared

(7.53.4.18) % of portfolio covered in relation to total portfolio value

26.6

(7.53.4.19) Total value of assets covered by the target

36287764169

(7.53.4.20) % of asset class covered by the target, based on the total value of this asset class

100

(7.53.4.21) Frequency of target reviews

Select from:

☒ Every five years

(7.53.4.22) End date of base year

12/31/2021

(7.53.4.23) Figure in base year

40

(7.53.4.24) We have an interim target

Select from:

☒ No

(7.53.4.27) End date of target

12/31/2030

(7.53.4.28) Figure in target year

16.97

(7.53.4.29) Figure in reporting year

(7.53.4.30) % of target achieved relative to base year

7.815892314372546

(7.53.4.31) Target status in reporting year

Select from:

☒ Underway**(7.53.4.34) Is this a science-based target?**

Select from:

☒ Yes, and this target has been approved by the Science-Based Targets initiative**(7.53.4.35) Target ambition**

Select from:

☒ 1.5°C aligned**(7.53.4.37) Please explain target coverage and identify any exclusions**

The scope of our target reflects the total lending within our Residential Mortgages portfolio, which was €29.4bn in 2021, representing 50% of the Group's total lending at that time. By 2024, our Residential Mortgages portfolio had increased to 51% of the Group's total lending, with a total of €36.3bn. We have not excluded any part of our Residential Mortgages loan book from our target scope.

(7.53.4.38) Target objective

In 2021, we estimated our baseline physical emissions intensity of our Residential Mortgages portfolio to be 40 kgCO₂e/m² and set a target to reduce the emissions intensity of our Residential Mortgages book by 58% by 2030, compared to the 2021 baseline year, aligning with the International Energy Agency (IEA) 2021 NZE2050 1.5°C SDA Scenario. In 2023, our Residential Mortgages emissions reduction target was validated by the SBTi. In 2024, the physical emissions intensity of our Residential Mortgages portfolio decreased by approximately 5.6%, compared to our 2021 baseline. Note that progress is not expected to be linear on a year-on-year basis given reliance on external factors such as policy, regulation, market trends and consumer behaviours. We have made significant progress in setting targets across our three most material portfolios, including the Residential Mortgages, and we are now further maturing the operationalisation of decarbonisation strategy across the Group. Progress towards the achievement of our targets supports us in mitigating Climate and Environmental risks, achieve our decarbonisation ambition

to align our portfolio to global climate goals and increase our sustainable lending supporting our ambition for 70% of our new customer lending to be green or transition by 2030.

Row 2

(7.53.4.1) Target reference number

Select from:

☒ Por2

(7.53.4.2) Target type

Select from:

☒ Sector Decarbonization Approach (SDA)

(7.53.4.4) Methodology used when setting the target

Select from:

☒ SBTi for Financial Institutions

(7.53.4.5) Date target was set

04/05/2023

(7.53.4.6) Target is set and progress against it is tracked at

Select from:

☒ Asset class level

(7.53.4.9) Portfolio

Select from:

☒ Banking (Bank)

(7.53.4.10) Asset classes covered by the target

Select all that apply

- ☒ Real estate
- ☒ Other, please specify :Commercial Real Estate

(7.53.4.11) Sectors covered by the target

Select all that apply

- ☒ Hospitality
- ☒ Infrastructure
- ☒ Retail

(7.53.4.12) Target type: Absolute or intensity

Select from:

- ☒ Intensity

(7.53.4.14) % of portfolio emissions covered by the target

44

(7.53.4.15) % of asset class emissions covered by the target

100

(7.53.4.16) Metric (or target numerator if intensity)

Select from:

- ☒ Other, SDA metric please specify :kgCO2e

(7.53.4.17) Target denominator

Select from:

- ☒ Meters squared

(7.53.4.18) % of portfolio covered in relation to total portfolio value

4.1

(7.53.4.19) Total value of assets covered by the target

5649359367

(7.53.4.20) % of asset class covered by the target, based on the total value of this asset class

73.6

(7.53.4.21) Frequency of target reviews

Select from:

☒ Every five years

(7.53.4.22) End date of base year

12/31/2021

(7.53.4.23) Figure in base year

116

(7.53.4.24) We have an interim target

Select from:

☒ No

(7.53.4.27) End date of target

12/31/2030

(7.53.4.28) Figure in target year

38.28

(7.53.4.29) Figure in reporting year

106.8

(7.53.4.30) % of target achieved relative to base year

11.837364899639736

(7.53.4.31) Target status in reporting year

Select from:

☒ Underway

(7.53.4.34) Is this a science-based target?

Select from:

☒ Yes, and this target has been approved by the Science-Based Targets initiative

(7.53.4.35) Target ambition

Select from:

☒ 1.5°C aligned

(7.53.4.37) Please explain target coverage and identify any exclusions

The scope of our target includes €5.6bn of Commercial Real Estate lending in 2024, accounting for 73.6% of our Commercial Real Estate lending portfolio and 8% of the Group's total lending. The remaining proportion (26.4%) of our Commercial Real Estate lending portfolio is included in our Portfolio Coverage target.

(7.53.4.38) Target objective

In 2021, we set a baseline physical emissions intensity of our CRE portfolio to be 135 kgCO₂e/m² and set a target to reduce CRE emissions intensity by 67% by 2030, compared to the 2021 baseline year, aligning with the IEA 2021 NZE2050 1.5°C SDA Scenario. In 2023, our CRE emissions reduction target was validated by the SBTi. During 2024, we undertook a process to enhance data quality, reflecting our commitment to more accurately measure emissions. As a result, we revised our 2021 baseline from 135 kgCO₂e/m² to 116 kgCO₂e/m², while maintaining our current IEA pathway and our emissions reduction target of 67% by 2030. This adjustment allows for a more accurate representation of progress to date. In 2024, the physical emissions intensity of our CRE portfolio decreased by c.8%, compared to our 2021 baseline. Note that progress is not expected to be linear year-on-year given reliance on external factors such as policy, regulation, market

trends and consumer behaviours. We have made significant progress in setting targets across our three most material portfolios, including CRE, and we are now further maturing the operationalisation of decarbonisation strategy across the Group. Progress towards achieving our targets supports us in mitigating Climate and Environmental risks, achieve our decarbonisation ambition to align our portfolio to global climate goals and increase sustainable lending supporting our ambition for 70% of our new customer lending to be green or transition by 2030.

Row 3

(7.53.4.1) Target reference number

Select from:

☒ Por3

(7.53.4.2) Target type

Select from:

☒ Sector Decarbonization Approach (SDA)

(7.53.4.4) Methodology used when setting the target

Select from:

☒ SBTi for Financial Institutions

(7.53.4.5) Date target was set

04/05/2023

(7.53.4.6) Target is set and progress against it is tracked at

Select from:

☒ Asset class level

(7.53.4.9) Portfolio

Select from:

☒ Banking (Bank)

(7.53.4.10) Asset classes covered by the target

Select all that apply

☒ Project finance

(7.53.4.11) Sectors covered by the target

Select all that apply

☒ Power generation

(7.53.4.12) Target type: Absolute or intensity

Select from:

☒ Intensity

(7.53.4.14) % of portfolio emissions covered by the target

1

(7.53.4.15) % of asset class emissions covered by the target

100

(7.53.4.16) Metric (or target numerator if intensity)

Select from:

☒ Other, SDA metric please specify :gCO2e

(7.53.4.17) Target denominator

Select from:

☒ kWh

(7.53.4.18) % of portfolio covered in relation to total portfolio value

(7.53.4.19) Total value of assets covered by the target

3608366772

(7.53.4.20) % of asset class covered by the target, based on the total value of this asset class

100

(7.53.4.21) Frequency of target reviews*Select from:*☒ Every five years**(7.53.4.22) End date of base year**

12/31/2021

(7.53.4.23) Figure in base year

21

(7.53.4.24) We have an interim target*Select from:*☒ No**(7.53.4.27) End date of target**

12/31/2030

(7.53.4.28) Figure in target year

21

(7.53.4.29) Figure in reporting year

0.97

(7.53.4.31) Target status in reporting year

Select from:

☒ Underway

(7.53.4.34) Is this a science-based target?

