euroclear

Euroclear Bank SA/NV
Annual report

2024

Table of contents

Directors' report

The directors of Euroclear Bank SA/NV ('Euroclear Bank' or 'the Company' or 'we') are pleased to present Euroclear Bank's Annual report for the year ended December 31, 2024. The report comprises three main sections. In the Directors' report we outline how we conduct our business to create long-term value for our stakeholders. For the first time, this report also outlines our approach to sustainability on a standalone basis (Sustainability statements), conforming to the EU Corporate Sustainability Reporting Directive (CSRD).

The report concludes with our detailed 2024 consolidated Financial statements for Euroclear Bank SA/NV.

I. Euroclear Bank at a glance

As a Financial Market Infrastructure (FMI), Euroclear Bank facilitates capital markets around the world with processing securities transactions efficiently, enhancing liquidity and managing associated risks. The company operates secure and resilient platforms where a wide network of the world's largest financial firms and central banks hold and transact securities issued by companies, governments, supranationals and investment fund managers. We are the backbone of the financial ecosystem ensuring that capital flows seamlessly to where it is needed in the real economy.

Euroclear Bank is based in Brussels and is part of the Euroclear Group ('the group' or 'Euroclear').

Euroclear Bank is the International Central Securities Depository (ICSD) of the group and holds a limited banking licence. Euroclear Bank provides solutions for domestic and global financial market participants to invest in securities issued by governments, supranationals, corporations, and fund managers. Euroclear Bank facilitates financing in capital markets by reducing risk, increasing post-trade process efficiency, and optimising collateral mobility and access to liquidity. Euroclear Bank also operates issuer Central Securities Depository (CSD) services for Ireland.

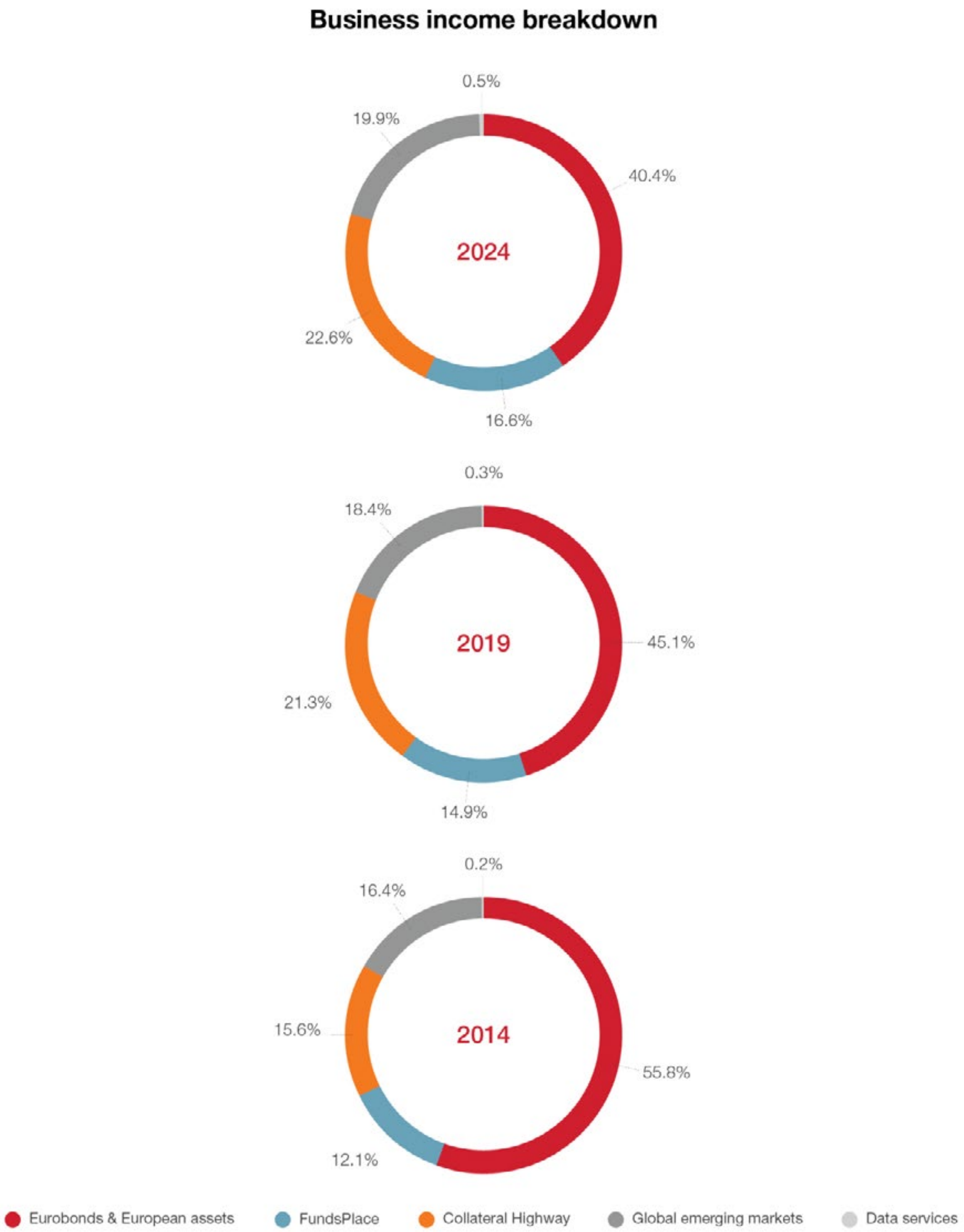
The Euroclear Bank network comprises around 1,800 financial institutions, which use its platform to access circa 50 different markets and settle transactions in 44 currencies. On their behalf, Euroclear Bank holds approximately €20 trillion of assets under custody and enables 197 million netted transactions per year, worth an equivalent of €772 trillion.

Euroclear Bank operates branches in Poland, Hong Kong and Japan. The Polish branch provides a dual-office arrangement with Euroclear Bank's existing operations in Belgium. The Hong Kong branch is an important contributor to client servicing in Asia and provides clients with a global service offering. The branch in Japan supports Japan-based users of its securities settlement system.

Euroclear Bank issued various capital instruments for €800 million in total. These instruments aim at structuring a relevant loss absorption mechanism to restore the capital position of Euroclear Bank in recovery and resolution scenarios in accordance with the Banking Recovery and Resolution Directive (BRRD) applicable to the Company. These instruments are fully subscribed by Euroclear Holding SA/NV, with €300 million out of the total amount issued recognised as Tier 2 regulatory capital by the National Bank of Belgium (NBB).

Besides the above Long-Term Notes issue, Euroclear Bank can count on a €5 billion Euro Medium-Term Note (EMTN) program and a €20 billion Certificates of Deposit (CDs) multi-currency program to increase its Qualifying Liquidity Sources in order to comply with the Central Securities Depository Regulation (CSDR). At the end of 2024, Euroclear Bank had a total amount equivalent to €1.6 billion in issuance in euro (EUR), and United States dollar (USD) through its EMTN program, and a total of €1.6 billion of CDs in USD and British pound sterling (GBP) for maturities from one week to one year. The CD multi-currency program addresses unforeseen liquidity shortfalls in 'beyond extreme but plausible' liquidity stress scenarios consistent with the recovery plan of Euroclear Bank.

Euroclear Bank's business model provides a natural hedge against capital market volatility. If markets are lower, the impact is mitigated by the diversified and subscription-like business model.


Business income breakdown
0.5%
19.9%
40.4%
2024
22.6%
16.6%
0.3%
18.4%
2019
45.1%
21.3%
14.9%
0.2%
16.4%
15.6%
2014
55.8%
12.1%
Eurobonds & European assets
FundsPlace
Collateral Highway
Global emerging markets
Data services

I.1 Euroclear Bank's ecosystem

Euroclear Bank supports a global ecosystem where some of the world's largest financial firms and central banks hold and transact securities issued by companies, governments, supranationals and investment fund managers.

Our customers include:

Issuers, their agents and fund managers

For issuers and their agents, Euroclear Bank offers a secure place of issuance for their securities to access funding from the capital markets. As an international CSD, Euroclear Bank plays the role of issuer CSD, which is to be the digital notary for the issued securities.

Investors and their custodians

Investors and their custodians expect to transact and hold their securities with full safety and transparency. Euroclear Bank enables the diversification of portfolios by offering access to multiple capital markets, multiple asset classes, as well as supporting the development of marketplaces for sustainable finance.

The broker-dealer community

As broker-dealers act as a conduit for the origination and trading process for the investment community, they require an efficient and reliable financial market infrastructure, with complete access to liquidity. Euroclear Bank enables broker-dealers to focus on optimising funding opportunities while in parallel also managing their costs and operational and credit risks.

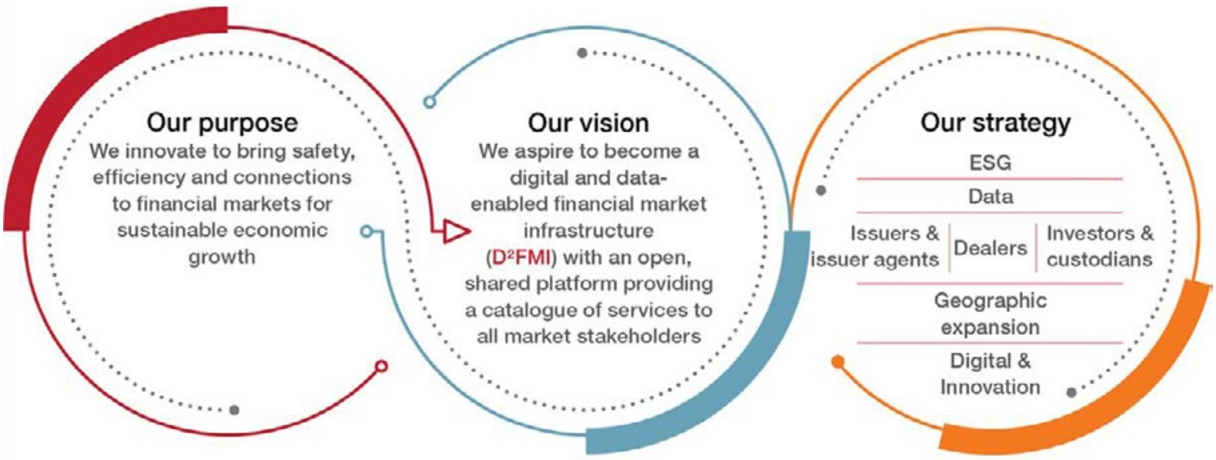
By taking a stronger client lens in our strategy, we further strengthen the virtuous circle of bringing all clients into one self-reinforcing ecosystem, focusing on launching and scaling initiatives, meeting the needs of investors, issuers and dealers. Furthermore, Euroclear Bank is adding diversity and scale to its client offering, by supporting the development of the sustainable financial marketplace.

II. Business and strategy update

We aim to future-proof the organisation by adding innovative digital and data enabled services to our core services, covering securities settlement, custody and related services in line with our clients' evolving business requirements. Furthermore, we continue to expand into new and digital asset classes. By continuing to invest in people and technology, against the backdrop of an ever-changing regulatory and business environment, we aim to remain relevant as the trusted, resilient provider of choice.

Reshaping traditional financial services

Financial markets never stand still – and neither do we. To continue to meet the needs of our clients we must keep investing and innovating. This means evolving our services, technologies and open platform, to seize new opportunities, while further strengthening the financial market ecosystem.



In line with our purpose and vision, our strategy is focused on taking a stronger client lens by launching and scaling strategic initiatives to serve issuers, investors and dealers; and developing Data, ESG, and Digital solutions to deliver sustained growth across geographies and asset classes.

- *Digital and Data-Enabled Services*

Euroclear has embarked on a transformative journey, as we are redefining our role as a Digital and Data-Enabled Financial Market Infrastructure – a vision we refer to as D²-FMI.

Our ambition is to create a data-driven platform economy for the securities industry that will support and reinforce Euroclear's traditional activities. At the heart of this strategic shift initiated in 2022 lies Euroclear's ambition to leverage data and cutting-edge technologies to provide Data-Enabled Services, which help solve clients' business problems and/or support their processes. By transitioning from a sequential value chain to an open, collaborative platform, we aim to co-create innovative data-driven solutions for and with our clients, fintech partners and other industry stakeholders.

As a neutral, credible and above all trustworthy FMI, Euroclear is in a unique position to be the common platform for our industry which helps unlock 'next level' efficiencies for our industry. This is what our D²-FMI strategy is all about, co-creating with the industry to bring our industry to the next level.

We expect this transition to offer considerable advantages for our clients and other stakeholders. From reducing operational costs and risks to unlocking capital for new business opportunities, our data-driven approach aims to increase efficiency, expand reach and offer greater value creation.

- *Supporting the adoption of digital assets*

One of the key focus areas for Euroclear is to support the adoption of tokenised assets. By representing physical assets or digital rights on a blockchain, tokenisation has the potential to unlock liquidity and create new investment channels across a wide range of hard-to-access assets. However, the journey towards widespread institutional adoption of digital assets has been fragmented, with firms often working in isolation and therefore struggling to align on broader ecosystem development. As a leading FMI, Euroclear seeks to bridge the gap between digital asset securities and the conventional financial landscape in a way that promotes innovation, efficiency and safety.

Recognising the transformative potential of Distributed Ledger Technology (DLT), Euroclear Bank has launched its own DLT platform (D-FMI) with an initial module for digital securities issuance (D-SI). In 2024, the Asian Infrastructure Investment Bank successfully issued its first Digitally Native Note (DNN) on our D-FMI platform, raising $500 million (including tap issuance) to support its sustainable development bond programme. This transaction marked the first digital issuance in USD for Euroclear Bank and the first such issuance by an Asia-based issuer on the D-FMI platform. We anticipate a growing number of issuers leveraging this platform for future issuance.

These successful issuances further demonstrate Euroclear Bank's growing capabilities to support market adoption of digital assets. Euroclear Bank fully integrated the D-SI platform with its traditional settlement system, providing investors with sufficient liquidity tools and complete access to trading venues, while ensuring full CSDR compliance. The service was recognised in May 2024 by the Global Custodian magazine with the 'Market Infrastructure Project of the Year' award.

- *Harnessing the full potential of digital assets*

Euroclear Bank is also actively engaged in exploring the full potential of digital assets and participates in various DLT projects with market partners. Alongside Digital Asset and the World Gold Council, it successfully completed a groundbreaking pilot to tokenise gold, Gilts and Eurobonds for use in collateral management. This initiative showcases how DLT can revolutionise collateral mobility, enhance liquidity and boost transactional efficiency. In collaboration with a group of French banks, Euroclear also facilitated the issuance of France's first Digitally Native Note, which was successfully issued by Caisse des Dépôts et Consignations (CDC) and settled using Banque de France's Distributed Ledger for Securities Settlement System (DL3S) platform for digital currency.

Furthermore, we collaborated with DTCC and Clearstream to jointly define a blueprint for an industry-wide digital asset ecosystem. The Digital Asset Securities Control Principles (DASCP) introduced in a joint whitepaper aim to address regulatory compliance and mitigate operational risks, paving the way for the wider adoption of tokenised assets. To read the whitepaper: Digital Asset Securities Control Principles - Euroclear

Euroclear also joined forces in 2024 with the Dubai International Financial Centre (DIFC) Innovation Hub and Julius Baer to address the challenges posed by the future of digital asset inheritance. This collaboration resulted in the publication of a whitepaper outlining how technologies are changing the transfer of wealth and highlighting opportunities to streamline the process, particularly in the Middle East. Digital technologies such as AI, smart contracts, DLT and tokenisation offer promising avenues to reduce friction, improve transparency and ensure secure, efficient asset transfers. To read the full report: Navigating the future of inheritance report-2025.pdf

Eurobonds, a model that continues to thrive

To position Euroclear Bank for the future, we continue to build on the strong foundations that have driven the market development over the past half century. With a total outstanding issuance amount in excess of €13.2 trillion equivalent, of which half is issued in euros, Eurobonds support Europe's strategic autonomy and the euro's role as a reserve currency. Today's Eurobond market brings unparalleled and deep liquidity to both issuers and investors. Furthermore, it is supported by a truly unique, globally connected ecosystem. In 2024, approximately 443,000 unique securities were issued at Euroclear Bank, and the Eurobond market's outstanding volumes have grown at an annual rate of over 5%. This further illustrates the key role Eurobonds have in the global capital markets of today.

The Eurobond model continues to evolve, notably through continued automation and digitalisation, enhancing the user experience and by adding greater levels of efficiency to the issuance process. The next generation Eurobond model will look to implement more standardised data models and further evolve the digitalisation of this asset class. We also anticipate an increasing use of dedicated application programming interfaces (APIs) for the set up and maintenance of static data around both the issuance process and the asset-servicing of issues.

Euroclear Bank also continued to innovate by expanding the asset classes available on our platform. We have supported ARTEX Global Markets (ARTEX) – a new fine art exchange - through the primary market process linked to bringing shares of a Francis Bacon painting to the market, totalling $55 million. This was the first issuance of equity common shares issued directly in Euroclear Bank. This initial offering also marks the first time that an artwork has been taken public and fractionalised. In so doing, this has opened new avenues for investors to participate in the fine art market. Starting at approximately €100 per art share, art lovers can now own a portion of Francis Bacon's triptych 'Three Studies for Portrait of George Dyer' (1963). These shares are actively traded on the art trading facility, ARTEX.

Optimising collateral

Euroclear Bank supports the need for liquidity by providing settlement services and a neutral, global and interoperable collateral management infrastructure, known as the Collateral Highway.

The Collateral Highway allows clients to source, mobilise and segregate collateral. It offers a complete view of exposures across the full spectrum of asset classes and enables clients to optimise their collateral, including a growing trend in the use of green collateral.

The average amount outstanding on the Collateral Highway increased throughout 2024 and is now very close to the early 2022 peak. At year-end 2024, the average daily collateral outstanding on the Collateral Highway for Euroclear Bank was around €1.4 trillion.

In June 2025, the new Eurosystem Collateral Management System (ECMS) will change the way clients interact with central banks to post collateral and receive credit. We are well prepared for this transition. Clients will be able to continue using Euroclear Bank to post collateral to their central bank and will also have the possibility to outsource this collateral management to us entirely, with Euroclear Bank delivering collateral to the national central banks in TARGET2-Securities (T2S) on their behalf.

Optimal collateral usage is often impeded by fragmented market rules and practices. Reducing market fragmentation aligns with Euroclear Bank's vision to develop robust, liquid, and competitive markets in Europe by leveraging common platforms and systems that work across the euro area. These help remove barriers to efficiency, competition and integration.

To better address clients' collateral optimisation needs, Euroclear entered into a partnership with technology provider Transcend to introduce a new joint collateral optimisation service. Available through existing Euroclear connectivity, the new service will easily integrate critical data for smart decision making and settle optimised collateral allocations. By leveraging Transcend's technology, clients will be able to configure optimisation scenarios, include external collateral pools to determine the best collateral use at Euroclear and perform 'what-if' analyses on specific constraints.

Euroclear announced its partnership with Transcend during the 2024 edition of the Euroclear Collateral Conference, an event that welcomed over 600 senior collateral management practitioners from around the world. For two decades, this event has been fundamental in encouraging dialogue and cooperation within our industry.

The transition to T+1

As a leading FMI, we support efficiencies that strengthen or improve the global securities settlement landscape, this includes shortening the settlement cycle (T+X), or the period of time between the trade date and settlement. The US, Canada and Mexico implemented T+1 settlement (i.e. next-day settlement) in May 2024, while Europe and the UK are setting out their plans for a shortened settlement cycle as of October 2027. A one-day settlement window is expected to help the industry achieve better operational efficiency, reduce counterparty risk and lower costs through eased margining requirements.

Transitioning to T+1 will require a collective, coordinated effort, underpinned by global alignment. Euroclear Bank is preparing for this transition and will assist its customers throughout the process.

Growing Euroclear's FundsPlace

Investment funds are a key pillar of Euroclear Bank's strategy. Euroclear FundsPlace offers its users – investors/distributors and funds management companies – a single place for data distribution, trading & custody, as well as digital services on the full range of fund types: mutual funds, money market funds, alternative funds, private asset funds and Exchange Traded Funds (ETFs).

Over the past years, Euroclear's funds offering has evolved rapidly thanks to internal investments, partnerships and acquisitions. Following the acquisitions of MFEX in 2021 and Goji in 2023, Euroclear also acquired a strategic stake in IZNES, a pan-European funds marketplace based on blockchain technology. This partnership complements our funds services in the French market and beyond and continues to play an active role in the development of innovative funds distribution models. Further, Euroclear has announced it will acquire a 49% stake in Inversis, a leading provider of global investment technology solutions and outsourced financial services, with the intention of full ownership of the Spanish company.

Euroclear's FundsPlace holds a leading position within the European ETF landscape. In 2024, Euroclear Bank reached the milestone of €1 trillion ETF assets under custody, as ETFs continue to grow globally. Moreover, it is a decade since Euroclear introduced its pioneering International ETF (iETF) model, which is now the preferred model for more than 75% of European ETFs. Under this international model, issuers and investors enjoy greater levels of market access, flexibility and liquidity management in all major currencies, while eliminating post-trade complexity. With less fragmentation, the ICSD model decreases the number of complex realignments between CSDs when trading on different stock exchanges. Local CSDs across the world hold their iETFs in Euroclear Bank, which allows global distribution and liquidity provision across local markets from the primary market activity in Euroclear Bank, reducing costs and simplifying inventory management.

In 2024, a number of major new clients in Europe, Asia and the US including DBS Bank, Banque et Caisse d'Epargne de l'Etat Luxembourg (Spuerkeess), ODDO BHF, Blackrock and China Construction Bank have selected Euroclear's FundsPlace for their investment fund needs. Euroclear Bank provides them with a one-stop-shop solution for fund distribution and execution services via its extensive network, allowing their clients to have access to more than 250,000 funds.

To foster industry dialogue, the first major funds-dedicated conference -Euroclear FundsCo- was organised in London in March. This inaugural Euroclear funds event brought together more than 200 senior representatives from across the funds industry to discuss future global trends.

Connecting markets

Euroclear Bank brings markets together through its open, flexible architecture and connects local issuers with international investors. In June 2024, Euroclear Bank successfully opened the first omnibus account for Korean Treasury Bonds (KTB) and Monetary Stabilisation Bonds (MSB), making South Korean government debt 'Euroclearable'.

Countries achieving Euroclearability can benefit in several ways. Foreign investors can access the local market in a more secure and standardised way with full asset protection. Local issuers have enhanced access to wider liquidity pools and can in turn realise a potential reduction in the overall volatility of their borrowing costs.

By connecting to South Korea, the 12th-largest economy in the world, Euroclear reinforces its presence in the region. This important market has strong need for efficient post-trade access to international markets. And with its strong brand, global reach, and solid presence in Hong Kong, Tokyo, Beijing, and Singapore, Euroclear Bank is perfectly placed to meet this need. To identify and capitalise on new growth opportunities, Euroclear appointed a dedicated CEO of Asia Pacific in September 2024.

Developing a sustainable marketplace

As a global FMI, Euroclear Bank has a role to play in facilitating and accelerating the development of a sustainable financial market. Our presence across the developed, emerging and frontier markets allows us to facilitate engagement across diversified market participants. On behalf of clients, we hold over €1.4 trillion of green, social, sustainable and sustainability-linked bonds (GSSS).

To foster a more sustainable economy, markets require collateral solutions that facilitate secure, transparent, and efficient transactions, while adhering to sustainability principles. Environmental, Social and Governance (ESG) data was used to enrich €GCPlus - a secured euro cash funding solution designed to optimise collateral management and liquidity, offered by LCH in collaboration with Euroclear Bank and the support of Banque de France. This service is designed to help fixed income trading desks, treasurers, and other market participants manage collateral efficiently and generate liquidity in a cleared environment. €GCPlus contributes to sustainability through its innovative green basket offering, which comprises euro-denominated investment grade bonds that are aligned with market-recognised ESG criteria. €GCPlus has been awarded the 'ESG Initiative of the Year' at the Securities Finance Times Industry Excellence Awards.

Euroclear Bank played a role in the issuance and settlement of the world's first non-financial enterprise Yulan Bond by Wuxi Construction and Development Investment, demonstrating our commitment to promoting green finance and fostering long-term partnerships among governments, banks and enterprises. The first non-financial enterprise Yulan Bond complies with the International Capital Market Association (ICMA) 'Sustainable Bond Guidelines 2021' and has received external evaluation and certification as a sustainable bond.

In August 2024, the World Bank issued the Amazon Reforestation-Linked Outcome Bond. Outcome bonds are a new type of bond that directs finance to a specific project and in turn makes a portion of the return on the bond contingent on the success of that project – in this case the partial reforestation of the Amazon Rainforest. Approximately 97% of this 9-year $225 million bond issued through international CSDs, was captured on the books of Euroclear Bank.

III. Economic and geopolitical context

As a global capital market provider, we are impacted by geo-political and macro-economic events. 2024 was characterised by ongoing conflict in Ukraine/Russia and the Middle East, as well as more than 50% of the world's population going to the polls. Macro-economic trends saw a stabilisation of the inflationary environment, but continuing budgetary deficits being run by leading economies. Navigating through challenging macro- and geopolitical turbulence is a hallmark of Euroclear's robust business model and its operating capabilities. For more details, please refer to the IV. Financial review.

In 2024, the global economy faced multiple headwinds. Regional outlooks diverged, with the US outperforming much of the rest of the world.

Geopolitics | Major conflicts continued throughout 2024, but with little direct impact on global markets. The war in Ukraine caused limited disruption, with global trade relationships now rearranged, but it has forced G7 governments to find new ways to sustain their financial support for Ukraine, including the introduction of a financial contribution from the proceeds of the immobilised assets of Russia's central bank. Likewise, conflict in the Middle East had minor impact on markets, despite escalation in Lebanon, exchanges between Israel and Iran, and attacks on shipping in the Red Sea. Efforts by the world's largest economies to prioritise economic security and domestic industry slowed growth in international trade and, in turn, contributed towards lower global growth. President Donald Trump's second presidency in the United States heralded further changes in global trade and investment. Markets expected US business to fare well under new administration, but the incoming administration's designs for tariffs and sanctions weighed on the wider world economy.

Economics | Over the course of 2024, inflation gradually approached target levels in most developed economies, and central banks began, cautiously, lowering rates to boost sluggish economic growth. In the US and much of Europe, public debt continued to increase. In Europe, this has led the European Commission to launch new Excessive Deficits Procedures (EDP) against six EU member states, including France, Italy and Belgium. The high level of debt has weighed heavily on European economic growth due to expectations of fiscal tightening or tax raising. In contrast, US growth continued apace with no expectations of significant fiscal tightening.

Markets expect short-term rates to decrease in Europe in 2025 due to weak economic growth. The European Central Bank (ECB) is planning to deliver additional cuts but has to tread carefully as inflation remains slightly above its 2% target. In the US, the Fed is unlikely to keep cutting rates as inflation proves sticky and the threat to see wide-ranging inflationary tariffs being imposed on trading partners remains very real.

Markets | Term yields remained largely stable in the first part of 2024, balanced by monetary policy loosening on the one hand, and up by governments' continuing need for substantial financing. Towards the end of the year though, yields started to rise as questions arose about the sustainability of fiscal policies, and the stability of governments. Issuers tapped the fixed-income market intensively throughout the year, front-loading issuance due to political developments in the United States. Equity markets showed positive performance in 2024, particularly in the US, influenced by momentum investors focusing on AI-driven productivity improvements and supportive monetary policy.

Unlocking scale and competitiveness in Europe's markets

In Europe, several reports on capital markets have highlighted a growing gap with the US and other economies. As a European-rooted market infrastructure, Euroclear group participated in this discussion with a comprehensive white paper about the EU Savings and Investment Union (SIU) and engaged with stakeholders to promote market development and integration. As a trusted FMI, it is our duty to support initiatives aiming at improving efficiency, competition and innovation to make European capital markets more liquid, resilient, and competitive.

Advancing post-trade integration requires concerted efforts from Member States, EU authorities and market participants. For Euroclear group, key steps include:

- addressing any remaining legal or practical barrier to CSD competition, particularly in equities, to facilitate efficient cross-border services;
- encouraging market participants to consider pan-European solutions that can enhance integration and efficiency at the infrastructure level, such as the Eurobond model;
- converging national frameworks and market practices;
- prioritising efforts to attract issuers to EU markets and deepen investment capital pools.

Download the full report: Unlocking scale and competitiveness in Europe's markets

Russian sanctions and countermeasures |

Russia's invasion of Ukraine in February 2022 resulted in market-wide application of international sanctions. Euroclear Bank considers the application of international sanctions as a key obligation. Therefore, well established processes are in place which have allowed Euroclear Bank to implement the sanctions, while maintaining our normal course of business.

In 2024, Euroclear Bank continued to act prudently and to strengthen its capital by retaining the remainder of the Russian sanctions related profits as a buffer against current and future risks. Euroclear Bank is focused on minimising potential legal, financial, and operational risks that may arise for itself and its clients, while complying with its obligations.

As a direct consequence of the sanctions and Russian countermeasures, Euroclear Bank faces multiple proceedings in Russian courts. Since Russia considers international sanctions against public order, Russian claimants initiated legal proceedings aiming mainly to access assets blocked in Euroclear Bank's books, by claiming an equivalent amount in Russian rouble and enforcing their claim in Russia. Despite all legal actions taken by Euroclear Bank and the considerable resources mobilised, the probability of unfavourable rulings in Russian courts is high since Russia does not recognise the international sanctions.

For more information about the sanctions on Russia and the application of the windfall contribution by Euroclear Bank, please refer to the IV. Financial review.

IV. Financial review

Euroclear Bank delivered a robust financial performance in 2024, driven by strong business income and interest earnings in the context of sustained high interest rates environment, despite a declining trend in the second half of 2024 due to policy decisions. Additionally, securities settlement and safekeeping activities reached record levels. Following the implementation of the EU windfall contribution regulation in 2024, Euroclear Bank recorded €4 billion as windfall contribution and made a first payment of €1.55 billion to the European Union to support Ukraine in July 2024.

Euroclear Bank delivered a robust financial performance in 2024, although the Company's overall consolidated financial performance was influenced by the new EU windfall contribution regulation introduced during the financial year. The implementation of the windfall contribution regulation had a direct impact on the Company's overall operating income and net profit, as Euroclear Bank recorded €4 billion as windfall contribution in 2024 and made a first payment of €1.55 billion to the European Union to support Ukraine in July 2024. A second payment for H2 2024 is expected to take place in March 2025 and should amount to approx. €2.05 billion. 10% of the windfall contribution (€0.40 billion) is retained for a period of 5 years to comply with capital and risk management requirements.

Excluding the effects of the Russian sanctions, Euroclear Bank's core business continued to thrive, driven by sustained market activity and solid stock exchange performances. The Company reached record levels in settlement and safekeeping, while interest earnings increased compared to 2023, despite the gradual policy rate cuts in the second half of 2024.

The Russian sanctions had a notable impact on Euroclear Bank's financial results, leading to increased cash balances and additional costs. Nevertheless, Euroclear Bank continued to maintain a strong capital position, while paying the windfall contribution. The focus on operational excellence, business performance, customer service, and cost mitigation remain vital to navigate the evolving market landscape.

Furthermore, Euroclear Bank reported several one-off events in 2024, resulting in a total impact of €25 million. These include an initial endowment and the 2024 contribution to the newly created Euroclear Foundation and to charities (€10 million), as well as the impact of a voluntary retirement incentive plan and a voluntary early retirement plan (€15 million). Excluding these non-recurring cost events, Euroclear Bank's business income margin and return on equity would have reached 19.1% and 32.4%, respectively, in 2024.

This section will first discuss Euroclear Bank's overall financial performance, followed by a focus on the Company's underlying's financials, while the last sub-section delineates the main impacts of Russian sanctions on the Company's performance.

IV. 1 The Company's overall financial performance

Operating income	Business income margin	Net profit
€5,144 million	16.9%	€2,136 million
Total assets	**ROE**	**CET1 ratio**
€212 billion	31.9%	92.1%

Selected financial information is derived from the audited Financial Statements and is defined in the section'IV.4 Management accounts definitions'.

The selected financial information and metrics set out below are derived from the audited Financial Statements for the financial years ended 31 December 2024 and 2023.

- In 2024, the Euroclear Bank's operating income totalled €5,144 million, a 22% decline from 2023, primarily driven by the implementation of the EU windfall contribution regulation that was effective from 15 February 2024. Euroclear Bank recorded €4,009 million as windfall contribution in 2024, of which a first tranche of €1,547 million was paid to the European Union to support Ukraine in July 2024. A second payment for H2 2024 is expected to take place in March 2025 and should amount to approx. €2.05 billion.

- Business income amounted to €1,155 million in 2024, an increase of 4% compared to 2023, confirming the resilience of the Euroclear Bank's business model. The Company's business income margin reached 16.9% in 2024. This represents a 23% decrease, primarily due to increased operating expenses. Euroclear Bank incurred several one-off events in 2024, amounting to €25 million. These include an initial endowment and the 2024 contribution to the newly created Euroclear Foundation and charities (€10 million), as well as the impact of a voluntary retirement incentive plan and a voluntary early retirement plan (€15 million), and the related tax impact (€4 million). Excluding these non-recurring cost events, Euroclear Bank's business income margin would have reached 19.1% in 2024.

- Net profit amounted to €2,136 million compared to €4,278 million in 2023, a year-on-year decrease of 50%, following the implementation of the EU windfall contribution regulation.

- Total assets reached €212 billion as of 31 December 2024, up €50 billion compared to 2023, corresponding to a year-on-year increase of 31%. Euroclear Bank's balance sheet continue to experience a material increase in cash as blocked coupon payments and redemptions linked to sanctioned assets continue to accumulate.

- Return on Equity (RoE) amounted to 32.0% for the year 2024, down from 99.1% in 2023, driven by the impact of the windfall contribution. Excluding the aforementioned one-off cost events, Euroclear Bank's RoE would have amounted to 32.4% in 2024.

- Euroclear Bank continues to maintain a strong capital position with a CET1 ratio[1] at 92.1% as of 31 December 2024. This strong capital position, along with a low-risk profile, is critical for a financial market infrastructure, especially given the significant increase in our balance sheet due to the Russian sanctions. Both Fitch and Standard & Poor's (S&P) Global Ratings reaffirmed the strong credit rating of Euroclear Bank, with Fitch Ratings confirming a rating of AA in October 2024, and S&P Global Ratings confirming an AA rating in May 2024.

1 Common Equity Tier 1 including the current year profit after deduction of the related dividend based on the group dividend policy, compared against current year's total risk exposures.

IV.2 Focus on underlying financial performance

In this sub-section, Euroclear Bank refers to its underlying results, after segregation of its Russia related sanctioned earnings.

Euroclear Bank's robust financial results on an underlying basis

Selected financial information is derived from the audited Financial Statements and is defined in the section *'IV.4 Management accounts definitions'.*

Euroclear Bank SA/NV - P&L (BEGAAP) Management reporting (in € million)	FY 2023 Total	FY 2023 Russian sanctions impacts	FY 2023 Underlying	FY 2024 Total	FY 2024 Russian sanctions impacts	FY 2024 Underlying
Operating income	**6,597**	**4,384**	**2,214**	**5,144**	**2,860**	**2,284**
Business income	1,111	-24	1,135	1,155	-27	1,183
Interest, banking & other income	5,487	4,408	1,079	7,998	6,897	1,101
Windfall contribution	0	0	0	-4,009	-4,009	0
Operating expenses	**-866**	**-62**	**-805**	**-960**	**-94**	**-866**
Operating profit before impairment	**5,731**	**4,322**	**1,409**	**4,184**	**2,766**	**1,418**
Impairment	0	0	0	0	0	0
Pre-tax profit	**5,731**	**4,322**	**1,409**	**4,184**	**2,767**	**1,417**
Tax	-1,453	-1,099	-353	-2,048	-1,689	-360
Profit for the period	**4,278**	**3,223**	**1,056**	**2,136**	**1,078**	**1,058**

***Note**: The line Net Interest, banking & other income includes the cost related to liquidity lines. This cost is classified as fee expense (part of Net Business income) in the financial statements.*

- Underlying business income improved year-on-year, reaching €1,183 million, a 4% increase compared to 2023. This growth was primarily driven by record levels in settlement and safekeeping activities, alongside assets under custody also hitting unprecedented levels. In 2024, the market showed signs of improvement following subdued market conditions in 2023. Notably, there was strong performance in the Eurobonds and European assets, as well as in the funds business, boosted by the success of ETFs and positive evolution of stock valuations. This stabilisation of the economic environment, supported by gradual policy rate cuts and easing inflation pressures, has contributed to a more favourable landscape for growth.

- Business income margin on an underlying basis reached 26.8% in 2024, a year-on-year decrease of 8%, driven by the increase in operating expenses (see below).

- On an underlying basis, 2024 interest, banking and other income increased by 2% year-on-year to €1,101 million despite a decreasing trend in interest earnings in the second half of 2024 due to policy decisions.

- Underlying operating expenses totalled €866 million, up by 8% compared to 2023, driven by continued investments in digital capabilities, workforce, and IT infrastructure, but also by the aforementioned non-recurring cost events (€25 million) that accounted for around 40% of the increase. The investments in Euroclear Bank's technology aim at enhancing the company's client proposition, business resilience, and to increase efficiency through standardisation and modernisation. Euroclear Bank remains focused on cost mitigation while making the necessary investments in its strategy, including the improvement of operational resilience, the modernisation of the Company' core platforms and the reinforcement of non-IT resources.

- Euroclear Bank's underlying unit cost ratio remained stable at 0.45 bps in 2024, as the increase in the average value of securities held offset the rise in operating expenses.

- Underlying net profit reached €1,058 million compared to €1,056 million in 2023, reflecting a robust business performance and continued progress of Euroclear Bank's core business. This not only highlights operational efficiency but also reinforces confidence among stakeholders in Euroclear Bank's ability to navigate the evolving market landscape.

- On an underlying basis, the Company's asset performance increased from 367 bps in 2023 to 379 bps in 2024.

- Underlying RoE decreased to 45.5% from 50.0% in 2023 as shareholders' equity increased at a faster pace than net profit on an underlying basis, in line with Euroclear Bank's focus on maintaining a strong capital position.

IV.3 Main impacts of Russian sanctions on performance and reconciliation of Euroclear Bank figures to underlying figures

Euroclear continues to separate the estimated Russian sanctions-related earnings from the underlying financial results when assessing the group's performance and resources.

- As a result of the sanctions, blocked coupon payments and redemptions owed to sanctioned entities result in an accumulation of cash on the Euroclear Bank's balance sheet. At the end of 2024, Euroclear Bank's balance sheet had increased by €50 billion year-on-year to a total of €212 billion.

- In line with Euroclear Bank's risk appetite and policies and as expected by the EU Capital Requirements Regulation (CRR), Euroclear Bank's cash balances are reinvested to minimise risk and capital requirements. In 2024, interest from Russian-sanctioned assets was approximately €6.9 billion. Subject to Belgian corporate tax, these earnings generated €1.7 billion in tax revenue for the Belgian state. Such interest earnings are driven by two factors: (i) the prevailing interest rates and (ii) the amount of cash balances that Euroclear Bank is required to invest. As such, future earnings will be influenced by the evolving interest rate environment and the size of cash balances as the sanctions evolve.

- Overall, Euroclear Bank incurred additional direct costs from the management of Russian sanctions of €94 million for the year 2024, with considerable senior management and Board focus on the topic.

Effective 15 February 2024, the EU Council adopted a regulation requiring CSDs holding assets of the Central Bank of Russia (CBR) with a total value of more than €1 million to apply specific rules in relation to the cash balances accumulating due to restrictive measures. These CSDs, such as Euroclear Bank, should account for and manage such extraordinary cash balances separately from their other activities, should keep separate the net profit generated and should not dispose of these ensuing net profits (e.g., in the form of dividends to shareholders).

In May 2024, the European Commission adopted a new regulation imposing a windfall contribution applicable to CSDs holding CBR assets with a total value of more than €1 million. The profits generated by the reinvestment of these sanctioned amounts dating from 15 February 2024 onwards are required to be paid to the European Union.

Russian sanctions impacts FY 2024 (BEGAAP) Management reporting (in € million)	**Russian sanctions impacts**	**o/w CBR** as of 15 Feb	**o/w Other Russia**
Operating income	**2,860**	**1,379**	**1,482**
Business income	-27	0	-27
Interest, banking & other income	6,897	5,387	1,509
Windfall contribution	-4,009	-4,009	0
Operating expenses	**-94**	**-26**	**-68**
Operating profit before impairment	**2,766**	**1,353**	**1,414**
Tax	-1,689	-1,340	-348
Profit for the period	**1,078**	**12**	**1,065**

- Following the implementation of the EU windfall contribution regulation applicable to the CBR assets dating from 15 February 2024 onwards, Euroclear Bank recorded €4 billion as windfall contribution in 2024.

- After retention of a 10% share of the windfall contribution to comply with capital and risk management requirements, Euroclear Bank made a first payment of €1,547 million to the European Union to support Ukraine in July 2024. The next payment is expected in March 2025 and should amount to approx. €2.05 billion.

- Gradual rate cuts have resulted in a decline in interest income from CBR assets in the second half of 2024. The outlook for future interest earnings on CBR assets remains contingent on policymaking decisions and is therefore sensitive to interest rate fluctuations. This interest rate normalisation is expected to continue in 2025.

Euroclear Bank continues to act prudently and to strengthen its capital by retaining the remainder of the Russian sanction related profits as a buffer against current and future risks. The Company is focused on minimising potential legal, financial and operational risks that may arise for itself and its clients, while complying with its obligations.

IV.4 Management accounts definitions

In presenting and discussing Euroclear Bank's financial position, management uses certain performance measures that have not been audited although derived from the audited Financial Statements, following the definitions below.

Measures	Definition
Business income	Business income, also presented as 'Net fee and commission income' in the financial statements, adjusted to include fees from the group's liquidity line. Business income stems mainly from the provision of settlement, asset servicing and other services.
Business income margin	Business income minus operating expenses divided by business income.
Unit cost ratio	General administrative expenses compared to the average value of securities held.
Asset performance	Net profit compared to total average assets of current year and prior year.
Return on Equity (RoE)	Net profit divided by average shareholders' equity of current year and prior year
Underlying	Excluding the impact of the Russian sanctions-related earnings.

