

ESG Questionnaire



Sofia, July 2026

Empowering
Communities to Progress.



» Environmental responsibility

» Do you have the target to be NET ZERO by 2050 and, if yes, have you joined sectors' initiatives?

We are committed to reaching Net Zero on our financed emission by 2050 - and in line with UNEP Guidance for FIs, we have outlined interim 2030 targets for seven of our most carbon-intensive client sectors on Group level (five sectors implemented in Bulgaria), including an industry-leading phase out policy for coal, as we continue to embed ESG in our financing activities and implement our Net Zero transition plan.

See pages 243-264 of our 2025 Annual Report and Accounts for more details.

<https://www.unicreditgroup.eu/content/dam/unicreditgroup-eu/documents/en/investors/financial-reports/2025/4q25/2025-Annual-Reports-and-Accounts.pdf>

» Does your organization plan to achieve net zero carbon emissions?

Yes, please see Our path towards Net Zero

<https://www.unicreditgroup.eu/en/esg-and-sustainability/net-zero.html>

» Please specify the baseline year for your carbon neutrality target

2021 and 2022 for different sectors

<https://www.unicreditgroup.eu/en/esg-and-sustainability/net-zero.html>



» Environmental responsibility

» Please specify which policies are used for emissions reduction.

Investment and lending policies / Internal ESG Product Guidelines

<https://www.unicreditgroup.eu/en/esg-and-sustainability/esg-sustainability-policies-and-ratings.html>

» Does your organization provide any specific financial products, that are focuses and/or ring fences towards a specific sustainability target?

Yes, including SMEs we provide sustainability-linked loans, loans to finance environmental opportunities (energy efficiency, renewable energy and waste management), social opportunities (hospitals, schools, public housing, investments promoting equitability and inclusivity). Please see ESG Product Guidelines.

<https://www.unicreditgroup.eu/en/esg-and-sustainability/esg-sustainability-policies-and-ratings.html>



» Social responsibility

» Does the bank have applicable social policies that foster diversity, social and inclusion among its employees?

Diversity, Equity, and Inclusion (DE&I) are key strategic drivers for our business and remain an integral part in building a strong foundation for our bank Culture. Our DE&I Global Policy supports our Culture transformation and defines behaviors we expect from everyone in our Group, while increasing transparency and providing direction on the ways we are addressing positive change, regardless of any diversity strands.

<https://www.unicreditgroup.eu/en/unicredit-at-a-glance/diversity.html>

» What social management policies do you have in place in your organization?

We have Code of Conduct; Anti-corruption policy; Conflict of interest; Reporting unacceptable behavior

<https://www.unicreditbulbank.bg/bg/pravna-informatsiya/reglamenti/etichen-kodeks/>

» What areas of employment does the equal opportunities and fair treatment policy covers?

Hiring; Compensation/remuneration; Promotion; Termination; Retirement

<https://www.unicreditgroup.eu/en/unicredit-at-a-glance/diversity.html>



» Social responsibility

» Does your organization ensure that individuals are treated equally irrespective of the following characteristics:

Age; disability; gender reassignment; marriage and civil partnership; medical conditions; pregnancy and maternity; race, including color, nationality, ethnic or national origin; religion or belief; gender; sexual orientation?

Yes

<https://www.unicreditgroup.eu/en/unicredit-at-a-glance/diversity.html>

» What is the percentage of gender diversity of the board of directors?

The representation of woman in Board of Directors is 53% (see page 26 from UniCredit Bulbank 2025 Annual report)

https://www.unicreditbulbank.bg/media/filer_public/88/e8/88e8f968-1ff8-4475-ba80-de21d89d453e/ucb-annual-report-2025-en.pdf

» What is the percentage of gender diversity at leadership team?

The representation of women is 32% (see page 26 from UniCredit Bulbank 2025 Annual report)

https://www.unicreditbulbank.bg/media/filer_public/88/e8/88e8f968-1ff8-4475-ba80-de21d89d453e/ucb-annual-report-2025-en.pdf



» Social responsibility

- » **Please confirm that you have documented health and safety policy?**
If yes, does it include the following topics: Assessment of health and safety risk; employees being required to attend or complete health and safety trainings; employees being required to report any defects in their work area equipment or any other hazards; employees being required to report any health and safety incidents?
We Yes, we also have committee on the health and safety incidents, which receives complaints, if any, on the health and safety topics

- » **Do you have a statement on modern slavery for your business and your suppliers?**
Yes

https://www.unicreditgroup.eu/content/dam/unicreditgroup-eu/documents/en/sustainability/sustainability-reports/2024/2024_UniCredit-Statement-on-Modern-Slavery-Act-and-Human-Trafficking_access-final.pdf



Governance responsibility

Does your institution publish or plan to publish a standalone or integrated annual ESG or sustainability report?

Yes, in our 2025 UniCredit Group Annual Report, you can find our Sustainability Statements, which we have prepared in compliance with the EU Corporate Sustainability Reporting Directive (CSRD).