Select from:

☒ Yes, and this target has been approved by the Science-Based Targets initiative

(7.53.4.35) Target ambition

Select from:

☒ 1.5°C aligned

(7.53.4.37) Please explain target coverage and identify any exclusions

The scope of our target reflects the total lending within our Electricity Generation Project Finance portfolio, which was €1.6bn in 2021, representing 3% of the Group's total lending at that time. By 2024, our Electricity Generation portfolio had increased to 5% of the Group's total lending, with a total of €3.6bn. Since setting our maintenance target, waste-to-energy assets have been excluded from the Electricity Generation target scope, following bilateral guidance received from the SBTi. This is primarily due to the fact that waste-to-energy facilities are not based on fossil fuels, and electricity generation is not their main purpose or revenue source. We have not excluded any other part of our Electricity Generation Project Finance portfolio from our target scope.

(7.53.4.38) Target objective

AIB's Electricity Generation portfolio has a significantly low emissions intensity relative to global average for electricity generation (458 gCO₂e/kWh in 2024), given the high share of renewable energy assets such as wind energy. In 2021, we estimated our baseline emissions intensity of our Electricity Generation Project Finance portfolio to be 21 gCO₂e/m². and set a target to maintain the emissions intensity of our portfolio at or below this emissions intensity level from 2021 through 2030 as well as only financing 1.5C aligned electricity generation projects. In 2023, our Electricity Generation maintenance target was validated by the SBTi. Due to the de-scoping of waste-to-energy, the baseline emissions intensity decreased significantly from 21 gCO₂e/m² to 0.01 gCO₂e/m². In 2024, the emissions intensity of our Electricity Generation portfolio was 0.97 gCO₂e/m². We have made significant progress in setting targets across our three most material portfolios, including the Electricity Generation, and we are now further maturing the operationalisation of decarbonisation strategy across the Group. Progress towards the achievement of our

targets supports us in mitigating Climate and Environmental risks, achieve our decarbonisation ambition to align our portfolio to global climate goals and increase our sustainable lending supporting our ambition for 70% of our new customer lending to be green or transition by 2030.

Row 4

(7.53.4.1) Target reference number

Select from:

☒ Por4

(7.53.4.2) Target type

Select from:

☒ Portfolio coverage

(7.53.4.4) Methodology used when setting the target

Select from:

☒ SBTi for Financial Institutions

(7.53.4.5) Date target was set

04/05/2023

(7.53.4.6) Target is set and progress against it is tracked at

Select from:

☒ Asset class level

(7.53.4.9) Portfolio

Select from:

☒ Banking (Bank)

(7.53.4.10) Asset classes covered by the target

Select all that apply

☒ Loans

(7.53.4.11) Sectors covered by the target

Select all that apply

☒ Retail

☒ Apparel

☒ Services

☒ Materials

☒ Hospitality

☒ Biotech, health care & pharma

☒ Manufacturing

☒ Infrastructure

☒ International bodies

☒ Transportation services

☒ Food, beverage & agriculture

(7.53.4.16) Metric (or target numerator if intensity)

Select from:

☒ % of portfolio setting a Science-Based Target

(7.53.4.18) % of portfolio covered in relation to total portfolio value

5.5

(7.53.4.19) Total value of assets covered by the target

7475410682

(7.53.4.20) % of asset class covered by the target, based on the total value of this asset class

100

(7.53.4.21) Frequency of target reviews

Select from:

☒ Every five years

(7.53.4.22) End date of base year

12/31/2021

(7.53.4.23) Figure in base year

12

(7.53.4.24) We have an interim target

Select from:

☒ Yes

(7.53.4.25) End of interim target year

12/31/2026

(7.53.4.26) Figure in interim target year

35

(7.53.4.27) End date of target

12/31/2030

(7.53.4.28) Figure in target year

54

(7.53.4.29) Figure in reporting year

27

(7.53.4.30) % of target achieved relative to base year

35.714285714285715

(7.53.4.31) Target status in reporting year

Select from:

☒ Underway

(7.53.4.32) Aggregation weighting used

Select from:

☒ Weighted average temperature score (WATS)

(7.53.4.34) Is this a science-based target?

Select from:

☒ Yes, and this target has been approved by the Science-Based Targets initiative

(7.53.4.35) Target ambition

Select from:

☒ 1.5°C aligned

(7.53.4.37) Please explain target coverage and identify any exclusions

The scope of the Corporate Portfolio target includes corporations within our corporate loan portfolio with >500 employees with and without SBTi validated targets in place. In 2021, 12% of our in-scope corporate loan portfolio had SBTi validated targets in place.

(7.53.4.38) Target objective

Our Corporate Portfolio Coverage target is an engagement target which aims to drive corporates to set SBTi validated targets and therefore, emissions reductions across all sectors. In 2021, we set a target to increase our in-scope corporate loan portfolio with SBTi validated targets in place from 12% in 2021 to 54% by 2030. In 2023, our Portfolio Coverage target was validated by the SBTi. In 2024, we increased our Corporate Portfolio Coverage to 27%. Note that progress is not expected to be linear on a year-on-year basis given reliance on corporates to set SBTi validated targets. The percentage of customers with SBTi validated targets in place is expected to increase in the coming years, as new regulations come into force, including transition plan disclosure requirements. We have made significant progress in setting targets across our loan portfolios and we are now further maturing the operationalisation of decarbonisation strategy across the Group. Progress towards the achievement of our targets supports us in mitigating Climate and Environmental risks, achieve our decarbonisation ambition to align our portfolio to global climate goals and increase our sustainable lending supporting our ambition for 70% of our new customer lending to be green or transition by 2030.

[Add row]

(7.54) Did you have any other climate-related targets that were active in the reporting year?

Select all that apply

- ☒ Targets to increase or maintain low-carbon energy consumption or production
- ☒ Net-zero targets

(7.54.1) Provide details of your targets to increase or maintain low-carbon energy consumption or production.

Row 1

(7.54.1.1) Target reference number

Select from:

- ☒ Low 1

(7.54.1.2) Date target was set

04/05/2023

(7.54.1.3) Target coverage

Select from:

- ☒ Organization-wide

(7.54.1.4) Target type: energy carrier

Select from:

- ☒ Electricity

(7.54.1.5) Target type: activity

Select from:

- ☒ Consumption

(7.54.1.6) Target type: energy source

Select from:

☒ Renewable energy source(s) only

(7.54.1.7) End date of base year

12/31/2019

(7.54.1.8) Consumption or production of selected energy carrier in base year (MWh)

34614.6

(7.54.1.9) % share of low-carbon or renewable energy in base year

1

(7.54.1.10) End date of target

12/31/2030

(7.54.1.11) % share of low-carbon or renewable energy at end date of target

100

(7.54.1.12) % share of low-carbon or renewable energy in reporting year

89

(7.54.1.13) % of target achieved relative to base year

88.89

(7.54.1.14) Target status in reporting year

Select from:

☒ Underway

(7.54.1.16) Is this target part of an emissions target?

AIB has now set and validated SBT for its operational emissions. For our Scope 2 emissions, we have committed to increase annual sourcing of renewable electricity to 100% by 2030 from a 2019 baseline. While to date we have been purchasing electricity on green tariffs, this target is based on “purchase of certified renewable electricity”. In 2022 AIB entered a vPPA agreement with NTR to buy energy from two new solar farms in Ireland. Construction began swiftly and both solar farms started energisation in 2024, delivering certified renewable energy to the Group. Please note that our SBTi target boundary excludes electricity consumption from Goodbody, which results in a 89% target progress compared to the Group figure of 87%, for 2024.

(7.54.1.17) Is this target part of an overarching initiative?