V. Risk management, compliance and internal control framework

In 2024, Euroclear Bank effectively managed various risks, ensuring smooth operations and resilience against potential disruptions. Euroclear Bank's strong risk profile was supported by a robust control environment and the dedication and expertise of its staff. Although the impact of sanctions against Russia and the Russian countermeasures is still present, the related risks are well managed and are fully integrated into Euroclear Bank's risk management processes.

Euroclear Bank has a Risk Management function that provides robust, and independent oversight. Its role is to challenge risk-taking activities across the Bank to help it achieve its goals and deliver its strategy. It has put in place an effective Enterprise Risk Management (ERM) framework governing the way in which risks are managed in the company and has determined risk appetite designed to meet Euroclear Bank Board, market and regulatory expectations. Detailed information on the risks faced by Euroclear Bank, as well as its risk management strategies, policies and processes can be found in Euroclear's yearly Pillar 3 report on www.euroclear.com.

Euroclear Bank also has an independent Compliance & Ethics function in charge of promoting ethical conduct and helping the company to navigate regulatory complexities through expertise, challenge, education, and oversight. The Compliance & Ethics function assists the Board and senior management in managing Compliance, Fraud, and Conduct & Culture risks, which is supported by robust risk management frameworks aligned with the ERM framework and relevant policies. The Compliance & Ethics function is governed by a Board-approved charter. Detailed information on the Compliance & Ethics function's organisation, responsibilities and reporting can be found in Euroclear's yearly Pillar 3 report on www.euroclear.com.

V.1 External context

As described in the Economic and geopolitical context section, the macro-economic and geopolitical environment in 2024 has been characterised by continuous volatility and uncertainty, driven by ongoing conflicts and geopolitical tensions. Nevertheless, improving inflation conditions, coupled with slower yet steady growth, provided grounds for cautious optimism, as evidenced by recent interest rate cuts by major central banks. Despite the ongoing impact of external factors on the environment in which Euroclear Bank operates, the Bank's risk profile has remained strong, bolstered by a robust control environment and the dedication and expertise of its staff. This conclusion is also supported by Fitch Ratings and S&P, who have reconfirmed Euroclear Bank's credit rating.

V.2 Evolution of Euroclear Bank's risk profile

Operational risk (people, process, systems)

Operational risks are at the core of Euroclear Bank's business. Euroclear Bank is committed to effectively managing these risks, ensuring its position as a resilient and strong financial market infrastructure by integrating continuous technological modernisation and innovation with the strategic development of its human resources. Euroclear Bank has a comprehensive operational risk management framework, underpinned by its dedication to investing in staff learning and development as well as fostering a culture of risk awareness.

In 2024, Russia continued to issue new decrees and countermeasures to international sanctions, posing operational challenges to ensure reconciliation of securities balances held within Euroclear Bank. As a result of these decrees, during 2024, the National Settlement Depository (NSD) converted part of our type 'I' accounts[2] and debited the full balance on our Type 'C' account[3] replacing it with an obligation on NSD to compensate the affected Euroclear participants with an equivalent amount in various foreign currencies from the frozen NSD client account in Euroclear Bank. The Bank is coordinating with the relevant authorities to obtain authorisation to reflect these movements while ensuring full compliance with international legislation and safeguarding its participants. Additionally, similar to the previous year, underlying clients of sanctioned Russian participants continued to bring cases before Russian courts against Euroclear Bank due to asset freezes imposed by international sanctions on those participants. For more details, please refer to the sub-section Legal, Compliance, Conduct, and Culture Risks.

Throughout 2024, Euroclear Bank demonstrated a robust operational risk management, resulting in a low number of incidents and operational losses, and the continued authorisation of its CSDR license.

Looking at the operational achievements, Euroclear Bank has enhanced its staff's risk management expertise through specialised development programs which are led and monitored by Risk Management and the Chief Information Security Office (CISO) division, resulting in heightened vigilance and capability. Euroclear Bank has continued to

2 Type I accounts contain income proceeds from non-RUB Russian Federation Eurobonds, do not meet the definition of a financial asset (and associated liability) and are reported off-balance sheet.
3 Type C accounts contain income proceeds from RUB local corporate securities, do not meet the definition of a financial asset (and associated liability) and are reported off-balance sheet.

reinforce its cybersecurity capabilities through substantial investments in its infrastructure and process improvements. Euroclear Bank has also engaged in modernising some of its applications to improve its clients' experience and using more fit for purpose technological solutions for today's needs while maintaining its robust operational risk management practices. Moreover, Euroclear Bank is investing, in addition to the programme to be compliant with the Digital Operational Resilience Act (DORA), on improved recovery capabilities over the next years. The programme is progressing largely in line with the plan with the completed delivery of several, improved or new, detection and response capabilities. Euroclear Bank has also defined its new data centres strategy to further increase its resilience in case of regional scale disaster and has initiated the implementation of this multi-year strategy. The investment in the IT risk and control environment resulted in improved security arrangements in a constantly evolving cyber threat landscape. Further investment will continue in 2025 and beyond to further reduce the residual risks and ensure sustainability and resilience. These are instrumental in the resilient response to potential disruptions, complementing the very high system stability and demonstrating the robustness of the control environment in place.

Additionally, Euroclear Bank has continued to strengthen its risk management in 2024 by reviewing and further implementing the ERM framework. This framework defines the roles and responsibilities of the Board, Management, and the Three Lines of Defence model, ensuring effective risk management. The implementation of the Integrated Risk Management (IRM) tool has further streamlined risk management processes and improved overall efficiency of risk, controls and issues management.

Financial risks (credit, market, and liquidity)

Throughout 2024, Euroclear Bank has mitigated its financial risks, contained the capital impacts and maintained robust financial stability.

Euroclear Bank continues to operate a resilient framework for credit, liquidity and market risk management. This framework aims to continuously reduce intra-day uncommitted secured credit provided to participants, ensure smooth day-to-day operations and maintain a high level of preparedness to handle unexpected and significant liquidity shocks.

Euroclear Bank's exposure to various financial risks has stabilised in 2024 despite the continuous increase of its balance sheet driven by the international sanctions against Russia. To comply with the international sanctions, Euroclear Bank has been blocking incoming cash proceeds linked to sanctioned balances and reinvesting this cash safely in line with banking and CSD regulations. Euroclear Bank has an investment policy designed to maintain a low risk profile - where possible, sanctioned cash is deposited with the central bank of the relevant currency. Where central bank access is not available, the reinvestments are made short-term and in a secure way (reverse repo) or converted into EUR via FX swaps with highly rated counterparties. Due to this prudent reinvestment strategy, while exposures are substantial, the resulting credit risk and capital requirements have subsided and remain stable, largely driven by routine economic activity rather than the reinvestment of accumulating sanctioned balances.

Euroclear Bank's liquidity position also remained strong in 2024, and it is further supported by the accumulating sanctioned balances as well as enhanced profitability. Liquidity risk from the reinvestment of sanctioned balances is effectively mitigated due to the short-term nature of the related assets.

As of end 2024, there is no market risk linked to the reinvestment of sanctioned balances as they are either reinvested in the same currency as the underlying balance or are swapped into EUR and deposited on a central bank account.

Most of Euroclear Bank's market risk is tied to its underlying activities and more specifically to fluctuations in interest rates, which primarily create uncertainties in future earnings and economic value of equity. Euroclear Bank has effectively contained this risk through a prudent investment strategy and appropriate hedging measures.

Legal, Compliance, Conduct and Culture risks

Euroclear Bank faces legal, compliance, conduct and culture risks given its position as a leading FMI operating in a highly regulated environment. In 2024, legal and compliance challenges persisted due to the scale and complexity of new international sanctions, Russian countermeasures, and the high volume and variety of new regulations. These risks are monitored and managed through the robust application of Euroclear Bank's legal and compliance risk management frameworks and ongoing adherence to the Code of Ethics and Business Conduct.

Euroclear Bank considers the potential impacts of uncertainties arising from Russian and international regulatory changes and court cases brought primarily against it on its financial position when assessing the appropriate capital levels and provisions to maintain and continue to provide safe and resilient services to its clients and the markets.

Change and Project risks, Business, and Strategic risks

The ability to anticipate and integrate change in an evolving market is essential for the longer-term strategy of Euroclear Bank.

Euroclear Bank operates a portfolio governance framework to translate the strategy into programmes and projects and monitor their execution. This approach highlights our commitment to delivering innovative solutions while effectively managing associated risks, such as in the digital asset space.

Managing change and project risks effectively through our project and programme management capabilities at corporate level is crucial for the successful execution of the strategy in the coming years.

VI. Acting responsibly

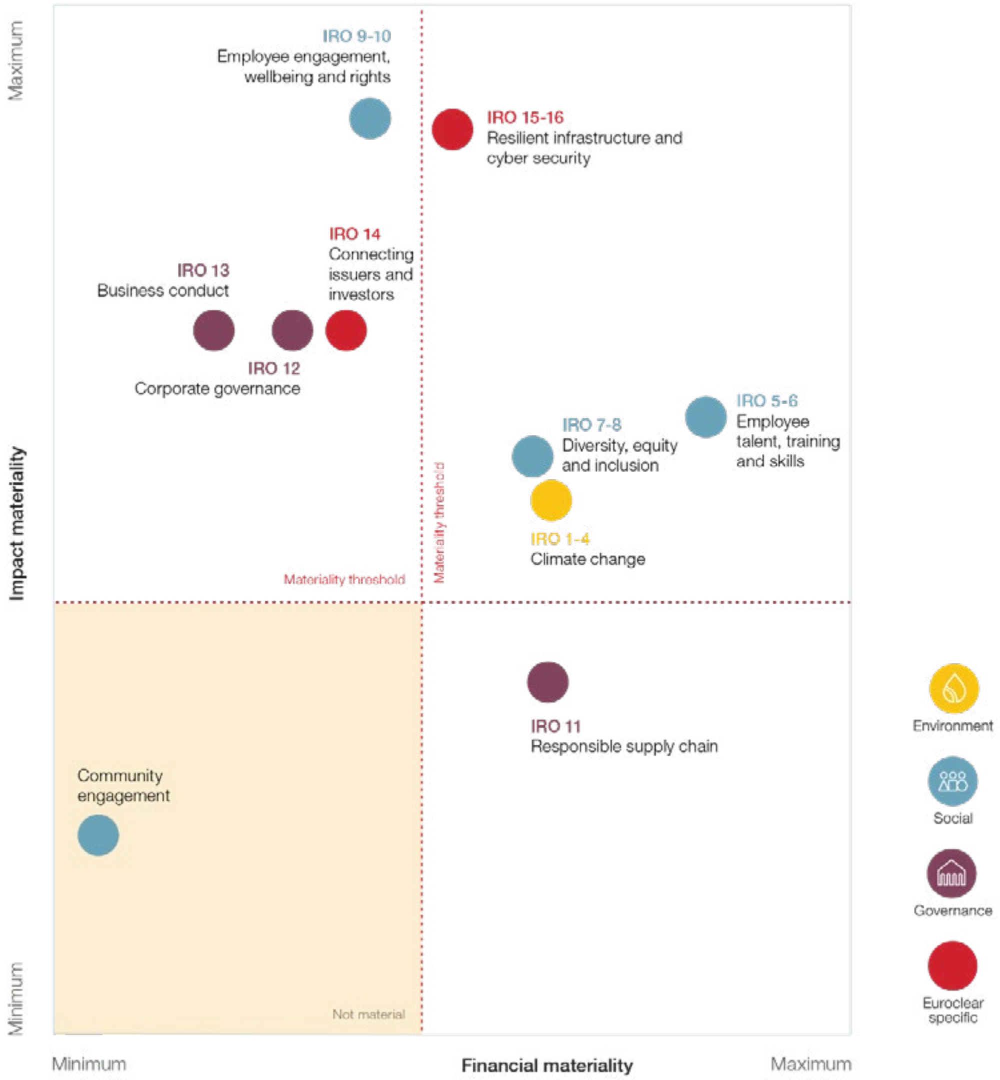
Our mission is to support and enable a sustainable financial marketplace, while limiting our impact on the environment, providing an equitable and inclusive workplace and conducting business in an ethical and responsible way.

In 2024, we focused on embedding the ESG policy commitments into our day-to-day activities and preparing for reporting according to the CSRD requirements. The full CSRD-compliant Sustainability Statements can be found further in this report. We also made progress on our commitments towards reaching the group's net zero target and formalised the related net zero Transition Plan. To ensure that we can realise our Diversity, Equity and Inclusion (DEI) ambitions, a multi-year DEI action plan was approved.

In line with market evolution, we split our ESG framework into Environment, Social (including Our People and Community) and Governance streams. These streams are complementary to our work to connect issuers and investors and to enable a more sustainable marketplace (please refer to the II. Business and strategy update section).

We performed our double materiality assessment (DMA), which was approved by the Euroclear Bank SA/NV Board. We identified nine material topics that stem from the most important impacts, risks and opportunities (IROs) which will steer our focus and ambitions going forward. In addition, we implemented targets and KPIs for most of these material topics. For full details on our DMA, achievements for 2024 and actions for 2025 and beyond, please refer to the Sustainability statements.

Euroclear Bank's material topics, and Impacts, Risks and Opportunities (IROs).



For the full list of IROs please refer to the section Sustainability statements, Policies, Actions, and Targets

VI.1 Environmental commitment

Under the intra-group outsourcing agreements, Euroclear SA/NV divisions provide services to Euroclear Bank covering domains such as IT, Finance, Facilities and Supply Chain. Further, the Science Based Targets initiative (SBTi) targets are set at group level, and the group is responsible for the net zero Transition Plan for all entities (supported by Euroclear Bank specific actions and strategies where needed). Considering this and given the significant size of the Bank in the group, we have opted for a pragmatic approach and do not compute or report stand-alone energy consumption, emissions or emission reduction targets for Euroclear Bank, as this information is of limited value without placing it within the broader context of the group that it is an integral part of. This section therefore refers to the group.

As a group, we are committed to minimising our environmental footprint. Through policies and practices, we are embedding a sustainable mindset across the company, including reducing carbon emissions, conserving energy, and reducing waste. This commitment extends to our key suppliers with whom we are working to ensure that our supply chain adheres to sustainability best practices. In 2024, we implemented a supplier assessment programme to monitor ESG performance and provided training and resources to support our key suppliers in meeting our environmental standards.

Net zero targets and Transition Plan

The SBTi validated Euroclear's group-wide near and long-term emissions reduction targets and classified them as compatible with limiting global warming to 1.5°C, in line with the Paris Agreement. Euroclear has committed to reach net zero greenhouse gas emissions across the value chain by 2050 from a 2019 base year. To achieve this, we have documented near, medium and long-term emissions reduction initiatives within a group Transition Plan which will be approved by the Board, and which we will begin implementing in 2025.

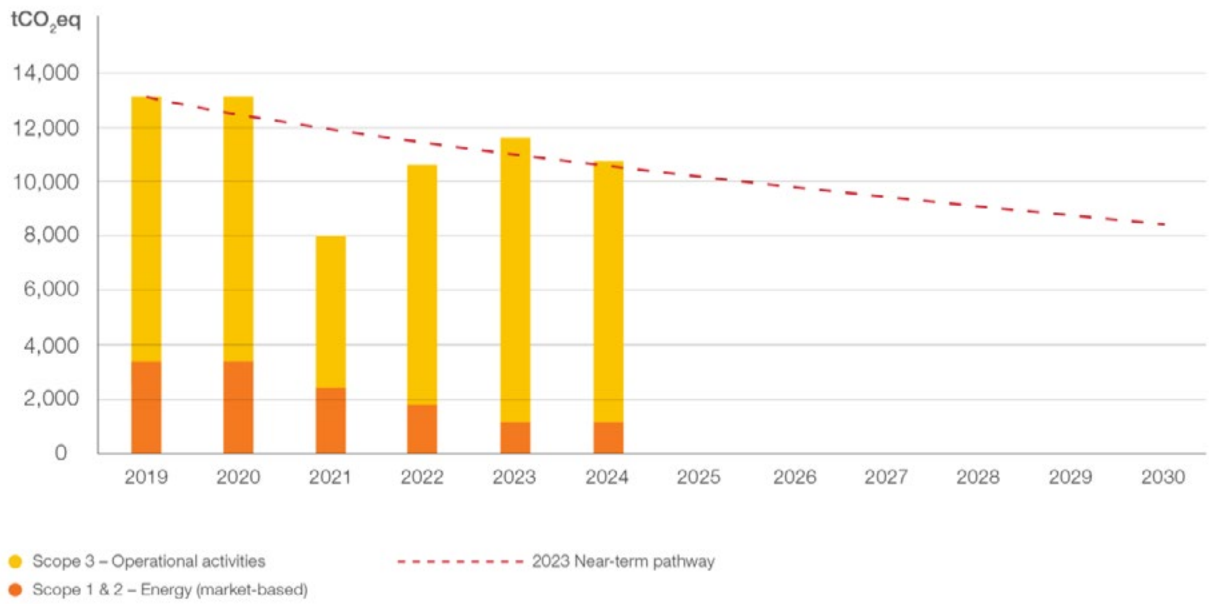
In 2024 Euroclear's total emissions were 89,616 tCO2eq, an increase of 13% on 2023 and 29% on the 2019 baseline, driven largely by an increase in Scope 3 emissions, as a result of business expansion. We maintained a 66% reduction in Scope 1 and 2 market-based emissions compared to the 2019 baseline, sustaining our 55% reduction target by 2030. This was mainly due to the purchase of renewable or low carbon energy which represented 83% of energy sources in 2024. A 6% reduction in Scope 3 operational activities (Categories 3-7) has brought these emissions back to 2019 levels, primarily due to reduced business travel and employee commuting emissions. Further effort is needed to meet the 28% reduction target set for emissions from Scope 3 operational activities by 2030. For Scope 3 emissions (Categories 1-2 i.e. supplier spends) 45% of suppliers' emissions were aligned with the 1.5°C commitment in 2024, compared to a target of 70% by 2027.

Progress against our climate KPIs including Euroclear Greenhouse Gas (GHG) emissions reduction targets:

Emissions (tCO2eq)	**2024**	**2023**	**2019**	**2024 target**	**Longer-term target**	**2024 progress versus 2023**	**2024 progress versus 2019**
Scope 1 and 2 Energy (market-based)	1,156	1,129	3,412	N/A*	-55% by 2030 -90% by 2050	+2%	-66%
Scope 3 Operational Activities**	9,716	10,381	9,738	-5.5%	-28% by 2030 -90% by 2050	-6%	0%
Scope 3 Suppliers***	75,222	64,715	54,412	–	N/A	-	–
Scope 3 Suppliers' emissions covered by targets	45%	37%	N/A	40%	70% by 2027	-	–
Total emissions (market-based)	89,616	79,439	69,565	-	-	+13%	+29%

* 2030 target to reduce by 55% exceeded in 2023 and therefore no reduction target set for 2024.
** Categories 3-7. These categories include Fuel and energy-related activities, Upstream transportation and distribution, Waste generated in operations, Business travel, Employee commuting and working from home.
***Category 1-2 supplier spend. These categories refer to Purchased products and services and Capital goods.

Evolution of emissions versus 2030 pathway (Scope 1,2,3 operational activities)



Climate change scenario analysis

Euroclear has conducted a long-term scenario analysis exercise to identify risks and opportunities related to climate change, and to assess the resilience of its business model and strategy in different future climate scenarios. Although we identified several risks associated with climate change, we concluded that our business model and strategy are broadly resilient to physical and transition climate risks, with some adaptations required in the long term.

Carbon removal

Annually, Euroclear voluntarily offsets our Scope 1, 2 and our operational Scope 3 emissions.

In 2024, Euroclear purchased 11,624 tons of carbon credits (for our 2023 emissions) with a mix of:

- 5% high-quality technical carbon removal credits from a Bolivian BioChar project and
- 95% non-technical removal or avoidance that it purchased in two parts:
    - 50% natural removal credits from forest reforestation in Tanzania, and
    - 45% renewable energy credits from a project in India

We aim to develop a comprehensive long-term carbon credit strategy, focusing more on carbon removal projects, during 2025.

For full details on our environment practices, achievements and ambitions, please refer to the E1 - Environment section of the Sustainability statements.

VI.2 Our people

At Euroclear Bank, we consider our people to be a key enabler in achieving our strategic goals. Our group People Strategy focuses on six key streams:

- Mobilising the workforce to deliver on strategic priorities with a clear purpose;
- Developing strong leaders to drive the implementation of the business vision;
- Building the right skills to implement our ambitions;
- Fostering a high-performance culture;
- Shifting our corporate culture to better enable the company strategy;
- Making a positive corporate social impact in the workplace and in our communities.

In 2024, Euroclear Bank recruited 80 employees externally, primarily in operational roles, increasing the total number of staff to 1,948. In December 2024, we announced our intention to open a voluntary retirement incentive plan and a voluntary early retirement plan in the course of 2025. These plans will give eligible colleagues the opportunity to retire earlier and allow the company to accelerate the development of internal talent or recruitment of new talents with new skills without increasing the headcount. This multi-year plan will allow sufficient time for teams to prepare for the transition.

Diversity, Equity and Inclusion (DEI)

We believe that a truly diverse and inclusive workplace leads to better business decisions, more innovative thinking and an environment where everyone can reach their true potential. At the end of 2024, the Euroclear SA/NV Board approved a strategy and action plan for DEI, and Community, which Euroclear Bank will also start implementing in 2025. We recognise that we will need to continue our efforts to meet our underrepresented gender targets (see below) and truly embed DEI in all its dimensions into our business practices and mindset.

Progress against our DEI KPIs

KPIs[4]	Targets	2024
Percentage of underrepresented gender at senior management level	Minimum 40% by end 2026	**36%**
Maintain or improve the employee engagement scores for non-discrimination, inclusion and diversity vs 2022 baseline	Non-discrimination: 8.5/10 Inclusiveness: 8.1/10 Diversity: 8.5/10	Non-discrimination: **8.6/10** Inclusiveness: **8.3/10** Diversity: **8.7/10**

[4] Please note, all KPIs related to 'Our People' have been calibrated using the 2022 baseline. Each year, we compare annual employee engagement survey scores with past performance as well as current year industry benchmarks and create action plans accordingly. In 2024, 86% of our employees participated in the survey.

Our revised group DEI strategy will focus on the following areas:

- Meeting our diversity senior leadership targets
- Reviewing the recruitment, promotion, and career development processes to ensure DEI principles are embedded at each stage of the employee career journey
- Defining non-financial metrics to link inclusion to pay and reward
- Further developing DEI reporting in order to expand metrics and targets beyond gender diversity and provide better insights with regards to DEI issues; and
- Rolling out an accessibility programme; focusing on physical and digital accessibility for all

Talent, learning and development

Progress against our learning and development KPIs

KPIs	Targets	2024
Maintain or improve the employee engagement score for training and development vs. 2022 baseline	Equal to or above 7.4/10	**7.6/10**

One of Euroclear Bank's key focus areas is investing in the talent and skills development of our employees, and we provide the necessary tools to enable employees to develop their skills and further their careers.

During 2024, we launched a new online Learning platform for all employees, so that they can tailor their learning experience to meet specific needs and introduced the Euroclear learning week, where employees can explore continuous learning opportunities in an informal setting to upskill for current or future professional challenges.

Wellbeing and employee engagement

Progress against our wellbeing and engagement KPIs

KPIs	Targets	2024
Maintain or improve the overall employee engagement score in engagement survey vs 2022 baseline	Equal to or above 7.7/10	**7.8/10**
Maintain or improve the score regarding health & wellbeing in employee engagement survey vs 2022 baseline*	Equal to or above 7.4/10	**7.8/10**

In 2024, we revised our group wellbeing strategy, focusing on providing employees with the resources to ensure their physical, social, mental, financial and environmental wellbeing at work. This will be rolled out in Euroclear Bank in the course of 2025.

Over the last 12 months, the long-term absenteeism ratio due to sickness decreased to a historic low at 2.2% of the headcount. This reflects the success of our return-to-work programme. We actively support our staff during long-term absences to enhance their physical, emotional, and mental wellbeing.

Our group wellbeing strategy for the next five years will focus on the following key domains:

- embedding wellbeing into our processes and habits and the way we lead our teams
- ensuring our activities have a positive long-term impact and
- measuring progress and performing benchmarking

Embedding an ESG mindset

To ensure that ESG becomes embedded into culture and mindset, we are continually seeking ways to engage our workforce around ESG topics and actions. In 2024, our month of sustainability focus, ‘Sustainable September’, which featured webinars, events and communications across all ESG topics, attracted over 2,500 unique attendees across the group.

The Euroclear Bank Change Agents community launched in 2023, drawing from representatives of the various departments, continued with its information-sharing and change management mission with the aim to adapt mindsets and behaviours across the Bank. Training sessions to expand knowledge of ESG-related topics were provided to the Euroclear Bank Board, Management Committee and its sub-committees, with a particular focus on embedding ESG into governance and decision-making.

VI.3 Community focus

As a significant employer we value our people and their communities. Our staff actively contribute to the wider community by volunteering, mentoring colleagues, proposing social impact projects, and participating in social initiatives.

We also consider that we have a duty to improve the lives of the people in the locations where we operate. We aim to tackle social issues in the community where we can make transformative impact through our people, clients, suppliers and partners.

Our group Community programme focuses on four streams:

- Tackling poverty
- Coaching and education
- Social and financial inclusion
- Environmental impact

In 2024, the Euroclear SA/NV Board approved the establishment of a new Euroclear Foundation, which was registered by year end and the founding board members were appointed. The foundation is endowed with an annual social dividend fixed at 1% of annual net profits (Business as Usual, excluding Russia-related earnings) of Euroclear. The group has decided to kickstart the foundation with an additional special contribution of €10 million in 2024. During 2025, the group will put in place the purpose, strategy and governance to manage the new Foundation to ensure that our contributions have the biggest impact where they are most needed and are governed in the most effective way.

Over many years, we have built a strong community approach, with a group-wide volunteering programme, where all employees are entitled to a minimum of eight hours a year to take part in corporate volunteering activities; local charity committees in our main locations; long-term community partnerships and a Matching Gift programme to match employee donations. The total investment in Community projects in 2024 at Group level was €22 million. Euroclear Bank has contributed €7 million to the new foundation and an additional €2.9 million to charitable donations. During the year, over 3,000 employees across the group took part in one of our volunteering opportunities and we supported 390 projects.

In 2024, the group celebrated 10 years of partnership with Junior Achievement, coaching young people in business skills and financial literacy.

VI.4 Robust governance

Upholding the highest standards of governance is at the core of Euroclear Bank's business. We also apply this principle to our suppliers through our due diligence practices. Euroclear Bank is governed by a robust framework that ensures transparency, accountability, and ethical conduct. This includes stringent compliance with regulatory requirements, continuous risk assessment, and a commitment to ethical business practices, as laid out in our group-wide ‘Code of Ethics and Business Conduct.’ ‘Euroclear Bank SA/NV Governance Charter’ published on the Euroclear website, covers in detail the responsibilities and accountability of the Euroclear Bank SA/NV Board.

Progress against our governance KPIs

KPIs	Targets	2024
Key suppliers screened by EcoVadis	75%	**80%**
Percentage of underrepresented gender at Board level	33%	**36%**

In 2024, we also ensured that ESG considerations are embedded into our mergers and acquisitions processes and that the human rights dimension (using independent indices) is taken into consideration when deciding to maintain or expand our geographical footprint.

For details on Board governance, compliance and ethics and business resilience, please refer to the VII. Corporate governance and the Sustainability statements.

VI.5 Other achievements

In 2024, the Euroclear Pension Fund received the IPE 'Small Pension Fund' award, primarily for its pioneering efforts to integrate the group's tailored ESG criteria into the Pension Fund's investment strategy. Together with our partner, Impact Cubed, Euroclear's Pension Fund team set up a specific benchmark and a new dedicated global equity mutual fund for its Defined Benefits plan, reflecting Euroclear's ESG priorities.

We are also proud to have started in 2024 to be the sponsor of a new Sustainable Finance Chair at the Solvay Brussels School of Economics and Management. This will further strengthen Euroclear's role in advancing the understanding of sustainable finance and is in line with our emphasis on continued learning and development.

In addition, we continue to invest in learning and sponsor an endowed chair at the KU Leuven to research on predictive process mining and on innovating the management core processes within financial market infrastructures.

VI.6 External ESG ratings

Rating agency	2023	2024
S&P Global ESG score	49/100	47/100

For details on all sustainability matters, please refer to the Sustainability statements.

VII. Corporate governance

Throughout 2024, the Board has demonstrated commitment and strategic oversight, guiding our organisation through a year marked by the Russia crisis, geopolitical tensions, significant macroeconomic and regulatory developments. Concurrently, the Board monitored regulation, technology, and industry dynamics rapid developments across various themes such as T+1, Capital Markets Union (CMU)/SIU, DORA, data centres, cybersecurity, and artificial intelligence.

VII.1 Corporate governance introduction

Euroclear Bank believes that sound corporate governance is key for a trusted FMI to protect the interests of its stakeholders. Euroclear Bank has put in place governance procedures and practices which promote accountability and transparency of decision-making, and which seek to ensure that all stakeholder interests are duly considered and safeguarded. These procedures are underpinned by a strong focus on ethical conduct and a positive working culture. Euroclear Bank believes that these elements together enable us to make better business decisions that ensure continued success.

Euroclear Bank ensures robust and transparent governance across the organisation and encourages good governance along its value chain. Euroclear Bank is subject to a variety of financial services regulations, most notably the CSDR and banking regulations which detail very specific governance requirements. Euroclear Bank publishes detailed governance charters which outline the main aspects of the Corporate Governance framework. Euroclear Bank is also subject to new climate and ESG regulations and standards coming from the ECB, European Commission and related European Banking Authority (EBA) guidelines. Euroclear Bank actively monitors these regulatory developments to determine their impact.

VII.2 Publicity of external mandates

For the details of the reportable directorship mandates and managerial functions exercised by the members of the Board and the management please refer to Appendix I.

VII.3 Composition of the Euroclear Bank Board and Board Committees

Directors, appointed by the General Meeting of shareholders, at all times meet the fitness and propriety criteria for their role as determined by law and applicable regulatory requirements. Only natural persons can be members of the Board. Euroclear Bank's Board is composed of executive and non-executive directors, whereof a suitable number of independent directors as required by law. There is no employee representation at the Board level of Euroclear Bank.

At the end of 2024, the Board consisted of 11 directors (2 non-executive directors, 4 independent non-executive directors and 5 executive directors).

All members of the Audit Committee, the Risk Committee, the Nominations and Governance Committee and the Remuneration Committee are non-executive directors of Euroclear Bank. Each of these committees also have two independent members, except for the Audit Committee which has three independent members, within the meaning of Article 3, 83° of the Belgian Banking Law.

Suitability

The Board regularly evaluates its own performance and effectiveness to ensure it has appropriate balance of skills, experience, independence, knowledge and diversity necessary to make decisions and perform effectively.

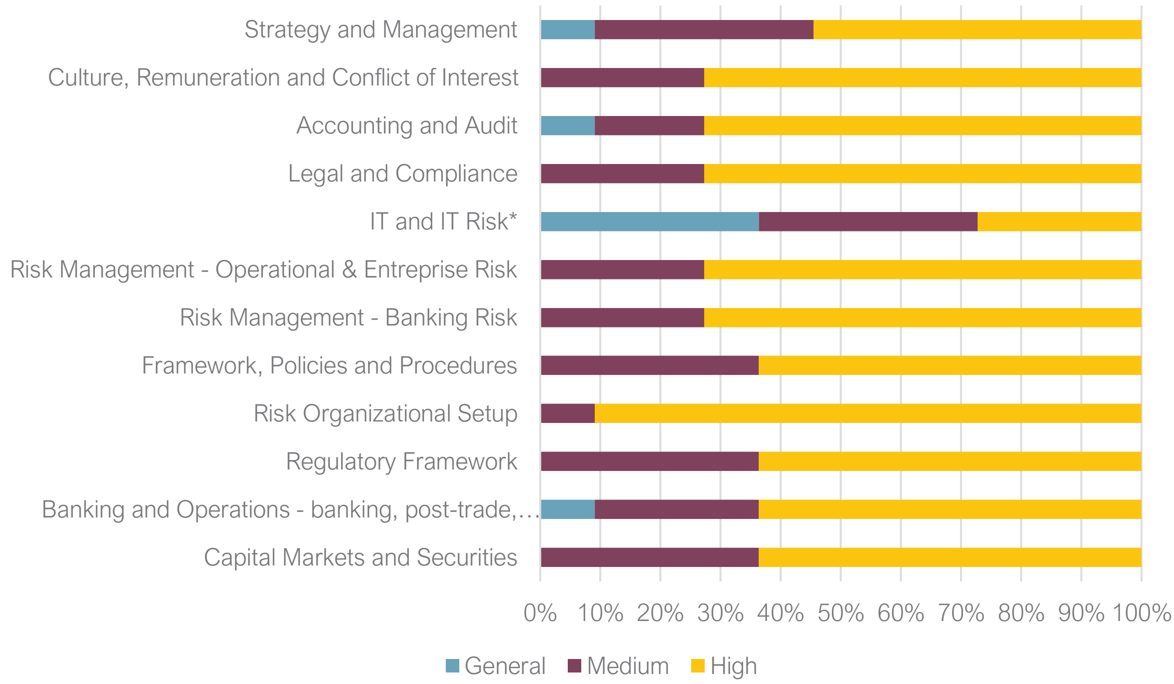
The Board committees have the required knowledge base and skills among their members and each member has the adequate personal attributes for each committee to fulfil its role efficiently.

Board members continue to receive dedicated trainings throughout the year across various topics and tailored to the outcome of the skills self-assessment. Skills enhancement is also addressed via Board composition decisions.

In addition to their own skills the Board of Euroclear Bank benefits from the expertise and knowledge from Euroclear SA/NV (ESA) in some expert matters such as IT.

See graph below:

Board's collective skills



*Including Cyber

Diversity

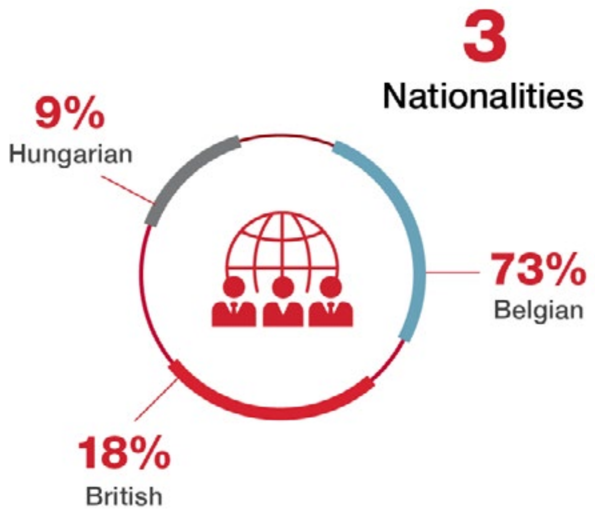
All Board nominations are proposed and approved with consideration of gender, nationality, diversity, skills, knowledge and experience. In line with legal requirements, it maintains a minimum of one third representation of the underrepresented gender on its Board. At the end of 2024, the Euroclear Bank Board was composed of 64% men and 36% women.

The graphics below show the composition of Euroclear Bank's Board by nationality and gender on 31 December 2024.

Euroclear Bank Board of Directors

Name	Gender	Nationality	Category
Stéphane Bernard	♂	BE	INED
Didier Boonen	♂	BE	INED
Victoria Cochrane	♀	GB	INED
Mike Martin	♂	GB	INED
Robert Peirce	♂	BE	INED
Carl Tilkin-Franssens	♂	BE	INED
Bernard Frenay	♂	BE	NED
Anne Swaelus	♀	BE	NED
Marie-Anne Haegeman	♀	BE	ED
Szandra Nagyné-Komocsi	♀	HU	ED
Peter Sneyers	♂	BE	ED

INED Independent non-executive director
NED Non-executive director
ED Executive director



VII.4 Conflict of Interest Euroclear Bank Board

During 2024, the Board has applied Article 7:115 of the Belgian Code of Companies and Associations at its meetings of 14 February (ordinary meeting), 14 February (closed meeting) 2024. Excerpts of the minutes of these Board meetings are reproduced below.

14 February 2024 (ordinary meeting)

In compliance with article 7:115 of the Code on Companies and Associations, and prior to any deliberation, each executive director present declares having a conflict of interest as to item 9.5.3. (Release of deferred compensation). Each of them requests the Company Secretary to enact that (s)he has a personal and direct financial interest conflicting with the recommendation to be issued in connection with his/her own remuneration given that (s)he would benefit personally from the proposed remuneration. There are no financial consequences for the Company other than those resulting from any payment made by the Company there under. Each executive director abstains from deliberating on this topic and abstains from voting insofar it concerns his/her own remuneration.

14 February 2024 (closed meeting)

In compliance with article 7:115 of the Code on Companies and Associations, and prior to any deliberation, Mr. Peter Sneyers declares having a conflict of interest as to item 5 (Performance Review, Bonus and Fixed Fee for the CEO). He requests the Company Secretary to enact that he has a personal and direct financial interest conflicting with the decision to be taken as he would benefit personally from the proposed remuneration. There are no financial consequences for the Company other than those resulting from any payment made by the Company there under.

…

Mr. Sneyers leaves the meeting as having a direct patrimonial conflict of interest as defined in article 7:115 of the Code on Companies and Associations. Mr. Frenay motivates the proposal of the variable 2023 and fix fee 2024 of the EB CEO. The Board members align with the motivation for the performance year 2023. Upon recommendation of the EB Remuneration Committee, the Board of Directors approve the proposed variable 2023 and proposed fix fee 2024 for the EB CEO (as presented in the memo).

VII.5 Management Committee

Management Committee (MC)

The MC is a collegiate body to which all management powers referred to in article 7:110 of the Belgian Code of Companies and Associations are transferred with the exception of everything which, by virtue of the Belgian Code of Companies and Associations or the Belgian Banking Law, remains with the Board. The MC is comprised of five voting members which are all executive directors of the Board and advisors. The MC members at all times possess the skills, experience, knowledge and professional integrity required for their roles.

Audit Committee (AC)

The AC assists the Board in fulfilling its financial and non-financial /sustainability reporting, audit, technology (ICT strategy – including ICT security and operational processes) and compliance and ethics oversight responsibilities. In addition, the AC also reviews the controls over all outsourced services on which Euroclear Bank is dependent. The AC is comprised of four non-executive directors of Euroclear Bank, of which three are independent. All members of the AC collectively have an understanding of Euroclear Bank's business as well as collective competence in accounting, audit, IT, and ESG matters. At least one member is competent in accounting and/or audit, technology and ESG matters.

Risk Committee (RC)

The RC assists the Board in fulfilling its risk oversight responsibilities. The RC is comprised of three non-executive directors of Euroclear Bank, of which two are independent. An observer from Euroclear SA/NV's RC has been appointed to support the committee. Equally, an observer from Euroclear Bank's RC has been appointed to attend the Euroclear SA/NV RC. The RC assists and advises the Euroclear Bank Board of Directors in its oversight of Euroclear Bank's risk management governance structure, risk tolerance, appetite and strategy and key risks as well as the processes for monitoring and mitigating such risks (including contingency planning, cyber security, recovery plans, board policies). The RC members individually have the skills and experience to be able to understand Euroclear Bank's business and to oversee the risk strategy, risk appetite, risk capacity and risk profile, including ESG.

Nominations and Governance Committee (NGC)

The NGC assists and advises the Euroclear Board in all matters in relation to the suitability assessment of Board, Management Committee members and key function holders, Board and Committee composition, succession planning, as well as corporate governance matters, as they apply to Euroclear Bank and reviews ESG matters in its remit. The NGC is comprised of three non-executive directors of Euroclear Bank, of which two are independent. Committee members possess individual and collective appropriate knowledge, skills, expertise and professional experience regarding governance, selection process, control practices and ESG matters, and are able to properly and independently advise the Board on the composition and the functioning of the Board and Board Committees of Euroclear Bank and, in particular, on the 'fit and proper' character of their members.

Remuneration Committee (RemCo)

The RemCo assists and advises the Board of Directors in defining a global compensation policy for Euroclear Bank. It ensures that the members of the MC, identified staff and the non-executive Board members of Euroclear Bank are compensated as per the principles described in Euroclear Bank's Compensation Policy and oversees management's implementation of the policy. The RemCo is comprised of three non-executive directors of Euroclear Bank, of which two are independent. The RemCo members exercise relevant and independent judgment on the remuneration policies and practices. They collectively have the knowledge, expertise and experience concerning remuneration policies and practices, risk management and control activities, namely with regard to the mechanism for aligning the remuneration structure to Euroclear Bank's risk and capital profiles. The RemCo members collectively have an understanding of Euroclear Bank's business and are competent in the sector in which Euroclear Bank operates.

VIII. Other disclosures

VIII. 1 Supervision and regulation

The NBB and, to a lesser extent, the Financial Services and Markets Authority (FSMA) are the supervisors of Euroclear Bank.

VIII.2 Recovery plan and resolution

In line with regulatory rules and guidance, a Recovery, Restructuring and Wind-down (RRW) plan is in place for Euroclear Bank as part of its overall approach to financial resilience. This plan is reviewed and approved by the Board of Directors, upon recommendation of the Risk Committee, on an annual basis. The aim of the RRW plan is to demonstrate Euroclear Bank's ability to recover from a series of extreme but plausible stresses that could threaten its financial viability, such that the Bank can, to the extent possible, ensure the continuous provision of critical (economic) functions. To this end, the RRW plan identifies and analyses a number of recovery and restructuring options that could be used in order to restore Euroclear Bank's capital base, liquidity position or profitability, over a short-to-medium timeframe. Finally, should these recovery and restructuring options prove insufficient to negate the stress, and thus could not recover Euroclear Bank, this RRW plan also contains a series of wind-down actions that could be taken to ensure, to the extent possible, the orderly wind-down of Euroclear Bank's critical (economic) functions such that it does not exacerbate or create undue stress on the market.

Euroclear is also subject to resolution planning requirements. To this end, Euroclear Bank and its parent, Euroclear SA/NV have implemented a multi-year programme to meet the provisions of the EU's BRRD and comply with relevant regulatory technical standards issued by the EBA and the 'Expectations for Banks' issued by the Single Resolution Board (SRB). The key outcome of this programme is to ensure that Euroclear may be deemed resolvable by the NBB, acting in its capacity as the National Resolution Authority (NRA) for the group and to allow for Euroclear Bank to continue to provide its critical functions in the unlikely scenario of resolution. Significant progress has been reached towards meeting the year-end 2024 milestones, a key timeline which has been set for all banks that are not in the direct remit of the SRB. Starting in 2024, and in line with industry requirements, Euroclear Bank has also begun publishing the minimum requirement for own funds and eligible liabilities (MREL) targets set by the NBB, in its Pillar 3 disclosures.