<https://www.unicreditgroup.eu/content/dam/unicreditgroup-eu/documents/en/investors/financial-reports/2025/4q25/2025-Annual-Reports-and-Accounts.pdf>

Regarding the reporting on climate information, do you comply with the reporting standard of the TCFD Task Force on Climate related Financial Disclosures?

Yes, we committed to the TCFD recommendations in 2019 and started reporting in the 2019 Integrated Report already. Since 2020, we are publishing a stand alone TCFD report. From 2024 it is integrated as part of our Group Annual Report.

https://www.unicreditgroup.eu/content/dam/unicreditgroup-eu/documents/en/sustainability/sustainability-reports/2023/UniCredit_2023_TCFD_Report.pdf



» Governance responsibility

» Do you commit to any (inter)national standards, industry, or association guidelines, reporting frameworks, or other initiatives that promote ESG practices? (e.g. TCFD, PACTA, UNEP FI PRB, SDGs, NZBA, ...)?

To strengthen and manifest our commitment to the green and social transition, over the years we have decided to adhere to key international and institutional initiatives.

Please see Page 276, 74, from 2025-Annual-Reports-and-Accounts

<https://www.unicreditgroup.eu/content/dam/unicreditgroup-eu/documents/en/investors/financial-reports/2025/4q25/2025-Annual-Reports-and-Accounts.pdf>

» Has your institution been assessed/rated on an ESG basis by an external institution?

The Group Investor Relations team, with the support of the ESG team, proactively and reactively interacts with ESG rating agencies with the aim of communicating, monitoring, and improving the Group's sustainability strategy. See the dedicated section of our website.

<https://www.unicreditgroup.eu/en/esg-and-sustainability/esg-sustainability-policies-and-ratings.html>



» Governance responsibility

» Does the bank have appropriate policies in place that incorporate sector specific standards promoting the adoption of the best ESG practices?

Environmental and social risk assessments are guided by our environmental, social, operational, and reputational risk sector policies as well as by our human rights commitment. When possible, the Equator Principles (EP) also apply. See the policies/commitments we have in place at the following link, of which applicable: ESG Product Guidelines, Tobacco Sector, Oil and Gas, Defense/weapons, Coal Sector, Mining, Civil Nuclear, Water Infrastructure, Human Rights, Rainforests; Statement of Natural Capital and Biodiversity; UniCredit Environmental Policy

<https://www.unicreditgroup.eu/en/esg-and-sustainability/esg-sustainability-policies-and-ratings.html>

» Has a Human Rights Complaints Mechanism in place?

Yes, and the reporting channels are Whistleblowing, People and culture department, Line Manager, another channel locally implemented.

<https://www.unicreditbulbank.bg/bg/pravna-informatsiya/reglamenti/etichen-kodeks/>



Governance responsibility

Does your institution have a Board level committee and/or a function dedicated to ESG and sustainability topics?

In recent years, our sustainability governance has been significantly strengthened at both steering and execution levels, underpinning the drive to further integrate ESG criteria into the Group's overall business strategy. Since April 2024, UniCredit operates under a one-tier corporate governance system based on a Board of Directors and an Audit Committee, established within the Board itself, both appointed by the Shareholders' Meeting. Our governance strongly supports the integration of ESG into UniCredit's strategy leveraging on relevant ESG components. See page 317 of our 2025 Annual Report and accounts.

<https://www.unicreditgroup.eu/content/dam/unicreditgroup-eu/documents/en/investors/financial-reports/2025/4q25/2025-Annual-Reports-and-Accounts.pdf>

Are you involved in causes related to improving the life of society?

Yes, on the topics: Education and culture, environmental protection and biodiversity, social investment, etc.



» Governance responsibility

- » Do you provide methods for reporting incidents, complaints and signals related to your activities by employees, suppliers, other interested parties? For example: anonymous email, anonymous boxes, green phone, etc.

Yes

<https://www.unicreditbulbank.bg/bg/pravna-informatsiya/reglamenti/etichen-kodeks/>

- » Do you assess the business ethics of suppliers and subcontractors before selecting them (such as evidence of corruption, conflict of interest, malign social influence, others)?

Yes, as part of Anti-Bribery and Corruption due diligence.

- » Are Occupational Safety standards and requirements in place for your suppliers?

Suppliers declare on an internal questionnaire (ARIBA), it does not apply to subcontractors.

- » Do you have a policy for change of your financial auditor periodically?

Yes, based on legislation requirements.



» Governance responsibility

- » Please confirm if your policies covers all your clients for the full extent of losses for which you are liable, regardless of your insurance coverage, for the following risks: Alleged or actual breach of fiduciary and other responsibilities; Fraud/crime; Error and omission; Loss of money or other property in bank's own possession; Directors and officers liability?

Yes, with third party insurance

- » Does your organization trains employees for environmental awareness?

Yes. Providing trainings to develop skills and understanding and keeping employees updated on the organization's strategy and initiatives.