Select all that apply

☒ Science Based Targets initiative

(7.54.1.18) Science Based Targets initiative official validation letter

Target language and summary AIB Group plc with date.pdf

(7.54.1.19) Explain target coverage and identify any exclusions

a) This target covers the sourcing of renewable electricity. b) This is a company-wide target but since Goodbody was only consolidated for the final 4 months of 2021, its emissions were excluded in the GHG inventory or associated targets for submissions to SBTi.

(7.54.1.20) Target objective

To transition to 100% renewable energy procurement across our operations, eliminating Scope 2 emissions and aligning with our Science-Base Target and the 1.5C climate pathway. In 2024 the activation of our vPPA enabled us to report fully traceable renewable energy, comprising 87% of the overall electricity procurement covered by this target. Please note that our SBTi target boundary excludes electricity consumption from Goodbody, which results in a 89% target progress compared to the Group figure of 87%, for 2024.

(7.54.1.21) Plan for achieving target, and progress made to the end of the reporting year

In 2022 we entered into a virtual Corporate Power Purchase Agreement (vPPA) with NTR plc to create two new solar farms in Co. Wexford (Ireland). Construction began swiftly and both solar farms started energisation in 2024 delivering certified renewable energy to the Group. In 2024, 87% of AIB’s own electrical energy needs was produced from these Solar Farms. Please note that our SBTi target boundary excludes electricity consumption from Goodbody, which results in a 89% target progress compared to the Group figure of 87%, for 2024. The energisation of both solar farms is instrumental to meeting our renewable electricity sourcing target of

100% by 2030. In addition, we are continuously upgrading our branch and office buildings to improve their energy efficiency. One example of this is our investment in our "Branch Network Greener Branches Refurbishments Programme" launched in 2024.

[Add row]

(7.54.3) Provide details of your net-zero target(s).

Row 1

(7.54.3.1) Target reference number

Select from:

☒ NZ1

(7.54.3.2) Date target was set

01/01/2020

(7.54.3.3) Target Coverage

Select from:

☒ Organization-wide

(7.54.3.4) Targets linked to this net zero target

Select all that apply

- ☒ Abs3
- ☒ Low1
- ☒ Por1
- ☒ Por2
- ☒ Por3
- ☒ Por4

(7.54.3.5) End date of target for achieving net zero

12/31/2050

(7.54.3.6) Is this a science-based target?

Select from:

☒ Yes, we consider this a science-based target, but we have not committed to seek validation of this target by the Science Based Targets initiative within the next two years

(7.54.3.8) Scopes

Select all that apply

- ☒ Scope 1
- ☒ Scope 2
- ☒ Scope 3

(7.54.3.9) Greenhouse gases covered by target

Select all that apply

- | | |
|---|---|
| <input checked="" type="checkbox"/> Methane (CH ₄) | <input checked="" type="checkbox"/> Sulphur hexafluoride (SF ₆) |
| <input checked="" type="checkbox"/> Nitrous oxide (N ₂ O) | <input checked="" type="checkbox"/> Nitrogen trifluoride (NF ₃) |
| <input checked="" type="checkbox"/> Carbon dioxide (CO ₂) | |
| <input checked="" type="checkbox"/> Perfluorocarbons (PFCs) | |
| <input checked="" type="checkbox"/> Hydrofluorocarbons (HFCs) | |

(7.54.3.10) Explain target coverage and identify any exclusions

AIB has set a target to reach net zero across our customer lending portfolio by 2050, alongside our company-wide net zero target. Across our loan book portfolio, we have set near-term science-based targets, based on a 2021 baseline for our three most material sectors – Residential Mortgages, Commercial Real Estate (CRE), and Electricity Generation – which are the loan portfolios with the highest transition risk. We also have a Corporate Portfolio Coverage target, an engagement target, which aims to drive corporates to set SBTi validated targets and therefore, emissions reductions across all sectors. In 2023, these targets were validated by the SBTi. These targets use a decarbonisation reference scenario that aims to limit global warming to 1.5C. These targets cover 36% of its total investment and lending by total assets as of 2021. Within its loan portfolio, these targets cover 75% of its lending by total assets as of 2021. Required activities made up 12% of AIB's total investment and lending by total assets while optional activities made up 33% and out of scope activities made up 55%. AIB's near-term targets support our decarbonisation ambition to reach net zero across our customer lending portfolio by 2050. In addition, AIB has set a target to reach net zero across our own operations by 2030. The target is a company-wide target and it covers Scope 1 and 2 emissions. There are no exclusions. We have set up two science-based targets that will create a pathway to deliver on our Net Zero ambition. Please refer to ABS 3 and LOW 1 for information on our Scope 1 and 2 targets.

(7.54.3.11) Target objective

We are driving positive change through our decarbonisation ambition to reach Net Zero across our customer lending portfolio by 2050, while protecting our planet and contributing to society. To date, we have made significant progress in setting near-term SBTi validated targets (up to 2030) across our three most material portfolios (Residential Mortgages, Commercial Real Estate and Electricity Generation) and a fourth Portfolio Coverage target, all of which use a decarbonisation reference scenario that aims to limit global warming to 1.5C. We are now further maturing the operationalisation of our decarbonisation strategy across the Group. Progress towards the achievement of our targets supports us in mitigating Climate and Environmental risks, achieve our decarbonisation ambition to align our portfolio to global climate goals and increase our sustainable lending supporting our ambition for 70% of our new customer lending to be green or transition by 2030. Furthermore, while we are supporting our customers in the transition to a low-carbon economy, AIB Group is ever mindful of our own carbon footprint, with a clear ambition to reach net zero in our own operations by 2030. This demands that we accept responsibility for the direct impact of our own operations on the environment. While we have been on a journey for years to reduce our Scope 1 & 2 emissions and use our resources responsibly, the establishment of this ambition has put a sharp focus on all of our efforts – across our buildings, our partners and our colleagues.

(7.54.3.12) Do you intend to neutralize any residual emissions with permanent carbon removals at the end of the target?

Select from:

☒ Yes

(7.54.3.13) Do you plan to mitigate emissions beyond your value chain?

Select from:

☒ No, and we do not plan to within the next two years

(7.54.3.14) Do you intend to purchase and cancel carbon credits for neutralization and/or beyond value chain mitigation?

Select all that apply

☒ Yes, we plan to purchase and cancel carbon credits for neutralization at the end of the target

(7.54.3.15) Planned milestones and/or near-term investments for neutralization at the end of the target

Not applicable as regards our decarbonisation ambition to reach Net Zero across our customer lending portfolio. As regards our own operations target, options for target year neutralisation are presently being explored.

(7.54.3.17) Target status in reporting year

Select from:

☒ Underway

(7.54.3.19) Process for reviewing target

In line with best practice and mandatory SBTi requirements, our near-term SBTi validated targets are reviewed every five years from the date of validation to ensure targets remain aligned with the most recent climate science. In addition, if/when a significant change occurs, a review of our targets is also required. In 2024, working closely with key stakeholders from relevant business areas across AIB through internal workshops and regular communication, we reviewed our decarbonisation reference scenarios to take account of external factors, the latest climate science and internal data enhancements, and to incorporate recent inorganic growth by AIB through the acquisitions of new loan books. Own Operations: We continue to measure the Group's operational emissions. Our milestones to reach NZ in our operations by 2030 are reported under the ABS3 and LOW1 targets. Ongoing monitoring of the target progress is in place and options to remove our residuals emissions are currently being explored. As part of our regular reviews, changes in existing GHG accounting guidance from the GHG Protocol and target criteria from SBTi are monitored.

[Add row]

(7.55) Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases.

Select from:

☒ Yes

(7.55.1) Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO2e savings.

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e
Under investigation	0	`Numeric input
To be implemented	1	1782
Implementation commenced	2	214
Implemented	5	275

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e
Not to be implemented	0	<i>Numeric input</i>

[Fixed row]

(7.55.2) Provide details on the initiatives implemented in the reporting year in the table below.