VIII.3 Capital management in Euroclear Bank

Capital measurement and allocation

Euroclear Bank has in place sound, effective and comprehensive capital measurement methodologies which are integrated within the overall Internal Capital Adequacy Assessment Process (ICAAP). The ICAAP relies on two complimentary views on capital adequacy:

Normative view: This view focuses on ensuring that Euroclear Bank complies with all regulatory capital requirements, even under adverse conditions. These requirements stem from two major regulations that Euroclear Bank is subject to: Capital Requirements Regulation (CRR and CRD IV as transposed into Belgian Banking law) and CSDR.

Economic view: This view focuses on ensuring that the institution has enough capital to cover all potential losses from risks that it is or might be exposed to, including risks that are not directly reflected in the regulatory capital requirements. The economic view is based on the concept of economic capital and relies on internally developed risk quantification methodologies at a 99.98% confidence level that are regularly validated by an independent Model Validation function. The economic capital models cover operational, credit and market risk complemented with additional methodology to measure pension risks.

Under the normative view, Euroclear Bank has to comply with the CRR requirements, which mandate to maintain at all times:

- a ratio of total capital to risk-weighted assets at or above 8%;
- a ratio of Tier 1 capital to risk-weighted assets at or above 6%;
- a ratio of common equity Tier1 capital (CET1) at or above 4.5%;
- Pillar 2 requirement (P2R) as defined through the yearly supervisory review and evaluation process (SREP);

- a Combined Buffer Requirement (CBR) comprising countercyclical buffer (CCyB), capital conservation buffer (CCB) and other systemic institution buffer (O-SII)[5].

For the computation of risk-weighted assets, Euroclear Bank relies on a mix of internally developed models and standardised approaches[6]:

- To compute credit risk-weighted assets Euroclear Bank uses the Foundation Internal Ratings Based Approach (FIRBA). Under this approach, credit risk-weighted assets take into consideration balance sheet assets and off-balance sheet exposures that may give rise to credit risk. Collateral and other eligible guarantees are taken into account appropriately.

- For the calculation of operational risk-weighted assets, Euroclear Bank relies on the Advanced Measurement Approach (AMA). The Advanced Measurement Approach (AMA) was developed internally and approved by the NBB for regulatory purposes.

- For the calculation of market risk-weighted assets, Euroclear Bank uses the Standardised Approach to cover the foreign exchange risk.

Additionally, under the normative view, Euroclear Bank is also subject to the CSDR capital requirements, in accordance with the Commission Delegated Regulation (EU) 2017/390. These requirements are calculated as the aggregate of capital requirements for: Operational, legal and custody risks; Investment risks; Business risks; and Winding-down or restructuring. Additionally, Euroclear Bank is subject to an additional capital surcharge for the provision of intraday credit.

Euroclear Bank complies with the 'combined capital requirement', which is composed of the CRR requirements, plus the additional capital requirements under CSDR Articles 47. This ensures that all risks faced by Euroclear Bank are adequately covered by its own funds, as defined under the CRR.

Lastly, in addition to the capital ratios, Euroclear Bank also complies with the leverage ratio. As part of its Risk Appetite Framework, Euroclear Bank has set a higher internal leverage ratio limit than the 3% limit prescribed by the legislation. Euroclear Bank's current levels of the leverage ratio are already well above this regulatory requirement and are disclosed in the Euroclear's Pillar 3 report.

The table below sets out the Euroclear Bank CET1, Tier 1 and total capital levels against the total risk-weighted assets. The latter has increased in 2024 largely driven by revised severity and/or frequency parameters for several scenarios underlying computation for the operational risk. Operational risk remains the largest driver behind Euroclear Bank's risk-weighted assets.

Despite the increase in total risk-weighted assets, Euroclear Bank is well-capitalised and remains comfortably above the regulatory requirements. Euroclear Bank's capital has further increased in 2024 as Euroclear Bank continues to act prudently and further strengthening its capital providing cushion against current and future risks.

[5] NBB identifies Euroclear Bank as domestic systemically important bank (referred to in EU legislation as 'other systemically important institutions', or O-SIIs) under Belgian banking law and CRD IV. Subsequently, the NBB applies a common equity Tier 1 capital ratio surcharge of 1.5% to Euroclear Bank.
6 Additional information on the capital requirements and related methodologies can be found in the Capital Management section of Euroclear's Pillar 3 report.

Regulatory capital position

(€'000)	CY	PY
Risk-weighted assets (1)	7,851,231	7,146,568
Capital requirement	628,099	571,725
- Credit risk	104,289	114,499
- Market risk	1,819	3,162
- Operational risk	521,991	454,064
Capital base (2)	7,526,614	6,247,757
CET1	7,227,462	5,948,690
Additional Tier 1	0	0
Tier 2	299,152	299,067
Solvency ratio		
CET1	92.1%	83.2%
Tier 1	92.1%	83.2%
Total	95.9%	87.4%

1 Risk-weighted assets represent the total capital requirement multiplied by a factor of 12.5. This means that the risk-weighted assets do not only relate to credit and market risk, but also comprise the gross-up of the capital requirements related to operational risks. For Euroclear Bank, the latter are the main source of capital consumption.

2 Capital base is highly comparable to the shareholders' equity as presented on the balance sheet of Euroclear Bank after incorporation of subordinated liabilities for which regulatory capital recognition was granted by the National Bank of Belgium. Differences are due to deductions required by CRR regulation, i.e., intangible assets, current year proposed dividend and provision shortfall for expected losses.

Consistent with the requirements of BRRD, as transposed by Belgian law and interpreted by the NBB as the NRA, Euroclear Bank is also required and maintains a minimum level of MREL to facilitate the orderly resolution should this ever be deemed necessary by the NRA. MREL is expressed both as a percentage of the Total Risk Exposure Amount (TREA) and the Leverage Ratio Exposure (LRE). MREL can be met with own funds (Common Equity Tier 1 (CET1), Additional Tier 1 and Tier 2) and a sub-set of eligible liabilities which, in case of resolution, the authorities may bail-in, write down or convert to capital.

VIII. 4 Research and development

The Company has continued investing in research and development. These investments are linked to the performance and resilience of its systems as well as business developments, which are described in more detail in the Business and strategy update section of this report. Euroclear Bank also continued investing in market research in line with its mission to provide increasingly commoditised market infrastructure services.

VIII.5 Authorised capital

The authorised capital amount stands at €500 million.

VIII.6 Acquisition of own shares

During the financial year, neither the Company nor any directly controlled subsidiary or person acting in his/her own name but on behalf of the Company or a directly controlled subsidiary of the Company acquired any shares of the Company.

VIII.7 Dividends

A total dividend of €11,830 per share will be distributed in respect of the financial year ending 31 December 2024. This amounts to €838,000,000 of shareholders' equity, of which €200,000,000 (or €2,823 per share) was already paid as an interim dividend in December 2024.The remaining €638,000,000 (or €9,006 per share) will be paid to shareholders in 2025.

VIII.8 Post-balance sheet events

Euroclear Bank continues to closely monitor the invasion of Ukraine by Russia, and to implement the various sanctions. In line with its role of financial market infrastructure (FMI), Euroclear Bank is carefully managing the various aspects resulting from this situation in cooperation with the competent authorities. The Company continues to act prudently and to strengthen its capital by retaining the remainder of the Russian sanction related profits as a buffer against current and future risks. Euroclear Bank is focused on minimising potential legal, financial, and operational risks that may arise for itself and its clients, while complying with its obligations.

Future earnings linked to the sanctions and the level of the windfall contribution will continue to depend on the prevailing interest rate environment and the evolution of the sanctions. Gradual rate cuts have already led to a gradual decline in interest income related to the Central Bank of Russia’s assets in 2024 with the outlook for future interest earnings likely to continue to decline though dependent on future policymaking decisions.

Various parties in Russia contest the consequences of the application of sanctions, with a significant number of legal proceedings ongoing, almost exclusively in Russian courts. The impact of the lawsuits on Euroclear Bank is uncertain. Euroclear Bank is defending against all relevant legal claims and intends to continue to do so against any further claims.

A United Nations (UN) resolution was voted in January 2025 with regards to the Libyan assets held at Euroclear Bank for underlying clients under UN sanctions. This UN resolution aims to enable Libyan Investment Authority (LIA) to preserve the value of the frozen assets by enabling investment decisions on frozen cash balances. Although the resolution is not readily actionable and its implementation may take some time, it is expected to impact the future earnings of Euroclear Bank.

VIII.9 Information on circumstances that might materially influence the development of the Company or its subsidiaries

Other than set out in the section above, no circumstances occurred that might materially influence the development of the Company or its subsidiaries.

On behalf of the Board

Robert Peirce
Chairman of the Board
17 March 2025

Appendix I: Details of the reportable directorship mandates and managerial functions exercised by the members of the Board and the Management as of 31 December 2024

Company	Registered Office Address	Activity	If Listed (Y/N) - Exchange	If Participating Interest >5%	Function	Executive (Y/N)
Euroclear Bank Board/Management Committee Members						
PEIRCE, Robert (Board Chairman) Independent Non-Executive Director						
External Functions						
European Money Markets Institute	Avenue des Arts 56 1000 Bruxelles, Belgium	Benchmark administrator	N	N	Member of the Board	N
Internal Functions						
None						
COCHRANE, Victoria (Audit Committee Chair) Independent Non-Executive Director						
External Functions						
IntegraFin Holdings PLC	29 Clement's Lane London EC4N 7AE United Kingdom	ultimate holding comany of UK investment platform provider	Y - LSE	N	Member of the Board Group Executive Committee	N
Ninety One plc	55 Gresham Street London EC2V 7EL United Kingdom	independent asset manager	Y - LSE & JSE	N	Member of the Board	N
DTEK Group	Tower B, Level 15, Strawinskylaan, 1531, Amsterdam, 1077XX Netherlands	diversified energy holding	N	N	Member of the Advisory Council	N
Internal Functions						
None						
TILKIN-FRANSSENS, Carl (Chairman Nominations and Governance Committee and Chairman Remuneration Committee) Independent Non-Executive Director						
External Functions						
EBA Clearing	Rue de Courcelles 40, F-75008 Paris France	financial/ clearing services	N	N	Independent Member of the Board,	N
Laco	Woluwelaan 13A, B-1831 Diegem Belgium	business Intelligence consultancy	N	N	Member of the Board	N
ToaC-Solutions	Nieuwstraat 123, B-3370 Boutersem Belgium	management consultancy services	N	N	Owner	Y
Internal Functions						
None						
MARTIN, James Michael (Mike) (Risk Committee Chairman) Independent Non-Executive Director						
External Functions						
Consilium Sports Group Limited	42 Eskbank Road Dalkeith EH22 3BT Scotland	management consultancy services	N	N	Chairman of the Board	N

Company	Registered Office Address	Activity	If Listed (Y/N) - Exchange	If Participating Interest >5%	Function	Executive (Y/N)
DLTM Limited	42 Eskbank Road Dalkeith EH22 3BT Scotland	personal investment vehicle	N	N	Director	N
True Potential Administration LLP	Newburn House Gateway West, Newburn Riverside, Newcastle Upon Tyne, Tyne And Wear, NE15 8NX, United Kingdom	wealth & asset management services	N	N	Independent Chairman of the Board	N
Handelsbanken ACD Limited	No.1 Kingsway London WC2B 6AN United Kingdom	wealth & asset management services	N	N	Independent Board member	N
Internal Functions						
None						

FRENAY Bernard (Representing Shareholder Euroclear SA/NV) Non-Executive Director						
External Functions						
None						
Internal Functions						
Euroclear SA/NV	Boulevard du Roi Albert II 1, B-1210 Brussels Belgium	Financial holding	N	Y	CEO of European Markets, Member of the	Y
Euroclear Pension Fund	Boulevard du Roi Albert II 1, B-1210 Brussels Belgium	Pension Fund Management	N	Y	Chairman of the Board	N
Euroclear Properties France SAS	66 rue de la Victoire, F-75009, Paris France	Property Management	N	Y	Chairman of the Board	N
Internal Functions						
None						

SWAELUS Anne (Representing Shareholder Euroclear SA/NV) Non-Executive Director
External Functions
None
Internal Functions
None

SNEYERS, Peter (Chief Executive Officer, Management Committee Chairman) Executive Director						
External Functions						
None						
Internal Functions						
Euroclear SA/NV	Boulevard du Roi Albert II 1, B-1210 Brussels Belgium	Financial holding	N	Y	Member of the Euroclear SA/NV Executive Committee	Y
Taskize Limited	Watling House, 33 Cannon Street London EC4M 5SB United Kingdom	Financial industry software platform provider	N	Y	Member of the Board	N

Company	Registered Office Address	Activity	If Listed (Y/N) - Exchange	If Participating Interest >5%	Function	Executive (Y/N)
BOONEN, Didier (Chief Financial Officer, Management Committee Member) Executive Director						
External Functions						
Royal Oree asbl	Drève des Brûles, 59 B-1050 Brussels Belgium	sports club	N	N	Member of the Board	N
Internal Functions						
None						

Company	Registered Office Address	Activity	If Listed (Y/N) - Exchange	If Participating Interest >5%	Function	Executive (Y/N)
BERNARD, Stéphane (Chief Operations Officer, Management Committee Member) Executive Director						
External Functions						
Association of IT & Business Process Services (Aspire)	Rynek Główny 39/8 31-013 Kraków Poland	Business Association	N	N	Member of the Executive Board	N
Febelfin	Boulevard du Roi Albert II 19 1210 Saint-Josse-ten-Noode Belgium	Activities of business and employers membership organisations	N	N	Member and Vice Chair of Febelfin's Financial Markets & Infrastructure Committee (FMIC)	N
Internal Functions						
EC Nominees Limited	Watling House, Cannon Street 33, London EC4M 5SB United Kingdom	Financial	N	Y	Director	N
Euroclear Nominees Limited	Watling House, Cannon Street 33, London EC4M 5SB United Kingdom	Financial	N	Y	Director	N
EOC Equity Limited	Watling House, Cannon Street 33, London EC4M 5SB United Kingdom	Financial	N	Y	Director	N
FundSettle EOC Nominees Limited	Watling House, Cannon Street 33, London EC4M 5SB United Kingdom	Financial	N	Y	Director	N
Euroclear Treasury Nominee Limited	Watling House, Cannon Street 33, London EC4M 5SB United Kingdom	Financial	N	Y	Director	N

Company	Registered Office Address	Activity	If Listed (Y/N) - Exchange	If Participating Interest >5%	Function	Executive (Y/N)
HAEGEMAN, Marie-Anne (Head of Banking & Network Management, Management Committee Member) Executive Director						
External Functions						
Argenta Bank en Verzekerings Groep	Belgïelei 49-53, B-2018 Antwerp Belgium	Credit and Insurance Institution (Holding)	N	N	Member of the Board	N
Internal Functions						
None						

Company	Registered Office Address	Activity	If Listed (Y/N) - Exchange	If Participating Interest >5%	Function	Executive (Y/N)
NAGYNÉ KOMÓCSI, Szandra (Chief Risk Officer, Management Committee Member) Executive Director						
External Functions						
None						

Company	Registered Office Address	Activity	If Listed (Y/N) - Exchange	If Participating Interest >5%	Function	Executive (Y/N)
Internal Functions						
Euroclear Pension Fund	Boulevard du Roi Albert II 1, 1210 Saint-Josse-ten-Noode	Pension Fund Management	N	Y	Member of the Board and Member of the Risk, Audit and Compliance Committee ("RAC")	N

Other Euroclear Bank Branch Managers

BERNARD, Stéphane Krakow Branch Manager
As Per Above

BEELEN, Stéphane Krakow (Deputy) Branch Manager
None

GEERAERTS, Diederik Krakow (Deputy) Branch Manager
None

KOSUDA, Ryo Tokyo Branch Manager
None

LAWRENCE, Jacques Tokyo (Deputy) Branch Manager
None

LO, Alice Hong Kong Branch Manager
None

LEE, Kin Ying (Esmond) Hong Kong (Deputy) Branch Manager
None

WONG, Karen Hong Kong (Deputy) Branch Manager
None

Euroclear Bank Board and Committees - composition

Members	Nature	Euroclear Bank Board	Audit Committee	Risk Committee	Remuneration Committee	Management Committee	Nominations & Governance Committee
Robert Peirce	Chairman Independent Non-Executive Director	●	●		●		
Victoria Cochrane	Independent Non-Executive Director	●	● (chair)	●			
Mike Martin	Independent Non-Executive Director	●		● (chair)			●
Carl Tilkin-Franssens	Independent Non-Executive Director	●	●		● (chair)		● (chair)
Anne Swaelus	Non-Executive Director	●	●				●
Bernard Frenay	Non-Executive Director	●		●	●		
Didier Boonen	Executive Director	●				●	
Marie-Anne Haegeman	Executive Director	●				●	
Szandra Nagyné-Komocsi	Executive Director	●				●	
Stéphane Bernard	Executive Director	●				●	
Peter Sneyers	Executive Director CEO Euroclear Bank	●				● (chair)	
Andrew Butcher	Non-Executive Director Chairman of the Euroclear SA/NV Risk Committee			● (observer)			

Sustainability statements

General Disclosures

Euroclear Bank's approach to sustainability

The new EU Corporate Sustainability Reporting Directive (CSRD) introduces mandatory sustainability reporting standards for reports on the financial year of 2024. Euroclear Bank SA/NV is required to report on its ESG performance on a stand-alone basis, in addition to consolidated group disclosures. In these Sustainability Statements, we describe our approach and performance related to material sustainability impacts, risks and opportunities. These statements follow the structure of the European Sustainability Reporting Standards (ESRS).

Our corporate purpose is the foundation of our sustainability strategy. Aligned with this strategy and tied to our material topics, we have policies and projects which embed environmental, social, and governance practices within our operations and we track progress through metrics and KPIs.

We are committed to conducting our business in a responsible and sustainable way, believing that acting responsibly is in the best long-term interest of the company and all the stakeholders. Our main business is to facilitate the financing of the real economy by connecting global issuers, investors and intermediaries. This financing allows companies and governments to tackle some of the societal and environmental challenges which the world is currently facing.

Connecting the dots between the Material Topics and Our Corporate Purpose

In 2025, we will continue the implementation of the requirements of ESRS based on a gap assessment. We will focus on reporting areas, governance processes and interaction of the strategy and business model with material impacts, risks and opportunities. We will also evaluate Policies, Actions, and Targets for the material impacts, risks and opportunities, and improve the reporting of metrics.

Basis For Preparation

These Statements, covering the period 1 January 2024 to 31 December 2024, have been prepared in accordance with the CSRD requirements, for Euroclear Bank SA/NV. Both upstream suppliers and downstream value chains have been taken into consideration when preparing the report. Metrics (identified as secondary data on p. (94-100) for these value chains have been estimated using indirect sources.

Euroclear Bank is guided by international guidelines, such as the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises on Responsible Business Conduct, the United Nations Guiding Principles on Business and Human Rights and the principles of the United Nations Global Compact.

When preparing the statements, the CSRD structure was followed as closely as possible. In order to focus on what is really material for the company, it was decided generally not to include voluntary or phased in data points in the 2024 report.

For ease of reading and logical sequence, Euroclear Bank has chosen to present the Statements as follows:

- General Information
    - Basis for preparation
    - Double Materiality Assessment including the approach taken, the outcome, a description of the IROs linked to each material topic and our approach to stakeholder engagement
    - A description of the Policies, Actions, and Targets for each material topic, including Euroclear Bank specific topics
    - ESRS 2 – Governance
- E1 - Environment – including metrics and the EU taxonomy
- S1 - Social – including metrics
- G1 - Governance – including metrics
- Index of disclosure requirements
- Datapoints derived from other EU legislation

When information is repeated in different sections of the statements, reference is made to where that information can be found. Some parts of the Sustainability Statements are included in the body of the Directors' Report and when this is the case, it is clearly indicated in the text.

Euroclear Bank has not used the option to omit a specific piece of information corresponding to intellectual property, know-how or the results of innovation; nor has it used the exemption from disclosure of impending developments or matters in course of negotiation. Resilient infrastructure is the sole material topic with significant CapEx and OpEx amounts. For reasons of confidentiality, these have been omitted based on CSRD exemption clauses. In case of uncertainty or estimation for environmental data, this is explicitly mentioned in the Data, methodology and key assumptions section on p. 94.

Double Materiality Assessment

In 2023-2024, Euroclear Bank conducted a CSRD-aligned Double Materiality Assessment (DMA). Once a sustainability matter was defined as material, all disclosure requirements and data points related to these topics have been included in the Sustainability Statements. As such, very few datapoints have been excluded. The outcome of the DMA forms the basis for the reporting in these statements.

Both the Euroclear SA/NV consolidated group and the Euroclear Bank DMA exercises were carried out in parallel due to the integrated group set-up, the materiality of Euroclear Bank within the group and the intra-group outsourcing agreements whereby Euroclear SA/NV divisions provide services covering domains such as People and Communications, Finance, Facilities, Supply Chain, Company Secretariat & Legal, Compliance & Ethics and Risk Management, as examples. To maintain oversight of the process and ensure its applicability to Euroclear Bank, the Euroclear Bank Chief Sustainability Officer was part of the core team together with the group Corporate Sustainability Office, responsible for the methodology, delivery and governance of the DMA exercise. We refer to this core team as Corporate Sustainability Office or CSO henceforth.

The approach taken, which followed three key phases between Q3 2023 and May 2024, is summarised below:

Phase 1

During the first phase, Euroclear Bank:

- conducted a legal entity scoping assessment
- documented the key activities across its businesses and value chain
- developed its DMA framework

Phase 2

During this phase, potentially material ESRS topics and subtopics were identified, based on an analysis of the business model and value chain, mapping outputs and conducting a desk top review of key resources. This review also identified Euroclear Bank sustainability matters that were potentially material. Through a workshop, the Corporate Sustainability Office (CSO) and ESG Risk Management continued with the identification of impacts, risks and opportunities for these potentially material topics (see p. 52).

Phase 3

The CSO gave a preliminary score to the IROs. These were then reviewed together with the related Subject Matter Experts (SMEs) and internal stakeholders. The CSO aggregated the scoring of all IROs and reviewed it for consistency. Specific thresholds were defined at a later stage, once there was sufficient maturity in understanding the results. Once an IRO reached the threshold, either for impact, risk or opportunity, the related topic was deemed material. This led to defining the material topics through a review process by internal stakeholders and final approval by Euroclear Bank Management Committee, Euroclear Bank Audit Committee and the Board of Directors.

Affected stakeholder engagement around the CSRD

For stakeholder engagement around Euroclear Bank's strategy and ongoing stakeholder engagement, please see the Governance section p. 66.

Internal stakeholder engagement

The CSO identified and engaged with the following groups of internal stakeholders throughout the process.

Board and Management Committee

The Board and Management Committee are central to overseeing and approving Euroclear Bank's CSRD disclosures. They were engaged at regular intervals to gather inputs and feedback.

Internal Subject Matter Experts (SMEs)

Internal SMEs are central to the process, providing input and validation, on the matters and IROs relevant to their areas of expertise. Internal SMEs were identified by considering the core operating functions of the business, in addition to the stakeholder groups with the relevant expertise relative to the sustainability matters being assessed.

Over 40 internal SMEs were engaged in their areas of expertise across 10 workshops. Engagement focused on validating:

- the value chain outputs;
- the longlist of potentially material sustainability matters and associated matters;
- the initial scoring of relevant IROs; and
- the identification of relevant external stakeholder groups

Employees

Employees are key stakeholders, in terms of expertise as well as for being consulted as affected groups. Employee views were taken into account via interviews with employee representatives from the European Works Council (EWC), as well as surveys for selected employees and Leaders for the Future, with the aim of gaining a balanced view of how employees are affected by and perceive Euroclear Bank's relevant sustainability IROs.

External Stakeholders

External stakeholders (including clients, issuers, investors and suppliers) were identified by the CSO, with input from the Chief Business Officer and internal SMEs.

The engagement method was determined, taking into account the relationship with the external stakeholder and the relationship 'owner'. All external stakeholders were either engaged through an online survey or through a 1:1 interview.

Once internal views on the validation and scoring of IROs had been finalised, and materiality thresholds had been defined and applied, external stakeholder engagement was conducted for further validation on the outcomes of the assessment. The external stakeholder validation focused on identifying the matters external stakeholders considered as being material for Euroclear Bank and the supporting rationale.

Validating the IROs and defining materiality thresholds

To validate the longlist of IROs and the associated initial scoring, a mapping exercise was first conducted to identify the relevant internal SMEs for each sustainability matter. The validation exercises were conducted for all relevant matters. After IRO scoring and validation, a consolidation exercise was carried out with the SMEs to ensure consistent application of the scoring methodology.

In order to determine which IROs are material to the business, materiality thresholds were defined. A materiality threshold is the score above which an IRO needs to have scored for the assessment to be deemed material.

Following the assessment, all IROs which scored above the threshold were considered material for Euroclear.

The materiality threshold(s) were then applied to the outputs of the IRO scoring assessment, to determine which IROs were material or not material.

The materiality of IROs, as per the initial threshold ranges, were reviewed by internal stakeholders and SMEs. This review particularly focused on IROs that were emerging within the ‘threshold zones’ described previously, to consider whether these should be included or excluded as material IROs.

The final materiality thresholds were determined as the mid-point of the range, which ensured that IROs below the top of the ‘threshold zone’ and therefore ‘close’ to the threshold were not automatically discounted. A total of six IROs emerged as ‘close’ to, but below the thresholds. These IROs were not included in the final outcome.

During the DMA, Euroclear Bank took the connections of impacts and dependencies with risks and opportunities that may arise from those impacts and dependencies into consideration, however they are not expressed explicitly in the final outcome.

Materiality topics were assessed from an impact, risk and opportunity perspective, with some connections identified. For example, in Own Workforce, the positive impacts identified were often more significant and material than the potential risks.

Scoring methodology

A scoring framework of 1-5 was developed for financial materiality, applicable to both risks and opportunities. Euroclear’s existing Enterprise Risk Management framework formed the basis of the scoring approach, and the size of potential financial effects was baselined using the 2022 annual operating income for Euroclear Bank.

These calculations were made only in the context of the DMA. For the next DMA review process, the same financial impact thresholds will be used as in the Assessment and Rating Methodology (ARM), which is the risk classification system that Euroclear uses to standardise how risks are measured in terms of likelihood, impact, and final rating.

For actual negative impacts, materiality is based on the severity of the impact, while for potential negative impacts it is based on the severity and likelihood of the impact. Severity is based on the following factors:

- the scale.
- scope; and
- irremediable character of the impact. In the case of a potential negative human rights impact, the severity of the impact takes precedence over its likelihood.

For positive impacts, materiality is based on:

- the scale and scope of the impact for actual impacts; and
- the scale, scope and likelihood of the impact for potential impacts.

Input parameters and resources

Based on ESRS requirements, a mapping of the business model and value chain was conducted, along with a desktop analysis of key resources and the company purpose and strategy, to assess the relevance of the ESRS topics and identify any additional Euroclear Bank-specific sustainability matters.

Resources used to identify potentially material topics:

- Industry standards including Sustainability Accounting Standards Board (SASB) and MSCI.
- The previous Euroclear materiality assessment (2021), based on GRI requirements; and

- An analysis of other financial sector firms.

For details on the management of ESG-related risk, please refer to Governance p.65.

Material topics and their respective Policies, Actions, Metrics and Targets will be reviewed annually by the Board. The outcome of the DMA can be seen in the chart on p. 49.

Outcome of the DMA and associated IROs

Material topics

As described on p. 49-51 impacts, risks and opportunities linked to Euroclear Bank's material topics are integrated into its purpose, strategy and business model and Policies and actions are derived from that. For more information on Euroclear Bank's business model and strategy, please also refer to Policies, Actions, and Targets in General Disclosures, p. 52 and p. 22 of the Directors' Report. For more information on supply chain please refer to G1 p. 115.

IROs are primarily driven by Euroclear Bank's own operations (including activities outsourced to Euroclear SA/NV divisions), with a few exceptions, such as the supply chain risk.

Material risks and opportunities are not expected to negatively impact Euroclear Bank's financial position, performance and cash flows nor are they expected to impact the business model, value chain or decision making.

Euroclear Bank assesses if its strategy and business model is resilient enough to cope with material risks and negative impacts.

More specifically, for climate change, and based on the long-term climate scenario analysis exercise conducted in 2023, Euroclear concluded that its strategy and business model are resilient to both physical and transition risks over the short, medium, and long term. However new risks will emerge in different scenarios which will require adaptations over time. More information on the results of the analysis can be found on p. 72 in the Environment section.

No change to the identified impacts, risks and opportunities has taken place since the last reporting period as this is the first year of reporting according to CSRD requirements.

Non-material topics

As a result of the DMA, the following ESRS topics were found to be not material for Euroclear

ESRS sustainability topics	Rationale
E2 Pollution	Due to the limited generation of pollution through Euroclear Bank's direct operations and following consideration of its value chain, this topic was deemed to be not material.
E3 Water and marine resources	Due to the limited consumption and withdrawal of water through Euroclear Bank's direct operations and following consideration of its value chain, this topic was deemed to be not material.
E4 Biodiversity and ecosystems	Due to the locations of Euroclear Bank's operating sites and its upstream value chain, this topic was deemed to be not material.
E5 Resource use and circular economy	Due to the low quantity of resource inflows, outflows and amount of waste generated through Euroclear Bank's direct operations and following consideration of its value chain, this topic was deemed to be not material.
S2 Workers in the Value Chain	Due to the nature of our upstream value chain activities and the location of our key suppliers, the S2 subtopics and sub-subtopics were assessed to be non-material.
S3 Affected Communities	Due to the limited impact of our business activities on local communities and the limited scale and scope of engagement programmes, the topic scored below the materiality threshold. However, Community support is important to Euroclear's values and in 2024 the group, established a new Charitable Foundation, to which Euroclear Bank contributed. For more details, see p. 27.
S4 Consumers and End-users	Due to the nature of products and services provided by Euroclear Bank, the S4 sub-topics and sub-sub- topics were assessed to be non-material with broader consumer-related impacts considered through the governance topic Connecting issuers and investors.

ESRS sustainability topics	Rationale
G1.5 Political Engagement and Lobbying Contributions	Euroclear Bank's lobbying is not sufficiently material to disclose, with a standard and prudent approach, limited to the monitoring of policy developments in the areas directly relevant to Euroclear Bank's activities. It provides input with the aim of promoting an efficient, well-regulated and resilient post-trading environment that supports the global securities markets and the Euroclear Bank strategy. To this effect, Euroclear Bank is mentioned in the EU Transparency Register, the EU official list of entities or persons who perform public policy outreach towards EU entities. Euroclear Bank and policy makers are governed through corporate, national and European Policies providing boundaries to lobbying activities. Furthermore, Euroclear Bank does not make monetary contributions to political parties.

Material topics and Impacts, Risks and Opportunities (IROs)

Environment Social Governance Euroclear specific

Material topic	Material IRO (Impact/Risk/Opportunity)	Classification	Positive/ Negative	Short	Medium	Long	Policies, actions, metrics and targets
Climate change	1 **Generation of emissions** Generation of GHG emissions from business operations including offices, hardware use, transport and supply chain, and associated impact on global warming and the environment. As Euroclear Bank's business model evolves and the strategy is implemented, the impact of GHG emissions from its own operations and that of its supply chain needs to be taken into consideration if Euroclear Bank is to remain competitive in a fast-changing market. The commitment to reaching net zero by 2050 at the latest is an illustration of the importance of this IRO to Euroclear.	Impact	-	•	•	•	p. 52
	2 **Impact of climate change on employee wellbeing** Impact of climate change and global warming on employee wellbeing (e.g. long period of heat causing loss of productivity).	Risk	N/ A		•	•	p. 52
	3 **Exposure to physical climate risks** Increased exposure to physical risks to Euroclear Bank assets, clients, suppliers, and employees and higher climate adaptation costs associated with investment in mitigation or technology (e.g. exposure of assets, data centers, clients to flooding or pollution). Employees, assets, clients and suppliers could be adversely affected by climate events. Any adverse effect upon the above-mentioned could impact the execution of our strategy. The risk will be monitored going forward.	Risk	N/A			•	p. 53
	4 **Risk of long-term economic downturn** A general decline in economic activity as a result of climate change, e.g. de-growth or erosion of client base (due to physical risks or transition to a low-carbon economy).	Risk	N/A			•	p. 53
Employee talent, training and skills	5 **Training, development and growth opportunities for employees** In a rapidly evolving environment, providing upskilling and education opportunities for employees supports them in achieving their career. goals and securing long-term employment (within Euroclear Bank or externally). This contributes to their improved social mobility, livelihoods. and wellbeing. As Euroclear Bank's people are key to ensuring that the strategy is executed and that we remain competitive, investing in training. and development ensures that employees have the skills needed to carry out the strategy, now and in the future. Euroclear Bank provides an environment that encourages all employees to progress in their chosen careers and to develop their skills and talents.	Impact	+	•	•		p. 53
	6 **Lack of talent for the future** A workforce with an outdated skills profile may result in reduced innovation, slow response or adaptation to market conditions and reduced competitive advantage. As the working environment rapidly changes, it is critical to ensure that employees have the right skills and profiles to carry out the strategy and that Euroclear Bank attracts the right talent to ensure its competitive advantage.	Risk	N/A		•	•	p. 53
Diversity, equity and inclusion	7 **Diversity, equity & inclusion in the workplace** A diverse, equitable and inclusive workplace leads to a more engaged, fulfilled workforce with career opportunities. A workplace where everyone can thrive and grow in their careers, no matter who they are, is beneficial for everyone, leading to better retention, more innovation and improved business decisions.	Impact	+	•	•	•	p. 54
	8 **Diverse, equitable and inclusive company** Build and maintain a diverse, equitable and inclusive company to improve diversity of thought, internal and external stakeholder reputation and ability to attract and retain talent.	Opportunity	N/A		•	•	p. 54
Employee engagement, wellbeing and rights	9 **Employment conditions and wellbeing** Providing attractive employment opportunities supports employees' livelihoods, financial security and wellbeing.	Impact	+	•	•		p. 54
	10 **Employee representation and consultation** Employee representation through works councils ensures a two-way dialogue between employees and management with employees having a formal channel to feed back their opinions and requests and management able to address employees' concerns in a timely manner.	Impact	+	•	•		p. 54
Responsible supply chain	11 **Reputational risks associated with ESG performance and breaches** Reputational risks of poor ESG performance and standards in the supply chain, or as a result of upstream scandals, or failures to meet net zero commitments. Partnerships with our suppliers are a key factor for us as we continue to upgrade our Data, ESG and Digital capabilities. It is critical that these suppliers' ESG performance is in line with our sustainability commitments and with regulatory requirements, so as to ensure that our reputation is not damaged as a result of supplier misconduct.	Risk	N/A			•	p. 55
Corporate Governance	12 **Enabling market trust and transparency from corporate governance** Maintaining good internal corporate governance, and transparent and trusted relationships with competent authorities supports Euroclear Bank's role as a systemically significant FMI.	Impact	+	•	•	•	p. 55
Business conduct	13 **Robust business conduct frameworks contribute to a more resilient financial ecosystem** Continuous efforts to identify and mitigate instances of bribery, fraud and corruption, money laundering or terrorism financing leads to favourable outcomes for the financial ecosystem. Euroclear Bank's position as a trusted FMI is dependent on its strong reputation. Any breach in business conduct or improper behaviour on the part of employees or third parties could damage Euroclear Bank's reputation and as a result have a negative impact on the financial system. It is critical that Euroclear Bank actively seeks to prevent any misconduct in its business.	Impact	+	•	•	•	p. 56

Connecting issuers and investors	14 **Increased financial stability, trust and efficiency in capital markets** Euroclear Bank has a strong focus on the global client network, launching strategic initiatives to serve issuers, investors and dealers to further. support the efficient functioning of financial markets, increased financial stability and improved access to (sustainable/green) finance (e.g. through expanded Euroclearability).	Impact	+	•	•	p. 57
Resilient infrastructure and cyber security	15 **Impact of maintaining a resilient infrastructure on stakeholders and financial markets** Through its resilient infrastructure, Euroclear Bank has a positive impact on its stakeholders, the macro economy and financial stability. It ensures. compliance with regulatory requirements, prevents business outages, data leakages and cyber-attacks, including destruction or corruption. of databases, the leaking of confidential information and the theft of intellectual property.	Impact	+	•	•	p. 58
	16 **Financial risk of business outages and cyber-attacks on Euroclear Bank** Being a resilient infrastructure is core to Euroclear Bank's purpose, business model and operations. Bringing safety and efficiency is key to Euroclear Bank's clients and stakeholders, and it contributes to the overall stability of financial markets and the economy. Data leakages, cyber attacks and business outages can lead to negative impacts in the financial systems and create a financial risk for Euroclear Bank. That is why Euroclear Bank considers this as part of its license to operate.	Risk	N/A	•	•	p. 58

Mapping the value chain

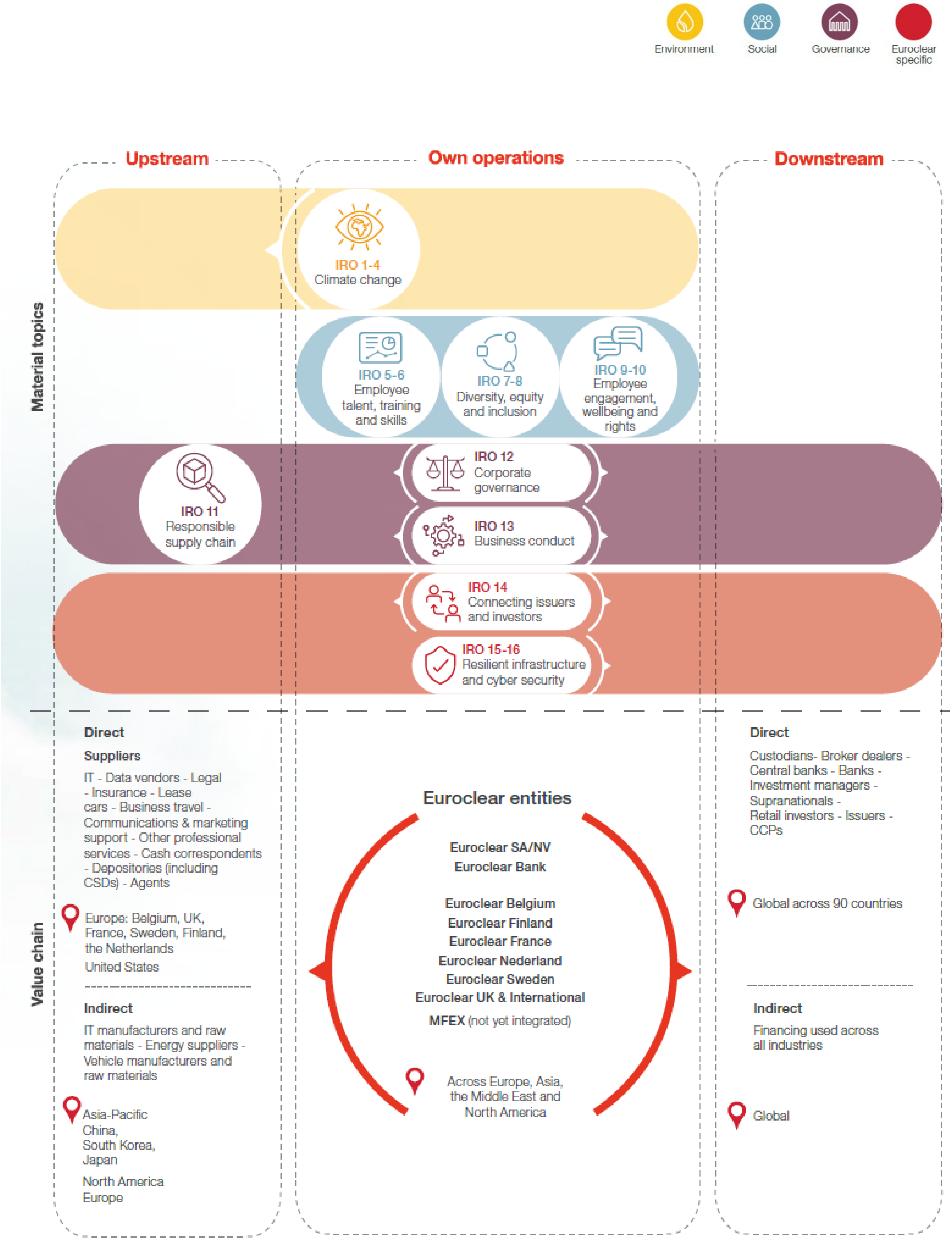
The value chain mapping took into account the Euroclear Bank business model, as well its value chain.

The ESRS requires potentially material IROs to be identified taking into account Euroclear Bank's direct operations, as well as the wider value chain. Following the ESRS's definition of a value chain and informed by European Financial Reporting Advisory Group's (EFRAG) Value Chain Implementation Guidance, the CSO mapped Euroclear Bank's business model and value chain to document the key business activities that occur throughout the business and its value chain. The analysis was based on:

- a review of existing internal documentation; and
- consultation with internal stakeholders from across the organisation.

The result is shown in the diagram below

Euroclear's value chain



Policies, Actions, and Targets

This section outlines the Policies, Actions, and Targets (and in some cases metrics) linked to each material topic. Recognising that not everything is measurable, where it was not possible to measure, there are no specific targets in place. Metrics are detailed in the relevant section of the Statement. The timelines (short, long and medium term) are those defined by the ESRS. The scope of the actions covers Euroclear Bank, also taking into consideration actions that have been outsourced to Euroclear SA/NV under the Euroclear framework for the intra-group outsourcing agreements or those which form part of group-wide initiatives (the actions performed by Euroclear SA/NV on behalf of Euroclear Bank are referred to as "Euroclear").

Policies and Third-Party Standards

Climate Change

Euroclear Bank (EB) ESG Policy outlining the principles to mitigate climate change by reducing emissions linked to energy use, company related travel, waste and resource and supply chain. The ESG Group Policy is issued by Euroclear SA/NV and then transposed by Euroclear Bank in the EB ESG Policy. Both Policies are publicly available on the Euroclear website and available to all Euroclear Bank employees and third parties on the Euroclear intranet. The EB ESG Policy is owned by the Chief Sustainability Officer, who is accountable for its implementation.