- » What is the percentage of your organization's Board are independent, non-executive directors?

The Board of Directors of UniCredit Group is made up of 15 Directors, of whom 1 is an executive and 14 are non-executive

Directors (with a quota equal to 93%). Please see page 124 from our 2025 Annual Report

<https://www.unicreditgroup.eu/content/dam/unicreditgroup-eu/documents/en/investors/financial-reports/2025/4q25/2025-Annual-Reports-and-Accounts.pdf>



Governance responsibility

 **Do you have internal governance arrangements in place to manage ESG related risks?**
Executive management body is responsible for overseeing and monitoring the institutions ESG objectives, risk strategy and governance arrangements.

 **Is the remuneration of your organization's Board of Directors linked to the achievement of ESG objectives?**
Yes, please see Group Remuneration policy

https://www.unicreditgroup.eu/content/dam/unicreditgroup-eu/documents/en/governance/compensation/group-compensation-policy/2026/2026_Group_Remuneration_Policy_and_Report.pdf

 **Does the policy framework of your organization's portfolio activities have exclusion policies?**
Yes

<https://www.unicreditgroup.eu/en/esg-and-sustainability/esg-sustainability-policies-and-ratings.html>



Governance responsibility

Does your organization have policies in place for forests and water security and for biodiversity in its investments/lending activities?

Yes

<https://www.unicreditgroup.eu/en/press-media/press-releases/2022/unicredit-e-la-prima-banca-italiana-a-firmare-il--finance-for-bi.html>

Does your organization have a process for identifying and assessing climate-related risks?

Yes, See pages 661 - 681 from our 2025 Annual Report and accounts.

<https://www.unicreditgroup.eu/content/dam/unicreditgroup-eu/documents/en/investors/financial-reports/2025/4q25/2025-Annual-Reports-and-Accounts.pdf>



Governance responsibility

With a view to managing, monitoring and mitigating them, does your organization incorporate climate-related risks in its risk management framework?

Yes, See pages 661 - 681 from our 2025 Annual Report and accounts.

<https://www.unicreditgroup.eu/content/dam/unicreditgroup-eu/documents/en/investors/financial-reports/2025/4q25/2025-Annual-Reports-and-Accounts.pdf>

Does your organization use metrics to assess climate-related risks and opportunities in line with its strategy and risk management process?

Yes, See pages 661 - 681 from our 2025 Annual Report and accounts.

<https://www.unicreditgroup.eu/content/dam/unicreditgroup-eu/documents/en/investors/financial-reports/2025/4q25/2025-Annual-Reports-and-Accounts.pdf>

Does your organization publicly disclose its Scope 1, Scope 2 and Scope 3 greenhouse gas emissions?

Yes, on all 3 scopes.

See pages 269-275 from our 2025 Annual Report and accounts.

<https://www.unicreditgroup.eu/content/dam/unicreditgroup-eu/documents/en/investors/financial-reports/2025/4q25/2025-Annual-Reports-and-Accounts.pdf>



Governance responsibility

Does your organization use targets to manage climate-related risks and opportunities in line with its strategy and risk management process?

Yes, See pages 249-267 from our 2025 Annual Report and accounts.

<https://www.unicreditgroup.eu/content/dam/unicreditgroup-eu/documents/en/investors/financial-reports/2025/4q25/2025-Annual-Reports-and-Accounts.pdf>

Has your organization set portfolio alignment targets?

Yes, See pages 257-266 from our 2025 Annual Report and accounts.

<https://www.unicreditgroup.eu/content/dam/unicreditgroup-eu/documents/en/investors/financial-reports/2025/4q25/2025-Annual-Reports-and-Accounts.pdf>

Has your organization conducted a materiality assessment on ESG issues?

Yes, See Page 76 - and page 119 - 322 from our 2025 Annual Report and accounts.

<https://www.unicreditgroup.eu/content/dam/unicreditgroup-eu/documents/en/investors/financial-reports/2025/4q25/2025-Annual-Reports-and-Accounts.pdf>



Governance responsibility

Have you supported or signed statutes, conventions, declarations or other initiatives related to social responsibility?

Yes. UniCredit Bulbank, either directly or as part of UniCredit Group, supports and implements a number of internationally recognized principles, declarations, and initiatives related to sustainable development and corporate social responsibility. The Bank is aligned with the commitments of the UN Global Compact, supports the objectives of the Paris Agreement through the Group's policies and targets, and adheres to the Group's ESG statements and commitments related to natural capital, biodiversity, and the transition to net-zero emissions.

UniCredit Bulbank also actively participates in initiatives and partnerships aimed at creating social impact and fostering community development. The Bank is a member of the Bulgarian Donors' Forum and maintains long-term partnerships with organizations such as Teach for Bulgaria (part of the global Teach For All network) and Junior Achievement Bulgaria, focused on improving access to quality education, youth development, and social inclusion. These commitments form an integral part of the Bank's overall approach to sustainability, responsible banking, and the creation of long-term value for society.