Row 1

(7.55.2.1) Initiative category & Initiative type

Energy efficiency in buildings

☒ Lighting

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

55

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

☒ Scope 2 (location-based)

(7.55.2.4) Voluntary/Mandatory

Select from:

☒ Voluntary

(7.55.2.5) Annual monetary savings (unit currency – as specified in 1.2)

78800

(7.55.2.6) Investment required (unit currency – as specified in 1.2)

765500

(7.55.2.7) Payback period

Select from:

☒ 4-10 years

(7.55.2.8) Estimated lifetime of the initiative

Select from:

☒ 11-15 years

(7.55.2.9) Comment

AIB have continued to reduce carbon emissions through reduction in energy consumption, through planned activities. This initiative covers the upgrade of older fluorescent lighting systems to modern LED type fittings and controls across the branch network & head office buildings. These initiatives are delivering annual carbon savings of 55 tonnes of CO2. NB#1: These initiatives exclude, AIB US, Payzone & Goodbody operations. NB#2: In addition to our lighting upgrades, a key element that contributes to the reduction of our carbon emissions is increased awareness through staff on-line learning. In particular, on promoting "conservation of energy in buildings"

Row 2

(7.55.2.1) Initiative category & Initiative type

Company policy or behavioral change

☒ Site consolidation/closure

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

84

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

- ☒ Scope 1
- ☒ Scope 2 (location-based)

(7.55.2.4) Voluntary/Mandatory

Select from:

- ☒ Voluntary

(7.55.2.5) Annual monetary savings (unit currency – as specified in 1.2)

0

(7.55.2.6) Investment required (unit currency – as specified in 1.2)

0

(7.55.2.7) Payback period

Select from:

- ☒ No payback

(7.55.2.8) Estimated lifetime of the initiative

Select from:

- ☒ 21-30 years

(7.55.2.9) Comment

We understand the contribution of buildings to carbon emissions, and in 2018 embarked on a rationalisation strategy of our operations starting with those based in older inefficient buildings. By consolidating older, energy-intensive sites into fewer, modern and energy-efficient facilities, we are aiming to deliver Scope 1 & 2 reductions and maintenance overheads. Consolidation of sites continued in 2024 and delivered circa 84 tonnes of CO2. The figures for cost savings and investment

allocated to this initiative are sensitive information and have not been disclosed. This set of initiatives have a payback. However due to the sensitive investment information, we have indicated “No Payback” period.

Row 3

(7.55.2.1) Initiative category & Initiative type

Transportation

☒ Company fleet vehicle replacement

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

64

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

☒ Scope 1

(7.55.2.4) Voluntary/Mandatory

Select from:

☒ Voluntary

(7.55.2.5) Annual monetary savings (unit currency – as specified in 1.2)

0

(7.55.2.6) Investment required (unit currency – as specified in 1.2)

0

(7.55.2.7) Payback period

Select from:

☒ 4-10 years

(7.55.2.8) Estimated lifetime of the initiative

Select from:

☒ Ongoing

(7.55.2.9) Comment

We are also conscious of the impact our fleet of vehicles has on the environment. In 2024, the Group continued our phased approach to transitioning our fleet, which is on track for full electrification by 2027. NB#1: Due to sensitive information some figures are disclosed as zero.

Row 4

(7.55.2.1) Initiative category & Initiative type

Energy efficiency in buildings

☒ Maintenance program

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

48

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

☒ Scope 1

☒ Scope 2 (location-based)

(7.55.2.4) Voluntary/Mandatory

Select from:

☒ Voluntary

(7.55.2.5) Annual monetary savings (unit currency – as specified in 1.2)

0

(7.55.2.6) Investment required (unit currency – as specified in 1.2)

200000

(7.55.2.7) Payback period

Select from:

☒ 4-10 years

(7.55.2.8) Estimated lifetime of the initiative

Select from:

☒ 11-15 years

(7.55.2.9) Comment

Our maintenance programme integrates both proactive and reactive elements to ensure optimal equipment performance and minimal downtime. We conduct regular energy audits to identify inefficiencies and drive continuous improvement. Energy efficiency is a programme priority, targeting inefficient systems and implementing upgrades to reduce energy use, supporting operational resilience, our ISO 50001 Energy Management System and Group Decarbonisation Goals. This initiative covers premises within the branch network, it contained building fabric upgrades to older buildings, time clock controls to small power consuming equipment and adjustments to BMS systems Annual monetary savings are currently under assessment as part of post-implementation monitoring. As this figure is not yet finalised, they have been temporarily disclosed as zero in this response.

Row 5

(7.55.2.1) Initiative category & Initiative type

Energy efficiency in production processes

☒ Electrification

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

- ☒ Scope 1
- ☒ Scope 2 (location-based)

(7.55.2.4) Voluntary/Mandatory

Select from:

- ☒ Voluntary

(7.55.2.5) Annual monetary savings (unit currency – as specified in 1.2)

0

(7.55.2.6) Investment required (unit currency – as specified in 1.2)

40000000

(7.55.2.7) Payback period

Select from:

- ☒ 16-20 years

(7.55.2.8) Estimated lifetime of the initiative

Select from:

- ☒ 21-30 years

(7.55.2.9) Comment

In 2024, we launched our “Branch Network Greener Branches Refurbishments Programme” aimed at decarbonising our operations by transitioning our premises away from fossil fuel-based systems. AIB will invest €40 million by the end of 2025 in a range of upgrades to branches (covering 35 refurbishments). This investment will reduce our operational emissions by a further 10% once completed. Scope 1 emission savings from this initiative began to materialise in late 2024, with an initial

reduction of 24 tonnes of CO2. The full annualised impact will be reflected in 2026, once all consolidation, energy efficiency upgrades and electrification measures are fully implemented and operational. This initiative is a key decarbonisation lever of our Net Zero operational pathway, supporting the reduction of Scope 1 emissions across our property portfolio. Annual monetary savings are currently under assessment as part of post-implementation monitoring. As this figure is not yet finalised, they have been temporarily disclosed as zero in this response. The payback period has been estimated.

[Add row]

(7.55.3) What methods do you use to drive investment in emissions reduction activities?

Row 1

(7.55.3.1) Method

Select from:

☒ Financial optimization calculations

(7.55.3.2) Comment

All energy expenditure and energy processes are reviewed annually to identify if and where savings can be made. Necessary investments and budget for energy and fuel efficiency projects are made based on supporting financial optimisation calculations as well as meeting and supporting the objectives of the organisations' Energy and Environment Policies.

Row 2

(7.55.3.1) Method

Select from:

☒ Dedicated budget for energy efficiency

(7.55.3.2) Comment

AIB has a dedicated Energy Team which delivers the energy management strategy. To reduce the energy consumption of our property portfolio we have adopted a continuous improvement approach to increase our energy efficiency in our operations based on ISO 50001. Every year AIB allocates a capital investment budget to the Energy Manager for investment in energy, reduction projects. Budgets are planned for 3 years in advance with a pipeline of projects maintained under the ISO 50001 energy opportunities register. Payback and projected savings are used to build a business case for investment.

Row 3

(7.55.3.1) Method

Select from:

☒ Employee engagement

(7.55.3.2) Comment

A large element of tackling our environmental impact is boosting employee awareness of sustainable practices and developing 'green skills' needed to bring positive changes across the organisation. This involves the education and motivation of colleagues. Awareness campaigns were held locally and Groupwide throughout 2024 with the overall aim to encourage individual responsibility in reducing waste, demand for natural resources and emissions.

Row 4

(7.55.3.1) Method

Select from:

☒ Compliance with regulatory requirements/standards

(7.55.3.2) Comment

AIB Workplace Operations has implemented an integrated Energy and Environment management system to meet the ISO 50001 (Energy) & ISO 14001 (Environment) international standards. Under these standards it is required to identify environmental requirements and demonstrate compliance on an on-going basis.

Row 5

(7.55.3.1) Method

Select from:

☒ Internal finance mechanisms

(7.55.3.2) Comment

Maximise efficiency of existing energy supplier arrangements/contracts. A business case is made for each initiative proposed based on financial optimisation calculations as well as supporting the objectives of the organisations' Environmental and Energy Policies.