Main principles of the Environment section in EB ESG Policy

- Deliver against net zero science-based reduction targets and offset residual emissions at group level
- Optimise all business travel and minimise emissions related to essential business travel in line with net zero targets. This principle includes car fleet management and mobility schemes for staff.
- Reduce resource consumption and waste generation, reuse and recycle, whenever possible
- Manage supply chain emissions in line with net zero ambition
- Offset residual emissions that cannot be avoided

Disclosure of third-party standards or initiatives that are respected through implementation of policy

- UN Labor and Human Rights principles
- SBTi for Carbon Emissions targets
- UN Global Compact

Actions

IRO 1: Generation of emissions

Over the past two years Euroclear has put in place a structured action plan to support its aim to reach net zero emissions by 2050 at the latest. In 2023, Euroclear's Science-Based Targets were validated by the Science-Based Targets initiative.

Continuous actions

- Support staff to commute and travel for business in a sustainable way
- Continue to source renewable energy
- Investigate and instigate a sustainable IT transition plan
- Focus on resource management, including natural resources

Short-to-medium term actions

In 2024, Euroclear built a net zero Transition Plan and intends to take the following actions in 2025:

- investigate and instigate a sustainable IT transition plan, including data centres
- Formalise the waste management system and recycling process
- Continue to mitigate emissions beyond the value chain, eventually moving to carbon offsets
- Engage with procurement chain on setting net zero targets
- Support reduction of employees' homeworking emissions

Euroclear intends to continue to implement the group Transition Plan with the following actions:

- Further deliver electrification and energy saving initiatives
- Formalise a property portfolio strategy for targeted emissions reduction
- Start transition to air travel using Sustainable Aviation Fuel (when available)
- Implement a sustainable procurement process to reduce the impact of supply chain emissions (including IT)
- Switch emissions data from being supplied by proxies to emissions data provided by suppliers
- Implement an internal carbon pricing scheme

Long-term actions

In the long-term, Euroclear intends to:

- Continue to implement the group net zero Transition Plan
- Neutralise emissions via high quality carbon removal

Targets

Emissions (tCO2eq)	2024	2023	2019	2024 target	Longer-term target	2024 progress versus 2023	2024 progress versus 2019
Scope 1 and 2 Energy (market-based)	1,156	1,129	3,412	N/A*	-55% by 2030 -90% by 2050	+2%	-66%
Scope 3 Operational Activities	9,716	10,381	9,738	-5.5%	-28% by 2030 -90% by 2050	-6%	0%
Scope 3 Suppliers	75,222	64,715	54,412	–	N/A	-	–
Scope 3 Suppliers' emissions covered by targets	45%	37%	N/A	40%	70% by 2027	-	–
Total emissions (market-based)	89,616	79,439	69,565	-	-	+13%	+29%

* 2030 target to reduce by 55% exceeded in 2023 and therefore no reduction target set for 2024.

IRO 2: Employee environmental well-being

Continuous actions

Euroclear Bank has started to monitor

Short-to-medium term actions

Euroclear Bank will investigate initiatives to foster employee

Targets: N/A

Policies and Third-Party Standards	Actions		Targets
	employee environmental wellbeing through its annual Employee engagement survey.	environmental wellbeing.	
	IRO 3: Exposure to physical climate risk **Continuous actions** Euroclear Bank performs a yearly threat assessment which assesses. current and future environmental threats to physical assets from physical climate risks • ESG Key Risk Indicator (KRI) in the Corporate Risk Report monitoring exposure of physical assets to physical climate risks.	**Short-to-medium term actions** • Completion of the action plan to meet ECB expectations on the management of climate and environmental risks • Integration of resilience to physical climate risks into the Data centre strategy	N/A
	IRO 4: Risk of long-term economic downturn In 2024, Euroclear conducted a long-term climate scenario analysis exercise to better understand transmission channels and impacts on Euroclear. **Continuous actions** Assessing the need to adapt to stress test scenarios to incorporate climate risk drivers and impacts	**Short-to-medium term actions** • Continue to incorporate latest climate change projections and economic impacts into Horizon Scanning exercise. • ESG KRI in the Corporate Risk Report monitoring the forecasted economic impacts of climate change	N/A
Employee talent, training and skills EB ESG Policy (see above) The policy states the following principles. Euroclear Bank must ensure business continuity, resilience and strategy delivery through talent succession and workforce planning. We are committed to managing talent and planning our workforce to ensure that we can identify and grow talent at all levels within the business and recruit talent externally as needed.	**IRO 5*: Training, development and growth opportunities for employees** **IRO 6*: Talent for the future** This topic scored high in the DMA. Ensuring that Euroclear Bank has the right skills and profiles in place and that all its employees have opportunity to develop and thrive is a key focus. Euroclear Bank has implemented the following to ensure that all its employees have the resources and tools to develop their skills and further their careers. • Launch of new online learning platform for all employees • Euroclear learning week where employees can explore career opportunities. • Succession planning for the top 100	**Continuous actions** • Euroclear Bank intends to continue working on Workforce planning and succession planning at different levels in the company and further develop upskilling content on the learning platform • Continuous effort on learning and upskilling staff in areas like digitalisation • Leaders for the Future program to identify the pipeline for future leaders **Short-to-medium term actions** • In the short term, Euroclear intends to launch a new leadership development programme and a new people	**KPIs** / **Targets** / **2024** Maintain or improve score for training & development in employee engagement survey vs 2022 baseline / Equal to or above 7.4/10 / 7.6/10 *For IROs 5, 6 and 8, KPIs related to Our People have been calibrated using the 2022 baseline. We compare annual results with past performance as well as Industry benchmarks and create action plans accordingly.

<table>
<tr><th>Policies and Third-Party Standards</th><th colspan="2">Actions</th><th>Targets</th></tr>
<tr><td></td><td>Capability assessment for the top 70
Launch of a new online career platform with all open internal vacancies
Enhanced career coaching offer</td><td>management programme</td><td></td></tr>
<tr><td>Diversity, equity and inclusion

EB ESG Policy (see above).

The Code of Ethics and Business Conduct further complements the EB ESG Policy, clarifying we 'apply a zero-tolerance policy against discrimination based on gender, race, colour, ethnic or social origin, educational background, genetic features, religion or belief, property, birth, physical conditions, age, or sexual orientation'.

The main principles outlined in the EB ESG Policy requires Euroclear Bank to:
Improve the representation of underrepresented groups in management.
build and maintain a diverse and inclusive workforce.
ensure fair and equal pay and access to work.
oppose and avoid all forms of harassment and discrimination.
foster a culture of inclusion.
report on its performance against diversity requirements of this policy
Disclosure of third-party standards or initiatives that are respected through implementation of policy
UN Global Compact
UN Labour and Human Rights principle
Signatory of the Women in Finance pledge and the Multi-cultural Bankers pledge (Belgium)
MOU with Open@work supporting LGBTQ+ rights.</td><td>IRO 7*: Diversity, equity & inclusion in the workplace

IRO 8*: Diverse, equitable and inclusive company

As a multinational company, Euroclear Bank has a long-standing robust DEI programme, focused on ensuring an inclusive and equitable workplace that encourages everyone to thrive and grow in their careers and to treat each other with respect, no matter who they are. Euroclear Bank aims to build and maintain a diverse and inclusive company which appreciates diversity of thought, improves our internal and external stakeholder reputation and strengthens our ability to attract and retain talent.

Euroclear has five Employee DEI networks, covering gender, ethnic and cultural inclusion, inclusion of those with disabilities, LGBTQ+ and Age. The purpose of these networks is to provide a two-way dialogue between employees and management and raise awareness on DEI topics in the organisation. In 2024, Euroclear recruited a new Head of Corporate Social Impact and defined a renewed DEI strategy to drive behavioural change and focus on inclusive behaviour and decision making on a day-to-day basis, especially at leadership level. In this context, a DEI action plan was defined and a concrete action plan for a diversity pipeline has been developed.</td><td>Short-term actions
Deliver inclusive leadership learning plan
Review recruitment, promotion, and career development processes to ensure DEI principles are embedded at each stage of the employee career journey
Further build on Euroclear employee DEI networks
Define non-financial metrics to link inclusion to pay and reward
Further develop DEI reporting in order to expand metrics and targets beyond gender diversity and provide better insights with regards to DEI issues
Mid-term actions
Expand focus beyond gender diversity
Deliver the DEI action plan</td><td><table><tr><th>KPIs</th><th>Targets</th><th>2024</th></tr><tr><td>Percentage of underrepresented gender at senior management level</td><td>Minimum 40% by end 2026</td><td>36% Women</td></tr><tr><td>Maintain or improve the employee engagement scores for non-discrimination, inclusion and diversity vs 2022 baseline</td><td>Non-discrimination: 8.5/10
Inclusiveness: 8.1/10
Diversity: 8.5/10</td><td>Non-discrimination: 8.6/10
Inclusiveness: 8.3/10
Diversity: 8.7/10</td></tr></table></td></tr>
<tr><td>Employee engagement, wellbeing and rights

EB ESG Policy (see above)

The policy states that:
Euroclear Bank is committed to taking steps to prevent and detect poor wellbeing in our employees by:
Ensuring that group-wide wellbeing offerings are made available, clearly signposted, and easily accessible to all employees.
Empowering employees to manage their own wellbeing and to support one another, through flexibility, trust and individual accountability.</td><td>IRO 9*: Employment conditions and wellbeing

IRO 10: Employee representation and consultation</td><td>Continuous actions
Maintain dialogue with social partners.
Embed wellbeing into the way we work and the way</td><td><table><tr><th>KPIs</th><th>Targets</th><th>2024</th></tr></table></td></tr>
</table>

<table>
<tr><th>Policies and Third-Party Standards</th><th>Actions</th><th>Targets</th></tr>
<tr>
<td>
Fostering work practices and workplaces that ensure safe environments for all employees and visitors, including emergency provisions.
Disclosure of third-party standards or initiatives that are respected through implementation of policy
UN Labour and Human Rights principles
</td>
<td>
Euroclear makes available a range of resources and activities such as the Employee Assistance Programme, the Euroclear Solidarity fund, for those who find themselves in unexpected financial difficulty. The Career Continuity programme in Belgium and France enables people with disabilities caused by chronic illness to work in an adapted environment and provides support to team leaders.
Over the course of the last two years, Euroclear has delivered the following:

Flexible working from home integrated into BAU way of working.
Group-wide wellbeing programme in place.
Continued compliance with applicable laws in relevant locations that leaders engage with their teams.
Focus on the reduction of stress in the organisation.

Short-to-medium term actions

Align global wellbeing practices with local country needs.
Promote global wellbeing programme to workforce.
Build action plan to strengthen the mental resilience of the workforce

</td>
<td>
<table>
<tr><td>Maintain or improve the overall employee engagement score in engagement survey vs 2022 baseline</td><td>Equal to or above 7.7/10</td><td>7.8/10</td></tr>
<tr><td>Maintain or improve the score for health & wellbeing in employee engagement survey vs 2022 baseline*</td><td>Equal to or above 7.4/10</td><td>7.8/10</td></tr>
</table>
*For IROs 5-9 the metrics/targets are only applicable to Euroclear's employees.
</td>
</tr>
<tr>
<td>
Responsible supply chain
EB ESG Policy (as above); group Supplier Code of Business Conduct (available on our website and to all staff, consultants and contractors); Purchasing Goods and Services Group Policy; Outsourcing and Critical Services Group Policy (all available to all staff and consultants and contractors on the Euroclear intranet)
The EB ESG Policy states that:
Euroclear Bank must integrate ESG considerations into its supplier selection and management decisions. With respect to all suppliers (new and existing), we are committed to:

Ensuring that proportionate ESG due diligence is performed on our suppliers, where the scope and level of detail of the due diligence depends on (1) criticality of the supplier to business operations, (2) materiality of our spending with the supplier.
Ensuring all suppliers commit to the latest version of the group's Supplier Code of Business Conduct, upon entering into a relationship with us or upon contract renewal or the purchase order.
Conducting ongoing screening, monitoring and follow-up on our ESG expectations with all existing outsourcing service providers (OSPs) and critical service providers (CSPs) in line with the existing recertification exercise.

Disclosure of third-party standards or initiatives that are respected through implementation of policy
UN Labour and Human Rights principles
</td>
<td>
IRO 11: reputational risks associated with ESG performance and breaches
Euroclear takes its commitments to ensuring ESG compliance in its supply chain very seriously. Over the last two years Euroclear has formalised ESG practices in the procurement process, by:

Integrating ESG in Due Diligence of new goods and service suppliers
Screening ESG maturity of key suppliers through a third-party provider
Monitoring responsible business practices within our supply chain
Sharing a new Supplier Code of Business conduct with all suppliers
Including ESG clauses in all new contracts

Short and medium-term actions

Euroclear plans to engage with key suppliers to set Science-Based targets on their carbon emissions and to improve their ESG score.

</td>
<td>
<table>
<tr><th>KPIs</th><th>Targets</th><th>2024</th></tr>
<tr><td>Key suppliers screened by EcoVadis</td><td>75%</td><td>80%</td></tr>
</table>
</td>
</tr>
<tr>
<td>
Corporate governance
<u>Governance Memorandum</u>
The Governance Memorandum of Euroclear Bank SA/NV ("EB") has been prepared pursuant to Article 21 §3 of the Belgian Banking Law and Article 26 §1 of CSDR. In accordance with the provisions of the Governance Manual for the banking sector (version of 11 October 2022) established by the National Bank of Belgium ("NBB") on good governance of financial institutions, the Governance Memorandum of EB describes the governance of EB and in particular sets out its corporate and group structure, a detailed overview of its governance bodies and key functions, its organizational structure, values and integrity Policies as well as compensation principles. The Management Committee and Board of Directors have approved the Governance Memorandum of EB.
<u>Governance Charter</u>
The EB Governance Charter outlines the main aspects of the Corporate Governance of EB.
<u>Articles of Association</u>
EB has its own Articles of Association which are aligned with group governance requirements and local regulations.
<u>Terms of Reference</u>
EB has its own Terms of Reference which are aligned with group governance requirements and local regulations.
<u>Suitability Policy</u>
The EB Suitability Policy sets out the expectations of the Board of Directors for the identification, suitability assessment and appointment of Board members, Management Committee members and Key Function Holders having significant influence over the direction of the business, in line with applicable legal and regulatory requirements. In drafting this Policy, EB has considered applicable minimum standards set by Euroclear SA/NV, EB's parent company, either within relevant sets of group Policies or the Euroclear Group Matters Protocol. The EB Suitability Policy also
</td>
<td>
IRO 12: enabling market trust and transparency from corporate governance
Euroclear Bank has a strong and robust corporate governance in place. This rigorous approach to corporate governance upholds its reputation as a trusted FMI and is the foundation of its ability to support the expansion of a sustainable finance market. Over the past year, Euroclear Bank has held an Annual Board effectiveness review, as well as an assessment of the appropriate skills knowledge and experience of the Boards. Board governance in terms of ESG has also been strengthened and regular ESG training is given to the Board members. Please refer to p. 30 of the Directors' Report for the Euroclear Bank Board Skills.
Continuous actions

Training for Board members on ESG topics will be carried out on a regular basis
Euroclear continues to deepen its relationships with its stakeholders through regular Investor days and the appointment of a Global Head of Investor Relations.

</td>
<td>
<table>
<tr><th>KPIs</th><th>Targets</th><th>2024</th></tr>
<tr><td>Percentage of underrepresented gender at Euroclear Bank SA/NV Board level</td><td>33%</td><td>36%</td></tr>
</table>
</td>
</tr>
</table>

Policies and Third-Party Standards	Actions	Targets
contains the EB Conflicts of Interest Management Procedure for EB Board Members which needs to be read in conjunction with the Conflicts of Interest Group Policy and the Code of Ethics and Business Conduct. <u>Conflicts of Interest and External Mandates Implementing Procedure</u> The objective of this Implementing Procedure is to provide guidance and set out the requirements and expectations for managing Conflicts of Interest at EB and transposes the requirements set by the Conflicts of Interest Group Policy. **Disclosure of third-party standards or initiatives that are respected through implementation of policy** • CSD Regulation (EU) • Belgian Banking Law • Circular NBB_2018_25 - Suitability of directors • European Securities and Markets Authority (ESMA) Guidelines - Suitability of members of the management body and key function holders	**Short-to-medium term actions** • Further deepen relationship with shareholders • Implement additional corporate governance KPIs for internal monitoring • In the medium term, Euroclear Bank intends to further broaden the diversity of the Board to include aspects other than gender	
Business conduct <u>EB Anti-Fraud and Anti-Bribery & Corruption Implementing Procedures</u> The objectives of the EB Anti-Fraud and the EB Anti-Bribery and Corruption Implementing Procedures are two-fold: • Setting out the EB roles and responsibilities to comply with laws and regulations as well as Euroclear's standards. • Providing a reference to assist in recognizing situations involving Fraud, Bribery and Corruption risks and to act appropriately when facing such situations. These Implementing Procedures are aligned with the minimum requirements that the Euroclear SA/NV Group Policy sets towards EB for the effective management and independent oversight of Fraud risks in accordance with the ERM Framework and in line with Euroclear's risk appetite. These minimum requirements cover elements such as the legal basis of the policy, its scope, a description of the minimum requirements covering the Governance aspect, the reporting alerts, the Fraud Risk Assessments, the Internal controls and the Fraud investigations. It also describes how to create awareness on these requirements throughout the organisation. Process for monitoring: Euroclear Bank's Chief Compliance Officer is responsible for overseeing the implementation of these procedures. <u>EB Anti-Money Laundering & Counter Terrorist Financing Implementing Procedure</u> The objective of the EB Anti-Money Laundering & Counter Terrorist Financing Implementing Procedure is to set out the internal Policies in relation to Anti-Money Laundering & Counter Terrorist Financing ('AML/CTF') implemented by Euroclear Bank, in accordance with the AML/CTF Group Policy, the AML/CTF Euroclear Bank Board Policy and the regulatory requirements regarding the AML/CTF Legal Framework. This implementing procedure addresses in more detail how the following topics are implemented by Euroclear Bank: (i) overall risk assessment, (ii) internal control and organization, (iii) Know Your Customer (KYC) ESA due diligence, (iv) continuous monitoring of transactions, (v) whistleblowing, (vi) training and awareness, and (vii) record keeping and data protection. This Implementing Procedure is aligned with the minimum requirements of the Euroclear SA/NV Board Group Policy sets towards EB for the effective management and independent oversight of Money Laundering (ML) and Terrorist Financing (TF) risks in accordance with Euroclear's Risk Appetite. The minimum requirements cover elements such as the legal basis of the policy, it scope, a description of the minimum requirements covering the Governance aspect, the risk-based approach, the internal controls, KYC, monitoring of transactions, know your securities, reporting. It also describes how to create awareness on these requirements throughout the organisation. Euroclear Bank's Chief Compliance Officer is responsible for overseeing the implementation of this Implementing Procedure. **Disclosure of third-part standards or initiatives that are respected through implementation of the policy** The Minimum Requirements are based on the following globally recognised standards and regulations: Anti-Fraud & Anti-Bribery & Corruption Group Policy Reference to third-party standards or initiatives • Fraud Risk Management Guide issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO). • Standards issued by the Association of Certified Fraud Examiners (ACFE). • Guidance issued by Transparency International. • International Convergence of Capital Measurement and Capital • Standards issued by The Basel Committee on Banking Supervision (BCBS). • EU Regulation No 909/2014, Regulation on settlement and central securities depositories (CSDR). • Principles for financial market infrastructures issued by the Committee on Payment and Settlement Systems and Technical Committee of the International Organization of Securities Commissions (CPMI-IOSCO). • US Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act (UK BA) • Economic Crime and Corporate Transparency Act; • The OECD Guidelines for Multinational Enterprises; • United Nations Convention against Corruption. Anti-Money Laundering & Counter Terrorist Financing Group Policy Reference to third-party standards or initiatives: • EU Directive 2015/849 of 20 May 2015 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing ('Fourth AML/CTF • Directive') as amended by EU Directive 2018/843 of 30 May 2018 ('Fifth AML/CTF Directive') and, where appropriate, EU Regulation 2015/847 on information accompanying transfers of funds	**IRO 13: Robust business conduct frameworks contribute to a more resilient financial ecosystem** Given its role as a trusted FMI, Euroclear Bank is focused on fighting fraud, bribery and corruption, money laundering and terrorist financing. Over the past year there has been regular communication and awareness training for all employees on Anti-money laundering/counter terrorism financing, anti-bribery & corruption and fraud. Additionally, Euroclear Bank continuously enhances the methodology and quality of fraud risk assessments, as well as its training coverage. Starting in 2025, there will be specific training targeting functions at risk of bribery and corruption. **Continuous actions** • The 'Know your client' process is continuously monitored to promptly identify changes in client risk profile. • Transaction monitoring is being strengthened to spot possible anti-money laundering or counter terrorism financing. **Short-to-medium term actions** Anti-Bribery & Corruption and Fraud • Euroclear is rolling out fraud analytics screening tools. Anti-Money Laundering/Counter Terrorism Financing • Euroclear will take actions to reduce the lead time for client admission and recertification.	Euroclear does not define targets for Business Conduct. For metrics, please see p. 114

<table>
<tr><th>Policies and Third-Party Standards</th><th colspan="2">Actions</th><th>Targets</th></tr>
<tr><td>International standards: recommendations and papers from the Financial Action Task Force ('FATF'), the Wolfsberg Group, the Basel Committee on Banking Supervision and the ISSA Financial Crime Compliance Principle (´FCCP`)
Belgian legislation as EB is a Belgian regulated entity, including the Belgian anti-money laundering law of 18 September 2017, as amended on 05 August 2020, and, where appropriate, the recommendations by the National Bank of Belgium ('NBB') that refer to obligations to be respected at group level.</td><td colspan="2"></td><td></td></tr>
<tr><td>Connecting issuers and investors (Euroclear Bank specific topic)

Euroclear Bank enables the financing of the real economy by processing transactions safely and efficiently and connecting issuers, investors and intermediaries.

That financing, facilitated by Euroclear Bank, allows companies and governments to grow, achieve their business objectives and tackle challenges facing society and people around the world. As Euroclear Bank is driven by its purpose, there are no Policies directly applicable to its role as a Financial Market Infrastructure.</td><td>IRO 14 In line with its Purpose, Euroclear Bank brings safety, efficiency and connections to markets

In the context of the DMA exercise, many stakeholders identified this Euroclear-specific material topic.
Euroclear Bank's core business significantly impacts the financial system by connecting issuers and investors worldwide and enables the climate transition finance. These connections facilitate efficient capital markets, promoting stability and trust and reducing systemic risk within the global financial ecosystem. Stakeholders across the value chain recognise that Euroclear Bank's role is crucial for the seamless operation of financial markets highlighting its important impact beyond traditional ESG considerations.
FMIs play a critical role in facilitating the efficient operation of global capital markets and supporting the stability of the financial system. Cross-border FMIs, like Euroclear Bank, offer capabilities that enable and facilitate the connection of issuers and investors across borders through, for example, cross- border payments, settlements and collateral movements.
Over the past years Euroclear Bank has contributed to the stability of the financial markets through the following.

Improving efficiency
Creating a set of recommendations for the markets to improve settlement efficiency

The CSDR Settlement Discipline Regime introduced in 2022 imposed cash penalties to incentivise the market to improve efficiency. With Europe expected to follow the US move to T+1, there is an increasing need for resolving issues in near real time on T+0, more process automation, and</td><td>Contributing to stability

Euroclear participated in the preparation phase of Digital Euro testing steered by the ECB

Continuous actions
Euroclear works on the continuous improvement of infrastructure for the benefits of the capital markets leveraging the relevant technologies and in permanent dialogue with regulators
Short-to-medium term actions
Further enhancements of transparency services for issuers (Equity, Funds & Bonds)
Expansion
With the launch of a cross-border link with South Korea, Euroclear Bank and the Korean Securities Depository (KSD) have opened the market's first omnibus account for Korean Treasury Bonds (KTBs) and Monetary Stabilisation Bonds (MSBs), making Korean government debt 'Euroclearable'

Short-to-medium term actions
Geographical expansion in Asia and Latin America
Continue to support development of the Savings and Investments Union in the EU
Sustainable growth
NextGenerationEU is a temporary recovery instrument to help repair the immediate economic and social damage brought about by the coronavirus pandemic. Euroclear continues to service NGEU assets.

LCH RepoClear SA has launched a new</td><td><table><tr><td rowspan="2">Euroclear Bank Settlement Efficiency</td><td>Number of instructions</td><td>94%</td></tr><tr><td>Value of instructions</td><td>98%</td></tr><tr><td colspan="2">Number of existing market connections</td><td>51</td></tr><tr><td colspan="2">Number of active new issues</td><td>1,143,620</td></tr><tr><td colspan="2">Number of GSSS bonds held in Euroclear Bank year on year</td><td>6,545</td></tr></table></td></tr>
</table>

Policies and Third-Party Standards	Actions		Targets
	more efficient workflows across middle- office, back-office and local markets. Recognising the challenges to improve settlement efficiency, Euroclear created a working group with members of the Euroclear Bank User Committee to focus on settlement efficiency and propose steps to improve settlement efficiency. *Launching new Funds solution* Faced with increasing levels of complexity and cost, fund management companies, custodians and distributors alike are on the lookout for an efficient mechanism to access a broad network of end investors in a fragmented marketplace. Euroclear FundsPlace® offers a single point of access to manage the complexities of the funds universe. **Long-term actions** • Modernisation of Eurobond model • Enhancing the new issues processes using digital flows, standardising and harmonising the data attributes and the ways they are communicated to the ICSDs in the pre-issuance stages • Delivery of data sharing hub with the industry, to streamline the processes across the value chain - from issuers to investors	€GCPlus General Collateral clearing offering under the existing triparty basket repo product. Delivered in collaboration with Euroclear, the EUR denominated Investment Grade green bonds basket is based on market recognised ESG securities reference criteria. **Short-to-medium term actions** • Feasibility study to enrich Euroclear's core products with Green Sustainable Social and Sustainability-linked bonds data	
Resilient infrastructure and cyber security (Euroclear Bank specific topic) EB ESG Policy (as above); **Market Stability** Euroclear Bank is committed to maintaining the stability and smooth running of the global financial markets, ensuring market efficiency, and actively reducing risk. Incidents such as technology or telecommunications failures, natural catastrophes, power outages, or terrorist attacks can disrupt financial markets. Therefore, Euroclear Bank must comply with all relevant legal and regulatory requirements and standards from competent authorities, e.g. for fraud and corruption, data protection, cybersecurity, business continuity, and ESG matters. EB's Operational Resilience Policy establishes the Operational Resilience Framework and outlines Euroclear Bank's ability to handle operational disruptions through prevention, detection, response, recovery, and learning. It details control objectives for operational resilience strategy and governance, policy and framework, end-to-end services framework, mapping of internal and external resources, risk scenarios and resilience requirements, recovery strategies and business continuity plans, incident and crisis management, exercising and testing, learning and evolving, and monitoring and oversight. EB IT Risk Policy outlines Euroclear Bank's approach to ICT risk management. It acknowledges the roles of the Board, senior management, and control functions in defining, operating, monitoring, and assuring ICT risk arrangements. Additionally, it sets minimum digital operational resilience requirements to ensure the continuity of critical ICT operations, systems, and services through disruptions.	**IRO 15: impact of maintaining a resilient infrastructure on stakeholders and financial markets** **IRO 16: Financial risk of business outages and cyber-attacks on Euroclear Bank** Euroclear Bank takes a pro-active approach and assesses possible threats to its resilience. The long-term climate scenario analysis performed in early 2024 enabled Euroclear to identify the physical assets at risk. The measures to protect assets were then defined, as well as the gaps in the current protection	**Short-to-medium term actions** • Further enhance Business Resilience and security capabilities, in line with evolving threat and regulatory landscape • First review of the minimum physical assets resilience requirements with a periodical review every three years • Further improve the infrastructure of our data centres to become more resilient to physical risk	**Euroclear Bank system up-time target:** 99.7% • Year 2024 result: **99.85%**

Policies and Third-Party Standards	Actions		Targets
	measures. Recommendations following this exercise will drive the actions going forward. Minimum requirements from a resilience perspective for physical assets are being defined and will integrate the learnings from the long-term climate scenario analysis. These will be reviewed every three years going forward to reflect any change to the climate risk evolution assumptions. Euroclear is also evolving its data centre infrastructure to increase its resilience to physical disasters. This multi-year investment programme is integrating ESG requirements from the start.		

Governance

For details on Board structure and skills, please refer to the Governance section of the Directors' Report, p. 29

Oversight of impacts, risks and opportunities

The Euroclear Bank Board sets the company's overall risk strategy, including its risk appetite for all its activities (including the criteria for major credit and counterparty risks) and establishes the company's risk management framework and desired risk culture. The Board also approves, regularly reviews and oversees the consistent implementation of the Policies governing the taking, managing monitoring and mitigating of risks to which the company is (or could be) exposed in line with the Euroclear Group's risk appetite and strategy as well as the embedding of the risk culture. Furthermore, the Board approves the Risk Management Charter and ensures the monitoring of the risk management function and of significant risks and provides the supervisory authority with the risk tolerance of the company. Further, in relation to ESG, the Euroclear Bank Board contributes to the ESG Group strategy, the sustainability reporting and its related implementation as well as the ESG risks and compliance with regulations, and more specifically:

- ensures Euroclear Bank's long-term resilience with respect to potential shifts in the business landscape that may result from ESG-related risks and opportunities.
- ensures the composition of the Board is sufficiently diverse in knowledge, skills, experience and background to effectively debate and take decisions informed by an awareness and understanding of ESG-related threats and opportunities.
- ensures that management assesses the short-, medium- and long-term materiality of ESG-related risks and opportunities on an ongoing basis.
- ensures that the actions and responses to ESG-related risks and opportunities are proportionate to the materiality of those ESG topics to Euroclear Bank.

Over the course of 2024, the Euroclear Bank Board has updated its oversight of sustainability matters as follows:

- A full review of sustainability matters, including climate issues, will occur annually at the Board.
- The Sustainability Statements will be approved annually by the Board.

The Euroclear Bank Board has also allocated responsibilities to the following Board committees:

- Nominations and Governance Committee (NGC): review of the ESG-related governance, the EB ESG Policy, the regulatory developments, and topics related to the Social dimension, such as DEI, wellbeing and support of local and global communities.
- Audit Committee (AC): Sustainability Statements and reporting process, including monitoring of effectiveness of internal quality control and risk management system and assurance of sustainability reporting, delivery of net zero targets (to be formalized in the Terms of Reference)
- Risk Committee (RC): ESG and climate Risk Appetite and KRIs, climate and ESG risk reporting.
- Renumeration Committee (RemCo): Advising and assisting the Board with regards to integrating ESG factors in executive compensation and equity (pay).

The Annual Board workplan, detailing all the topics in scope of the Committees and Board, and scheduling them throughout the year, is mapped against the IROs to ensure adequate coverage.

The Euroclear Bank Management Committee monitors that the company's business model is sustainable and takes into account all risks, including environmental, social and governance risks. It assesses the short-, medium- and long-term materiality of ESG related impacts, risks and opportunities on an ongoing basis and is responsible for the regular review and approval of Policies, Actions, Metrics and Targets related to the IROs. The Euroclear Bank CSO attends the group ESG Steering Committee and group ESG Advisory Committee where material topics are regularly reviewed. For details on how the administrative, management and supervisory bodies are informed about material impacts, risks and opportunities, implementation of due diligence, and results and effectiveness of Policies, Actions, Metrics and Targets adopted to address them, please see General Disclosures p. 52.

Skills and experience

To adequately fulfil its roles and responsibilities, the Board possesses the necessary balance of skills and experience to:

- set the general policy and strategy of the company
- oversee the effectiveness and independence of the control functions
- set all material aspects of governance arrangements relevant to the company; and
- establish culture, values, standards, ethics and rules of conduct to properly supervise management in the implementation of the company policy and strategy

Directors also receive ongoing training on matters relevant and material to their directorships and committee mandates.

In 2024 several workshops were organised for Board members on CSRD and Double Materiality.

Board knowledge of sustainability matters are covered at a more granular level and we conducted a mapping of the material IROs against our Board members sustainability skills and sub-skills. Collectively, Board members have a knowledge above the General level, for all sustainability skills.

Please also refer to the Euroclear Bank Board skills on p. 30.

Material Topic	Material IRO	Board Committee	Frequency/year
Climate Change	1 Generation of emissions	Audit Committee and Board of Directors	2
	2 Impact of climate change on employee wellbeing	Risk Committee	1
	3 Exposure to physical climate risks	Risk Committee/ Board of Directors	
	4 Risk of long-term economic downturn	Risk Committee	
Employee talent, training and skills development	5 Training, development and growth opportunities for employees	Nominations and Governance Committee	1
	6 Lack of talent for the future	Board of Directors	
Diversity, equity and inclusion	7 Diversity, equity & inclusion in the workplace		
	8 Diverse and inclusive company		
Employee engagement, wellbeing and employee rights	9 Employment engagement, wellbeing and employee rights		
	10 Employee representation and consultation		
Responsible supply chain	11 Reputational risks associated with ESG performance and breaches in supply chain	Risk Committee/Board of Directors	2

Material Topic	Material IRO	Board Committee	Frequency/year
Corporate governance	12 Enabling market trust and transparency from corporate governance	Nominations and Governance Committee Board of Directors	1
Business conduct	13 Robust business conduct frameworks contribute to a more resilient financial ecosystem	Audit Committee Board of Directors	
Connecting issuers and investors	14 Increased financial stability, trust and efficiency in capital markets	Board of Directors	2
Resilient infrastructure	15 Impact of maintaining a resilient infrastructure on stakeholders and financial markets	Risk Committee	4
	16 Financial risk of business outages and cyber-attacks on Euroclear	Risk Committee/Board of Directors	

Integration of sustainability-related performance in incentive schemes

Previously, there was no direct and explicit connection between performance of corporate objectives, including sustainability related targets, and Management remuneration.

For the full year 2025, based on annual corporate objectives, including sustainability-related objectives, Euroclear has defined metrics which will be linked to overall senior management remuneration. The sustainability metrics are related to Employee engagement score, reducing Scope 3 (cat 3-7 emissions) and progressing towards the under-represented gender target at senior management level by end 2026.

Due Diligence

A due diligence process is in place for two IROs

Material topic	IRO Material Topic	Due Diligence Process	References
Climate change	**1 Generation of emissions**	To mitigate the impact of our GHG emissions, Euroclear has committed to reaching net zero by 2050, with clear interim reduction targets by 2030. A Transition Plan has been drafted, which details future plans to prevent, reduce and address the impact of our GHG emissions.	See p. 52 for disclosures related to Euroclear's Policies, Actions, Metrics and Targets, and p. 78 for the Transition Plan.
Responsible supply chain	**11 Reputational risks associated with ESG performance and breaches in supply chain**	Euroclear conducts due diligence on its key suppliers. This process includes integrating ESG in due diligence of new goods and service suppliers, screening ESG maturity of key suppliers, monitoring responsible business practices within our supply chain and sharing a Supplier code of Business conduct with all suppliers. Euroclear has also set engagement targets for suppliers to set their own science-based targets to reduce emissions.	See p. 55 for disclosures related to Euroclear's Policies, Actions, Metrics and Targets.

The management of ESG-related risks

Euroclear's risk and control framework starts from its business objectives and is systematically built around:

- risks which could impede achieving our business objectives.
- control objectives, described in Policies, which ensure risks are effectively mitigated to acceptable levels.
- specific control activities required to meet the defined Control Objectives

For more details on Euroclear Bank's approach to Risk, please refer to p. 19 of the Directors' Report.

There is no positive or negative prioritisation of ESG-related risks relative to other types of risks. ESG risks are considered as drivers of existing risk types within Euroclear's risk framework. As such, ESG risks are managed within the existing risk management framework and the three lines model. Risk assessment tools used to identify and manage these risks include amendments to the Euroclear risk library where material ESG-driven risks have been identified; addition of ESG risk controls; the execution of risk assessments to understand the impact of ESG on financial and non-financial risks; and the integration of ESG considerations where appropriate into stress tests used for capital adequacy.

Ultimately the Euroclear Bank Chief Risk Officer is responsible for embedding ESG-related risks into the Euroclear Bank risk framework. The Euroclear Bank Credit, Asset and Liability Committee (CALCO) is responsible for monitoring ESG-related financial risks, while the Euroclear Bank Risk & Operating Committee (ROC) is responsible to monitoring ESG-related operational risks.

The risks identified in the DMA form the basis of the climate risk assessment in the context of the ECB expectations on the management of climate-related and environmental risks. These results also formed the basis for making changes to the risk library, the identification of ESG risk controls, and ESG considerations added to stress tests and scenario analysis.

The set-up and embedding of control objectives in relation to CSRD data requires a phased approach. In 2024, ESG data points were inventoried, and a risk assessment identified the numerical data points with the highest risk of misstatement, considering the probability of errors and level of materiality. These most critical data points were prioritised in terms of establishing and evidencing controls. Implementation of these controls is ongoing. For all CSRD numerical data, Euroclear is working towards an appropriate and evidencable set of controls, which over time should become part of the yearly control adequacy and effectiveness attestation performed by control owners. Dedicated controls and procedures applied to the management of material topics will gradually be integrated into the overall risk management process and procedures.

Significant residual risks are reported to the Euroclear Bank Risk Committee and Board on a quarterly basis. On a yearly basis an extensive risk and control self-assessment is performed which concludes in an internal control system report provided to the Euroclear Bank Risk & Audit Committees and Board, including ESG risks and CSRD regulation.

Stakeholder engagement

Ongoing stakeholder engagement

The table below shows how Euroclear engages with its key stakeholders and the outcomes of such engagement:

	Workforce	Shareholders, Board and Management	Clients, Issuers and Investors	Suppliers
Topics for which we engage with stakeholders	• Corporate strategy, objectives, priorities and challenges • Company culture and values • Health, safety and employee wellbeing • Compliance and Ethics • Training and Development • Performance and reward • Diversity, equity and inclusion • Employee experience and engagement • Environment • Community-related topics	• Strategy definition, execution and monitoring controls, including investment strategy, M&A • ESG Disclosure and performance • Group Financial performance	• Client needs, experience and engagement • Quality of products, services and solutions • Assessment of market dynamics and prevailing trends • Regulatory impacts and requirements	• Business ethics and legal compliance • Quality products and services • Supply chain reliability and efficiency • Sustainability management practices to reduce impact on climate change, workforce and the wider society.
Engagement channels & Frequency of engagement	• Code of Ethics & Business Conduct • Interactive Company intranet • Townhalls • Training and Learning Platform • Coaching and Leadership development programs • Employee engagement survey • DEI Networks • Corporate cultural initiatives • Employee representatives • 24/7 Speak up Hotline • Interactions between employees and people managers	• Quarterly financial updates • MC & Board meetings	• User committees, Client Strategic Forum, • Client Relationship management at all levels • Annual Client satisfaction survey • Periodical Commercial events • Client services, Helpdesk, 24/7 Incident production hotline • Euroclear website • Investor day • Website updates and press releases	• Supplier relationship management • Supplier Code of Conduct • Yearly risk assessment of our critical/outsourcing suppliers and screening of new suppliers • EcoVadis rating and verification

	Workforce	Shareholders, Board and Management	Clients, Issuers and Investors	Suppliers
			• Thought Leadership White papers	
Outcome of engagement	• Employee expectations, needs and concerns understood and actionable • Safe workplace environment • Talent management: to have the right people with the right skills at the right place • Diversity, Equity & Inclusion vision and strategy implemented • Employees understand, feel part of the company culture and have adopted the desired mindsets and behaviours	• Strategy and execution alignment, financial position, business outlooks, risks and opportunities. • Knowledge and expertise in line with DMA.	• Greater client-centricity • Better understanding of the future needs of the financial ecosystem. • New products and services • Implementation of CSDR and other regulatory requirements	• Suppliers' services in line with needs and expectations • Reduction of scope 3 emissions in line with NetZero targets • Encouragement of a more sustainable supply chain

Stakeholder engagement around our strategy

Euroclear Bank has established a structured process including, stakeholder engagement, for reviewing the strategy at each stage of its lifecycle, which includes a feedback loop mechanism for continuous improvement.

Euroclear Bank engages with the following key stakeholders:

- Board & Management committees
- internal SMEs
- employees & employee representatives
- external stakeholders such as clients, issuers, investors

Stakeholders are engaged with as follows:

- Recurring workshops were held with Board and Management for consultation and decision making to define our strategy. Strategy execution progress updates are shared quarterly with the Board.
- External stakeholders are engaged with through user committees and bilateral conversations to explore market dynamics and prevailing trends to evaluate Euroclear Bank's strategic positioning. Regular user committees were held where strategy was presented and input was considered, when applicable. The user committee is composed of representatives or participants and issuers of Euroclear Bank, which provides independent advice on key arrangements that impact the Bank's members and non-binding opinions on pricing structure among other inputs.
- Client visits are a feedback mechanism to ensure continuous improvement.
- Information sessions were held with employees around the Business strategy, though no organised feedback mechanism was put in place. Evaluations occurred to assess capacity risks and analyse capacity structural aspects, ensuring an understanding of potential risks and challenges.
- Strategy, goals and focus areas are properly documented, shared, and cascaded across entities and to the workforce. Regular activities are held to ensure that Euroclear Bank has the right culture in place to achieve its strategic goals.

The Corporate Vision and Mission and core values serve as the basis for the strategy definition. The strategy was defined top down, reviewed, and approved by the Euroclear SA/NV and Euroclear Bank Boards.

A feedback mechanism was put in place to ensure consistency between the group and bank strategies. The strategy was formulated into plans, and client needs as well as market evolution were analysed and are being monitored.

Amendments to strategy and (or) business model

The strategy was put in place in September 2022 and structured regular updates are provided to the Euroclear Bank Board. Potential risks which could impede the execution of the strategy have been identified and are reviewed on a periodic basis. Management acts on those key risks and can decide to adjust the strategic approach if necessary.

Euroclear Bank continuously engages with internal and external stakeholders around progress and development related to its strategy.

Strategy and ESG matters are shared with the Management and Board on a periodical basis. This incorporates views and interests of affected internal and external stakeholders implicitly.

E1 - Environment

Introduction

Climate change is a major challenge globally. Euroclear is committed to managing emerging climate risks and integrating sustainability into its operations. It aims to achieve net zero emissions and has set targets to reduce its carbon footprint, guided by the Science Based Targets initiative (SBTi) and the Paris Agreement. And, as a Financial Market Infrastructure, Euroclear enables climate transition finance by connecting issuers and investors globally.

Euroclear Bank is a 100% owned subsidiary of Euroclear SA/NV. Until 2023, Euroclear Bank was reporting its ESG performance (including Environment) as part of the Euroclear SA/NV Group consolidated Sustainability report. As of 2024, it is required to report on a stand-alone basis under CSRD.

Euroclear Bank accounts for more than 75% of underlying Group operating income, Net profits and Total assets. It forms part of an integrated group set-up, is co-located with Euroclear SA in major locations (Belgium and Poland) and employs 1/3 of the approx. 6,000 group staff. It operates under intra-group outsourcing agreements whereby Euroclear SA/NV divisions provide services to Euroclear Bank covering domains such as People & Communications, IT, Finance, Facilities, Supply Chain, Company Secretariat & Legal, Compliance & Ethics and Risk Management with Euroclear Bank accounting for approx. 70-75% of group recharges. In addition to the group structure and outsourcing arrangements detailed above, the SBTi targets are set at group level, and the group is responsible for the net zero Transition Plan for all entities including Euroclear Bank (supported by Bank specific actions and strategies where needed). As such, the Group and the Bank operate under closely linked ESG Policies and a common set of action plans to achieve net zero. Euroclear Bank's governance is closely involved in the development, approval, implementation and oversight of the Group Transition Plan.

Given this reality, Euroclear Bank has opted for a pragmatic approach and does not compute or report stand-alone energy consumption, emissions or emission reduction targets as this information is of limited value without placing it within the broader context of the group that it is an integral part of.

This section E-1 refers to the Euroclear Group (including Euroclear Bank).

Euroclear recognises the physical and transition risks posed by climate change. Using the Network for Greening the Financial System (NGFS) climate scenarios has helped Euroclear understand these risks, allowing climate risks to be better integrated into our decision making and improving our long-term resilience to climate risks.

Climate risks are being embedded into Euroclear's enterprise risk management framework, ensuring it systematically identifies, assesses and manages climate risks across its operations and value chain.

Through its DMA exercise, Euroclear identified climate-related impacts and risks. Based on initial internal assessments, Euroclear has not identified climate-related issues over the short term that can materially impact its financial performance or position. As a result, climate-related issues are not currently a material input into the financial planning process.

In addition to contributing to reducing overall GHG emissions, Euroclear's strategy also focuses on driving positive change with suppliers, enhancing transparency and fostering collaboration with clients, partners and regulators to support the development of a resilient and sustainable financial system for the future.

In 2024 Euroclear's total emissions were 89,616 tCO_2eq an increase of 13% on 2023 and 29% on the 2019 baseline, driven largely by an increase in Scope 3 emissions as a result of business expansion. Euroclear maintained a 66% reduction in Scope 1 and 2 market-based emissions compared to the 2019 baseline, sustaining its 55% reduction target by 2030. This was mainly due to the purchase of renewable or low carbon energy which represented 83% of energy sources in 2024. A 6% reduction in Scope 3 operational activities (Categories 3-7) has brought these emissions back to 2019 levels, primarily due to reduced business travel and employee commuting emissions. Further effort is needed to meet the 28% reduction target set for emissions from Scope 3 operational activities. For Scope 3 emissions (Categories 1-2 i.e. supplier spends) 45% of suppliers' emissions were aligned with the 1.5°C commitment in 2024, compared to a target of 70% by 2027.

For details on climate-related Governance considerations, such as links to remuneration of management bodies, please refer to Governance p. 63.

Emissions (tCO2eq)	**2024**	**2023**	**2019**	**2024 target**	**Longer-term target**	**2024 progress versus 2023**	**2024 progress versus 2019**
Scope 1 and 2 Energy (market-based)	1,156	1,129	3,412	N/A*	-55% by 2030 -90% by 2050	+2%	-66%
Scope 3 Operational Activities**	9,716	10,381	9,738	-5.5%	-28% by 2030 -90% by 2050	-6%	0%
Scope 3 Suppliers***	75,222	64,715	54,412	–	N/A	-	–
Scope 3 Suppliers' emissions covered by targets	45%	37%	N/A	40%	70% by 2027	-	–
Total emissions (market-based)	89,616	79,439	69,565	-	-	+13%	+29%

* 2030 target to reduce by 55% exceeded in 2023 and therefore no reduction target set for 2024.
** Categories 3-7. These categories include Fuel and energy-related activities, Upstream transportation and distribution, Waste generated in operations, Business travel, Employee commuting and working from home.
***Category 1-2 supplier spend. These categories refer to Purchased products and services and Capital goods.

Impact, risk and opportunity management

Euroclear conducted a CSRD-aligned DMA, considering all in-scope entities, for reporting under CSRD in 2025. See General Disclosures/Double Materiality Assessment on p. 44.

Through this process, Euroclear assessed and identified its climate-related IROs considering its carbon footprint and profile, and the outcomes of the resilience assessment exercise using long-term climate scenario analysis. (See description of this process p.72)

Impact

The initial CSRD-aligned DMA concluded that the generation of emissions has a material negative impact on the environment in the short, medium and long term. These emissions are primarily caused directly or indirectly by energy and resource usage in various activities required to operate its business. They fall into three main categories:

- **Scope 1 and 2 GHG emissions**: These are emissions from office buildings and data centres.
- **Scope 3 GHG emissions**: These include emissions from suppliers (mainly categories 1 and 2) and from operational activities such as business travel, waste, employee commuting and working from home… categories 3, 4, 5, 6 and 7).

These GHG emissions are generated by Euroclear's employees and suppliers located in various countries around the world. Due to the nature of Euroclear's business activities, which do not involve manufacturing or selling goods that generate emissions, the Scope 1 and 2 GHG emissions from office buildings and data centres are relatively low compared to the overall GHG emission footprint. Instead, a significant portion of GHG emissions arises from the supply chain, indirectly caused by purchased goods and services and capital goods. As a financial market infrastructure and with Euroclear Bank holding a limited banking licence, Euroclear does not have a loan book or investments with Scope 3 financed emissions similar to other financial institutions. Emissions from the supply chain are currently computed by converting spends using Comprehensive Environmental Data Archive (CEDA) spends emission factors. CEDA is an economic input-output model that calculates industry averages for each spend category. Influencing suppliers' emission reduction strategies will be challenging, but Euroclear has engaged with suppliers about their GHG emissions during 2024.

In 2024, 45% of its suppliers' emissions resided with suppliers who have set targets compatible with the 1.5°C pathway. As Euroclear continues to grow, it will focus on reducing emissions by working closely with these suppliers and including ESG criteria in the supplier selection process. This approach is crucial because there is a positive correlation between business growth and associated supplier emissions.

No climate-related assumptions are made in Euroclear's financial statements, as the financial effects of climate change have not been quantified.

Climate-related risks and opportunities

In 2023, Euroclear conducted a long-term scenario analysis exercise to identify risks and opportunities related to climate change and to assess the resiliency of its business model and strategy in different future climate scenarios. See p. 72.

The results of this exercise were used as input for the DMA, which resulted in the identification of three material climate-related risks:

1. **Euroclear's exposure to physical risks**: The inherent exposure to physical risks was assessed as material in the medium term in this exercise. To identify and mitigate these risks, environmental hazards are incorporated into the annual threat assessment exercise. This exercise assesses the inherent and residual risks to Euroclear's data centres, buildings and people, from a range of environmental hazards, and assesses the effectiveness of mitigants.
2. **Impact on Euroclear staff**: The impact of climate change on Euroclear staff was assessed in terms of productivity and impacts on wellbeing in the medium and long term. Mitigating actions are considered in the same annual threat assessment exercise.
3. **Potential for climate change to trigger a long-term economic downturn**: Transition events were identified over short, medium and long-term horizons and were considered as part of the long-term climate scenario analysis exercise, including screening for likely exposure of assets and business activities and their sensitivity to identified transition events. One scenario, consistent with the Paris Agreement, was used. The exercise also concluded that no assets or business activities were incompatible, or needed significant efforts to be compatible, with transition to a climate- neutral economy.

Compared to commercial and investment banks, Euroclear is less exposed to financial risks driven by climate change. This is due to the nature of its business model and risk profile, as it does not finance or invest in clients or counterparties but provides short-term (primarily intraday) credit secured by high-quality collateral. Based on initial internal assessments, Euroclear has not identified climate-related issues over the short term which can materially impact its financial performance or position. As a result, climate-related issues are not a material input into the financial planning process.

Euroclear has not yet formalised any significant outcomes through the CSRD-aligned DMA. Through its role as an FMI, Euroclear aims to support the green, low carbon transition. In 2024 Euroclear held the equivalent of over 1.4 trillion euros in GSSS bonds under custody for Euroclear Bank. Additionally, in response to growing demand from issuers and investors for climate-related data, Euroclear is expanding its capabilities to fulfil these needs. This opportunity to enhance data has been identified within the corporate strategy and the enabling of a sustainable marketplace is a key pillar of its sustainable finance strategy.

Processes to identify and assess material climate-related impacts, risks and opportunities

Euroclear continuously strives to mitigate its environmental impact by taking actions to reduce its current and future carbon levels. Additionally, it seeks to ensure the resilience of the organisation in the face of physical and transition risks. It has analysed the impact that climate change can have on its operations, risk profile and broader organisation from three key exercises.

CSRD-aligned Double Materiality Assessment
See p.52 for detailed description of all IROs

Assessment of carbon footprint and profile
Total emissions by year

	2024	2023	2022	2021	2019 Baseline
Total emissions (tCO2eq)	89,616	79,439	88,002	72,726	69,565
Scope 1	788	737	721	777	928
Scope 2 (market-based)	368	391	962	1,580	2,484
Scope 3	88,460	78,311	86,319	70,369	66,153

- In 2022, Euroclear mandated EcoAct, an international sustainability consultancy, to complete screening of all Scope 3 categories (in addition to Scope 1 and Scope 2).
- As a result, Euroclear reports its emissions on Scope 1, Scope 2 and eight relevant categories of Scope 3 yearly. This is a stable inventory considering past and potential future changes that may impact GHG missions. Euroclear does not conduct business outside of its core business.
- Euroclear uses the operational control approach, where a company accounts for 100% of emissions from operations over which it, or one of its subsidiaries, has operational control. It accounts for its GHG emissions and completed its calculations in line with the GHG Protocol Corporate Accounting and Reporting Standard. It identified which sites and activities would be reported under the Scope 1 and 2 carbon footprints. Euroclear provides the global site list and activity data to EcoAct. Data gaps were addressed using estimates based on the consumption patterns of the sites within the same region and industry benchmarks.
- Within this same exercise, Euroclear assessed its capability to reach net zero and near-term targets. It screened its activities and potential actions to reduce emissions in its operations and value chain. These aspects were recorded as having the potential to increase the volume of Euroclear's emissions:
  - Potential Mergers and Acquisitions (M&As) would increase volume in Euroclear but unless they were very large scale should not substantially challenge the baseline emissions. Recent M&A candidates are also service-type companies with a similar emissions profile.
  - Organic increase in business activity
  - Increase in headcount

Resilience analysis using climate change scenarios

In 2023, Euroclear conducted a scenario analysis exercise to identify risks and opportunities related to climate change and to assess the resiliency of its business model and strategy in different long-term future climate scenarios.

It used three distinct scenarios from the NGFS:

- 'Net zero' (moderate transition risks and low physical risks);
- 'Current Policies' (high physical risks, low transition risks); and
- 'Delayed Transition' (high physical risks, high transition risks after 2030).

The scope of the long-term climate scenario analysis exercise encompassed the whole of the Group including Euroclear Bank, the local CSDs (Euroclear Belgium, Euroclear France, Euroclear Nederland, Euroclear Finland, Euroclear Sweden, Euroclear UK and International) and MFEX. The exercise looked at the risks that both the upstream (suppliers, cash correspondents) and downstream (clients) value chain can have on Euroclear.

Euroclear used NGFS scenarios in the long-term climate scenario analysis because they are tailored to the financial sector and have become a market standard since their use in the ECB climate stress test. Assumptions taken for these three scenarios are available on the NGFS website. For its resilience analysis, Euroclear applies the time horizon definitions described in ESRS 1 section 6.4 for short, medium and long-term periods. These align with the climate and business scenarios used to identify material physical and transition risks and to set GHG emission reduction targets. For the long-term climate scenario analysis, Euroclear considered the years 2030 and 2050. These horizons extend beyond typical strategic planning and match the Paris Agreement goals of reducing global emissions by 50% by 2030 and achieving net zero by 2050 for many governments and corporations, including Euroclear. Using the NGFS scenarios above, Euroclear developed baseline narratives depicting different world, economy and societal conditions. It held workshops with representatives from various divisions and entities to discuss and challenge potential risks and opportunities for each scenario up to 2030 and 2050. The financial impacts of material and transition risks have not been estimated due to the primarily indirect effects on Euroclear, making them difficult to quantify.

Based on this comprehensive climate analysis, Euroclear has identified several physical and transitional risks associated with climate change.

Physical risks

- **Physical assets**: Euroclear owns or has exposure to very few physical assets apart from its data centres.
- **Business**: Euroclear's strategy and business model are inherently tied to the performance of global financial markets. A long-term global economic downturn, potentially exacerbated by climate change, could reduce transaction volumes, lower the value of assets under custody, increase credit risks and result in inflationary pressure. As a multimarket infrastructure with a highly diversified portfolio of assets, services, client base and multi-office locations, it is naturally hedged against regional climate risks.
- **Own and suppliers' Workforce**: in more severe physical risk scenarios, Euroclear and its suppliers' workforce may be increasingly negatively impacted by climate change, affecting wellbeing and productivity. The health, safety and wellbeing of its workforce are of paramount importance to Euroclear and are monitored for negative impacts.

Transition risks

As a multi-market infrastructure, Euroclear already manages complex laws and regulations and handles the arbitrages between regions, ensuring compliance and operational continuity amidst evolving climate-related regulations.

Euroclear's geographically diverse client base and office locations, with diversified assets and limited exposure to the economy (i.e. no dependency on sectors vulnerable to climate risks), allows it to manage and adapt to the challenges posed by climate change and potential economic consequences. The table below outlines the potential climate-related risks and opportunities, identified in Euroclear's various assessment activities, including the long-term climate scenario analysis.

Resilience analysis findings

E1-ESRS-2.SBM-3.19.c	Climate-related risks and opportunities	
	Physical risks	
Risks	Acute and chronic climate risks to data centres, critical suppliers, network agents, or staff	• Business disruption • Impacts on staff wellbeing • Additional adaptation or insurance costs
	Physical risks trigger client defaults	• Higher probabilities of default and capital requirements • Loss of business and decreased revenues
	Prolonged macroeconomic downturn and inflation triggered by physical risks	• Lower revenues, increased costs
	Transition risks	
	More complex climate-related laws and regulations	• Increased compliance costs • More vulnerability to greenwashing accusations • Potential regulatory arbitrage between regions
	Economic shift from a transition to a low-carbon economy leads to new winners and losers	• Loss of business or revenues if existing clients or issuers are not replaced by new incumbents
Opportunities	Market demand for new green products and services	• Growth opportunities for new acquisitions and strategic investments (Greenomy, Impact Cubed) • New data services to support clients' compliance requirements
	Increased green investments in emerging markets	• Global Reach can facilitate new issuances and increased financial flows from developed markets

Policies related to climate change mitigation and adaptation

Euroclear applies its *ESG group policy* to manage its material impacts, risks and opportunities related to climate change mitigation and adaptation. The Policy aims to reduce GHG emissions and enhance the group's resilience to climate impacts. The policy principles are also aligned with the principles of the CSRD, which emphasise the importance of climate change mitigation, adaptation, energy efficiency and renewable energy deployment and are listed in the table below.

In addition, Euroclear has embedded ESG-driven risks (including climate related risks) into its risk management framework as drivers of existing risks. The ESG Risk Guidelines describe how these risks are to be embedded in the risk framework, policies and processes.

Euroclear's efforts to mitigate climate change impacts include transitioning to renewable energies, improving energy efficiency, implementing more sustainable business travel, modernising its supply chain management and supporting sustainable employee commuting practices. These initiatives are crucial in reducing its Scope 1, 2 and 3 emissions due to operational activities and achieving its net zero targets.

Adaptation measures are equally important as they help manage the physical and transition risks associated with climate change. Euroclear's plans focus on building resilience through infrastructure changes, promoting sustainable practices and enhancing resource efficiency.

Policy Principles extracted from the ESG group policy

- **Principle 1.1A:** Each Euroclear company must be covered by, and have its progress tracked against, net zero science-based targets to reduce GHG emissions set by Euroclear SA/NV (ESA).
- **Principle 1.1B**: Each Euroclear company must have its residual emissions offset by ESA where they cannot be avoided.
- **Principle 1.2A**: Each Euroclear company must ensure that all GHG emissions from company-related transport are managed in line with the group's net zero targets.
- **Principle 1.2B**: To achieve the group's net zero targets, each Euroclear company must seek to optimise its business travel overall, while minimising GHG emissions for necessary business-related travel.
- **Principle 1.2C**: To achieve the group's net zero target, each Euroclear company must support sustainable employee commuting practices, as relevant. This principle addresses the generation of emissions and the impact of climate change on employee wellbeing.
- **Principle 1.2D**: To achieve its net zero target, each Euroclear company must seek to reduce GHG emissions in its company fleet, employee car and soft mobility schemes, as relevant.
- **Principle 1.3A**: Each Euroclear company must take steps to fully understand the environmental impact of its waste and resource use.
- **Principle 1.3B**: Each Euroclear company must take steps to improve resource and waste efficiency, by reducing resource consumption and waste, and reusing and recycling resources wherever possible.
- **Principle 1.4A**: Each Euroclear company must integrate climate risk management into its overall risk management framework, ensuring that climate risks are systematically identified, assessed and managed across operations and the value chain.
- **Principle 1.4B**: Each Euroclear company must ensure that climate risks are considered in strategic decision-making processes.
- **Principle 1.4C**: Each Euroclear company must regularly review and update its climate risk management practices to reflect evolving risks and opportunities.
- **Principle 4.4B**: Each Euroclear company must engage with suppliers to reduce emissions and ensure that suppliers are aligned with the group's net zero targets.

Policy principles related to climate change

ESRS-E1-2.25.a	Mitigation vs adaptation	Progress	Targets (from 2019 baseline)	Short-term	Medium-term	Long-term	Scope 1	Scope 2	Scope 3 Upstream-operational	Scope 3 Upstream suppliers	Euroclear policy principles	CSRD-aligned policy areas	IROs
Transition to renewable energy	Mitigation	Started	-55% by 2030	•	•	•	•	•					1
Improve energy use and efficiency (Including fuel switching and electrification)	Mitigation	Started	-55% by 2030	•	•	•	•	•			- Principle 1.1A - Principle 1.1B - Principle 1.2D	- Climate change mitigation - Climate change adaptation - Energy efficiency - Renewable energy deployment	1
Implement sustainable business travel guidelines	Mitigation	Started	-28% by 2030	•	•	•			•		- Principle 1.2A - Principle 1.2B	- Climate change mitigation	1
Support employee 'green' commuting	Mitigation	Started	-90% by 2050	•	•	•			•		- Principle 1.2C	- Climate change mitigation - Climate change adaptation	1 and 2
Engage with procurement chain	Mitigation	Started	70% suppliers' emissions covered by target by 2027	•	•					•	- Principle 4.4B	- Climate change mitigation	1
Integrate sustainability into property management	Adaptation	To start			•	•	•	•				- Climate change adaptation	1 and 3
Integrate sustainability into data centers strategy	Mitigation	Started	-90% by 2050		•	•	•	•				- Climate change adaptation	1 and 3
Transition to sustainable IT	Mitigation	To start	-90% by 2050		•	•	•	•				- Climate change adaptation	1
Implement sustainable resource management (all)	Mitigation	Started	-90% by 2050		•	•			•		- Principle 1.3A - Principle 1.3B	- Energy efficiency - Climate change adaptation - Other	1
Support employees' homeworking emissions	Adaptation	To start			•	•			•			- Climate change adaptation	1 and 2
Implement a sustainable procurement chain	Mitigation	To start	-90% by 2050		•	•				•	- Principle 4.4B	- Climate change mitigation	1
Implement internal carbon pricing	Mitigation	To start			•	•	•	•	•	•			1

IRO 1 Generation of emissions IRO 2 Impact of climate change on employee wellbeing IRO 3 Exposure to physical climate risks

Actions and resources in relation to climate change policies

Euroclear is implementing a series of actions and resource allocations to mitigate and adapt to the impacts of climate change. These actions are designed to be applied to all entities of the Euroclear Group, including Euroclear Bank. Their delivery is supported by a Group net zero Transition Plan ('Transition Plan'). See p. 78.

Actions and resources in relation to climate change policies

Actions ongoing / planned	Actions taken by end 2024	Disclosure of quantitative and qualitative information regarding progress of actions or action plans disclosed in prior periods	Short-term	Medium-term	Long-term	Affected Stakeholders
Transition to renewable energy	Renewable energy installed in offices in France & Poland	66% Scope 1 and 2 market-based emissions reduction achieved in 2024 due to sustained focus set on switching the renewable energy for key operational sites	•	•	•	Energy providers, Global Facilities and real estate team
Improve energy use and efficiency (Including fuel switching and electrification)	Energy saving measures sustained	Contain the increase of energy usage in key sites despite increase in office occupancy. A global initiative to replace fluorescents lamps by LED lighting, with more than 2800 units replaced so far. Target completion date is end of Q2 2025.	•	•	•	Energy providers, Global Facilities and real estate team
Implement sustainable business travel guidelines	Group sustainable business travel guidelines	Noticeable decrease (provisional 30%) in business travel emissions - Implementation of group-wide reduction target on business travel emissions in 2024 – including an aligned target per business units, quarterly reporting, and business travel guidelines	•	•	•	Business travel agency, Global Facilities and real estate team, Supply chain team
Support employee 'green' commuting	Bi-annual survey conducted on employee commuting habits	Approximately 75% of employees commuting are done with public transport. Supportive schemes continuously support and promote more sustainable choice in key locations (Belgium, Poland…) Car policy encourages the choice of electric vehicles for employees when relevant	•	•	•	Employees, People and Communications, Supply chain team
Engage with procurement chain	Pilot supplier engagement programme	Around 50 key suppliers representing 70% of suppliers' emissions were analysed for clear insights on their specific emissions and their willingness and capacity to deliver 1.5°C aligned emissions reduction targets	•	•		All suppliers, Supply chain team
Integrate sustainability into property management				•	•	Global Facilities and real estate team
Integrate sustainability into datacentres strategy				•	•	IT Division, Global Facilities and real estate team, Supply chain team
Transition to sustainable IT	Signature of the 'Sustainable IT Charter'			•	•	IT Division
Implement sustainable resource management (all)	Continuous collaboration with Close the Gap Implementation of waste management in multiple offices	Partnership with Close the Gap for the socially beneficial re-purposing or disposal of 4,991 IT devices, including 2,064 notebooks, 1,137 iPhones, and 370 tablets, resulting in significant environmental benefits.		•	•	Global Facilities and real estate team, Supply chain team, IT Division
Support employees' homeworking emissions				•	•	Employees, People and Communications, Supply chain team
Implement a sustainable procurement chain				•	•	All suppliers, Finance division
Implement internal carbon pricing				•	•	All business units

NB: Please refer to table on p. 76

Euroclear's mitigation and adaptation efforts are designed to reduce GHG emissions across its operations and value chain and to address the physical and transition risks associated with climate change, enhancing its resilience and ensuring the sustainability of its operations. These initiatives are to be implemented globally across the group to ensure a consistent and effective approach.

Euroclear's key mitigation actions can be grouped into several themes around energy transition and efficiency, sustainable supply chain management, sustainable mobility and travel and sustainable IT and data centres. Its adaptation efforts focus on building resilience through infrastructure changes and risk management, on promoting sustainable practices for remote homeworking wellbeing, for resource management and waste reduction.

To address the risks related to climate, to implement the ESG Risk Guidelines and to meet the European Central Bank's expectations on the management of climate-related and environmental risks, Euroclear developed a climate risk action plan through to the end of 2024. The actions are related to embedding climate-related risks into Euroclear's business strategy and objectives, risk management framework, risk appetite framework, stress testing and business continuity planning. Due to the nature of Euroclear's business, which does not involve manufacturing products or financing activity, and operates through global office infrastructures, it is currently not feasible to allocate specific achieved emission reduction outcomes to mitigation and adaptation actions. Similarly, it is not possible to produce a quantitative breakdown of the expected impact of its decarbonisation actions at this stage. However, Euroclear is committed to continuously improving its data collection and analysis processes to provide more accurate and comprehensive assessments in the future. To this end, Euroclear is implementing a tool that will enable the modelling of expected and achieved GHG emissions reduction outcomes in relation to specific climate change mitigation initiatives.

Relationship of significant CapEx and OpEx required to implement actions

There is currently no definitive view on the Capital Expenditures (CapEx) and Operational Expenditures (OpEx) associated with the group's Transition Plan. The relationship between significant CapEx and OpEx and key performance indicators, as well as the CapEx plan, will be established once detailed budget and financial plans are further developed in 2025. Euroclear does not anticipate requiring any material operational or capital expenditures to implement its Transition Plan at this stage Euroclear does not engage in any activities related to coal, oil and gas and will not engage in any CapEx associated to these activities. See table p. 76 and table p. 77.

Transition Plan for climate change mitigation

Euroclear is committed to reaching net zero GHG emissions across its value chain by 2050, aiming to reduce absolute Scope 1, 2 and 3 GHG emissions by 90% from a 2019 base year.

To support this, Euroclear has developed an inaugural climate change Transition Plan (see table p. 76), which follows the template provided by the UK Transition Plan Taskforce (TPT) which is set to become the global standard. This plan includes time-bound targets for 2027-2030 and a longer-term outlook towards 2050. The plan contains a detailed description of decarbonisation levers and key actions as well as highlighting investments and funding required to support its implementation. It also outlines the role of the administrative, management and supervisory bodies in overseeing the plan. The Transition Plan is not public but is summarised in these Sustainability Statements.

Basis for preparation

Before the ideation of its Transition Plan, Euroclear assessed its full value chain emissions, including Scope 1, 2 and 3 emissions and set ambitious yet achievable science-based targets emissions reduction targets.

Following this, Euroclear assessed its capacity to reduce emissions using scenario modelling and by collecting various initiatives and concepts. This modelling was conducted in alignment with the SBTi framework, ensuring that its approach is grounded in the latest climate science.

From this assessment, Euroclear derived its GHG emission reduction targets, ensuring that they are compatible with limiting global warming to 1.5°C. These targets form the basis of its commitment to reducing absolute Scope 1, 2 and 3 GHG emissions by 90% from a 2019 base year by 2050. (see flow p. 80)

It then formalised its action plan, which includes detailed governance structures, descriptions of specific initiatives and mechanisms for monitoring and reporting progress.

Transition Plan and science-based targets

Euroclear did not follow the Sectoral Decarbonisation pathway as it is not a primary finance institution as defined by the Sectoral Decarbonisation Approach (SDA).

As a financial services provider without a typical credit, investment and/or loan book, Euroclear concluded, in agreement with the SBTi, that it falls outside the scope of the SDA. Consequently, Euroclear adopted the absolute reduction approach and set its targets in alignment with the cross-sector pathway provided by the SBTi. For more details, please refer to the table p. 76.

This pathway is compatible with limiting global warming to 1.5°C and includes predefined reduction expectations for Scope 1, 2 and 3 emissions. Science-based emission reduction targets are a core component of Euroclear's net zero strategies. Each of its science-based target serves as an interim abatement target for reaching net zero emissions, defining the emission reductions required over the medium to long term to limit global warming.

Because Euroclear has aligned its targets with the predefined reduction expectations provided by the cross-sector pathway, the company can directly compare its own GHG emission reduction targets and interim targets against these reduction expectations. As a result, Euroclear does not need to calculate a separate 1.5°C aligned reference target value for Scope 1 and 2 (or separately for Scope 3) emissions. Therefore, reference target values will not be disclosed separately. Euroclear's targets are aligned with the minimum coverage criteria and are set out in detail in the table on p. 52 in the General Disclosures.

Value chain calculation (the sum of direct and indirect emissions) is a requirement for setting a science-based target. Euroclear uses the SBTi net zero framework for corporates. To neutralise the remaining 5-10% of unabated emissions, it intends to purchase credits from permanent Carbon Dioxide Removal (CDR) projects at net zero.

The inaugural Transition Plan and climate change targets will be adjusted over time allowing Euroclear to respond to new information, technological advancements and changes in its operating environment.

Setting science-based targets in Euroclear

1 Define climate industry context

Euroclear has been committed to reducing its environmental impact through emissions reduction targets since 2012. In 2021, after a gap assessment facilitated by PWC on Euroclear's sustainability performance versus industry and stakeholders' expectations, Euroclear committed to strengthening its climate ambition to further support its credibility and stance as a reliable, ESG-compliant service provider.

2 Establish baseline emissions and base year

In the scoping assessment all organisational activities were mapped to the three emissions scopes.

Euroclear selected calculation tools and relevant emissions factors to identify data requirements and sources and to define its calculation methodology. EcoAct uses proprietary bespoke calculation models for:

- Working from home emissions
- Employee commuting
- Business travel
- Emissions from investments
- Output of Scope 1, 2 and 3 footprint

All relevant data was collected, suitability reviewed and gaps in data were addressed (e.g. use of proxy data such as spends).

3 Engage internal teams

Workshops were held with participants representing different levels and domains. These sessions collected initiatives to reduce emissions and classify initiatives by phase i.e. ongoing, proposed/approved initiatives, concepts. This enabled an informed assessment of Euroclear's capacity to reach net zero.

4 Define targets

Baseline data and the information from engaged teams was used to establish targets:

- Scope 1 and 2 target is modelled by ambition level. EcoAct uses ACA SBTi methods where applicable
- Scope 3 targets suitability is performed

EcoAct recommendations come from modelling in CRaFT.

The defined targets were approved by Euroclear Bank's Executive Committee.

5 SBTi validation

The submission in 2022 and successful validation from SBTi in 2023, sets Euroclear on a disciplined course to reach net zero no later than 2050, with firm interim targets. These objectives are a first step to support a wider transition to a low carbon economy

Disclosure of decarbonisation levers and key actions in the Transition Plan

To support its overall ESG strategy and achieve its net zero commitments, Euroclear has documented near, medium and long-term emissions reduction initiatives within a Transition Plan.

The Net Zero project will enable their delivery, overseen and steered by dedicated committees in accordance with Euroclear's governance arrangements. The initiatives are organised into Working Groups and each Business Unit is responsible for delivering the transposed climate objective into its own operations and within the sub-entities as relevant.

The decarbonisation initiatives support Euroclear's broader business objectives, such as enhancing operational efficiency, reducing costs and enhancing stakeholder relations.

For example, investments in renewable energy and energy efficiency can lead to cost savings and increased resilience against energy price volatility. The financial aspects of the Transition Plan and the decarbonisation initiatives will be considered in Euroclear's overall budget planning and investment priorities. This includes setting aside specific budgets for sustainability projects and ensuring that these initiatives are aligned with the company's long-term financial goals. Euroclear's emissions reduction targets are primarily derived from its business activities and suppliers, unlike typical financial institutions. To reach these targets, the focus is mainly on transforming internal operations to become more sustainable. Since, the content of the Transition Plan is centred on these internal actions, it is not currently published externally. All key aspects of the Transition Plan are included, where relevant, in this section.

Mechanisms are in place for monitoring and reporting the progress of the decarbonisation initiatives, including regular updates to the relevant committees and the use of tools like the Carbon Reduction and Feasibility Tool1 (CRaFT) to evaluate and report the quantitative contributions of the decarbonisation strategies.

- Euroclear does not foresee any changes in product and service portfolio or adoption of new technologies in its own operations or value chain at this stage. See table on p. 77.
- Euroclear does not anticipate requiring any material operational or capital expenditures to implement its action plan at this stage.
- There are no material locked-in GHG emissions in Euroclear's key assets or products that may jeopardise achievement of GHG emission reduction targets and drive transition risk.
- Euroclear currently does not plan to align the eligible economic activities under the Taxonomy Regulation (Commission Delegated Regulation 2021/2139) with the technical screening criteria. Financially, the eligible activities are a very small part of Euroclear's overall business, as they are limited to the data processing and computer programming activities of Euroclear SA/NV. This is largely due to the low materiality of these economic activities in relation to Euroclear's overall business and its role as an FMI (rather than a financer of the real economy).
- Euroclear is not excluded from the EU Paris-aligned Benchmarks.

The Transition Plan was approved by the Euroclear SA/NV Executive Committee in January 2025, with the involvement of Euroclear Bank, and Euroclear will start to implement it from 2025. Some of the documented actions have already been initiated as part of the continuous effort to deliver a steep emissions reduction by 2030. These actions are assigned across the organisation to responsible business functions.

Targets related to climate change

To ensure the effectiveness of its policies and actions, Euroclear set its science-based targets in 2023 and to address climate-related risks it also established several Key Risk Indicators.

These targets, as detailed in the table on p 52 in the General Disclosures' received validation from the SBTi. Euroclear chose 2019 as its base year and emissions baseline because it is representative of the activities covered and external influences. In addition, as the last pre-Covid year, 2019 reasonably reflects usual practices in terms of energy consumption and regular business activities. However, the CapEx category tends to fluctuate for most corporations, including Euroclear. CapEx for Euroclear relates largely to office and building management (e.g. office investment, rebuilds, refurbishment). Any large office design and build projects, will create a swing to the fit-out/structural categories. The general replacement of equipment due to wear and tear is more consistent across years.

When establishing its science-based near-term, long-term, and net zero targets with a base year and baseline of 2019, and with near-term horizons of 2027 and 2030, Euroclear ensured that its targets were consistent with its GHG inventory boundaries, covering all relevant sub-entities within its geographical scope. These targets are aligned with the minimum coverage criteria from the relevant SBTi framework, see table below. Euroclear also took into account potential organic business growth, spending, and headcounts.

The intention is to follow the SBTi's recommendations and threshold for rebaselining (i.e. updating the baseline year or emissions data to reflect more accurate or current information). Their threshold sets boundaries of 5% or less of total emissions. Euroclear has also considered a diverse range of climate scenarios to detect relevant environmental, societal, technology, market and policy related developments and determine decarbonisation levers as described on p. 81. For each of these scenarios the transmission channels to Euroclear were identified and their impact on Euroclear's decarbonisation efforts were assessed.

In addition to emissions reduction targets, Euroclear includes several Key Risk Indicators related to climate change in its quarterly Corporate Risk Report. These indicators help track the success of the company's policies and actions:

- Vulnerability of data centres, buildings and suppliers to physical risks leading to business disruption
- Euroclear collateral exposure to sectors and countries vulnerable to climate risk
- Euroclear participant, treasury counterparty and investment exposure to sectors or countries vulnerable to climate risk

These metrics rely on EBA classifications of sectors vulnerable to climate risk and the ND-GAIN2 database for determining countries vulnerable to climate risk. The metrics are not validated by an external body.

Euroclear has outlined its GHG emissions reduction targets in its Transition Plan and identified several key actions as part of its decarbonisation strategies. These targets and associated actions are designed to manage material climate-related impacts, risks and opportunities effectively.

These include investments in renewable energy, enhancements in energy efficiency, containing emissions linked to operational activities, sustainable procurement practices and carbon offsetting. These efforts demonstrate Euroclear's dedication to reducing its carbon footprint and meeting its sustainability targets. Currently, however, it is not yet able to attribute specific and quantitative impacts of these actions towards its overall GHG emission reduction goals.

Greenhouse gas emissions reduction targets versus base year

Target	Target type	Emissions scope	Target change from base year	Base year	Target year	Interim target	Interim target year
Scope 1 and 2	Long-term absolute	1, 2 (Market-based)	-90%	2019	2050	See below	See below
	Short-term absolute	1, 2 (Market-based)	-55%	2019	2030		
	Interim annual absolute	1, 2 (Market-based)		Annual		-7%	
Scope 3	Long-term absolute	3 (excluding Cat.15)	-90%	2019	2050	See below	See below
	Short-term absolute	3 (Cat. 3-7)	-28%	2019	2030		
	Interim annual absolute	3 (Cat. 3-7)				-5.5%	
	Short-term supplier engagement	3 (Cat. 1-2)	70% emissions covered by targets	Annual	2027		

* The yearly reduction target is adjusted year-on-year to reflect progress made or regression

Greenhouse gas emissions reduction targets per Scope of emissions and consistency with inventory boundaries

	Near-term SBTs		Long-term SBTs	
	Scope 1 & 2	Scope 3	Scope 1 & 2	Scope 3
Boundary The minimum coverage criteria define what sources of emissions must be included in the near-term and long-term science-based targets (SBTs) as part of the net- zero emissions reduction ambition.	95%	67%	95%	90%
Target Timeframe Euroclear's targets are set on 2019 base year (must not be before 2015)	Near-term targets are set 5-10 years from date of submission (in 2022)		Long-term targets are set at 2050 (or sooner)	
Minimum ambition Euroclear's minimum ambition is in line with the 1.5°C pathway	The minimum ambition is 1.5°C for Scope 1 & 2 and well below 2°C for Scope 3		90% absolute reduction is required in the long-term	

Measuring progress on actions

Euroclear's progress in reducing its emissions compared to its 2019 baseline is described on p. 52.

Currently, Euroclear does not attribute specific and quantitative impacts of its emissions reduction initiatives towards its overall GHG emission reduction goals. To bridge this gap, Euroclear plans to enhance its knowledge of the feasibility and cost implications of the identified activities. It intends to use the CRaFT tool, which provides modelling features, analytics and insights, to evaluate and report the quantitative contributions of the decarbonisation strategies toward Euroclear's emission reduction objectives. Euroclear integrated CRaFT at the end of 2024 and expects to implement it fully from mid-2025. Additionally, it will employ a carbon metric calculation tool to better measure and monitor emissions reduction.

Energy consumption and mix

Euroclear does not operate in, nor is it active in, any high-climate impact sectors used to determine energy intensity.

Euroclear's net revenue used in environmental calculations cannot be directly cross-referenced to a line item or disclosure in the financial statements.

Euroclear's energy consumption has been relatively stable since 2019. In 2024, Euroclear made efforts to manage and optimise its energy consumption. Although several energy efficiency measures were implemented across facilities, overall energy consumption increased.

This increase is primarily due to the need to accommodate higher occupancy rates in key offices associated with a growing workforce and heightened office activities. On the other hand, there was a stronger focus on procuring renewable energy and reducing fossil fuel consumption, which has allowed Euroclear to keep its market-based emissions at a low level.

In 2024, to address continuing challenges in accurately tracking and managing energy data, Euroclear enhanced its energy monitoring capabilities, enabling the capture of a broader range of energy consumption data. This improvement not only allowed for more comprehensive data collection but also facilitated more accurate estimations where data was missing. This resulted in a more complete and accurate reporting of our overall energy use. Despite these data improvement efforts, Euroclear does not yet have granular data on the share of consumption from nuclear sources in total energy consumption and therefore cannot report on it. However, this should be of limited impact as nuclear energy, which is likely negligible, is not included in the reported figure of renewable energy, since the countries where Euroclear's key offices are located do not consider nuclear as renewable.

Euroclear is considering the impact of artificial intelligence (AI) usage on energy consumption. In 2025, it plans to analyse the effects of AI on its energy footprint and explore ways to mitigate any negative impacts. This approach ensures that Euroclear continues to improve its energy management practices while leveraging the benefits of new technologies such as AI.

Energy consumption and mix	**2023**	**2024**
Total fossil energy consumption	4,841 MWh	5,307 MWh
Share of fossil sources in total energy consumption	17%	17%
Consumption from nuclear sources	Not Applicable	
Share of consumption from nuclear sources in total energy consumption		
(1) Fuel consumption from renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.)		
(2) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	24,196 MWh	25,810 MWh
(3) Consumption of self-generated non-fuel renewable energy	Not Applicable	
Total renewable and low carbon energy consumption (sum of (1) to (3))	24,196 MWh	25,810 MWh
Share of renewable and low carbon sources in total energy consumption	83%	83%
Total energy consumption	29,037 MWh	31,117 MWh

Energy consumption	2023	2024
Renewable	0 MWh	0 MWh
Non-renewable	0 MWh	0 MWh
Total energy production	0 MWh	0 MWh

Gross scopes 1, 2, 3 and total GHG emissions (tCO2eq)

Gross scopes 1, 2, 3 and total GHG emissions – Numerical

	Base year 2019	Comparative 2023	N 2024	%N/N-1	2025	2030	-2050	Annual % target/base year
				Delta % 24-23		% reduction from 2019 or absolute	If available	
Scope 1								
Gross Scope 1	928	737	788	7%	-7%	-55%	-90%	5%
Percentage of Scope 1	Not applicable	1%	1%	Not applicable				
Scope 2								
Location-based	5,174	3,934	4,127	5%	Not applicable			5%
Market-based	2,484	391	368	-6%	-7%	-55%	-90%	5%
Significant Scope 3								
Total gross indirect	66,153	78,311	88,460	13%	-	-	-	-
(1) Purchased goods and services	50,536	61,246	71,522	17%	Excluded	Excluded		Excluded
(2) Capital goods	3,876	3,468	3,700	7%	Excluded	Excluded		Excluded
(3) Fuel and energy-related activities (not included in Scope 1 or Scope 2)	1,186	1,344	1,221	-9%				
(4) Upstream transportation	381	178	241	36%			90%	

	Base year 2019	Comparative 2023	N 2024	%N/N-1	2025	2030	-2050	Annual % target/base year
and distribution								
(5) Waste generated in operations	126	25	14	-44%	-5.5%	-28%		3%
(6) Business traveling	4,728	3,618	2,471	-32%				
(7) Employee commuting	3,317	5,216	5,769	11%				
(8) Upstream leased assets	Not applicable							
(9) Downstream transportation								
(10) Processing of sold products								
(11) Use of sold products								
(12) End-of-life treatment of sold products								
(13) Downstream leased assets								
(14) Franchises								
(15) Investments	2,003	3,217	3,522	9%	Not applicable			
Total GHG emissions								
Location-based	72,255	82,982	93,375	13%				
Market-based	69,565	79,439	89,616	13%				

GHG emissions footprint for 2024

Compared with 2023, Euroclear has stabilised the increasing trend of its emissions caused by growth in business and headcount. Total emissions stand at 89,616 tCO_2eq compared with 79,439 tCO_2eq in 2023. The data used to calculate emissions vary in terms of quality and maturity, and therefore, uncertainty about the exact emission figures cannot be excluded. See table on p. 94 for descriptions of data sources.