Row 6

(7.55.3.1) Method

Select from:

☒ Dedicated budget for other emissions reduction activities

(7.55.3.2) Comment

The Group has considered energy efficiency and energy saving as key elements in reducing CO₂ emissions. Key initiatives to meet these targets are incorporated in our property and fleet strategies, our energy purchasing decisions (such as our vPPA), and actions taken to continuously increase our energy efficiency (e.g increasing our real-time energy monitoring capabilities).

[Add row]

(7.79) Has your organization retired any project-based carbon credits within the reporting year?

Select from:

☒ No

C12. Environmental performance - Financial Services

(12.1) Does your organization measure the impact of your portfolio on the environment?

Banking (Bank)

(12.1.1) We measure the impact of our portfolio on the climate

Select from:

☒ Yes

(12.1.2) Disclosure metric

Select all that apply

☒ Financed emissions

(12.1.5) We measure the impact of our portfolio on forests

Select from:

☒ No, and we do not plan to do so in the next two years

(12.1.6) Primary reason for not measuring portfolio impact on forests

Select from:

☒ Other, please specify :Water and Marine Resources was not deemed as having had or having anticipated a material substantive effects on AIB pursuant to our Double Materiality Assessment.

(12.1.7) Explain why your organization does not measure its portfolio impact on forests

Important but not an immediate strategic priority.

(12.1.8) We measure the impact of our portfolio on water

Select from:

☒ No, and we do not plan to do so in the next two years

(12.1.9) Primary reason for not measuring portfolio impact on water

Select from:

☒ Other, please specify :Biodiversity was not deemed as having had or having anticipated a material substantive effect on AIB pursuant to our Double Materiality Assessment.

(12.1.10) Explain why your organization does not measure its portfolio impact on water

Important but not an immediate strategic priority.

(12.1.11) We measure the impact of our portfolio on biodiversity

Select from:

☒ No, and we do not plan to do so in the next two years

(12.1.12) Primary reason for not measuring portfolio impact on biodiversity

Select from:

☒ Other, please specify :Biodiversity was not deemed as having had or having anticipated a material substantive effect on AIB pursuant to our Double Materiality Assessment.

(12.1.13) Explain why your organization does not measure its portfolio impact on biodiversity

Important but not an immediate strategic priority.

[Fixed row]

(12.1.1) Provide details of your organization's financed emissions in the reporting year and in the base year.

Banking (Bank)

(12.1.1.1) Asset classes covered in the calculation

Select all that apply

☒ Project finance

☒ Real estate

(12.1.1.2) Financed emissions (metric unit tons CO2e) in the reporting year

1067519

(12.1.1.3) % of portfolio covered in relation to total portfolio value

33

(12.1.1.4) Total value of assets included in the financed emissions calculation

45033120000.00

(12.1.1.5) % of financed emissions calculated using data obtained from clients/investees (optional)

1

(12.1.1.6) Emissions calculation methodology

Select from:

☒ The Global GHG Accounting and Reporting Standard for the Financial Industry (PCAF)

(12.1.1.7) Weighted data quality score (for PCAF-aligned data quality scores only)

1

(12.1.1.8) Financed emissions (metric unit tons CO2e) in the base year

2570000

(12.1.1.9) Base year end

12/31/2021

(12.1.1.10) % of undrawn loan commitments included in the financed emissions calculation

0

(12.1.1.11) Please explain the details of and assumptions used in your calculation

We calculate financed emissions for our three most material asset classes: Residential Mortgages, Commercial Real Estate (CRE), Project Finance (Electricity Generation), accounting for 64% of our loan book value and 33% of its total balance sheet in 2024. Our financed emissions calculation methodology, scope and assumptions used align with the Partnership for Carbon Accounting Financials (PCAF) guidance on financed emissions calculation. In alignment with CSRD, we have obtained limited assurance over our financed emissions calculations. The scope of our financed emissions calculations for each of our three asset classes include Scope 1 and 2 emissions. In line with PCAF guidance, Scope 3 emissions are not included for each of the three asset classes' financed emissions. AIB's share of financed emissions is calculated by applying an attribution factor to our customers' Scope 1 and 2 emissions. This attribution factor is based on a ratio between AIB's total outstanding exposure to the company, project or asset and the total company, project or asset value. Across our three most material asset classes that we estimate financed emissions, total asset value is included in the scope of our financed emissions as far as possible. For CRE, 74% of the lending portfolio is included in our financed emissions and target scope with the remaining proportion (23%) covered in the Portfolio Coverage target. As far as possible, primary data obtained from our customers is used to calculate our financed emissions. Where primary customer data is not directly available, proxies are used. For our Project Finance (Electricity Generation) portfolio primary data is provided by our customers. For our Residential Mortgages and CRE portfolios, emissions intensity data is extracted from our customers' BER certificate or EPC. Where a BER certificate or EPC is not available, a proxy median is assigned based on national publicly available information or, where a property's floor area is unknown, floor area is calculated at the property sub-type level using publicly available Central Statistics Office property figures. We are continuing to put measures in place to enhance data across our lending portfolio. Over time, we aim to replace estimates with actual customer data and reduce our reliance on proxy data. As more specific data becomes available, we will need to revise our actual emissions, targets and underlying assumptions. Note we are not disclosing the weighted data quality scores

[Fixed row]

(12.2) Are you able to provide a breakdown of your organization's financed emissions and other portfolio carbon footprinting metrics?

	Portfolio breakdown	Please explain why you do not provide a breakdown of your portfolio impact on the climate
Banking (Bank)	Select all that apply <input checked="" type="checkbox"/> Yes, by asset class	See below breakdown of financed emissions and other portfolio carbon footprinting metrics in 12.2.1 below.

	Portfolio breakdown	Please explain why you do not provide a breakdown of your portfolio impact on the climate
	<input checked="" type="checkbox"/> Yes, by industry	

[Fixed row]

(12.2.1) Break down your organization's financed emissions and other portfolio carbon footprinting metrics by asset class, by industry, and/or by scope.

Row 1

(12.2.1.1) Portfolio

Select from:

☒ Banking (Bank)

(12.2.1.2) Portfolio metric

Select from:

☒ Other, please specify :kgCO2e/M2

(12.2.1.3) Industry

Select from:

☒ Retail

(12.2.1.4) Asset class

Select from:

☒ Real estate

(12.2.1.6) % of asset class emissions calculated in the reporting year based on total value of assets

100

(12.2.1.7) Value of assets covered in the calculation

36287764169

(12.2.1.8) Financed emissions or alternative metric

16.97

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

Select from:

☒ Not applicable

(12.2.1.12) Please explain the details, assumptions and exclusions in your calculation

AIB calculate financed emissions for one of our most material asset classes, Residential Mortgages, which accounts for 51% of our loan book value and 26% of our total balance sheet in 2024. We have set a financed emissions reduction target for our Residential Mortgages portfolio, validated by the SBTi in 2023. Our financed emissions calculation methodology, scope and assumptions used align with the Partnership for Carbon Accounting Financials (PCAF) guidance. The scope of our financed emissions calculations include Scope 1 and 2 emissions and excludes Scope 3 emissions, in line with PCAF guidance. Total asset value, i.e. 100% is included in the scope of our Residential Mortgages financed emissions calculation. As far as possible, primary data obtained from our customers is used to calculate our financed emissions. In the absence of primary data, emissions intensity data is extracted from our customers' BER certificate or EPC. Where a BER certificate or EPC is not available, a proxy median is assigned based on national publicly available information or, where a property's floor area is unknown, floor area is calculated at the property sub-type level using publicly available Central Statistics Office property figures. AIB's share of financed emissions is calculated by applying an attribution factor to our customers' Scope 1 and 2 emissions. This attribution factor is based on a ratio between total outstanding mortgage loan and the total property value at the time of loan origination. Progress against our target is tracked using a physical emissions intensity metric, i.e. kgCO₂e/m², and reported externally via AIB's Annual Sustainability Statement and internally through executive and board governance channels.

Row 2

(12.2.1.1) Portfolio

Select from:

☒ Banking (Bank)

(12.2.1.2) Portfolio metric

Select from:

☒ Other, please specify :kgCO2e/M2

(12.2.1.3) Industry

Select from:

☒ Infrastructure

(12.2.1.4) Asset class

Select from:

☒ Real estate

(12.2.1.6) % of asset class emissions calculated in the reporting year based on total value of assets

100

(12.2.1.7) Value of assets covered in the calculation

5649359367

(12.2.1.8) Financed emissions or alternative metric

106.8

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

Select from:

☒ Not applicable

(12.2.1.12) Please explain the details, assumptions and exclusions in your calculation

AIB calculate financed emissions for one of our most material asset classes, Commercial Real Estate, which accounts for 8% of our loan book value and 4% of our total balance sheet in 2024. We have set a financed emissions reduction target for our Commercial Real Estate portfolio, validated by the SBTi in 2023. Our financed emissions calculation methodology, scope and assumptions used align with the Partnership for Carbon Accounting Financials (PCAF) guidance. The scope of our financed emissions calculations include Scope 1 and 2 emissions and excludes Scope 3 emissions, in line with PCAF guidance. Total asset value, i.e. 73.6% is included in the scope of our Commercial Real Estate financed emissions calculation. As far as possible, primary data obtained from our customers is used to calculate our financed emissions. In the absence of primary data, emissions intensity data is extracted from our customers' BER certificate or EPC. Where a BER certificate or EPC is not available, a proxy median is assigned based on national publicly available information or, where a property's floor area is unknown, floor area is calculated at the property sub-type level using publicly available Central Statistics Office property figures. AIB's share of financed emissions is calculated by applying an attribution factor to our customers' Scope 1 and 2 emissions. This attribution factor is based on a ratio between total outstanding loan and the total property value at the time of loan origination. Progress against our target is tracked using a physical emissions intensity metric, i.e. kgCO₂e/m², and reported externally via AIB's Annual Sustainability Statement and internally through executive and board governance channels.

Row 3

(12.2.1.1) Portfolio

Select from:

☒ Banking (Bank)

(12.2.1.2) Portfolio metric

Select from:

☒ Other, please specify :gCO₂e/kWh

(12.2.1.3) Industry

Select from:

☒ Power generation

(12.2.1.4) Asset class

Select from:

☒ Project finance

(12.2.1.6) % of asset class emissions calculated in the reporting year based on total value of assets

100

(12.2.1.7) Value of assets covered in the calculation

3608366772

(12.2.1.8) Financed emissions or alternative metric

0.97

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

Select from:

☒ Not applicable

(12.2.1.12) Please explain the details, assumptions and exclusions in your calculation

AIB calculate financed emissions for one of our most material asset classes, Project Finance (Electricity Generation), which accounts for 8% of our loan book value and 4% of our total balance sheet in 2024. We have set a financed emissions reduction target for our Project Finance (Electricity Generation) portfolio, validated by the SBTi in 2023. Our financed emissions calculation methodology, scope and assumptions used align with the Partnership for Carbon Accounting Financials (PCAF) guidance. The scope of our financed emissions calculations include Scope 1 and 2 emissions and excludes Scope 3 emissions, in line with PCAF guidance. Total asset value, i.e. 100% is included in the scope of our Project Finance (Electricity Generation) financed emissions calculation. As far as possible, primary data obtained from our customers is used to calculate our financed emissions. For our Project Finance (Electricity Generation) portfolio primary data is provided by our customers. AIB's share of financed emissions is calculated by applying an attribution factor to our customers' Scope 1 and 2 emissions. This attribution factor is based on a ratio between total outstanding loan and the total property value at the time of loan origination. This attribution factor is based on a ratio between AIB's total outstanding exposure to the company, project or asset and the total company, project or asset value. Progress against our target is tracked using a physical emissions intensity metric, i.e. gCO2e/kWh, and reported externally via AIB's Annual Sustainability Statement and internally through executive and board governance channels.

[Add row]

(12.3) State the values of your financing and insurance of fossil fuel assets in the reporting year.

Lending to all fossil fuel assets

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

☒ Yes

(12.3.2) Value of the fossil fuel assets in your portfolio (unit currency - as specified in 1.2)

166000000

(12.3.3) New loans advanced in reporting year (unit currency – as specified 1.2)

150000

(12.3.5) % of portfolio value comprised of fossil fuel assets to total portfolio value in reporting year

0.1

(12.3.6) Details of calculation

Percentage of portfolio value comprised of carbon-related assets in reporting year is the value of the carbon-related assets in your portfolio as at 31.12.2024 expressed as a % of the Group loan portfolio as at - 166,000,000/136,484,000,000) c.0.12%. Further information as follows: As per our Q4 2024 Pillar 3 report (Template 1 Indicators of potential climate change risk: Credit quality exposures by sector, emissions and residual maturity), the Group provided information on exposures to sectors that are more prone to the risks that institutions may face from the transition to a low-carbon and climate resilient economy. Non-Paris Agreement aligned assets refers to non-financial corporate lending to counterparties with revenue from fossil fuel activities. As part of Template 1 of the Pillar 3 report, AIB disclosed loans to counterparties that are excluded from the EU Paris-aligned Benchmarks as specified in Article 12(1) (d)-(g) and Article 12(2) of Commission Delegated Regulation (EU) 2020/1818. Article 12(1) (d)-(g) are outlined below: (d) companies that derive 1% or more of their revenues from exploration, mining, extraction, distribution or refining of hard coal and lignite, (e) companies that derive 10% or more of their revenues from the exploration, extraction, manufacturing, distribution or refining of oil fuels, (f) companies that derive 50% or more of their revenues from the exploration, extraction, manufacturing or distribution of gaseous fuels; (g) companies that derive 50% or more of their revenues from electricity generation with a GHG intensity of more than 100g CO₂ e/kWh. For Q4 2024 no significant testing against the Do No Significant Harm criteria has occurred, as a result, Article 12(2) of Commission Delegated Regulation (EU) 2020/1818 exclusion criteria has not been taken into account during the counterparty identification process. The Group has completed a bottom up review of the portfolio in line with the relevant revenue and emissions thresholds and determined that 166,000,000 of exposures were towards companies that highly contribute towards climate change.

Lending to thermal coal

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

☒ Yes

(12.3.2) Value of the fossil fuel assets in your portfolio (unit currency - as specified in 1.2)

0

(12.3.3) New loans advanced in reporting year (unit currency – as specified 1.2)

0

(12.3.5) % of portfolio value comprised of fossil fuel assets to total portfolio value in reporting year

0

(12.3.6) Details of calculation

Not applicable due to no exposure.

Lending to met coal

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

☒ Yes

(12.3.2) Value of the fossil fuel assets in your portfolio (unit currency - as specified in 1.2)

0

(12.3.3) New loans advanced in reporting year (unit currency – as specified 1.2)

0

(12.3.5) % of portfolio value comprised of fossil fuel assets to total portfolio value in reporting year

0

(12.3.6) Details of calculation

Not applicable due to no exposure.

Lending to oil

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

☒ Yes

(12.3.2) Value of the fossil fuel assets in your portfolio (unit currency - as specified in 1.2)

0

(12.3.3) New loans advanced in reporting year (unit currency – as specified 1.2)

0

(12.3.5) % of portfolio value comprised of fossil fuel assets to total portfolio value in reporting year

0

(12.3.6) Details of calculation

Not applicable due to no exposure.

Lending to gas

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

☒ Yes

(12.3.2) Value of the fossil fuel assets in your portfolio (unit currency - as specified in 1.2)

0

(12.3.3) New loans advanced in reporting year (unit currency – as specified 1.2)

0

(12.3.5) % of portfolio value comprised of fossil fuel assets to total portfolio value in reporting year

0

(12.3.6) Details of calculation

*Not applicable due to no exposure.
[Fixed row]*

(12.4) Does your organization provide finance and/or insurance to companies in the commodity value chain? If so, for each commodity and portfolio, state the values of your financing and/or insurance in the reporting year.