Scope 1 and 2 energy-related emissions

In 2024, Euroclear maintained the reduction achieved in 2023 by securing renewable energy sourcing, despite a noticeable increase in energy consumption to support higher office occupancy. Ongoing and future identified initiatives will focus on containing energy consumption. This effort has been crucial in stabilising the emissions from Scope 1 (direct emissions from owned or controlled sources) and Scope 2 (indirect emissions from the generation of purchased electricity, steam, heating and cooling consumed by the reporting company).

Scope 3 emissions related to operational activities

For Scope 3 emissions related to operational activities (categories 3-7), Euroclear has managed to contain the increasing trend since 2021 by returning to the level of its 2019 baseline emissions. This achievement is due to a decrease in business travel emissions and employee-related commuting. The categories included here are:

- Category 3: Fuel and energy-related activities (not included in Scope 1 or 2)
- Category 4: Upstream transportation and distribution
- Category 5: Waste generated in operations
- Category 6: Business travel
- Category 7: Employee commuting and working from home

Scope 3 emissions linked to suppliers' products and services

Euroclear's Scope 3 emissions linked to suppliers' products and services, calculated from spends, have increased mainly due to a switch from the usage of CEDA 6 to CEDA 7. The update from CEDA 6 to CEDA 7 reflects more current emissions factors, which can lead to changes in reported emissions. Since Euroclear started including its suppliers' emissions in the baseline emissions of 2019, it has followed market best practices and updates of emissions factors databases to closely reflect the reality of the decarbonisation effort of the economy. However, these changes add substantial volatility to the reported emissions, making it difficult to have a relevant year-to-year comparison of the absolute numbers. Additionally, the reliance on spends to convert to emissions restricts by design Euroclear's capability to drive down the absolute emissions.

As an intermediary measure to address these challenges, Euroclear has targeted that 70% of its suppliers' emissions should be covered by 1.5°C aligned targets by 2027. This approach provides a coherent way of tracking progress and making an impact in the procurement chain. In 2024, Euroclear conducted a pilot supplier engagement programme with several key suppliers to better understand their environmental profiles and start engaging with them. This programme will be expanded and complemented with concrete actions in the course of 2025. Currently, the coverage stands at 45%. Ultimately, Euroclear aims to move to a hybrid method for calculating suppliers' emissions, which will involve using suppliers' specific emission factors applied to their relevant emissions. This approach will allow for more precise and pertinent data, effectively driving down emissions from the most emitting suppliers.

Technical note: Euroclear uses the cash flow view of the purchase ledger for emissions calculation, rather than the Profit and Loss (P&L) view. This approach provides more real-time insights into cash flows, aligning with our supply chain practices and enabling focused engagement with key suppliers based on significant cash spends. Although this method does not allow for reconciliation with the financial accounting P&L view, it facilitates more targeted and effective ongoing supplier engagement.

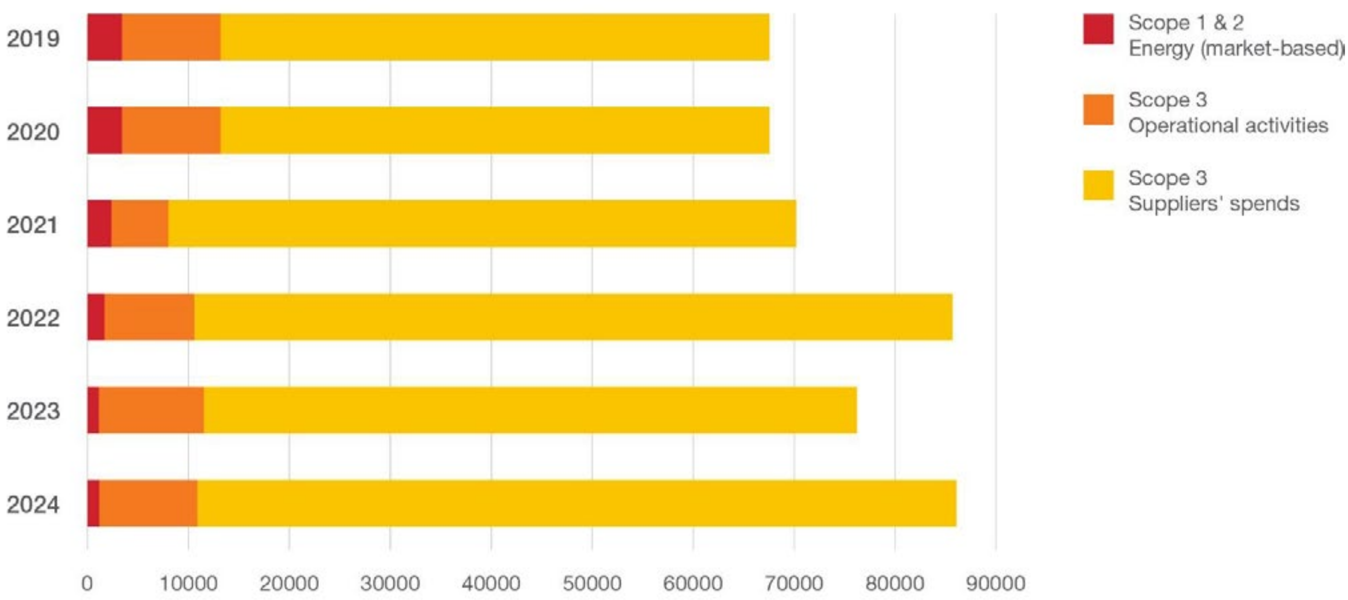
Carbon accounting and data quality

Euroclear has performed its carbon accounting exercise using a 9-month actual +3-month data extrapolation approach. This means that some peak activity effects may not have been accounted for, or some emissions could be higher due to the conservative approach when doing extrapolation. Within its ongoing effort to improve data quality and coverage, in 2024 Euroclear increased the number of sources of data, for instance, for sites where data were not available before from its smaller entities. As a result, some emissions segments have increased. Additionally, some emissions sources have been excluded for materiality and data reliability reasons. These exclusions are consistent with previous year's accounting. These sources include:

- **Emissions from assets in custody, including sovereign debts, corporate bonds, equities, and other financial instruments, are excluded from Euroclear's calculations.** Euroclear's role with respect to these assets is purely that of a financial market infrastructure. Euroclear does not finance or facilitate the underlying emissions of these assets. Consequently, emissions from these assets do not qualify under the typical definition of financed or facilitated emissions as described by the PCAF and are not attributed to Euroclear in accordance with PCAF standards.
- **Network and banking fees associated spends**: These emissions are excluded because there is no commonly recognised framework to calculate them, even within the PCAF.
- **Pension funds:** Emissions from pension funds are excluded due to their lack of relevance to Euroclear's core business activities.
- **Hazardous waste:** This is excluded due to its immateriality and the difficulty in obtaining accurate data.
- **Waste linked to confidential paper**: Similarly to hazardous waste, this is excluded due to its immateriality and the challenge in obtaining precise data.
- **Expat rented locations**: Emissions from private housing for expats contracted in the name of Euroclear are excluded due to their immateriality and the lack of reliable data.
- **Business travel booked directly (not centrally) by employees**: This is excluded because the size of these emissions is currently unknown. A process will be put in place to track these bookings in 2025.

These exclusions are made because they either lack a reliable calculation method, are not material to Euroclear's core business activities, or the data quality is too imprecise to provide accurate measurements. However, Euroclear is actively monitoring changes in framework availability, recommendations and best practices of emissions accounting and is working to improve data capture.

Evolution of emissions (in tCO2eq)



Intensity of GHG emissions per net revenue

	Comparative 2023	N 2024	% N/N-1
Total GHG emissions (location-based) per net revenue (tCO2eq/€ million)	10.28	8.78	-15%
Total GHG emissions (market-based) per net revenue (tCO2eq/€ million)	9.84	8.42	-14%

Details	Amount
Net revenue used to calculate GHG Intensity	€ 10,642,391,334

Net revenue can be directly cross-referenced to the financial statements of Euroclear SA/NV in the Segmental Reporting Note V.

Net revenue is the sum of Interest income, Fee and commission income, Dividend income, Net gains/(losses) on non-trading financial assets mandatorily at FVPL, Net gains/(losses) on financial assets and liabilities held for trading, Net gains on foreign exchange and Other operating income.'

The yearly carbon accounting exercise

In 2024, there have been no significant changes in how Euroclear defines its reporting entity and its upstream and downstream value chain.

To calculate its emission footprint, Euroclear accounts for 100% of GHG emissions over which it has operational control and therefore has not accounted for emissions from non-consolidated subsidiaries (See more information below).

This approach was used to identify which sites and activities would be reported under the Scope 1 and 2 carbon footprints. In a similar way to the process for assessing our baseline carbon footprint (see p. 72), Euroclear provides the global site list and activity data to EcoAct. Data gaps are addressed using estimates, extrapolation or proxy data, based on the consumption patterns of the sites within the same region and industry benchmarks. (See table p. 94)

Euroclear does not yet collect primary data to compute Scope 3 GHG emissions using inputs from specific activities in its upstream and downstream value chain. Instead, it converts activity data into emissions using an emission factors database.

Euroclear's total carbon footprint (Scopes 1, 2 and 3) is calculated for the period from 1 January 2023 to 30 September 2023, with the last quarter of the year being extrapolated. Emissions are reported in tonnes of carbon dioxide equivalent (tCO_2eq), a standard unit used to compare the global warming effect of the six 'Kyoto' greenhouse gases. The carbon footprint calculations mainly consist of converting collected data into emissions using formulas and published conversionfactors.

The emission factors applied do not separate the percentage of biomass or biogenic CO_2. Additionally, GHG emissions other than CO_2, particularly CH_4 and N_2O, are not available for or are excluded from location-based grid average emissions factors or market-based method information. This is because Euroclear is not involved in manufacturing or industrial activities where these gases would be more relevant. However, when performing emissions calculation, EcoAct considers all relevant GHGs for Euroclear and converts them into CO_2 equivalent (CO_2eq) as per the GHG Protocol.

The conversion factors used are internationally recognised emission factors specifically designed for GHG accounting and can be consulted in the Data, methodology and key assumptions table.

Investee companies

Euroclear will continue to report the emissions of its investee companies under Scope 3, Category 15 Investments, given the current limitations on data availability. This approach aligns with Disclosure Requirement E1-6, which mandates the disclosure of gross Scope 1, Scope 2, Scope 3 and total GHG emissions in metric tonnes of CO_2eq. The objective is to provide a comprehensive understanding of the direct and indirect impacts of the undertaking on climate change, including the emissions occurring in the upstream and downstream value chain. Euroclear acknowledges that these companies are small and may not have the resources to calculate their carbon emissions accurately. Therefore, a proxy approach is used to estimate their emissions, which will be refined as more data becomes available. This involves estimating the emissions based on economic activity data collected and using the attribution factor. Specifically, the approach includes:

- **Economic activity data**: emissions are estimated based on the economic activity data collected from investee companies, including information on their financial transactions and operational activities.
- **Attribution factor**: an attribution factor is used to allocate a portion of the emissions to Euroclear's investments. This factor is derived from the proportion of Euroclear's investment in the company relative to its total value.
- **Extrapolation and proxy data**: when actual data is missing, extrapolation methods such as using previous year's data are employed to estimate emissions.

Renewable energy procurement in 2024

In 2024, Euroclear secured renewable energy through various contractual arrangements to ensure the integrity and verification of its renewable energy usage.

Energy bundled with attributes:

Green Tariff contracts: Euroclear purchases renewable electricity through green tariff contracts from major national and international energy providers. These contracts often include Guarantees of Origin (GOs) or Renewable Energy Certificates (RECs) bundled with the energy supply. This means that the renewable energy Euroclear consumes is directly verified by the accompanying certificates, ensuring that its energy is sourced from renewable generation. In some cases, contracts explicitly specify that the electricity supplied is 100% renewable, without the need for separate certificates. The types of renewable energy provided under these contracts are mostly wind and hydraulic.

Future considerations for unbundled Energy Attribute Certificates (EACs):
While Euroclear did not procure any unbundled EACs in 2024, it is considering this option for future procurement. It will approach this with prudence to ensure that its actions support the development of renewable energy in the grid and offset its consumption in a meaningful way. This includes paying attention to potential weaknesses such as geographical irrelevance, time zone discrepancies and the risk of double counting. By carefully selecting unbundled EACs, Euroclear aims to maximise their environmental impact and ensure they contribute effectively to its sustainability goals.

Share of bundled energy attributes

E1-6.AR.45.d

Type	Share
Green tariff	56.37%
Guarantee of origin	39.21%
Renewable Energy Certificate	4.41%
Total EC backed by contractual instrument	*25,806 MwH (97.54%)*
Total electricity consumption	*26,456 MwH (100%)*

Data, methodology and key assumptions

Euroclear's carbon emissions are calculated by EcoAct based upon raw data provided by Euroclear. Metrics are reported for full year 2024. Methodologies used to calculate the metrics, and significant assumptions are reported below. Raw data are evidenced, controlled. The process is reviewed by Deloitte.

<table>
<tr><th></th><th>Description</th><th>Data used for emissions calculation</th><th>Type of data</th><th>Metrics calculation methodology</th><th>Key assumptions 2024</th><th>% versus total</th></tr>
<tr><td rowspan="2">Scope 1
Direct GHG Emissions</td><td rowspan="2">All direct emissions from Euroclear's owned and controlled resources:
1. stationary combustion (e.g. fuels, heating sources) mobile combustion (all vehicles owned or controlled, burning fuel)
2. fugitive emissions (leaks from greenhouse gases from refrigeration, air conditioning units...)
3. process emissions released during industrial processes, and on-site manufacturing</td><td>Activity data</td><td>Primary</td><td>Fuel-based method
Euroclear's site data on fuel usage and refrigerants was imported by EcoAct. Activity data was multiplied with location-specific emission factors based on Euroclear's instructions. EcoAct's Scope 1, 2, and 3 tool ensured alignment with GHG Protocol requirements.

Sources for emission factors
Department for Business, Energy and Industrial Strategy (BEIS); International Energy Agency (IEA)</td><td rowspan="2">Vehicle fuel consumption: Only 0.5% of total fuel consumption is relevant to company transportation, consistent with previous footprints.

Refrigerants are calculated using only primary data.
If data is absent, estimation is assumed as 0 for this category.

Extrapolation: Conservative methods are used to ensure robust and credible emissions estimates.

Consumption pattern: Current year's consumption follows the previous year's pattern, accounting for trends and anomalies.</td><td>79%</td></tr>
<tr><td>Extrapolated or proxy data (when actual data is missing)</td><td>Secondary</td><td>Extrapolation method
This method is considered as the standardised one and is applied throughout the calculation exercise unless otherwise specified, complemented or adjusted. When actual data is missing, previous year's data is used to estimate the current year's monthly usage. In some cases, previous year's data is used as a proxy for the current year's emissions. Data for 9 months is collected, and the last 3 months are extrapolated based on the last 12-month trend.

Estimation methods
Natural gas, gas oil, diesel and petrol: estimated using global intensity per m² or office benchmark.</td><td>21%</td></tr>
</table>

	Description	Data used for emissions calculation	Type of data	Metrics calculation methodology	Key assumptions 2024	% versus total
Scope 2 **Indirect emissions associated with purchased electricity, heat or stream**	All indirect emissions from the generation of purchased energy, from a utility provider	Activity data	Primary	**Fuel-based method** Refer to explanation in Scope 1 **Sources for emission factors** BEIS, IEA - non-UK electricity	Electricity sources are assumed to be non-renewable without evidence of renewable generation. **Consumption pattern**: Refer to Scope 1	Location-based: 74% Market-based: 56%
		Extrapolated or proxy data (when actual data is missing)	Secondary	**Extrapolation method** (same as standardised one) **Estimation methods** • Electricity, district heating, district cooling: estimated using global intensity per m² from sites with actual data. • Renewable energy: Grid emissions are used when market-based factors are absent.		Location based: 26% Market based: 42%
Scope 3 **Other Indirect emissions**	**Category 1 | Purchased goods and services**					
	All upstream (i.e., cradle-to-gate) emissions from all production and non-production-related products and services purchased or acquired by Euroclear in the reporting year.	Raw data	Primary	**Raw data method** For water and paper, activity data is used and multiplied with the relevant emission factor. **Sources for emission factors** BEIS	Closest currency conversions are applied when countries are not available in the CEDA database. Categories labelled 'Occupancy' are assumed to be related to rent and excluded. Directors' fees are assumed to be part of payroll and excluded. **Consumption pattern:** Refer to Scopes 1 & 2	0%
		Spends	Secondary	**Spend-based method** Euroclear's purchase ledgers, including MFEX, are used to convert spend into emissions. Each spend category gets an emissions factor from the CEDA database, which uses industry averages. Best practice is to use CEDA factors in the local currency. Previously assigned CEDA factors are reused, and new categories get new CEDA mappings. **Sources for emission factors** CEDA v7.0		100%

	Description	Data used for emissions calculation	Type of data	Metrics calculation methodology	Key assumptions 2024	% versus total
		Extrapolated or proxy data (when actual data is missing)	Secondary	**Extrapolation method** (same as standardised one) For spend data in cat.1, in addition to standard extrapolation, the last 3 months are extrapolated with a 10% top-up to account for the seasonal spending peak and any other unplanned expenses at the end of the year. This top-up % is defined based on the spending pattern of 2 previous years. An additional 7.5% adjustment is applied to emissions in categories 1, 2, 4, and 6, which are calculated using the spend-based method on expenses from the Euroclear purchase ledger. This adjustment is made to account for potential effects generated by the 9+3 cut-off process. **Estimation methods** Water and paper: Estimated using global intensity per m² from sites with actual data.		
	Category 2 | Capital goods					
	All upstream (i.e., cradle-to-gate) emissions from the production of capital goods purchased or acquired by Euroclear in the reporting year.	Spends	Secondary	**Spend-based method** Refer to Scope 3 Category 1 **Sources for emission factors** CEDA v7.0	Spends referring to hard facilities are assumed to be category 2.	100%
		Extrapolated data (when actual data is missing)	Secondary	**Extrapolation method** Refer to Scope 3 Category 1		
	Category 3 | Fuel- and energy-related activities (not included in Scope 1 or Scope 2)					
	Emissions associated with the production of energy or fuel used during the reporting year which has not been accounted for in Scope 1 and 2	Activity data	Secondary	Fuel-based method Refer to Scope 1&2 Country-specific emission factors are applied to calculate WTT, WTT and T&D emissions. Sources for emission factors BEIS, IEA		Refer Scope 1&2
	Category 4 | Upstream transportation and distribution					

	Description	Data used for emissions calculation	Type of data	Metrics calculation methodology	Key assumptions 2024	% versus total
	Emissions from Euroclear's inbound transport and outbound transport (Category 9 - Downstream transport and distribution) as Euroclear does not have separate data for these two categories.	Spends	Secondary	**Spend-based method** Refer to Scope 3 Category 1 **Sources for emission factors** CEDA v7.0		100%
		Extrapolated data (when actual data is missing)	Secondary	**Extrapolation method** (same as above, specific for spends)		
	Category 5 | Waste generated in operations					
	Emissions from third-party disposal and treatment of waste that is generated in Euroclear's owned or controlled operations in the reporting year.	Raw data	Primary	**Raw data method** EcoAct imported Euroclear's site data and used specific instructions to calculate emissions with waste-type specific factors from BEIS and EcoInvent. Emissions were calculated based on the total weight of each waste disposal method. Waste estimates were split between recycling and landfill based on national recycling rates. **Sources for emission factors** BEIS, EcoInvent	It is assumed that sites with no FTEs i.e. spare offices have no waste if data was not already provided Consumption pattern: see above	34%
		Spends	Secondary	**Spend-based method** Waste-related spend identified in purchase ledgers is included in the emissions calculation.		66%
		Extrapolated data (when actual data is missing)	Secondary	**Extrapolation method** Estimation uses global intensity per m² from sites with actual data, plus a global waste benchmark.		
	Category 6 | Business travel					
	Transportation of employees for business-related activities during the reporting year	Activity data	Primary	**Distance-based method** Primary data is provided for all type of travel. Flight and Train distances are calculated using EcoAct's tool, and flights are classified by type and cabin class. Car data is split between spend and distance data.	• Short-haul flights: up to 3,700 km. • Long-haul flights: over 3,700 km. • Train: Use national or international rail emission factors.	72%

	Description	Data used for emissions calculation	Type of data	Metrics calculation methodology	Key assumptions 2024	% versus total
				Hotel emissions are based on the number of nights and rooms **Sources for emission factors** BEIS, IEA, CEDA v7.0, DEFRA, Hotel footprinting tool, other best practice sources		
		Spends	Secondary	**Spend-based method** Commodity-specific emission factors are applied for each category of direct spend. Emission factors are based on per Euro spent in each category. These factors are from the CEDA database, which uses industry averages.		28%
		Extrapolated data (when actual data is missing)	Secondary	**Extrapolation method** (standardised method and specific for spends) When data is missing for a region, calculations are extrapolated based on available data. The number of Full-Time Equivalents (FTEs) is used to determine the region's percentage, which is then applied to each relevant category, such as transport modes, using the applicable emissions factors.		
	Category 7 | Employee commuting + Working From Home (WFH)					
	Transportation of employees between their homes and their worksites during the reporting year (in vehicles not owned or operated by Euroclear)	Employee commuting and Work from Home (WFH) survey	Secondary	**Average data method** Euroclear conducts an employee survey every two years. The latest results are used until new ones are available and applied to relevant FTE numbers. Annual distances by transport type are multiplied by emission factors, including well-to tank emissions. Emissions are calculated by country and office, considering home-working rates in % and FTE terms. Home-working emissions include office equipment, lighting, heating (natural gas and electricity), and	• For sites with unavailable data, a WFH rate of 80% is assumed. • Office equipment power load per desk is 140 W. • Lighting is assumed to be 10 W throughout the year. • Heating energy assumes typical usage of 12,000 kWh per year.	100%

	Description	Data used for emissions calculation	Type of data	Metrics calculation methodology	Key assumptions 2024	% versus total
				cooling (air-conditioning where applicable). **Sources for emission factors** BEIS; IEA, EcoAct WFH tool		
	Category 15 | Investments					
	Emissions associated with Euroclear's investments in the reporting year, not already included in Scope 1 or Scope 2	Previous year data on business loans, unlisted equity;	Secondary	**Complex estimation method** • Applied to business loans and unlisted equity. • When yearly data is missing, previous year's data is used. • The company accounts for a portion of the annual emissions of the borrower and investee, using the attribution factor (ratio of outstanding amount to the value of the financed company). • Emissions are estimated based on economic activity data collected from the borrower or investee company and allocated using the attribution factor. **Sources for emission factors** CEDA v7.0	• Where total equity is negative, it is set to zero in accordance with PCAF. • Where financial data is not available, previous year's data is used.	100%
	Suppliers' emissions covered by 1.5°C aligned targets					
	This metric measures the percentage of our suppliers' GHG emissions that are covered by science-based targets aligned with the 1.5°C pathway	Suppliers' emissions		**Arithmetic target-based method** • Calculate the proportion of suppliers' GHG emissions aligned with the 1.5°C target set by the Paris Agreement.		N/A

	Description	Data used for emissions calculation	Type of data	Metrics calculation methodology	Key assumptions 2024	% versus total
				• List all suppliers and their GHG emissions. • Check if each supplier has set SBTs aligned with the 1.5°C pathway. • Sum the GHG emissions of suppliers with 1.5°C aligned targets. • Divide the total emissions of these suppliers by the total emissions of all suppliers to get the percentage covered by 1.5°C aligned targets.		

GHG removals and GHG mitigation projects financed through carbon credits

Due to the nature of its business, Euroclear has not developed any GHG removal or storage projects within its own operations, nor has it contributed to such projects in its upstream or downstream value chain. Currently, there are no plans to initiate or support these projects.

Nevertheless, Euroclear recognises the importance of mitigating the impact of its currently produced emissions on the pathway to net zero. Please refer to table on p 52 in the General Disclosures for its net zero target and GHG mission reduction targets in detail.

To support the transition to net zero, Euroclear will continue to compensate for its operational emissions through the annual spot purchase of carbon credits. These operational emissions are the residual amounts after reduction efforts and encompass Scope 1, Scope 2 market-based and part of Scope 3 (i.e. emissions related to fuel and energy, upstream transportation and distribution, waste, business travel, employee commuting and working from home). Euroclear intends to mature its approach by adopting a medium to longer-term carbon credit strategy during 2025.

Avoidance or removal outside the value chain

Project name	Wind India	Unchindele	Biochar	Totals
% in total amount compensated	40%	55%	5%	100%
Tons	4,650	6,393	581	11,624
Location	India	Tanzania	Bolivia	
Type of project	Avoidance – Wind renewable energy	Nature-based removal – Reforestation	Technical removal – Biochar	
Type of project	Gold Standard	VCS	Puro Earth	

E1-7.60 E1-7.AR.64

Euroclear does not count the offset credits towards its reduction targets; instead, they remain part of its beyond value chain mitigation efforts. This approach focuses on achieving absolute reduction targets.

Euroclear annually determines the amount of emissions to offset through an emissions calculation exercise performed by EcoAct and purchases a portfolio of carbon credits corresponding to the amount of emissions to be offset. The data, calculation assumptions, methodologies and frameworks used to determine the amount of carbon credits to offset are the same as those of the general emissions calculation performed yearly. They can be consulted in relevant sections of the disclosure. The actual data was collected for the first three quarters and extrapolated temporally to a full year.

For FY 2024 reporting, Euroclear reports on the carbon credits that have been purchased and cancelled/retired in 2024 for the emissions produced in the year 2023 (Scope 1, 2 and Scope 3 categories 3-7). This amounted to 11,624 tCO_2eq.

This will be the first year Euroclear performs its disclosure with a one-year arrear. This means it will report the same figures for FY 2024 as already reported in the Sustainability Report of 2023. It is therefore impossible to compare the FY 2024 carbon removal disclosure with its N-1.

The total amount of GHG avoidance or removal for FY2024 is 11,624 tCO_2eq and can be broken down into:

- Own operations (Scope 1 and Scope 2 market-based): 1,277 metric tonnes of CO_2eq
- Upstream value chain (Scope 3 categories 3-7): 10,347 metric tonnes of CO_2eq
- Downstream value chain: these categories have been assessed and deemed non-applicable to Euroclear (except emissions from Investments that are excluded from its targets baseline).

Euroclear compensates these emissions in total, regardless of the underlying scopes versus type of removal. It purchases carbon credits in a mix of:

- 5% of high-quality technical removal (biochar project in Bolivia)
- 95% of non-technical removal or avoidance that it purchases in two parts:

- 50% of natural removal (reforestation and sustainable forest management project in Tanzania)
- 45% of offset (renewable energy project in India)

In total, Euroclear has cancelled/retired all purchased carbon credits, with 55% of these being removal-type carbon credits. This includes 5% from biochar projects and 50% from nature-based projects.

As disclosed, Euroclear did not finance any projects within the EU. The share of carbon credits it purchased that qualify as corresponding adjustments is 0%.

Use of carbon credits

Euroclear will repeat this annual process in 2025, when it will purchase carbon credits to compensate for residual emissions produced in 2024. The estimated amount of carbon credits to be purchased and retired/cancelled is expected to be at 10,871 tCO2eq.

Euroclear will continue with annual spot purchases, which are not subject to ongoing contractual agreements, and will mitigate the yearly impact of its carbon emissions by purchasing progressively higher quality carbon removal projects.

During 2025, Euroclear intends to develop a comprehensive medium to long-term carbon credit strategy. This strategy will rely on high-quality, technically based Carbon Dioxide Removal (CDR) projects to neutralise its residual emissions at net zero claim (5-10% unabated emissions). This may include exploring longer-term Advance Market Commitment (AMC) options for the 2030 horizon.

Internal carbon pricing

Euroclear currently does not use any type of internal carbon pricing scheme to support its decision making. Euroclear, however, recognises the importance of internal carbon pricing as a tool for managing its carbon footprint and driving sustainability initiatives. In 2025, Euroclear will explore the implementation of Internal Carbon Pricing (ICP) to incentivise sustainable behaviour and support its net zero targets particularly in relation to business travel emissions.

EU Taxonomy Disclosure

Euroclear Bank starts reporting on a standalone basis under the CSRD in 2025, covering 2024 and, therefore, also under the EU Regulation on the establishment of a framework to facilitate sustainable investment (the "Taxonomy Regulation"). However, following regulatory guidance at EU level [FN: European Commission Notice C/2024/6691dated 08.11.2024], which recognises the particular situation of a Central Securities Depository (CSD) holding a banking licence only to offer CSD services, Euroclear Bank is not treated as a credit institution for purposes of the mandatory Taxonomy Regulation disclosures, but is encouraged to report credit institution KPIs on a voluntary basis. This reflects that CSDs do not directly finance EU Taxonomy-aligned economic activities. We have assessed the voluntary credit institution KPIs, most notably the Green Asset Ratio (GAR), and find them to be of low relevance or non-applicable for the 2024 disclosures, either due to the specificities of Euroclear Bank's business which is limited to intraday credit exposures (not considered as loans and advances for the computation of the GAR) or since the Fees & Commissions (F&C) KPIs will only become applicable in 2025. Hence, Euroclear Bank is not reporting stand-alone Taxonomy Regulation KPIs as a credit institution but will continue to be covered by the consolidated disclosures of Euroclear SA/NV.

S1 - Social

Impacts on Euroclear Bank's workforce

Euroclear Bank's workforce is critical to carrying out its corporate strategy and serving the markets in which it operates. Through Policies and programs, Euroclear Bank provides a safe, inclusive and healthy environment where everyone has the opportunity to thrive.

All the people in Euroclear Bank's own workforce who can be materially impacted by Euroclear Bank are included in the scope of disclosure under ESRS 2. Please refer to General Disclosures p. 43 for details.

Euroclear Bank's own workforce consists of (i) employees, that have a direct contractual relationship with Euroclear Bank and (ii) non-employees, such as contractors and consultants, who are engaged indirectly through third parties. In addition, there is a limited number of other types of workers, who are not considered in the employee figures, such as interns, including summer students.

In the DMA, no material negative impacts on our own workforce were identified. However, risks related to employee wellbeing as a result of climate change were identified. There are three climate change related risks with possible negative impact on our own workforce:

- climate change
- physical climate risks
- long-term economic downturn.

There is also a potential long-term risk for Euroclear Bank not being able to attract or retain the right skills and talent to achieve its strategic objectives.

No material impacts on workers that may arise from transition plans for reducing negative impacts on the environment and achieving greener and climate-neutral operations have been identified.

Euroclear Bank creates a safe and inclusive environment for its workforce. These are mainly related to the wellbeing, Diversity, Equity and Inclusion, Community and Training and development programs. Euroclear Bank also ensures employee representation and continued alignment with legal requirements.

Please refer to General Disclosures, Policies, Actions, and Targets, p. 53-55 for actions related to these topics.

No material impacts on workers that may arise from transition plans for reducing the company's negative impacts on the environment and achieving greener and climate-neutral operations have been identified.

There are limited particular contexts or activities which could create a greater risk of harm for workers with particular characteristics. Such occasions would be identified through risk assessments or specific People and Communications processes. Almost all activities linked to hazardous activities are outsourced to suppliers as they require specific technical skills. A limited number of employees work at night.

Policies

There have been no changes versus last year, as this is the first reporting year. All Policies are aligned with internationally recognised standards. Euroclear Bank's Policies apply to Board members, employees and contractors. For more information on Policies please refer to Policies, Actions, and Targets on p. 52 in General Disclosures.

There is currently no policy in place to manage the three-climate change related IROs which could have a negative impact on employees over time. Euroclear Bank has not identified other material topics or IROs which have a significant impact on its workforce and would require additional Policies to manage these impacts.

Human rights and employee wellbeing Policies

Employee wellbeing is covered through the group-wide wellbeing program and also covered in the EB ESG Policy.

The 'Code of Ethics and Business Conduct' states that running Euroclear's business in an environmentally and socially responsible manner is critical to its business success. The EB ESG Policy also covers human rights stating in Principle 4.5A: 'Euroclear Bank must respect human rights as defined by international conventions, standards and norms.

For more details on Policies please refer to Policies, Actions, and Targets on p. 52 in General Disclosures.

Employee Policies (i.e. working regulations) are in place in each entity and location, detailing the rights and obligations of employees in accordance with applicable international and national laws in each location.

In Belgium, Euroclear Bank has social dialogue bodies in place. In addition, a EWC includes representatives from these and other European Euroclear entities. Euroclear Bank complies with the regulation on social dialogue in all locations and keeps minutes of meetings with its social partners.

Measures to address and remedy human rights impacts

Euroclear recognises human rights as defined by internationally recognised standards. These include, at a minimum, human rights as expressed within the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work and reflect the UN Guiding Principles on Business and Human Rights.

Euroclear Bank is committed to acting ethically and with integrity. Its governance framework and related corporate Policies such as the Code of Ethics and Business Conduct, EB ESG Policy, Speak-up Policy, and dedicated training on ethics, reflect this and empower employees to report and escalate any concerns of unethical conduct or conduct that infringes on human rights. Measures are in place to make sure the workforce can raise issues and claim protection in the event of a breach to human rights, such as the whistleblowing mechanism, discrimination claim processes and protection against harassment. Internal and external prevention services are in line with national employment laws.

Human rights violations (in Euroclear Bank's workforce) raised via the whistleblowing process are communicated to the People and Communications Division and investigated. If allegations are confirmed, remediation actions are taken. Please refer to Governance G1, p 113 for more information.

In 2024, we also ensured that ESG considerations are embedded into our mergers and acquisitions processes and that the human rights dimension (using independent indices) is taken into consideration when deciding to maintain or expand our geographical footprint.

Accident prevention and management impacts

Euroclear has a well-established workplace accident management process in place to effectively manage the reporting of workplace accidents to the insurers, in compliance with current legislation. The system is designed to ensure the safety of all employees and to promote a culture of prevention. Through this process, incidents can be quickly identified and their causes analysed. When necessary, corrective measures are put in place to prevent their recurrence. There is currently no accident prevention Policy.

Euroclear Bank complies with all its obligations with respect to prevention of accidents and the protection of its workforce. All necessary insurance is in place. In some countries, workplace accidents are covered by the social security systems. There is a Health and Safety management system in place that is designed to meet legal obligations and ensure a safe working environment for all employees.

Eliminating discrimination and promoting equal opportunities

Diversity, Equity and Inclusion is embedded in a number of Euroclear Policies such as the EB ESG Policy, The Code of Ethics and Business Conduct, Speak Up Policy and Remuneration Policy.

Most grounds for discrimination are explicitly covered in Euroclear Bank's Policies:

- EB ESG Policy: 'We recognise and support diversity across all dimensions, including gender, gender identity, disability (including physical and mental conditions), neurodiversity, ethnic and cultural heritage, socio-economic and educational background, age, and sexual orientation'.
- 'Code of Ethics and Business Conduct': 'Applying a zero-tolerance policy against discrimination based on gender, race, colour, ethnic or social origin, educational background, genetic features, religion or belief, property, birth, physical conditions, age, or sexual orientation'.
- For Euroclear Bank a 'Suitability Policy' sets out suitability standards for the Board, taking 'all aspects of diversity into account (educational and professional background, gender, age and geographical provenance as the case may be) when considering new appointments.'

The EB ESG Policy makes specific commitments towards people at risk of vulnerability in Euroclear Bank's workforce and also commits to targets in these areas.

For details on Policies please refer to p. 53-55 in General Disclosures.

Euroclear has a comprehensive Diversity, Equity and Inclusion strategy and action plan, which is currently being deployed across the group, with the aim of embedding DEI into all aspects of the company. Diversity, Equity and Inclusion Policy requirements are embedded through different means, such as training, inclusive hiring, audit of accessibility of the Euroclear buildings and a regular evaluation and adaptation of the management non-discrimination approach. There is also a process to track whether decisions impact men and women differently during the performance review process.

Euroclear Bank gains insight into perspectives of people in its workforce that may be particularly vulnerable through five dedicated Euroclear Employee Resource groups: the WoMen Empowering Academy, the Community on Ethnic and Cultural Inclusion, All-Abilities Included employees with neurodiversity, a disability or chronic illness and their caregivers), the Proud Network (LGBTQ+) and Age-ility (focusing on age discrimination). These networks create a safe space for colleagues to interact, raise awareness and act as a sounding board for management.

Engaging with the workforce and workers' representatives

Euroclear Bank engages with the employee representatives at European and local levels, in accordance with applicable legislations.

The European Works Council (EWC) is the European-based employee information and consultation entity for all matters concerning Euroclear, including the group's strategic economic, financial and social ambitions and major changes in direction.

The following subjects are addressed by the EWC (at group level, including Euroclear Bank topics):

- Major evolutions in the economic situation of the group,
- Services and investments
- Turnover and developments in the markets in which the group is present
- Exceptional circumstances with an impact on the employees' interests, in particular the closure of an establishment, a redundancy plan, a plan to transfer an activity, or a plan modifying the balance of the group's structure

The Belgian Works Council (BEWC), chaired by a Euroclear Bank Management Committee member, is the Belgian-based employee information and consultation entity for all matters concerning the Belgian entities. The BEWC:

- is informed on the economic and financial situation of the company;
- is informed on social and employment information;
- is consulted on work reorganisations, working conditions, employment, training and introduction of new technologies as well as new or changed company policies
- takes decisions on the introduction of changes to the Employment regulations, working schedules, performance of week-end work etc.

If a topic requires an information and consultation process, employee representatives are informed as soon as the Euroclear Bank Management has a clear intention to proceed. Frequency of engagement is dependent on the topic under discussion and on the forum.

Four EWC plenary sessions are held per year. In addition, five extraordinary EWC meetings for specific ad hoc topics were held in the course of 2024.

Twelve BEWC plenary sessions (one per month) are held per year. In addition, seven extraordinary BEWC meetings for specific ad hoc topics were held in the course of 2024.

The Chief People & Communications Officer together with the Head of People and Communications Legal & Social Relations are responsible for the engagement approach with Euroclear's workforce.

Euroclear Bank performed an effectiveness assessment of the BEWC in 2023, which led to an action plan to continue to improve ways of working.

In addition, Euroclear Bank engages with Belgian-based employee representatives on health, safety and well-being topics in the Committee for Prevention and Protection at Work (CPPW).

The CPPW is informed and consulted:

- on the annual company action plan with measures linked to health, safety and well-being;

- before any decision is taken on the application of health, safety and well-being matters, ergonomics, employees' protection against violence, moral and sexual harassment legislations;

Finally, Euroclear Bank also engages with Belgian-based employee representatives in the Union Delegation (UD) meetings.

The main scope of competence of the UD is:

- to negotiate company agreements with the Euroclear Bank Management;
- to ensure a correct application within the company of labour laws and regulations;
- to reconcile collective or individual conflicts between the employees and the employer.

Process to address staff concerns and remediate negative impacts

In line with the EB Anti-Fraud and EB Anti-Bribery and Corruption Implementing Procedures, Euroclear Bank's workforce can raise any concerns via the channels described on p 113 in section Governance G1.1. This will trigger an investigation either by People & Communications, if the case concerns cases of unfair treatment of staff, or by Compliance & Ethics if the case concerns fraud.

As stated in the 'Speak Up Policy', Euroclear Bank encourages all employees, senior management and third parties to raise and discuss acts, or potential acts, of misconduct with confidence and without fear of retaliation.

For details on actions related to own workforce material impacts please refer to p. 53-55 in General Disclosures.

Tracking and assessing actions and initiatives

Euroclear issues an annual Employee engagement survey (hosted by a third party to ensure anonymity and enable benchmarking), which covers a broad range of topics. The outcome is analysed within the teams and divisions and action plans set up to tackle any issues identified. Metrics and targets are tracked by Management.

In addition to the annual Employee engagement survey, standard processes, reporting and governance are in place with explicit coverage of people risk, such as a yearly Risk and control self-assessment and quarterly risk reporting.

Actions to mitigate risks, to manage impacts or to pursue opportunities are usually resourced through divisional resources and budget. In case specific actions require significant investments, these are reviewed and managed through Euroclear Bank's governance process.

Mitigating risks related to dependencies on own workforce

Strategic workforce planning provides a view on skills demand and supply, supporting the actions required in terms of skills development. There is a regular review to avoid the possible risk of not having the appropriate workforce to implement the corporate strategy. This is the only material impact with a dependency on Euroclear Bank's own workforce.

In 2024, a new inclusive leadership training for leaders at all levels and focusing on impact was created. This will be rolled out in 2025. Euroclear Bank has started to embed inclusion goals and KPIs in People and Communications processes, such as recruitment, talent attraction and development.

Actions related to employee wellbeing, talent and development and diversity, equity and inclusion all offer material opportunities for Euroclear Bank's workforce. Please refer to *Policies, Actions, and Targets* in General Disclosures p. 52 for more details.

Euroclear ensures, through risk assessments, that potential material negative impacts on its own workforce are identified upfront and can be mitigated.

Material topics and related impacts are managed by a Euroclear SA/NV Division head under the responsibility of the Euroclear Bank Management Committee in accordance with the inter-group outsourcing agreement.

Setting targets

For a description of the targets set to manage material impacts, risks and opportunities related to own workforce, please refer to Policies, Actions, and Targets in General Disclosures p. 52.

Targets for material topics have been defined by the accountable Business Owner, in collaboration with the CSO and have been approved by the Euroclear Bank Management Committee and Euroclear Bank Board. Some targets defined in the EB ESG Policy are in line with market standards or are externally certified, for example, SBTi. The workforce or workforce representatives were not directly involved in setting targets.

The yearly employee engagement survey invites employees to provide their personal views on a broad range of subjects, from strategy definition to all own workforce related material topics. The results of the employee engagement survey are part of Euroclear Bank's externally reported KPIs.

Each team is asked to review the outcome of the employee engagement survey and to propose actions for further improvement.

Characteristics of Euroclear Bank's employees

The following tables show the breakdown by gender, contract type, age, region and seniority, as well as information on leavers.

Data collection process and methodology

The reported numbers are compiled using a comprehensive data collection process that involves gathering all available employee and worker data as of 31/12/2024. The methodology includes:

- Data Sources: Employee data is sourced from internal HR systems.
- Data Verification: The collected data undergoes a verification process to ensure accuracy and completeness.
- Assumptions: It is assumed that the data from the entities included is representative of the overall employee population.

The reported numbers are based on the collection of all employee/worker data available on 31/12/2024 for locations in scope of the report.

Employee turnover: The data shows the headcount as it stood at the end of 2024.

'Leavers' includes voluntary and involuntary leavers who leave Euroclear Bank but excludes movers from one Euroclear entity to another.

For Turnover, voluntary and involuntary leavers are included and also natural (death and retirements).

Calculation

The results are calculated on a rollover 12-month period.

The definition of 'Employee turnover' used within Euroclear Bank is number of leavers out of the company (voluntary, involuntary and natural (death and retirement)) compared to the average of headcounts.

Headcount by Gender

Gender	Headcount
Male	1,159
Female	789
Total	**1,948**

Headcount by Region

Country/region	Headcount
Belgium	911
China	4
Germany	3
Hong Kong	189
Japan	19
Singapore	21
Poland	775

United Arab Emirates	8
United States	18
Total	**1,948**

Headcount by Gender and Contract Type

	Female	Male	Total
Permanent	786	1,157	1,943
Temporary	3	2	5
Non-guaranteed hours*	N/a	N/a	N/a
Total	**789**	**1,159**	**1,948**

*Euroclear Bank does not employ workers with non-guaranteed hours

Headcount by Age Group

Age group	Headcount	Percentage
Under 30 years old	473	24.28%
30 – 50 years old	1222	62.73%
Over 50 years old	253	12.99%
Total	**1948**	**100.00%**

Underrepresented gender at senior management level

Age group	Headcount	Percentage
Male	21	63.64%
Female	12	36.36%
Other		0.00%
Not reported		0.00%
Total	**33**	**100.00%**

Leavers (at 31 December 2024)

Total number of employees who have left the undertaking during the reporting period	88
Rate of employee turnover in the reporting period	4.50%

Remuneration

The level of fixed remuneration of employees is benchmarked on a regular basis within the Financial Services industry in each location. Pillar 3 annual reporting provides further details.

The gender pay gap, defined as the difference of average pay levels between female and male employees, expressed as a percentage of the average pay level of male employees is at -13% for Euroclear Bank. This gap can be explained by the fact that there are fewer women at senior levels in the company, something Euroclear Bank is addressing through its DEI strategy and action plans.

The total remuneration for the highest paid individual at Euroclear Bank is 19 times that of the Euroclear Bank median.

In line with EBA guidelines, the gender pay gap is calculated based on the annual salary of employees (full time salary, not the salary adjusted to reflect working regime) and not the hourly rate as stipulated by CSRD. A snapshot of the annual salary is taken in the month of May, when Euroclear Bank closes the annual performance and compensation cycle. The population considered for the calculation excludes:

- employees who have started working after September of the previous year.
- employees who retired before April of the current year; and
- employees with zero presence time over the past year.

Base salary, fixed fees remuneration, variable payments and benefits in kind are taken into consideration to calculate the remuneration ratio of the highest paid to the median.

Collective bargaining coverage and social dialogue

All employees in European Economic Area (EEA) locations are represented on the European Works Council (EWC) by an EWC representative. Euroclear engages with local employee representatives according to the applicable legislation of each country.

In Belgium, Euroclear Bank has a coverage rate for workplace representation, which is greater than 80%.

Additionally, Euroclear Bank has collective bargaining agreements in place in a number of EEA countries, as shown in below table

Coverage Rate	Employees - EEA	Employees - Non-EEA
0-19%	Germany*, Poland	China*, Hong Kong, Japan*, United States of America*, United Arab Emirates*, Singapore*,
20-39%		
40-59%		
60-79%		
80-100%	Belgium	
Collective Bargaining agreement ratio EEA countries	**53,94%**	0%
Collective Bargaining Agreement ratio all countries	**46,77%**	

* Countries with fewer than 50 employees, representing less than 10% of total workforce

Health and safety metrics

The table below is a summary of the key data points with regard to Health & Safety.

Euroclear Bank's Health & Safety management practices are designed to meet legal obligations and ensure a safe working environment for the workforce.

A methodology has been drafted for the data collection process for the Sustainability Statements of 2024 to guarantee that accurate and consistent data is shared across all Euroclear entities.

The result of all the inputs is summarised in the table below

	Euroclear Bank
The percentage of people who are covered by Euroclear Bank's health and safety management system based on legal requirements and/or recognised standards or guidelines *	96%
Fatalities as a result of work-related injuries and work-related ill health	0
The number of recordable work-related accidents	1
The rate of recordable work-related accidents **	0.33%

* Excluding offices with fewer than 50 employees

**based on standard working hours

Incidents, complaints and severe human rights impacts

Euroclear Bank keeps a record of incidents reported through the whistleblowing channels. No severe human rights issues or incidents connected to own workforce occurred during 2024. There were no material fines, penalties or compensation for damages as a result of violations regarding social and human rights factors in 2024.

Headcount by Region	
Incidents of discrimination*	9*
Complaints filed through channels for people in the undertaking’s own workforce to raise concerns	4
Complaints filed to National Contact Points for OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (IF APPLICABLE)	0
Total amount of material fines, penalties, and compensation for damages as a result of the incidents and complaints disclosed above, and a reconciliation of such monetary amounts disclosed with the most relevant amount presented in the financial statements.	€0
Severe human rights issues and incidents connected to own workforce that are cases of UN Guiding Principles on Business and Human Rights and OECD Guidelines for Multinational Enterprises on Responsible Business Conduct	0

Severe human rights issues and incidents connected to own workforce	0
Total amount of material fines, penalties, and compensation for severe human rights issues and incidents connected to own workforce	€0

* Based on the number of reported cases opened in 2024 with an allegation of discrimination. Comprises incidents subject to litigation and not subject to litigation (the latter also being included in the number of complaints filed through whistleblowing channels)

Please refer to p. 113 for details on the whistleblowing process.

G1 – Governance

Business conduct

Ensuring that all its interactions are based on ethical and responsible conduct is important for Euroclear Bank. Euroclear's Code of Ethics and Business Conduct sets out the ethical standards that are the basis for behaviour, actions and decision making and which are based on the corporate values. These ethical standards are integrated into day-to-day work and interactions with employees, contractors, consultants, suppliers, clients and regulators.

Euroclear Bank has one IRO in terms of business conduct: 'Robust business conduct frameworks contribute to a more resilient financial system'. To achieve this the *EB Conduct and Culture Risk Policy handbook* states that Euroclear Bank must assess its exposure to Conduct and Culture risk and document and review the assessment on a regular basis. They must implement preventive, detective and corrective controls to mitigate such risks. They must also continuously assess the adequacy and effectiveness of these controls and take any necessary corrective actions.

Identifying and investigating unlawful/unethical behaviour
Euroclear Bank must:

- Ensure that Conduct and Culture risks are appropriately monitored through Key Risk Indicators, allowing Euroclear Bank to track and monitor risk across the organisation.
- Put in place an internal process allowing Board members, staff and external third parties to report all actual and suspected misconduct cases through Management, Compliance & Ethics, People & Communication (P&C) or specific independent and autonomous channels, in accordance with the applicable laws and regulations.
- Have an internal process in place to assess suspected cases of misconduct and perform investigations if necessary.
- Report incidents identified via the internal control processes to the Compliance & Ethics department. There is an internal process in place to assess suspected cases of misconduct and perform investigations. Depending on the nature of the misconduct, Compliance & Ethics and/or P&C will conduct a preliminary assessment and investigate, if necessary. All investigations follow the principles described in the EB Anti-Fraud and EB Anti-Bribery and Corruption Implementing Procedures. Appropriate administrative or disciplinary action is applied, depending on the outcome of the investigation.

For each investigation an Investigation Oversight Body (IOB) is set up. Together with P&C and the business line, the IOB is accountable for all decisions related to the investigations including ensuring that consequence management is adequately followed up on by Senior management, and for the remediation plan.

As stated *in the EB Speak Up Policy Handbook*, Euroclear Bank encourages all employees, senior management and third parties to raise and discuss acts, or potential acts, of misconduct with confidence and without fear of retaliation.

Channels for reporting unlawful/unethical behaviour

The following channels are available for Board members, staff and external third parties to report all actual or suspected cases of misconduct:

- Internal contact points:
    - Line manager (Employees) or Euroclear point of contact (Contractors);
        - Compliance & Ethics
        - People & Communications
- Internal Hotline
- External Hotline
- Competent authorities, where applicable.

As stated in the *EB Speak up Policy handbook*, Euroclear Bank tolerates no acts or retaliation against whistleblowers. Anyone who retaliates against a person who has raised a concern in good faith may face disciplinary action. Follow up controls are in place to ensure that no one who raises a concern is retaliated against.

Communication and training

Euroclear Bank must ensure that expected conduct is clearly communicated to all Board members and staff.

There is a dedicated site on the Euroclear intranet containing all relevant information on how to report unlawful behaviour or behaviour in contradiction of the Code. Training sessions and communication campaigns are held regularly for all staff.

A training plan for Board members and staff covering the different business conduct topics (such as Conduct & Culture, Money Laundering, Bribery & Corruption, Fraud, Sanctions) is delivered on a yearly basis. Examples of training and communication towards staff are:

- Mandatory Bi-yearly Compliance & Ethics test (covering, amongst other topics, Business Conduct) for all employees and recommended for contractors.
- Internal awareness raising campaigns; and
- Ethics workshops for all people managers and members of specific committees

Dedicated training sessions were given to the following functions most at risk in respect of Corruption and Bribery: Senior management, functions advising Senior Management, functions dealing with government officials, service providers, clients and functions facilitating payments.

Corruption and bribery

Procedures

To ensure that allegations or incidents of bribery and corruption are prevented, detected and addressed to the extent possible, the *EB Anti-Fraud and EB Anti-Bribery and Corruption Implementing Procedures* set out the behaviours and processes that Euroclear Bank expects its people to adhere to. The risk of bribery and corruption is integrated under fraud risks, which are referred to in the following section. As such, the processes detailed include, among others, control activities to mitigate fraud risks, assessments of fraud risk, as well as of allegations or incidents of fraud and finally fraud investigations in case of sufficient grounds.

The main role of the IOB is to take all key decisions related to the fraud investigation including, but not limited to, the extent of the scope and the follow up by senior management on any sanctions. The Euroclear Bank Chief Compliance Officer (CCO) is in the driving seat for the IOB and decides the composition of the IOB (taking into consideration the characteristics and sensitivity of the case). If the alert creates a potential conflict of interest with the CCO or any member of their team, then the IOB defines an independent lead (generally the Euroclear Bank Chief Audit Officer). To ensure objectivity, Investigators or investigating committees are separate from the chain of management involved in the matter.

The Euroclear Bank CCO reports on a regular basis a comprehensive list of local Fraud investigations as well as the Fraud investigation activity (including analysis of occurrence and potential trends) to the Euroclear Bank Management Committee, the Euroclear Bank Audit Committee.

Communication and training

The relevant policies are made available to staff and contractors for consultation on the Euroclear intranet and are made publicly available, when relevant for external consultation. Please refer to the Policies table on p. 52 in General Disclosures

The *EB Anti-fraud Implementing Procedure* and the *EB Anti-bribery & Corruption Implementing Procedure* have been communicated to 100% of the Euroclear Bank Management Committee.

98.4% of Euroclear employees received an e-learning course on anti-bribery and corruption. The remaining 1.6% are key function holders who follow a different process.

Of those who were in the scope of the e-learning, 98.3% of employees and over 99.3% of employees in functions at risk of bribery and corruption completed it.

An awareness campaign communicated to all employees was carried out on receiving gifts and hospitalities. Lastly, all employees are requested to annually certify that they comply with the Anti-Bribery and Corruption policy and that they declared their gifts and hospitalities.

Incidents of corruption or bribery

Description	Value
Convictions for violation of anti-corruption and anti-bribery laws	0
Fines for violation of anti-corruption and anti-bribery laws	€ 0
Functions-at-risk that attended and completed training programmes	99.3%
Confirmed incidents of corruption or bribery	0

Confirmed incidents relating to contracts with business partners that were terminated or not renewed due to violations related to corruption or bribery	0
Confirmed incidents in which own workers were dismissed or disciplined for corruption or bribery-related incidents	0

Management of relationships with suppliers

Euroclear manages the relationship with its suppliers through an end-to end purchasing process, covered by different Policies which encompass:

- Procurement: business needs definitions, sourcing strategy, tendering, due diligence and contractual management
- Ordering and payment: purchase request, purchase order, invoicing and payment
- Supplier management: supplier registration, performance and risk monitoring

To best manage operational risk, and in compliance with regulatory requirements, Euroclear has established a comprehensive framework, robust governance, and a well-defined lifecycle to oversee the relationship with suppliers. Key suppliers are expected to manage and limit any negative impacts, ensuring their operations are sustainable as stated in our *EB ESG Policy and* group *Supplier Business code of Conduct.*

The group of key suppliers is composed of:

- Outsourcing Service Providers (OSP): playing a crucial role in performing functions that would typically be carried out by Euroclear as part of its regular business operations.
- Critical Service Providers (CSP): providing services deemed essential for maintaining the stability, security, and continuity of our business.
- Suppliers with a material spend: these are likely to contribute substantially to our indirect Environmental and Social impact and are more likely to represent a reputational risk in case they fail to manage and limit any negative impacts.

EB ESG Policy outlines a series of principles to promote sustainable and responsible business practices within the supply chain which cover:

- Supplier selection and management
- Measurement and reduction of supply chain GHG emissions
- Social and ethical responsibility of suppliers
- Supply chain transparency and disclosure

This approach addresses the material reputational risks associated with ESG performance and breaches from our key suppliers.

Euroclear Bank must incorporate social and environmental criteria into their key supplier selection and management, as established in Principle 3.4.4A of our *EB ESG Policy*. Suppliers go through a due diligence assessment, where their ESG risks are evaluated in line with our existing Enterprise Risk Management framework. In addition, key suppliers go through a recurrent risk review. ESG criteria are being progressively and proportionally embedded into the tendering phase, with the aim of highlighting the sustainable elements of our suppliers during the selection process. Most of our key suppliers go through a comprehensive ESG screening performed by a third-party entity, which provides Euroclear with their respective sustainability performance score card. Dialogue is established with key suppliers who are below the minimum desired target with the aim of monitoring their actions to reach at least the minimum level of performance.

Euroclear Bank has also started integrating ESG considerations into its Network Agent selection and management decisions.

Payment practices

No distinction is made for categories of suppliers. Unless otherwise stated in the Purchase Order, payment will be made within 60 days from the date of receipt of an invoice, provided the goods and/or services have been correctly delivered and accepted by Euroclear. The supplier has the right to charge Euroclear for late payment of any undisputed amounts at the then current rate of Euribor at 11.00 CET plus 2%, but in no event more than the highest rate allowed by applicable law, calculated from the day payment was due to the date of actual payment.

Payments aligned with the standard terms	91%
Average time to pay an invoice	22 days
Legal proceedings currently outstanding for late payments	0

Index of disclosure requirements

Listed in alphabetical order

Disclosure requirement	Description	In section	Page number
G1-1.10	Business conduct - Identifying and investigating unlawful/unethical behaviour	Governance	113
G1-2	Management of relationships with suppliers	Governance	115
G1-2.14	Management of relationships with suppliers	Governance	115
G1-2.15	Management of relationships with suppliers	Governance	115
G1-3.18.(a-c)	Corruption and bribery	Governance	114
G1-3.20	Communication and training	Governance	114
G1-3.21	Communication and training	Governance	114
G1-3.21.b	Table incidents of corruption or bribery	Governance	114
G1-4.24	Table incidents of corruption or bribery	Governance	114
G1-4.25	Table incidents of corruption or bribery	Governance	114
G1-6.33	Payment practices	Governance	116
S1-1.19	Policies	Social	103
S1-1.20	Policies	Social	103
S1-1.21	Measures to address and remedy human rights impacts	Social	104
S1-1.22	Measures to address and remedy human rights impacts	Social	104
S1-1.23	Accident prevention and management impacts	Social	104
S1-1.24	Eliminating discrimination and promoting equal opportunities	Social	104
S1-1.AR.10	Policies	Social	103
S1-2.27	Eliminating discrimination and promoting equal opportunities	Social	104
S1-2.28	Eliminating discrimination and promoting equal opportunities	Social	104
S1-3.32	Business conduct - Channels for reporting unlawful/unethical behaviour	Governance	113
S1-3.32.(a-e)	Business conduct - Channels for reporting unlawful/unethical behaviour	Governance	113
S1-3.33	Business conduct - Channels for reporting unlawful/unethical behaviour	Governance	113
S1-3.34	Business conduct - Channels for reporting unlawful/unethical behaviour	Governance	113
S1-4.37	Process to address staff concerns and remediate negative impacts	Social	106
S1-4.38.(a-b)	Process to address staff concerns and remediate negative impacts	Social	106
S1-4.38.(c-d)	Tracking and assessing actions and initiatives	Social	106
S1-4.39	Tracking and assessing actions and initiatives	Social	106
S1-4.40	Mitigating risks related to dependencies on own workforce	Social	106
S1-4.41	Mitigating risks related to dependencies on own workforce	Social	106
S1-4.43	Mitigating risks related to dependencies on own workforce	Social	106
S1-5.46	Setting targets	Social	107
S1-5.47	Setting targets	Social	107
S1-6.50	Characteristics of Euroclear Bank's employees	Social	108
S1-8.60	Table 'Collective bargaining Agreements'	Social	110
S1-6.50.b.iii	Table 'Headcount by contract type and gender'	Social	109
S1-8.63	Collective bargaining coverage and social dialogueTable 'Workplace representation'	Social	110
S1-9.66	Table 'Underrepresented gender at senior management level'	Social	109
S1-9.AR.71	Table 'Underrepresented gender at senior management level'	Social	109
S1-10.69	Remuneration	Social	110
S1-14.88	Health and safety metrics	Social	111
S1-16.95	Remuneration	Social	110
S1-16.97	Remuneration	Social	110
S1-16.97.c	Remuneration	Social	110
S1-17.103	Health and Safety metrics	Social	111
S1.17.104	Incidents, complaints and severe human rights impacts	Social	111
S1-ESRS-2.SBM-2.AR.4	Stakeholder engagement and Impacts on Euroclear's workforce	General disclosures / Social	66, 103, 105
S1-ESRS-2.SBM-3.13	Material Topics and Stakeholder Engagement and Impacts on Euroclear Bank's workforce	General disclosures / Social	47, 66, 105
S1-ESRS-2.SBM-3.14	Impacts on Euroclear Bank's workforce	Social	105
S1-ESRS-2.SBM-3.15	Impacts on Euroclear Bank's workforce	Social	105

Datapoints derived from other EU legislation
(Appendix B)

Disclosure Requirement and related datapoint	Applicability	Page reference number	Response	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)			Please refer to the Directors' Report, section 'Composition of the Board of Euroclear SA/NV in 2024'	Indicator n. 13 of Table #1 of Annex 1		Commission Delegated Regulation (CDR) (EU) 2020/1816, Annex II	
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)			Please refer to the Directors' Report, section 'Composition of the Board of Euroclear SA/NV in 2024'			Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2 GOV-4 Statement on due diligence paragraph 30		64		Indicator n. 10 Table #3 of Annex 1			
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i	Not applicable. Euroclear has no exposure to this sector			Indicators n. 4 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii	Not applicable. Euroclear has no exposure to this sector			Indicator n. 9 Table #2 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii	Not applicable. Euroclear has no exposure to this sector			Indicator n. 14 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1818 (29), Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv	Not applicable. Euroclear has no exposure to this sector					Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II	
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14		78					Regulation (EU) 2021-1119 Article 2 (1)
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)		81			Article 449a Capital Requirements Regulation – CRR; Template 1: Banking book - Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article12.1 (d) to (g), and Article 12.2	
ESRS E1-4 GHG emission reduction targets paragraph 34		83		Indicator n. 4 Table #2 of Annex 1		Delegated Regulation (EU) 2020/1818, Article 6	
ESRS E1-5 Energy consumption from non-renewable sources disaggregated by sources (only high climate impact sectors) paragraph 38	Not applicable. Euroclear has no exposure to high climate impact sectors	85		Indicator n. 5 Table #1 and Indicator n. 5 Table #2 of Annex 1			
ESRS E1-5 Energy consumption and mix paragraph 37		85		Indicator n. 5 Table #1 of Annex 1			
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	E1-5.40 is not applicable to Euroclear	87 and 92		Indicator n. 6 Table #1 of Annex 1			
ESRS E1-6 Gross Scope 1, 2, 3 and total GHG emissions paragraph 44		87		Indicators n. 1 and 2 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)	
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55		91		Indicators n. 3 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1818, Article 8(1)	
ESRS E1-7 GHG removals and carbon credits paragraph 56		101					Regulation (EU) 2021-1119 Article 2 (1)
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66			We are currently aggregating how best we wish to reflect this answer and we aim to begin reporting on this figure in the future.			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II	
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a) **ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c).**			We are currently aggregating how best we wish to reflect this answer and we aim to begin reporting on this figure in the future.		Article 449a CRR; Final draft ITS, paragraphs 46 and 47; Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk.		
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c)			We are currently aggregating how best we wish to reflect this answer and we aim to begin reporting on this figure in the future.		Article 449a CRR; Final draft ITS, paragraph 34;		

Disclosure Requirement and related datapoint	Applicability	Page reference number	Response	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference
					Template 2: Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral		
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities paragraph 69			We are currently aggregating how best we wish to reflect this answer and we aim to begin reporting on this figure in the future.			Delegated Regulation (EU) 2020/1818, Annex II	
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	Not applicable. This is not within the scope of Euroclear activities			Indicator number 8 Table #1 of Annex 1 Indicator number 2 Table #2 of Annex 1 Indicator number 1 Table #2 of Annex 1 Indicator number 3 Table #2 of Annex 1			
ESRS E3-1 Water and marine resources paragraph 9	Not applicable. Euroclear has no exposure to this sector			Indicator n. 7 Table #2 of Annex 1			
ESRS E3-1 Dedicated policy paragraph 13	Not applicable. Euroclear has no exposure to this sector			Indicator n. 8 Table 2 of Annex 1			
ESRS E3-1 Sustainable oceans and seas paragraph 14	Not applicable. Euroclear has no exposure to this sector			Indicator n. 12 Table #2 of Annex 1			
ESRS E3-4 Total water recycled and reused paragraph 28 (a)	Not applicable. Euroclear has no exposure to this sector			Indicator n. 6.2 Table #2 of Annex 1			
ESRS E3-4 Total water consumption in m^3 per net revenue on own operations paragraph 29	Not applicable. Euroclear has no exposure to this sector			Indicator n. 6.1 Table #2 of Annex 1			
ESRS 2-SBM3-E4 paragraph 16 (a)	Not applicable. Euroclear has no exposure to this sector			Indicator n. 7 Table #1 of Annex 1			
ESRS 2-SBM3-E4 paragraph 16 (b)	Not applicable. Euroclear has no exposure to this sector			Indicator n. 10 Table #2 of Annex 1			
ESRS 2-SBM3-E4 paragraph 16 (c)	Not applicable. Euroclear has no exposure to this sector			Indicator n.14 Table #2 of Annex 1			
ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24 (b)	Not applicable. Euroclear has no exposure to this sector			Indicator n. 11 Table #2 of Annex 1			
ESRS E4-2 Sustainable oceans / seas practices or policies paragraph 24 (c)	Not applicable. Euroclear has no exposure to this sector			Indicator n. 12 Table #2 of Annex 1			
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	Not applicable. Euroclear has no exposure to this sector			Indicator n. 15 Table #2 of Annex 1			
ESRS E5-5 Non-recycled waste paragraph 37 (d)	Not applicable. Euroclear has no exposure to this sector			Indicator n. 13 Table #2 of Annex 1			
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	Not applicable. Euroclear has no exposure to this sector			Indicator n. 9 Table #1 of Annex 1			
ESRS 2-SBM3-S1 Risk of incidents of forced labour paragraph 14 (f)	Not applicable to Euroclear			Indicator 13 Table #3 of Annex I			
ESRS 2-SBM3-S1 Risk of incidents of child labour paragraph 14 (g)	Not applicable to Euroclear			Indicator 12 Table #3 of Annex I			
ESRS S1-1 Human rights policy commitments paragraph 20		103		Indicator n. 9 Table #3 and Indicator n. 11 Table #1 of Annex I			
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21		104				Delegated Regulation (EU) 2020/1816, Annex II	
ESRS S1-1 Processes and measures for preventing trafficking in human beings paragraph 22		104	Additionally, please refer to our 'Modern Slavery and Human Trafficking Statement' on our website	Indicator n. 11 Table #3 of Annex I			

Disclosure Requirement and related datapoint	Applicability	Page reference number	Response	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference
ESRS S1-1 Workplace accident prevention policy or management system paragraph 24		111		Indicator n. 1 Table #3 of Annex I			
ESRS S1-3 Grievance/complaints handling mechanisms paragraph 32 (c)		113		Indicator n. 5 Table #3 of Annex I			
ESRS S1-14 Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)		111		Indicator n. 2 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II	
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)			We are currently aggregating how best we wish to reflect this answer and we aim to begin reporting on this figure in the future.	Indicator n. 3 Table #3 of Annex I			
ESRS S1-16 Unadjusted gender pay gap and weighted average gender pay gap paragraph 97 (a)		110		Indicator n. 12 Table #1 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II	
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)		110		Indicator n. 8 Table #3 of Annex I			
ESRS S1-17 Incidents of discrimination paragraph 103 (a)		111		Indicator n. 7 Table #3 of Annex I			
ESRS S1-17 Violations of UNGC principles and OECD paragraph 104 (a)		111		Indicator n. 10 Table #1 and Indicator n. 14 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)	
ESRS 2-SBM3-S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	Not applicable.		In Euroclear we require our Supplier to comply with the Euroclear Supplier Code of Conduct, where as a result we do not engage with suppliers exposed to the risk of child labour or forced labour.	Indicators n. 12 and n. 13 Table #3 of Annex I			
ESRS S2-1 Human rights policy commitments paragraph 17			The Supplier Code of Business Conduct states under the section 'social' that Euroclear supports the protection of human rights and is guided by fundamental principles such as those in the United Nations (UN) Universal Declaration of Human Rights and the International Labour Organisation (ILO) conventions. It also expect its suppliers to support to the following principles in their own business and supply chains: (1) Comply with all applicable labour, human and social rights laws, regulations and standards (2) Healthy, safe and secure work environment (3) Refusal of forced labour (4) refusal of child labour (5) Freedom of association and collective bargaining (6) Privacy and protection of personal information (7) Non-discrimination and harassment. In order to comply with the UK Modern Slavery Act 2015, Euroclear is required to publish a slavery and human trafficking statement setting out the steps taken to ensure there is no modern slavery in Euroclear's own business and in its supply chain. In this context, supply chain performs a yearly assessment on risky suppliers. Would there be any concerns highlighted during the risk assessment, it will be reported to Senior Management and it will trigger remedy for human rights impacts.	Indicator n. 9 Table #3 and Indicator n. 11 Table #1 of Annex 1			
ESRS S2-1 Policies related to value chain workers paragraph 18			There is a Supplier Code of Business Conduct stating that it expects its suppliers to support to the following principles in their own business and supply chains: (1) Comply with all applicable labour, human and social rights laws, regulations and standards (2) Healthy, safe and secure work environment (3) Refusal of forced labour (4) Refusal of child labour (5) Freedom of association and collective bargaining (6) Privacy and protection of personal information (7) Non-discrimination and harassment.	Indicator n. 11 and n. 4 Table #3 of Annex 1			
ESRS S2-1 Violations of UNGC principles and OECD guidelines paragraph 19			The Supplier Code of Business Conduct states that it is guided by fundamental principles such as those in the United Nations (UN) Universal Declaration of Human Rights and the International Labour Organisation (ILO) conventions. We are currently writing a Human Rights Statement that will be publicly available referring to Euroclear's adherence to the 'UN Guiding Principles on Business and Human Rights' and the 'OECD Guidelines for Multinational Enterprises' (it will be published in the coming weeks). However, there is currently no reference to any reporting upstream and downstream about violations in relations to the UN Global Compact Principles and the OECD Guidelines for Multinational Enterprises that involve workers in the value chain.	Indicator n. 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)	
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19			For key suppliers, Euroclear conducts a more prescriptive Supplier due diligence which addresses Euroclear group's ESG requirements and its adherence to the Code of Business Conduct, aiming for ethical and socially responsible actions and respect towards human and children's rights (including the prohibition of child labour), applicable principles on environmental protection, and appropriate working conditions.			Delegated Regulation (EU) 2020/1816, Annex II	
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36			Severe human rights issues and incidents connected to downstream value chain would be identified through the supplier due diligence and the monitoring on existing suppliers and would be reported in the sustainability report	Indicator n. 14 Table #3 of Annex 1			
ESRS S3-1 Human policy commitments paragraph 16	Not applicable. Euroclear has no exposure to this client group			Indicator n. 9 Table #3 of Annex 1 and Indicator n. 11 Table #1 of Annex 1			
ESRS S3-1 Violations of UNGC principles and OECD guidelines paragraph 17	Not applicable. Euroclear has no exposure to this client group			Indicator n. 10 Table #1 Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)	
ESRS S3-4 Human rights issues and incidents paragraph 36	Not applicable. Euroclear has no exposure to this client group			Indicator 14 Table #3 of Annex 1			
ESRS S4-1 Policies related to consumers and end-users paragraph 16	Not applicable. Euroclear has no exposure to this client group			Indicator n. 9 Table #3 and Indicator n. 11 Table #1 of Annex 1			
ESRS S4-1 Violations of UNGC principles and OECD guidelines paragraph 17	Not applicable. Euroclear has no exposure to this client			Indicator 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)	

Disclosure Requirement and related datapoint	Applicability	Page reference number	Response	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference
	group						
ESRS S4-4 Human rights issues and incidents paragraph 35	Not applicable. Euroclear has no exposure to this client group			Indicator n. 14 Table #3 of Annex 1			
ESRS G1-1 United Nations Convention against corruption paragraph 10 (b)		113		Indicator n. 15 Table #3 of Annex 1			
ESRS G1-1 Protection of whistleblowers paragraph 10 (d)		113		Indicator n. 6 Table #3 of Annex 1			
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws paragraph 24 (a)		114		Indicator n. 17 Table #3 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II)	
ESRS G1-4 Standards of anticorruption and anti-bribery paragraph 24 (b)		113		Indicator 16 Table #3 of Annex 1			

Financial statements

Euroclear Bank Board and Committees – composition

Members	Euroclear Bank Board	Audit Committee	Risk Committee	Remuneration Committee	Management Committee	Nominations & Governance Committee
Robert Peirce (Chairman) Independent Non-Executive Director	•	•		•		
Victoria Cochrane Independent Non-Executive Director	•	• (chair)	•			
Mike Martin Independent Non-Executive Director	•		• (chair)			•
Carl Tilkin-Franssens Independent Non-Executive Director	•	•		• (chair)		• (chair)
Anne Swaelus Non-Executive Director	•	•				•
Bernard Frenay Non-Executive Director	•		•	•		
Didier Boonen Executive Director	•				•	
Marie-Anne Haegeman Executive Director	•				•	
Szandra Nagyné-Komocsi Executive Director	•				•	
Stéphane Bernard Executive Director	•				•	
Peter Sneyers Executive Director CEO Euroclear Bank	•				• (chair)	
Andrew Butcher Non-Executive Director, ESA Risk Committee Chairman			• (observer)			

Notice about additional auditing or adjusting mission

The managing board declares that no assignment neither regarding auditing nor adjusting has been given to a person who was not authorised by law, pursuant to art. 34 and 37 of the Law of 22nd April 1999 concerning the auditing and tax professions.

The annual accounts have not been audited or adjusted by an external accountant or auditor who is not a statutory auditor.
If YES, mention here after: name, first names, profession, residence-address of each external accountant or auditor, the number of membership with the professional Institute ad hoc and the nature of this engagement.

A. Bookkeeping of the undertaking **
B. Preparing the annual accounts **
C. Auditing the annual accounts and/or
D. Adjusting the annual accounts.

If the assignment mentioned either under A. or B. is performed by authorised accountants or authorised accountants-tax consultants, information will be given on: name, first names, profession and residence-address of each authorised accountant or accountant-tax consultant, his number of membership with the Professional Institute of Accountants and Tax consultants and the nature of this engagement.

Name, first name, profession, residence-address	Number of membership	Nature of the engagement (A, B,C and/or D)

(*) Delete where appropriate.

(**) Optional mention.

Balance sheet

As at 31 December 2024

(€'000)	Notes	2024	2023
ASSETS			
I. Cash in hand, balances with central banks and post offices		-	-
II. Government securities eligible for refinancing at the central bank		**11,739,920**	**9,518,276**
III. Amounts receivable from credit institutions	I	**189,037,570**	**143,604,293**
A. On demand		142,156,097	107,794,226
B. Other amounts receivable (at fixed term or period of notice)		46,881,473	35,810,067
IV. Amounts receivable from customers	II	**6,643,007**	**3,827,642**
V. Bonds and other fixed-income securities	III	**3,804,339**	**3,983,107**
A. Of public issuers		2,056,588	2,268,387
B. Of other issuers		1,747,751	1,714,720
VI. Corporate shares and other variable-income securities	IV	-	-
VII. Financial fixed assets	V, VI	**9,439**	**9,186**
B. Participating interests in other associated enterprises		-	-
C. Other shares or stakes constituting financial fixed assets		9,439	9,186
D. Subordinated loans with affiliated enterprises and with other associated enterprises		-	-
VIII. Formation expenses and intangible fixed assets	VII	**98,255**	**80,859**
IX. Tangible fixed assets	VIII	**3,132**	**4,047**
X. Own shares		-	-
XI. Other assets	IX	**31,157**	**40,732**
XII. Deferred charges and accrued income	X	**455,982**	**499,124**
Total assets		**211,822,801**	**161,567,266**

The accompanying Notes form part of these financial statements.

Balance sheet (continued)

As at 31 December 2024

(€'000)	Notes	2024	2023
LIABILITIES			
THIRD-PARTY FUNDS			
I. Amounts payable to credit institutions	XI	**180,227,190**	**135,766,002**
A. On demand		180,128,534	135,633,236
B. Resulting from refinancing by rediscounting of trade bills		-	-
C. Other amounts payable at fixed term or period of notice		98,656	132,766
II. Amounts payable to customers	XII	**17,043,947**	**14,464,531**
A. Savings deposits		-	-
B. Other amounts payable		17,043,947	14,464,531
1. On demand		16,528,663	13,954,065
2. At fixed term or period of notice		515,284	510,466
3. Resulting from refinancing by rediscounting of trade bills		-	-
III. Debt securities in issue	XIII	**3,140,223**	**3,678,763**
A. Bills and bonds in circulation		-	-
B. Other		3,140,223	3,678,763
IV. Other amounts payable	XIV	**3,099,001**	**997,786**
V. Accrued charges and deferred income	XV	**655,542**	**310,936**
VI. A. Provisions for risks and charges		**24,352**	**14,387**
1. Pensions and similar obligations		7,556	12,664
2. Fiscal charges		-	-
3. Other risks and charges	XVI	16,796	1,723
B. Deferred taxes		-	-
VII. Fund for general banking risks		-	-
VIII. Subordinated liabilities	XVII	**299,152**	**299,067**
Shareholders' equity		**7,333,394**	**6,035,794**
IX. Capital	XVIII	**285,497**	**285,497**
A. Called up share capital		285,497	285,497
B. Uncalled capital		-	-
X. Share premium account		**558,008**	**558,008**
XI. Revaluation reserve		-	-
XII. Reserves		**94,048**	**94,048**
A. Legal reserve		28,550	28,550
B. Non available reserve		-	-
1. For own shares		-	-
2. Others		-	-
C. Untaxed reserve		-	-
D. Available reserve		65,498	65,498
XIII. Profit (loss (-)) carried forward		**6,395,841**	**5,098,241**
Total liabilities		**211,822,801**	**161,567,266**

The accompanying Notes form part of these financial statements.

Balance sheet (continued)

As at 31 December 2024

(€'000)	Notes	2024	2023
OFF-BALANCE SHEET ITEMS			
I. Contingent liabilities	XXII	**5,208,654**	**6,137,715**
A. Unnegotiated acceptances		-	-
B. Guarantees in the nature of credit substitutes		5,208,654	6,137,715
C. Other guarantees		-	-
D. Documentary credits		-	-
E. Assets pledged by secured guarantees on behalf of third parties		-	-
II. Commitments which can give rise to a credit risk	XXII	**6,708,253**	**4,914,900**
A. Firm commitments to make funds available		6,708,253	4,914,900
B. Commitments in respect of spot purchases of transferable securities or other assets		-	-
C. Available margin under confirmed credit lines		-	-
D. Commitments to underwrite and place securities		-	-
E. Repurchase commitments resulting from imperfect repurchase agreements		-	-
III. Assets entrusted to the institution		**19,998,234,660**	**18,427,906,240**
A. Assets held on an organised trusteeship basis		-	-
B. Assets in safe custody and under similar arrangements		19,998,234,660	18,427,906,240
IV. To be paid upon corporate shares and units		**-**	**-**

Under the terms of the Euroclear Securities Lending and Borrowing Program, Euroclear Bank provides a guarantee to securities lenders whereby if a securities borrower is unable to return the securities, Euroclear Bank guarantees the lender to receive replacement securities or their cash equivalent. Euroclear Bank also provides a guarantee to the GCA lenders, should the GCA borrowers fail to return lent Securities. This guarantee is provided on a net basis (difference between the market value of the unreturned Loan Securities and the market value of the Collateral Securities relating to the unreturned Loan Securities).

As of 31 December 2024, assets in safe custody (heading III.B. above) include securities for a market value of 89,707,669,000 €-equivalent blocked pursuant to applicable International sanctions measures (2023: 131,636,363,000 €-equivalent) of which 77,621,919,000 €-equivalent related to Russian sanctions (2023: 121,168,812,000 €-equivalent).

In addition to the amounts presented above, Euroclear Bank holds amounts on restricted C- and I-accounts. As a consequence of the international financial sanctions imposed on Russia, various Russian countermeasures were issued, introducing special procedures regarding the repayment of debt by the Russian state and Russian debtors to non-Russian creditors. In application of these measures, National Settlement Depository (NSD), the Russian CSD, opened new types of restricted accounts (C- and I-accounts) in the name of Euroclear Bank where all amounts received from Russian issuers are blocked. For the clients of Euroclear Bank, the main consequence is that the funds are paid on these accounts in RUB and blocked in accordance with the countermeasures. These accounts do not meet the definition of financial assets, and are accordingly not recorded on balance sheet. The amounts held on the restricted C- and I-accounts have significantly decreased and amount to respectively to RUB 41.9 billion (0.4 billion €-equivalent) and RUB 9.7 billion (0.1 billion €-equivalent) at year end, compared to RUB 262 billion (2.6 billion €-equivalent) and RUB 19 billion (0.2 billion €-equivalent) last year.

Between April and September 2024, Euroclear Bank's C-account has been seized or debited on several occasions following Russian decrees for an amount of approximately 2.8 billion €-equivalent for the benefit of NSD's sanctioned clients. These clients are consequently no longer entitled to the balance blocked in Euroclear Bank and these balances could potentially serve to compensate the affected clients if the competent authorities provide the authorisation to release these amounts. NSD I-accounts have decreased as NSD has paid out some of the underlying to bondholders outside of Euroclear Bank in RUB.

The EU has introduced in December a loss recovery and no liability clause to its Russian sanctions regime now allowing the competent authority of a Member State to authorise the release of cash balances frozen by a CSD and attributable to the National Settlement Depository (NSD) under certain conditions. Essentially, this new clause allows the Belgian Ministry of Finance to authorise Euroclear Bank to debit NSD's account with the amounts that have been taken from Euroclear Bank's accounts with NSD following Russian court decisions or in application of Russian countermeasures, so that Euroclear Bank can compensate its Participants. Euroclear Bank will only be able to pay out the compensation amounts once the Belgian Ministry of Finance has provided its authorisation.

The accompanying Notes form part of these financial statements.

Profit and loss statement

As at 31 December 2024

(€'000)	Notes	2024	2023
INCOME STATEMENT			
(list form)			
I. Interest and similar income	XXIII	**8,443,195**	**5,916,150**
Of which : from fixed-income securities		619,063	342,410
II. Interest and similar charges (-)		**(4,426,152)**	**(426,665)**
III. Income from variable-income securities	XXIII	**299**	**278**
A. Corporate shares and other variable-income securities		-	-
B. Participating interests in affiliated enterprises		-	-
C. Participating interests in associated enterprises		-	-
D. Other shares or stakes representing financial fixed assets		299	278
IV. Commissions received	XXIII	**1,639,653**	**1,618,722**
A. Brokerage and similar commissions		523,133	566,551
B. Management, advisory and safekeeping services		803,676	779,383
C. Other commissions received		312,844	272,788
V. Commissions paid		**(506,818)**	**(532,948)**
VI. Profit from (loss on) financial operations	XXIII	**(11,491)**	**16,948**
A. Foreign exchange transactions and transactions in securities and other financial instruments		(11,491)	16,948
B. Sale of investment securities and similar operations		-	-
VII. General administrative expenses		**(913,615)**	**(829,984)**
A. Wages and salaries, social charges and pensions		(176,578)	(164,902)
B. Other administrative expenses		(737,037)	(665,082)
VIII. Depreciation and amounts written off (-) on formation expenses and intangible and tangible fixed assets		**(12,946)**	**(4,975)**
IX. Write-back of amounts written off (amounts written off (-)) on amounts receivable and write-back provisions (provision (-))for headings "I. Contingent liabilities" and "II. Commitments which can give rise to a credit risk" in the off-balance sheet section		**(28)**	**(296)**
X. Write-back of amounts written off (amounts written off(-))on the investment portfolio of bonds, shares and other fixed-income or variable-income securities		**-**	**-**
XI. Uses and write-back of provisions for risks and charges other than those referred to in heading "I. Contingent liabilities"and "II. Commitments which can give rise to a credit risk" in the off-balance sheet section		**7,496**	**1,398**
XII. Provisions for risks and charges other than those covered in headings "I. Contingent liabilities" and "II. Commitments which can give rise to a credit risk" in the off-balance sheet section (-)		**(15,067)**	**-**
XIII. Transfers from (Appropriation to) the fund for general banking risks		**-**	**-**
XIV. Other operating income	XXIII	**33,944**	**36,501**
XV. Other operating charges (-)	XXIII	**(56,718)**	**(67,012)**
XVI. Current profit (loss) before taxes		**4,181,752**	**5,728,117**

The accompanying Notes form part of these financial statements.