Lending to companies operating in the timber products value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

☒ Yes

(12.4.2) Commodity value chain stage coverage

Select all that apply

☒ Production

☒ Processing

- ☒ Trading
- ☒ Manufacturing
- ☒ Retailing

(12.4.3) Portfolio exposure (unit currency – as specified in 1.2)

1

(12.4.4) New loans advanced in reporting year (unit currency – as specified in 1.2)

1

(12.4.6) % value of the exposure in relation to your total portfolio value

1

Lending to companies operating in the palm oil value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

- ☒ No

Lending to companies operating in the cattle products value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

- ☒ Yes

(12.4.2) Commodity value chain stage coverage

Select all that apply

- ☒ Production

- ☒ Processing
- ☒ Trading
- ☒ Retailing

(12.4.3) Portfolio exposure (unit currency – as specified in 1.2)

1

(12.4.4) New loans advanced in reporting year (unit currency – as specified in 1.2)

1

(12.4.6) % value of the exposure in relation to your total portfolio value

1

Lending to companies operating in the soy value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

- ☒ No

Lending to companies operating in the rubber value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

- ☒ No

Lending to companies operating in the cocoa value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

☒ No

Lending to companies operating in the coffee value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

☒ No

[Fixed row]

(12.5) In the reporting year, did your organization finance and/or insure activities or sectors that are aligned with, or eligible under, a sustainable finance taxonomy? If so, are you able to report the values of that financing and/or underwriting?

Banking (Bank)

(12.5.1) Reporting values of the financing and/or insurance of activities or sectors that are eligible under or aligned with a sustainable finance taxonomy

Select from:

☒ Yes

(12.5.2) Taxonomy under which portfolio alignment is being reported

Select from:

☒ EU Taxonomy for Sustainable Activities

(12.5.3) Total assets in your portfolio (unit currency as selected in 1.2)

136464000000.00

(12.5.4) Total assets covered in the calculation of the taxonomy KPIs in the reporting year

(12.5.5) Total assets excluded from the calculation of your alignment KPIs in the reporting year

45409539035

(12.5.6) Aligned assets based on turnover of investees in the reporting year (unit currency as selected in 1.2)

0

(12.5.7) Share of aligned assets based on turnover of investees out of total assets in the reporting year

0

(12.5.8) Eligible assets based on turnover of investees in the reporting year

0

(12.5.9) Share of eligible assets based on turnover of investees in the reporting year out of total assets in the reporting year

0

(12.5.10) Aligned assets based on CAPEX of investees in the reporting year (unit currency as selected in 1.2)

0

(12.5.11) Share of aligned assets based on CAPEX of investees out of total asset in the reporting year

0

(12.5.12) Eligible assets based on CAPEX of investees in the reporting year

0

(12.5.13) Share of eligible assets based on CAPEX of investees out of total asset in the reporting year

0

(12.5.14) Share of aligned assets contributing to climate change mitigation based on turnover of investees in the reporting year

0

(12.5.15) Share of aligned assets contributing to climate change mitigation that is transitional based on turnover of investees in the reporting year

0

(12.5.16) Share of aligned assets contributing to climate change mitigation that is enabling based on turnover of investees in the reporting year

0

(12.5.17) Share of aligned assets contributing to climate change adaptation based on turnover of investees in the reporting year

0

(12.5.18) Share of aligned assets contributing to climate change adaptation that is adapted based on turnover of investees in the reporting year

0

(12.5.19) Share of aligned assets contributing to climate change adaptation that is enabling based on turnover of investees in the reporting year

0

(12.5.20) Share of aligned assets contributing to climate change mitigation based on CAPEX of investees in the reporting year

0

(12.5.21) Share of aligned assets contributing to climate change mitigation that is transitional based on CAPEX of investees in the reporting year

0

(12.5.22) Share of aligned assets contributing to climate change mitigation that is enabling based on CAPEX of investees in the reporting year

0

(12.5.23) Share of aligned assets contributing to climate change adaptation based on CAPEX of investees in the reporting year

0

(12.5.24) Share of aligned assets contributing to climate change adaptation that is adapted based on CAPEX of investees in the reporting year

0

(12.5.25) Share of aligned assets contributing to climate change adaptation that is enabling based on CAPEX of investees in the reporting year

0

(12.5.32) “Do No Significant Harm” requirements met

Select from:

☒ Yes

(12.5.33) Details of “Do No Significant Harm” analysis

In order for residential mortgages to be aligned to the EU Taxonomy, the Technical Screening Criteria (TSC) for both ‘Substantial Contribution (SC) to Climate Change Mitigation (CCM)’ and ‘Do No Significant Harm (DNHS) to Climate Change Adaptation (CCA)’ must be met, as laid out in Annex 1 of the Commission Delegated Regulation (EU) 2021/2139, dated 4 June 2021. The physical climate risks that are material to the activity have been identified from those listed by performing a robust climate risk and vulnerability assessment with the following steps: (a) screening of the activity to identify which physical climate risks from the list may affect the performance of the economic activity during its expected lifetime; (b) where the activity is assessed to be at risk from one or more of the physical climate risks listed, a climate risk and vulnerability assessment to assess the materiality of the physical climate risks on the economic activity; (c) an assessment of adaptation solutions that can reduce the identified physical climate risk. For 2024 the DNSH to CCA requirement will be achieved, through the application of flood risk data to the residential mortgage portfolio, and the removal from the aligned population of any properties vulnerable to modelled flood damage.

(12.5.34) Details of calculation

AIB have carried out a risk assessment and identified flood risk (fluvial, coastal, groundwater, pluvial) as being a relevant hazard to the residential mortgage portfolio. The flood risk model (subject to appropriate validation and approval in AIB) will be applied to the residential mortgage book. Properties subject to flood damage, under the methodology outlined therein, will be identified and removed from the population that is aligned under the TSC for Substantial Contribution to Climate Change Mitigation. A property is determined to be damaged if it experiences a flood depth of more than 20cm when applying the flood risk model. If a property, otherwise aligned with the TSC for Substantial Contribution to Climate Change Mitigation, is determined to be damaged, it is removed from the taxonomy aligned population. For the Republic of Ireland, AIB’s proprietary flood risk model is applied. This model is currently subject to validation. The flood risk model parameters applied are as follows: Combined 1-in-200 year fluvial, pluvial and coastal flood risk; Assets with exposure to more than one peril type are allocated the highest of the damages from each individual hazard; IPCC scenario RCP 8.5; Time horizon 2031-2035. Properties, where possible, are mapped to their specific location (‘rooftop’) and if the modelled flood height at this location is more than 20cm, the property is determined to be subject to flood damage and removed from the aligned portfolio. For properties that cannot be mapped to a specific ‘rooftop’ the following approach is taken. If the property is mapped to a specific thoroughfare, the mean flood depth of all of the individual properties on that thoroughfare (not limited to AIB collateral) is taken and the property determined to be subject to flood damage if that mean flood depth is more than 20cm. If the property is mapped to a townland or other discrete area, the 90th percentile flood depth for all the individual properties in that area (not just AIB collateral) is taken and the property determined to be subject to flood damage if this flood depth is more than 20cm. For the United Kingdom, the same flood risk model is applied and, where the ‘rooftop’ can be identified, the flood depth data is applied to the property directly and those aligned properties subject to modelled flood depth of more than 20cm are removed from the aligned portfolio

[Fixed row]

(12.6) Do any of your existing products and services enable clients to mitigate and/or adapt to the effects of environmental issues?

	Existing products and services enable clients to mitigate and/or adapt to the effects of environmental issues
	<i>Select from:</i> <input checked="" type="checkbox"/> Yes

[Fixed row]

(12.6.1) Provide details of your existing products and services that enable clients to mitigate and/or adapt to the effects of environmental issues, including any taxonomy or methodology used to classify the products and services.

Row 1

(12.6.1.1) Environmental issue

Select all that apply

☒ Climate change

(12.6.1.2) Product/service enables clients to mitigate and/or adapt to climate change

Select all that apply

☒ Mitigation

☒ Adaptation

(12.6.1.3) Portfolio

Select from:

☒ Banking (Bank)

(12.6.1.4) Asset class

Select from:

- ☒ Loans

(12.6.1.5) Type of product classification

Select all that apply

- ☒ Products that promote environmental and/or social characteristics
- ☒ Products that have sustainable investment as their core objective

(12.6.1.6) Taxonomy or methodology used to identify product characteristics

Select all that apply

- ☒ The EU Taxonomy for environmentally sustainable economic activities
- ☒ Internally classified

(12.6.1.7) Type of solution financed, invested in or insured

Select all that apply

- | | |
|---|--|
| <input checked="" type="checkbox"/> Carbon removal | <input checked="" type="checkbox"/> Nature-based solutions |
| <input checked="" type="checkbox"/> Renewable energy | <input checked="" type="checkbox"/> Low-emission transport |
| <input checked="" type="checkbox"/> Ecosystem protection | <input checked="" type="checkbox"/> Regenerative production |
| <input checked="" type="checkbox"/> Fortified buildings | <input checked="" type="checkbox"/> Energy efficiency measures |
| <input checked="" type="checkbox"/> Ecosystem restoration | <input checked="" type="checkbox"/> Paperless/ digital service |
| <input checked="" type="checkbox"/> Green buildings and equipment | |

(12.6.1.8) Description of product/service

We offer Green Mortgages across AIB, EBS and Haven, with favourable interest rates available for energy efficient homes. All three entities provide Green Mortgages to homes with a BER of between A1 and B3 to new and existing mortgage customers, including customers seeking to switch their mortgage. AIB is a preferred finance provider to Electric Ireland Superhomes, a One Stop Shop which looks after all the key stages of a home energy retrofit and, through them, they offer the AIB Green Personal Loan. Customers who are building their own home can choose from the full range of mortgage products, including one of the lowest Green rate mortgages in the Irish market (where compliance with nearly Zero Energy Building (nZEB) standards is demonstrated). In 2024, the Government, in partnership with the SBCI, launched the new low-cost Home Energy Upgrade Loan Scheme for homeowners. AIB is one of the finance providers approved to participate in this scheme. Customers can borrow between €5,000 and €75,000 per property, for up to three properties, up to a maximum of €225,000 in total. Furthermore, up to 25% of the loan can be used for non energy upgrades. Loans will be available up to 31 December 2026 or until the scheme is fully subscribed. In 2024, and our green

mortgage offerings across our brands performed very well with 52% of all new mortgage lending going to finance energy efficient homes. We also issue lending to customers for eligible green or transition to green purposes as follows: renewable energy, animal production efficiency, pollution control, amongst others.

(12.6.1.9) % of portfolio aligned with a taxonomy or methodology in relation to total portfolio value

3.04

(12.6.1.10) % of asset value aligned with a taxonomy or methodology

2.91

(12.6.1.11) Product considers principal adverse impacts on environmental factors

Select from:

☒ Yes

(12.6.1.12) Details on how the principal adverse impacts on environmental factors are considered in this product

As part of AIB commitments to provide Green and Transition lending, the Bank has developed a Sustainable Lending Framework (SLF) to provide transparency on the types of activities to be considered as Green, Transition or social activities. EU Taxonomy aligned lending is a subset of the green lending categorisation as determined by the SLF. EU Taxonomy: The criteria for EU Taxonomy are strict with many lending activities that contribute to the transition of a greener economy excluded as the activities do not meet the criteria. For AIB, EU Taxonomy aligned exposure identified materially comprises 1) lending to residential mortgages where the underlying assets meet the technical screening criteria for Climate Change Mitigation including an assessment of DNSH to Climate Change Adaptation and to a much less extent 2) lending to counterparties subject to the Non-Financial Reporting Directive (representing a small portion of total lending activity c.1%). In determining alignment for residential mortgages we have utilised the BER or EPC of the property to identify assets contained in the Top 15% of national stock (constructed pre 2020) or aligned to the Nearly Zero Energy Building Standard – 10% (constructed post 2020).

[Add row]

(12.7) Has your organization set targets for deforestation and conversion-free and/or water-secure lending, investing and/or insuring?

Forests

(12.7.1) Target set

Select from:

☒ No, we have not set such targets and we do not plan to in the next two years

(12.7.2) Explain why your organization has not set targets for deforestation- and conversion-free and/or water-secure lending, investing and/or insuring

Forests was not deemed as having had or having anticipated a material substantive effect on AIB pursuant to our first full Double Materiality Assessment in 2023.

Water

(12.7.1) Target set

Select from:

☒ No, we have not set such targets and we do not plan to in the next two years

(12.7.2) Explain why your organization has not set targets for deforestation- and conversion-free and/or water-secure lending, investing and/or insuring

Water was not deemed as having had or having anticipated a material substantive effect on AIB pursuant to our first full Double Materiality Assessment in 2023.
[Fixed row]

C13. Further information & sign off

(13.1) Indicate if any environmental information included in your CDP response (not already reported in 7.9.1/2/3, 8.9.1/2/3/4, and 9.3.2) is verified and/or assured by a third party?

	Other environmental information included in your CDP response is verified and/or assured by a third party
	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

(13.1.1) Which data points within your CDP response are verified and/or assured by a third party, and which standards were used?

Row 1

(13.1.1.1) Environmental issue for which data has been verified and/or assured

Select all that apply

☒ Climate change

(13.1.1.2) Disclosure module and data verified and/or assured

Environmental performance – Climate change

☒ Other data point in module 7, please specify :Scope 1, 2 & 3 emissions (excluding investments)

(13.1.1.3) Verification/assurance standard

Climate change-related standards

☒ ISO 14064-3

(13.1.1.4) Further details of the third-party verification/assurance process

The Group GHG emissions data for reporting year 2024 was externally verified by an accredited third-party assurance provider. The verification covered Scope 1 emissions, Scope 2 emissions (Market and Location based) and Scope 3 emissions (purchased goods and services, capital goods, fuels and energy-related activities, waste, business travel, employee commuting & WFH and downstream leased assets). The organisational boundary of AIB was established as to include all operational sites in FY24. The carbon footprint was calculated by AIB using the operational control approach. The process followed the ISO 14064-3 International Standard. The assurance level provided was limited, involving data sampling and document review during the verification process. No material discrepancies were identified and the data was deemed reliable and accurate for disclosure. Further details as per attached document.

(13.1.1.5) Attach verification/assurance evidence/report (optional)

AIB - GHG Emissions FY2024_ Limited Verification Statement v1.2_HJ_250826.pdf

Row 2

(13.1.1.1) Environmental issue for which data has been verified and/or assured

Select all that apply

☒ Climate change

(13.1.1.2) Disclosure module and data verified and/or assured

Environmental performance – Financial services

☒ Other data point in module 12, please specify :Scope 3 Category 15 financed emissions

(13.1.1.3) Verification/assurance standard

General standards

☒ ISAE 3000

(13.1.1.4) Further details of the third-party verification/assurance process

As part of our 2024 annual reporting, limited assurance was obtained across AIB's Scope 3 Category 15 financed emissions, calculated in accordance with the Partnership for Carbon Accounting Financials (PCAF) and the GHG Protocol. The limited assurance engagement was conducted in accordance with International Standard on Assurance Engagements (Ireland) 3000.

(13.1.1.5) Attach verification/assurance evidence/report (optional)

aib-group-plc-afr-report-2024 (1).pdf
[Add row]

(13.2) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored.

	Additional information	Attachment (optional)
	Please see our Annual Financial Report for FY2024 for further detail.	aib-group-plc-afr-report-2024.pdf

[Fixed row]

(13.3) Provide the following information for the person that has signed off (approved) your CDP response.

(13.3.1) Job title

Chief Executive Officer (CEO)

(13.3.2) Corresponding job category

Select from:

☒ Chief Executive Officer (CEO)

[Fixed row]

(13.4) Please indicate your consent for CDP to share contact details with the Pacific Institute to support content for its Water Action Hub website.

Select from:

☒ Yes, CDP may share our Disclosure Submission Lead contact details with the Pacific Institute