Profit and loss statement (continued)

As at 31 December 2024

(€'000)	Notes	2024	2023
INCOME STATEMENT (CONTINUED)			
(list form)			
XVII. Exceptional income		**8**	**224**
A. Write-back of depreciation and amounts written off on intangible and tangible fixed assets		-	-
B. Write-back of amounts written off on financial fixed assets		-	-
C. Write-back of provisions for exceptional risks and charges		-	-
D. Capital gains on disposal of fixed assets		8	224
E. Other exceptional income	XXV	-	-
XVIII. Exceptional charges		**(307)**	**-**
A. Exceptional depreciation on and amounts written off on formation expenses, intangible and tangible fixed assets		(14)	-
B. Amounts written off on financial fixed assets		(293)	-
C. Provisions for extraordinary risks and charges		-	-
D. Capital losses on disposal of fixed assets		-	-
XIX. Profit (Loss (-)) for the year before taxes		**4,181,453**	**5,728,341**
XIX. Bis. Deferred taxes		**-**	**-**
A. Transfers to deferred taxes (-)		-	-
B. Transfers from deferred taxes		-	-
XX. Taxes on profit	XXVI	**(2,045,853)**	**(1,450,051)**
A. Taxes (-)		(2,045,865)	(1,450,077)
B. Adjustment of income taxes and write-back of tax provisions		12	26
XXI. Profit (Loss (-)) for the year		**2,135,600**	**4,278,290**
XXII. Transfers to the non taxable reserve (-)		-	-
XXIII. Profit (loss (-)) for the year to be appropriated		**2,135,600**	**4,278,290**

The accompanying Notes form part of these financial statements.

Appropriation and transfer

As at 31 December 2024

(€'000)	2024	2023
APPROPRIATION AND TRANSFER		
A. Profit (loss (-)) to be appropriated	**7,233,841**	**5,942,843**
1. Profit (loss (-)) of the year to be appropriated	2,135,600	4,278,290
2. Carried forward profit (loss (-)) of previous financial years	5,098,241	1,664,553
B. Transfer from shareholder's equity	-	-
1. From capital and share premium	-	-
2. From reserves	-	-
C. Appropriation to shareholder's equity (-)	-	-
1. To the capital and to the share premium	-	-
2. To the legal reserve	-	-
3. To the other reserves	-	-
D. Profit (loss) to be carried forward (+)/(-)	**6,395,841**	**5,098,241**
E. Shareholders' intervention in the loss	-	-
F. Profit to be distributed	**838,000**	**844,602**
1. Shareholders (a)	838,000	844,602
2. Directors (a)	-	-
3. Other beneficiaries (a)	-	-

(a) Solely in Belgian limited companies

A total dividend of €11,830 per share will be distributed in respect of the financial year ending 31 December 2024. This amounts to €838,000,000 of shareholders’ equity, of which €200,000,000 (or €2,823 per share) was already paid as an interim dividend in December 2024. The remaining €638,000,000 (or €9,006 per share) will be paid to shareholders in 2025.

The accompanying notes form part of the financial statements.

Notes

I.Statement of amounts receivable from credit institutions

As at 31 December 2024

(€'000)	2024	2023
(heading III of the assets)		
A. For the heading as a whole	**189,037,570**	**143,604,293**
1. Amount receivable from affiliated enterprises	-	-
2. Amount receivable from other enterprises linked by participating interests	-	-
3. Subordinated amounts receivable	-	-
In terms of nature, the following additional analysis is relevant		
- Surplus funds with banks	187,012,831	141,353,316
- Loans to banks	2,024,739	2,250,977
	189,037,570	143,604,293
B. Other amounts receivable (with a term or period of notice) from credit institutions	**46,881,473**	**35,810,067**
(heading III B. of the assets)		
1. Bills eligible for refinancing at the central bank of the country or countries of establishment of the credit institution	-	-
2. Breakdown according to remaining term to maturity		
- Up to 3 months	46,881,473	35,810,067
- Over 3 months and up to one year	-	-
- Over one year and up to 5 years	-	-
- Over 5 years	-	-
- Undated	-	-

II.Statement of amounts receivable from customers

(Heading IV of balance sheet assets)

As at 31 December 2024

(€'000)	2024	2023
1. Amounts receivable from affiliated enterprises	**4**	**176**
2. Amounts receivable from other enterprises linked by participating interests	-	-
3. Subordinated amounts receivable	-	-
4. Bills eligible for refinancing at the central bank of the country or countries of establishment of the credit institution	-	-
5. Breakdown of amounts receivable according to remaining term to maturity		
a. Up to 3 months	6,643,007	3,827,642
c. Over one year and up to 5 years	-	-
d. Over 5 years	-	-
e. Undated	-	-
6. Breakdown according to the nature of the debtors		
a. On public authorities	1,708	260
b. On individuals	-	-
c. On corporates	6,641,299	3,827,382
7. Breakdown by type		
a. Commercial paper	-	-
b. Leasing loans	-	-
c. Consumer loans	-	-
d. Real estate loans	-	-
e. Other loans superior to 1 year	-	-
f. Other	6,643,007	3,827,642
8. Geographical breakdown (a)		
a. Belgium	24,141	22,223
b. Foreign countries	6,618,866	3,805,419
9. Analytical data related to real estate loans with reconstitution of capital at the bank		
a. Initial capital granted	-	-
b. Reconstitution fund and mathematical reserve linked to the loans	-	-
c. Net position (a-b)	-	-

(a) Geographical breakdown is done according to the beneficiaries of the credits.

III.Statement of bonds and other fixed-income securities

(Heading V of balances sheet assets)

As at 31 December 2024

(€'000)	2024	2023
A. GENERAL	**3,804,339**	**3,983,107**
1. Bonds and other securities issued by affiliated enterprises	-	-
2. Bonds and other securities issued by other enterprises linked by participating interests	-	-
3. Bonds and securities representing subordinated loans	-	-
4. Geographical breakdown of the following headings		
a. Belgian public issuers	201,232	203,858
b. Foreign public issuers	1,855,357	2,064,529
c. Belgian other issuers	1,156,857	1,107,526
d. Foreign other issuers	590,893	607,194
5. Quotations		
a. Book value listed securities	3,804,339	3,983,107
b. Market value listed securities	3,723,799	3,869,233
c. Book value unlisted securities	-	-
6. Quotations and durations		
a. Residual term up to one year	1,341,910	1,037,121
b. Residual term over one year	2,462,429	2,945,986
7. Breakdown according to whether the securities are part of :		
a. Trading portfolio	-	-
b. Investment portfolio	3,804,339	3,983,107
8. For the trading portfolio		
a. Positive difference between the market value and the acquisition value for bonds and securities to be valued at their market value	-	-
b. Positive difference between the market value and the book value for bonds and securities valued in accordance with Article 35 ter §2 (2)	-	-
9. For the investment portfolio		
a. Positive difference in respect of all securities with a redemption value higher than their book value	27,653	36,246
b. Negative difference in respect of all securities with a redemption value lower than their book value	29,042	40,680

III.Statement of bonds and other fixed-income securities (continued)

(Heading V of balance sheet assets)

As at 31 December 2024

(€'000)	2024	2023
B. DETAILS OF THE BOOK VALUE OF THE INVESTMENT PORTFOLIO		
1. Acquisition value at the end of the previous financial year	**3,983,107**	**5,792,096**
2. Changes during the financial year		
a. Acquisitions	4,055,010	4,336,614
b. Redemptions and disposals	(4,264,022)	(6,164,328)
c. Adjustments made in accordance with Article 35 ter §4 and 5 (+/-)	30,244	18,725
3. Acquisition value at the end of the financial year	**3,804,339**	**3,983,107**
4. Transfers between portfolios		
a. From the investment portfolio to the trading portfolio (-)	-	-
b. From the trading portfolio to the investment portfolio (+)	-	-
c. Impacts of these transfers on the result	-	-
5. Write-offs at the end of the previous financial year	**-**	**-**
6. Changes during the financial year		
a. Charged	-	-
b. Reserved because of surplus (-)	-	-
c. Cancelled (-)	-	-
d. Transferred from one heading to another (-)	-	-
7. Write-offs at the end of the financial year	**-**	**-**
8. Book value at the end of the financial year	**3,804,339**	**3,983,107**

IV.Statement of corporate shares and other variable-income securities

(Heading VI of balance sheet assets)

As at 31 December 2024

(€'000)	2024	2023
1. Geographical breakdown of the securities		
a. Belgian issuers	-	-
b. Foreign issuers	-	-
2. Quotations		
a. Book value listed securities	-	-
b. Market value listed securities	-	-
c. Unlisted securities	-	-
3. Shares and securities belonging to the		
a. Trading portfolio	-	-
b. Investment portfolio	-	-
4. For the trading portfolio		
a. Positive difference between the acquisition value and the market value for securities valued at their market value	-	-
b. Positive difference between the market value, when higher, and the book value for securities valued in accordance with Article 35 ter § 2 (2)	-	-

IV.Statement of corporate shares and other variable-income securities (continued)

(Heading VI of balance sheet assets)
As at 31 December 2024

(€'000)	2024	2023
B. Details of the book value of the investment portfolio		
1. Acquisition value at the end of the previous financial year	-	-
2. Changes during the financial year	-	-
a. Acquisitions	-	-
b. Cancelled (-)	-	-
c. Other changes	-	-
3. Acquisition value at the end of the financial year	-	-
4. Transfers between portfolios		
a. From the investment portfolio to the trading portfolio (-)	-	-
b. From the trading portfolio to the investment portfolio (+)	-	-
c. Impact of these transfers on the result	-	-
5. Write-offs at the end of the previous financial year	-	-
6. Changes during the financial year	-	-
a. Charged	-	-
b. Reversed because of surplus (-)	-	-
c. Cancelled (-)	-	-
d. Transferred from one heading to another (+/-)	-	-
7. Write-offs at the end of the financial year	-	-
8. Book value at the end of the financial year	-	-

V.Statement of financial fixed assets

(Heading VII of balance sheet assets)

As at 31 December 2024

(€'000)	2024 Credit institutions	2024 Other	2023 Credit institutions	2023 Other
A. Breakdown of the headings VII A, B, C, D of the assets				
1. Economic sector of				
b. Participation in other enterprises linked by participating interests	-	-	-	-
c. Other financial assets	-	9,439	-	9,186
d. Subordinated loans with affiliated enterprises and with other associated enterprises	-	-	-	-

(€'000)	2024 Quoted	2024 Not quoted	2023 Quoted	2023 Not quoted
2. Quotation				
b. Participation in other enterprises linked by participating interests	-	-	-	-
c. Other financial fixed assets	-	9,439	-	9,186
d. Subordinated loans with affiliated enterprises and with other associated enterprises	-	-	-	-

V.Statement of financial fixed assets (continued)

(Heading VII of balance sheet assets)

As at 31 December 2024

(€'000)	Enterprises Affiliated	Enterprises Associated	Other
B. Details on the book value at the end of the financial year (VII A, B and C of the assets)			
1. Acquisition value at the end of the previous financial year	**-**	**-**	**9,186**
2. Changes during the financial year	**-**	**-**	**253**
a. Acquisitions	-	-	256
b. Sales	-	-	(3)
c. Transfers from one heading to another (+/-)	-	-	-
3. Acquisition value at the end of the financial year	-	-	**9,439**
4. Revaluation at the end of the previous financial year	-	-	-
5. Changes during the financial year	-	-	-
a. Charged	-	-	-
b. Acquired from third parties	-	-	-
c. Cancelled (-)	-	-	-
d. Transferred from one heading to another(+/-)	-	-	-
6. Revaluation at the end of the financial year	-	-	-
7. Write-offs at the end of the previous financial year	-	-	-
8. Changes during the financial year	-	-	-
a. Charged	-	-	-
b. Revered because of surplus (-)	-	-	-
c. Acquired from third parties	-	-	-
d. Cancelled (-)	-	-	-
e. Transfers from one heading to another (+/-)	-	-	-
9. Write-offs at the end of the financial year	-	-	-
10. Net book value at the end of the financial year	**-**	**-**	**9,439**

V.Statement of financial fixed assets (continued)

(Heading VII of balance sheet assets)

As at 31 December 2024

(€'000)	Affiliated enterprises	Associated enterprises
C. Details of the subordinated loans		
1. Net book value at the end of the previous financial year	-	-
2. Changes during the financial year	-	-
a. Additions	-	-
b. Repayments (-)	-	-
c. Write-off (-)	-	-
d. Write-off taken back	-	-
e. Exchange differences (+/-)	-	-
f. Other change(+/-)	-	-
3. Net book value at the end of the financial year	-	-
4. Cumulated provisions at the end of the financial year	-	-

VI.Information on financial participations

As at 31 December 2024

A. Participating interests and other rights in other enterprises

Mentioned hereafter are the enterprises in which the credit institution holds a participation as mentioned in the Royal Decree of 23 September 1992, as well as the other enterprises in which the credit institution holds social rights representing at least 10% of the subscribed equity.

Name, address, VAT or Nat. Id nr	Shareholder's stake				Data from the last available financial statements			
	Directly			Through subsidiaries				
	Type of shares	Number	%	%	Financial statements of	Currency	Equity	Net result

VI.Information on financial participations (continued)

As at 31 December 2024

B. Enterprises to which the company is unlimitedly liable either as a qualified partner or member
The annual accounts of each of the enterprises to which the company is unlimitedly liable will be added to the present accounts and published jointly. Departure from that requirement will be mentioned in the second column referring to the appropriate code (A, B, C or D) as defined hereafter.

The annual accounts of the enterprise:

A.will be published through a deposition in the National Bank of Belgium;
B.will be published effectively in another member state of the EC pursuant to art.16 of the directive 2017/1132;
C.will be fully or proportionally consolidated in the consolidated annual accounts of the company which is prepared, audited and published pursuant to the provision of the Code of companies and associations related to the consolidated annual accounts;
D.concern a company of the common law.

	Name and complete address of the headquarter and for the Belgian enterprises, mention of the VAT number or the national number	Possible code (a)
Code	05	10

VII.Statement of formation expenses and intangible fixed assets

(Heading VIII of balance sheet assets)

As at 31 December 2024

(€'000)	2024	2023
A. Detail of the formation expenses		
1. Net book value at the end of the previous financial year	-	-
2. Changes during the financial year	-	-
a. New expenses incurred	-	-
b. Depreciation	-	-
c. Other changes	-	-
3. Net book value at the end of the financial year	-	-
4. Including		
a. Formation and capital - increased expenses or issuing expenses for loans and other start-up expenses	-	-
b. Reorganisation expenses	-	-

(€'000)	Goodwill	Other intangible fixed assets	Commissions for the operations of art 27 Bis
B. Intangible fixed assets			
1. Acquisition value at the end of the previous financial year	-	124,067	-
2. Changes during the financial year	-	28,799	-
a. Acquisitions including production of fixed assets	-	21,538	-
b. Transfers and disposals (-)	-	-	-
c. Transfers from one heading to another(-)	-	7,261	-
3. Acquisition value at the end of the financial year	-	152,866	-
4. Depreciation and amounts written off at the end of the previous financial year	-	43,208	-
5. Changes during the financial year	-	11,403	-
a. Charged	-	11,403	-
b. Reversed because of surplus (-)	-	-	-
c. Acquired from third parties	-	-	-
d. Cancelled (-)	-	-	-
6. Depreciation and amounts written off at the end of the financial year	-	54,611	-
7. Net book value at the end of the financial year	-	98,255	-

VIII.Statement of tangible fixed assets

(Heading IX of balance sheet assets)

As at 31 December 2024

(€'000)	Land and buildings	Installations, machines and tools	Furniture, fixtures and vehicles	Leasing and similar rights	Other tangible fixed assets	Fixed assets under constructionand advance payments
1. Acquisition value at the end of the previous financial year	-	5,492	1,411	-	6,210	-
2. Changes during the financial year	-	(348)	54	-	348	-
a. Acquisitions including own production of fixed assets	-	440	76	-	348	-
b. Transfers and disposals (-)	-	(788)	(22)	-	-	-
c. Transfers from one heading to another (+/-)	-	-	-	-	-	-
3. Acquisition value at the end of the financial year	-	5,144	1,465	-	6,558	-
4. Revaluations at the end of the previous financial year	-	-	-	-	-	-
5. Changes during the financial year	-	-	-	-	-	-
a. Recorded	-	-	-	-	-	-
b. Acquired from third parties	-	-	-	-	-	-
c. Cancelled (-)	-	-	-	-	-	-
d. Transferred from one heading to another (+/-)	-	-	-	-	-	-
6. Revaluations at the end of the financial year	-	-	-	-	-	-
7. Depreciation and amounts written-off at the end of the previous financial year	-	4,035	744	-	4,286	-
8. Changes during the financial year	-	(63)	162	-	871	-
a. Charged	-	726	181	-	955	-
b. Reversed because of surplus (-)	-	-	-	-	-	-
c. Acquired from third parties	-	-	-	-	-	-
d. Cancelled (-)	-	(789)	(19)	-	(83)	-
9. Depreciation and amounts written-off at the end of the financial year	-	3,972	906	-	5,157	-
10. Net book value at the end of the financial year	-	1,172	559	-	1,401	-

IX.Other assets

(Heading XI of balance sheet assets)

As at 31 December 2024

(€'000)	2024	2023
Breakdown of this caption if it represents an important amount		
a. Taxes to recover	24,148	22,307
b. Guarantee deposits	5,642	5,345
c. Tax assets	6	-
d. Miscellaneous	1,361	13,080
	31,157	**40,732**

X.Deferred charges and accrued income

(Heading XII of balance sheet assets)

As at 31 December 2024

(€'000)	2024	2023
1. Deferred charges	8,135	6,158
2. Accrued income	447,847	492,966
	455,982	**499,124**

X.bis Re-use of funds of segregated customers

(Heading XII of balance sheet assets)

As at 31 December 2024

(€'000)	2024	2023
1. Total	-	-

XI.Amounts payable to credit institutions

(Heading I of balance sheet liabilities)

As at 31 December 2024

(€'000)	2024	2023
1. Amounts payable to affiliated enterprises	**-**	**-**
2. Amounts payable to other enterprises linked by participating interests	**-**	**-**
3. Breakdown of the amounts payable other than at sight according to their residual term (heading I.B and C of the liabilities)		
a. Up to three months maximum	98,656	130,051
b. Over three months and up to one year maximum	-	2,715
c. Over one year and up to five years maximum	-	-
d. Over five years	-	-
e. Undated	-	-
	98,656	**132,766**

XII.Amounts payable to customers

(Heading II of balance sheet liabilities)

As at 31 December 2024

(€'000)	2024	2023
1. Amounts payable to affiliated enterprises	**509,521**	**519,030**
2. Amounts payable to other enterprises linked by participating interests	**-**	**-**
3. Breakdown by residual term		
a. At sight	16,528,664	13,954,066
b. Up to 3 months maximum	16,555	7,046
c. Over 3 months and up to one year maximum	-	5,000
d. Over one year and up to 5 years maximum	199,719	199,580
e. Over 5 years	299,009	298,839
f. Undated	-	-
4. Breakdown of the debts according to the nature of the debtors		
a. Debts on public authorities	17,199	59,493
b. Debts on individuals	-	-
c. Debts on corporates	17,026,748	14,405,038
5. Geographical breakdown of the amounts payable to		
a. Belgium	625,218	608,106
b. Foreign countries	16,418,729	13,856,425
	17,043,947	**14,464,531**

Amounts payable to credit institutions and customers (headings I and II of balance sheet liabilities) include an amount 181,639,000,000 €-equivalent (2023: 135,734,800,000 €-equivalent) of deposits blocked pursuant to applicable international sanctions measures of which 174,021,000,000 €-equivalent related to Russian sanctions and 7,617,000,000 €-equivalent related to Libyan sanctions.

In 2018, the following convertible loans were granted by Euroclear Investments SA to Euroclear Bank in order to strengthen its recovery profile:
• a senior non-preferred loan issued in 2018 for €200 million (maturing in 2026);
• a senior non-preferred loan issued in 2018 for €300 million (maturing in 2030);
Following the dissolution of the Euroclear Investments SA in 2024, the notes are now held by Euroclear Holding SA/NV.

XIII.Debt securities in issue

(Heading III of balance sheet liabilities)

As at 31 December 2024

(€'000)	2024	2023
1. Amounts payable which, to the knowledge of the credit institution, constitute amounts payable to affiliated enterprises	**-**	**-**
2. Amounts payable which, to the knowledge of the credit institution, constitute amounts payable to other enterprises linked by participating interests	**-**	**-**
3. Breakdown according to the residual term		
a. Up to 3 months maximum	1,293,018	1,277,975
b. Over 3 months and up to one year maximum	772,528	863,015
c. Over one year and up to 5 years maximum	1,074,677	1,537,773
d. Over 5 years	-	-
e. Undated	-	-
	3,140,223	**3,678,763**

Euroclear Bank issues Medium Term Notes and Certificates of Deposits.

XIV.Other amounts payable

(Heading IV of balance sheet liabilities)

As at 31 December 2024

(€'000)	2024	2023
1. Fiscal and social debts towards the fiscal administration	**301,823**	**75,542**
a. Overdue	-	-
b. Not overdue	301,823	75,542
2. Fiscal and social debts towards the social security authorities	**4,954**	**6,026**
a. Overdue	-	-
b. Not overdue	4,954	6,026
3. Taxes	**301,823**	**75,542**
a. Payable	66,880	15,629
b. Estimated	234,943	59,913
4. Other debts		
Breakdown of this caption if it represents an important amount		
Dividend	638,000	844,602
Payroll (other than social security)	34,997	30,277
Other payable	61,633	41,339
Windfall contribution	2,057,594	-

XV.Accrued charges and deferred income

(Heading V of balance sheet liabilities)

As at 31 December 2024

(€'000)	2024	2023
1. Accrued charges	654,324	309,837
2. Deferred income	1,218	1,099
	655,542	**310,936**

XVI.Provisions for other liabilities and charges

(Heading VI.A.3 of balance sheet liabilities)

As at 31 December 2024

(€'000)	2024	2023
Breakdown of this heading if it represents an important amount		
Provisions for onerous lease contracts	-	-
Provisions for dilapidation costs	957	951
HR-related provisions	15,839	772
	16,796	**1,723**

Provisions for voluntary early retirement and retirement incentive plans amounting to €15,005,000 were established at the end of 2024. These provisions will be adjusted once the amount and timing of the payments are determined. A 5% increase or decrease in the success rate of the plans would result in an estimated financial impact of €1,200,000.

XVII.Statement of subordinated liabilities

(Heading VIII of balance sheet liabilities)

As at 31 December 2024

(€'000)	2024	2023
1. Debts to affiliated enterprises	-	-
2. Debts to other enterprises linked by participating interest	299,152	299,067
3. Charges in respect of subordinated debts	10,006	9,961

4. Details of subordinated debt are as follows:

N° Ref.	**Currency**	**Amount**	**Maturity date**	**A) Circumstances for early redemption** **B) Conditions for subordination** **C) Conditions for convertibility**
1	EUR	200,000	30/03/2033	A) At early redemption date (30/03/2028) the issuer has the option to redeem in whole the outstanding amount of the Note, with a notice period of 15 days. Early redemption is allowed for tax deductibility and capital disqualification events. B) Payment after all preferred and non-preferred creditors, equally with other subordinated obligations, before shareholders and holders of other obligations or instruments of the Issuer that rank or are expressed to rank junior to the Note. C) Permanent write-off at Common Equity Tier 1 trigger of €1,175 million. Write-off amount corresponds to the lower of (i) the amount necessary to restore the level of the Issuer's Common Equity Tier 1 capital to €1,175 million and (ii) the Outstanding Principal Amount.
2	EUR	100,000	30/03/2033	A) At early redemption date (30/03/2028) the issuer has the option to redeem in whole the outstanding amount of the Note, with a notice period of 15 days. Early redemption is allowed for tax deductibility and capital disqualification events. B) Payment after all preferred and non-preferred creditors, equally with other subordinated obligations, before shareholders and holders of other obligations or instruments of the Issuer that rank or are expressed to rank junior to the Note. C) Permanent write-off at Common Equity Tier 1 trigger of €1,275 million. Write-off amount corresponds to the lower of (i) the amount necessary to restore the level of the Issuer's Common Equity Tier 1 capital to €1,275 million and (ii) the Outstanding Principal Amount.

XVIII.Statement of capital and shareholding structure

As at 31 December 2024

A. Statement of capital

	Amounts (€'000)	Number of shares
1. Capital		
a. Subscribed capital		
(heading IX. A. of the liabilities)		
- At the end of the last financial year	285,497	70,838
- Subscribed capital changes throughout the exercise	-	-
- At the end of the financial year	285,497	70,838
b. Structure of capital		
- Categories of shares		
* Ordinary shares	285,497	70,838
* Registered or dematerialised shares		
* Registered	xxxxxxxxxxxxxx	70,838
* Dematerialised	xxxxxxxxxxxxxx	-

	Uncalled capital	Called up capital, unpaid
2. Called up but unpaid capital		
a. Uncalled capital	-	-
b. Called capital, unpaid	-	-
c. Shareholders still owing capital payment	-	-

	Capital amount held	Corresponding number of shares
3. Own shares held		
a. By the credit institution	-	-
b. By its subsidiaries	-	-
4. Share issuance commitment		
a. Following the exercise of conversion rights		
- Amount of convertible loans outstanding	-	-
- Amount of capital to be subscribed	-	-
- Corresponding maximum number of shares to issue	-	-
b. Following the exercise of subscription rights		
- Number of subscription rights outstanding	-	-
- Capital amount to be subscribed	-	-
- Corresponding maximum number of shares to issue	-	-
5. Non-subscribed authorised capital	500,000	-

XVIII.Statement of capital and shareholding structure(continued)

	2024	2023
6. Shares not representing capital		
a. Breakdown		
* Number of stakes	-	-
* Number of voting rights attached	-	-
b. Breakdown by shareholder		
* Held by the credit institution	-	-
* Held by its subsidiaries	-	-

B. Structure of the institution's shareholding structure at the closing date of its accounts, as it results from the declarations received by the institution

The shares of Eurolear Bank are all held by Euroclear SA/NV, with the exception of one share that is held by Euroclear Holding SA/NV, the ultimate parent company.

XIX.Breakdown of total assets and total liabilities in euros and foreign currencies

As at 31 December 2024

(€'000)	2024
1. Total assets	
a. In euros	141,979,423
b. In foreign currencies (euro equivalent)	69,843,378
2. Total liabilities	
a. In euros	133,959,535
b. In foreign currencies (euro equivalent)	77,863,266

XX.Trustee operations referred to in Article 27ter, § 1 paragraph 3

As at 31 December 2024

(€'000)	2024
Concerned headings of the assets and liabilities	
....	
....	
....	
....	

XXI.Statement of guaranteed liabilities and commitments

As at 31 December 2024

Secured guarantees provided or irrevocably promised by the credit institution on its own assets

(€'000)	Mortgages (a)	Pledging of goodwill (b)	Pledges on other assets (c)	Guarantees established on future assets (d)
1. As security for liabilities and commitments of the credit institution				
a. Headings of the liabilities				
b. Off-balance sheet headings				
- Guarantee with the National Bank of Belgium	-	-	1,698,120	-
- Guarantee with other central banks	-	-	359,576	-
- Guarantee with credit intitutions	-	-	25,000	-
2. As security for liabilities and commitments of third parties				
a. Headings of the liabilities				
b. Off-balance sheet headings	-	-	-	-

(a): Amount registered or book value of the real estate encumbered if the latter is lower
(b): Amount registered
(c): Book value of the assets pledged
(d): Amount of the assets in question

An amount of investment securities of €1,698,120,000 (2023: €3,549,108,000) resulting from the reverse repo activity have been deposited with the National Bank of Belgium as potential collateral for TARGET2-related exposures.

Other investments securities for an amount of €359,576,000 (2023: €630,953,000) have been deposited with the Bank of England as potential collateral for the settlement of our operations on the UK market.

XXII.Statement of the contingent liabilities and of commitments which can give rise to a credit risk

(Heading I and II of the off-balance sheet)

As at 31 December 2024

(€'000)	2024	2023
1. Total of contingent liabilities on account of affiliated enterprises	-	-
2. Total of contingent liabilities on account of other enterprises linked by participating interests	-	-
3. Total of the commitments to affiliated enterprises	-	-
4. Total of the commitments to other enterprises linked by participating interests	-	-

XXIII.Operating results

(Headings I through XV of the profit and loss accounts)

As at 31 December 2024

	2024		2023	
(€'000)	Belgian entities	Entities abroad	Belgian entities	Entities abroad
1. Breakdown of operating income according to origin				
a. Interests and similar income	8,443,191	4	5,916,146	4
b. Income from variable-income securities				
- Corporate shares and other variable-income securities	-	-	-	-
- Participation in affiliated enterprises	-	-	-	-
- Participation in other enterprises linked by participating interests	-	-	-	-
- Participating interests and shares representing financial fixed assets	299	-	278	-
c. Commissions received	1,639,653	-	1,618,722	-
d. Profit from financial operations				
- From exchange transactions and transactions in securities and other financial instruments	(12,093)	602	17,007	(59)
- From sale of investment securities	-	-	-	-
e. Other operating income	33,036	908	35,356	1,145

XXIII.Operating results (continued)

(Headings I through XV of the profit and loss accounts)

As at 31 December 2024

(€'000)	2024	2023
2. Workers registered		
a. Total number of workers at the end of the financial year	1,941	1,972
b. Average number registered as full-time equivalent	1,917	1,911
- Management	363	335
- Employees	1,554	1,576
- Manual workers	-	-
- Other	-	-
c. Number of hours worked	3,124,988	3,027,846
3. Social charges		
a. Wages and direct social advantages	131,704	123,788
b. Social insurance paid by the employer	26,260	24,174
c. Employer premiums for extra legal insurance	3,136	2,823
d. Other	7,845	7,248
e. Pensions	7,633	6,869
	176,578	**164,902**
4. Provisions for pensions		
a. Additions (+)	-	308
b. Write-backs (-)	(7,496)	-
	(7,496)	**308**
5. Other operating income		
a. Breakdown of the heading XIV if they represent an important amount		
....		
....		
....		
6. Other operating charges		
(heading XV of the profit and loss account)		
a. Taxes	19,187	16,937
b. Other operating charges	37,531	50,075
c. Breakdown of the other operating charges if they represent an important amount		
- Royalties	14,402	28,297
- Other operating charges	23,129	21,778
	56,718	**67,012**
7. Revenues linked to affiliated enterprises	30,788	27,439
8. Expenses linked to affiliated enterprises	785,338	726,754

The total number of employees based on the CSRD required methodology, is based on the employee headcount and includes self-employed employees. This leads to a difference versus the total number of employees reported in the Financial Statements.

XXIV.Forward off balance sheet operations in securities, foreign currencies and other financial instruments that do not constitute commitments creating a credit risk as defined in section II of the off balance sheet

As at 31 December 2024

(€'000)	Amount at 31 December 2024	Of which transactions do not constitute hedging transactions
A. Types of operations		
1. On transferable securities		
a. Forward purchases and sales of transferable securities and negotiable instruments	-	-
2. On currencies (a)		
a. Forward exchange operations	12,974,747	-
b. Interest-rate and currency swaps	-	-
c. Currency futures	-	-
d. Currency options	-	-
e. Forward exchange rate contracts	-	-
3. On other financial instruments		
a. On interests (b)		
- Interest-rate swaps	4,741,548	-
- Interest-rate futures	-	-
- Forward interest-rate contracts	-	-
- Interest-rate options	-	-
b. Other forward purchases and sales (c)		
- Other option contracts	-	-
- Other futures operations	-	-
- Other forward purchases and sales	-	-
	17,716,295	-

(a) Amounts to be delivered

(b) Nominal/notional reference amount

(c) Agreed buying/selling price

XXIV.Forward off balance sheet operations in securities, foreign currencies and other financial instruments that do not constitute commitments creating a credit risk as defined in section II of the off balance sheet (continued)

As at 31 December 2024

B. Estimation of the impact on the results of the derogation to the valuation rule defined under Article 36 BIS, § 2, granted by the Belgian Banking and Finance Commission, concerning interest-rates derivatives

(€'000)	Amount at closing date (a)	Difference between market value and book value (b)
B. Type of interest-rate derivative		
1. For the purposes of treasury management	-	-
2. For the purposes of asset and liability management	-	-
3. Without effect on risk reduction	-	-

(a) Notional amount
(b) Positive fair value (Negative fair value)

XXV.Exceptional results

(Heading XVII.E and XVIII.E of the profit and loss accounts)

As at 31 December 2024

(€'000)	2024	2023
1. Realised gain on disposal of fixed assets to affiliated enterprises	-	-
2. Realised loss on disposals of fixed assets to affiliated enterprises	-	-
4. Other exceptional incomes - Breakdown of the heading if it represents an important amount		
4. Other exceptional charges - Breakdown of the heading if it represents an important amount		

XXVI.Income taxes

(Heading XX of the profit and loss accounts)

As at 31 December 2024

(€'000)	2024	2023
1. Income tax for the year	**2,045,565**	**1,449,554**
a. Taxes or withholding taxes paid or due	1,810,622	1,389,641
b. Taxes or withholding taxes receivable booked as an asset	-	-
c. Additional estimated tax (brought to heading IV. B. of the liabilities) as fiscal debts	234,943	59,913
2. Income taxes on previous financial years	**288**	**497**
a. Additional taxes or withholding taxes	288	497
b. Additional estimated taxes (brought to the heading IV of the liabilities) or provisioned (brought to heading VI A.2. of the liabilities)	-	-
	2,045,853	**1,450,051**
3. Sources of the differences between accounting profit and tax profit With particular mention of those related to timing differences		
- Non-deductible expenses	4,021,725	3,700
- Taxable provisions	(7,254)	57,792
- RDT	(299)	(278)
- Non tax deductible pension costs	(5,087)	67
4. Impact on the extraordinary results of the taxes on the result of the year		
....		
....		
5. Sources of deferred taxes (where those indications are important for the valuation of the credit institution)		
a. Deferred tax assets		
- Cumulated tax losses, future deductible taxed benefits	-	-
- Other deffered tax assets	-	-
b. Deferred tax liabilities	-	-
- Breakdown of deffered tax liabilities	-	-
....		

XXVII.Other taxes and taxes at the charges of third parties

As at 31 December 2024

(€'000)	2024	2023
1. VAT charged and special taxes		
a. To the credit institution (deductible)	232,587	204,368
b. By the credit institution	11,206	10,778
2. Taxes withheld		
a. Personal income tax withheld	23,898	22,291
b. Withholding tax on financial revenue	-	-

XXVIII.Off-balance sheet rights and commitments and transactions with related parties

As at 31 December 2024

(€'000)	2024	2023
A. Off-blance sheet rights and commitments		
1. Major commitments for the acquisition of fixed assets		
....		
....		
....		
2. Major commitments for the sale of fixed assets		
....		
....		
....		
3. Important legal proceedings and other important commitments		
....		
....		
4. If necessary, brief description of the commitments relating to the supplementary retirement benefit plan for the benefit of employees and directors		
5. Retirement benefits which are the responsibility of the credit institution		
- Estimated amount of engagement for the credit institution for services already carried out	113,098	100,613
- Method of this estimation		
6. Nature and business purpose of off-balance sheet operations	44,461	73,095
To the extent that the risks and advantages related to those operations are significant and that the disclosure of those risks and rewards is necessary for the correct assessment of the financial situation of the institution	1,830	3,050
The commitment of Euroclear Bank towards Euroclear SA/NV as of 31 December 2024 amounts to €44,461,200 and corresponds to the development costs related to infrastructure and innovation projects currently under development or already launched that Euroclear SA/NV, as owner, will charge out in future years. The amount of €1,830,000 is a right to receive from other group entities and relates to the Easyway infrastructure.		
....		

XXVIII.Off-balance sheet rights and commitments and transactions with related parties (continued)

As at 31 December 2024

	2024
B. Transactions with related parties not carried out at arm's length	-
Disclosure of such transactions to the extent that they are significant, including their amount, the nature of the links with the related party, as well as any other information on the transactions which would be necessary for a better understanding of the financial situation of the institution	
....	
C. Nature and financial impact of significant subsequent events at the balance sheet date that are not included in the income statement or in the balance sheet.	-
Euroclear Bank continues to closely monitor the invasion of Ukraine by Russia, and to implement the various sanctions. In line with its role of financial market infrastructure (FMI), Euroclear Bank is carefully managing the various aspects resulting from this situation in cooperation with the competent authorities. The Company continues to act prudently and to strengthen its capital by retaining the remainder of the Russian sanction related profits as a buffer against current and future risks. Euroclear Bank is focused on minimising potential legal, financial, and operational risks that may arise for itself and its clients, while complying with its obligations.	
Future earnings linked to the sanctions and the level of the windfall contribution will continue to depend on the prevailing interest rate environment and the evolution of the sanctions. Gradual rate cuts have already led to a gradual decline in interest income related to the Central Bank of Russia's assets in 2024 with the outlook for future interest earnings likely to continue to decline though dependent on future policymaking decisions.	
Various parties in Russia contest the consequences of the application of sanctions, with a significant number of legal proceedings ongoing, almost exclusively in Russian courts. The impact of the lawsuits on Euroclear is uncertain. Euroclear Bank is defending against all relevant legal claims and intends to continue to do so against any further claims.	
An United Nation (UN) resolution was voted in January 2025 with regards to the Libyan assets held at Euroclear Bank for underlying clients under UN sanctions. This UN resolution aims to enable LIA to preserve the value of the frozen assets by enabling investment decisions on frozen cash balances. Although the resolution is not readily actionable and its implementation may take some time, it is expected to impact the future earnings.	

XXIX.Financial relationships with

As at 31 December 2024

(€'000)	2024	2023
A. Directors and managers, individuals or corporate bodies who control the credit institution directly or indirectly, but who are not affiliated enterprises or other enterprises controlled directly or indirectly by those persons		
1. Amounts receivable from them		
a. Main conditions concerning amounts receivable	-	-
b. Amounts that may haven been reimbursed or waived	-	-
2. Amount of guarantees given on their behalf		
a. Main conditions concerning guarantees given on their behalf	-	-
3. Other significant commitments undertaken in their favour		
a. Main conditions concerning other commitments	-	-
4. The amount of direct and indirect remuneration and pensions included in the income statement, as long as this disclosure does not concern exclusively or mainly the situation of a single identifiable person		
a. To directors and managers	5,339	3,778
b. To past directors and past managers	-	-

(€'000)	2024	2023
B. The auditor(s) and person(s) to whom he (they) is (are) linked		
1. Audit fees	512	515
2. Non-statutory audit services		
a. Other assurance services	332	86
b. Tax services	-	-
c. Other services	-	-
3. Non-statutory audit services performed by individuals related to the statutory auditor		
a. Other assurance services	207	199
b. Tax services	-	-
c. Other services	-	-
	1,051	**800**

4. Disclosure in application article 3:64, §2 et §4 of the Code of Companies and Associations

Euroclear Bank ensures that the independence of the external auditor is preserved through a specific policy adopted by the board and agreed to by Deloitte. This policy adheres to the highest standards of independence. The engagement of the external auditor for non-core services is subject to specific controls, supervised by the Audit Committee.

XXX.Positions in financial instruments

As at 31 December 2024

(€'000)	2024	2023
1. Financial instruments to be received by the institution on behalf of customers	-	-
2. Financial instruments to be delivered by the institution to customers	-	-
3. Financial instruments deposited by customers by the institution	15,729,651,015	14,497,891,383
4. Financial instruments from customers deposited by the institution	19,998,234,661	18,427,906,240
5. Financial instruments from customers received in guarantee by the institution	4,268,583,646	3,930,014,857
6. Financial instruments from customers given in guarantee by the institution	-	-

XXXI.Information country by country

As at 31 December 2024

Information to be completed for the institutions referred to in Article 4 Section 1, 3 of the Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on the prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012 except those who are publishing consolidated accounts in accordance with the Royal Decree of 23 September 1992 on the consolidated accounts of credit institutions, investment firms and management companies of undertakings for collective investment.

DENOMINATION of the branch, subsidiary or joint subsidiary NATURE of activities COUNTRY	2024				
	Number of full-time employees	Revenues	Profit (loss) before tax (1)	Income taxes	Public subsidies received
Euroclear Bank Credit institution BE	964	10,070,876	4,267,866	(2,038,408)	358
Euroclear Bank's Hong Kong branch Operational support HK	185	660	(22,789)	(233)	-
Euroclear Bank's Polish branch Operational support PL	773	16	(59,397)	(6,962)	-
Euroclear Bank's Japan branch Operational support JP	19	104	(4,227)	(250)	-

(1) Figures are presented after intercompany eliminations, i.e. before the recharge of operating expenses to Head Office

XXXII.Derivative financial instruments not estimated at fair value

As at 31 December 2024

Estimate of the fair value for each category of derivative financial instruments which are not evaluated on the basis of its economic value stating the volume and nature of the instruments concerned

				2024		2023	
Category of derivative financial instruments	**Risk covered**	**Speculation/coverage**	**Volume**	**Book value**	**Fair value**	**Book value**	**Fair value**
Forward foreign exchange	Forex	Coverage	12,974,747	-	(44,661)	-	8,618
Interest rate derivatives	Interest	Coverage	4,741,548		48,955		12,968

	Book value	**Fair value**
FINANCIAL FIXED ASSETS THAT ARE CAPITALIZED AT AN AMOUNT OVER THE FAIR VALUE		
Amounts of assets adequately taken separately or grouped		
Reasons for which the book value is not reduced		
Elements that allow to suppose that the book value will be covered		

XXXIII.Note related to associated companies as defined in Article 1:20 of the Code of companies and associates

As at 31 December 2024

	2024
1. Financial Assets	
a. Participations	-
b. Subordinated loans	-
c. Other receivables	-
2. Other receivables	
a. More than one year	-
b. Up to one year	-
3. Debts	
a. More than one year	-
b. Up to one year	-
4. Personal and real guarantees constituted or irrevocably promised	
a. as security for debts or commitments to associated companies	-
b. as security for debts or commitments of the institution	-
5. Other significant financial liabilities	-

Statement relative to the consolidated accounts

As at 31 December 2024

Declaration related to consolidated accounts

A. Information to be completed by all the credit institutions

~~The credit institution establishes and publishes consolidated accounts and a consolidated management report*~~
The credit institution does not establish consolidated accounts or a management report for one of the following reasons*:

- the credit institution does not control, solely or jointly, one or more subsidiaries under Belgian or foreign law*
- ~~the credit institution, however, submitted to the Royal Decree of 23 September 1992, is exempted to establish consolidated accounts and a consolidated management report because the credit institution is a subsidiary of a mother company that establishes and publishes consolidated accounts (Article 4 of the Royal Decree of 23 September 1992).*~~
  - ~~justification of the respect of the provisions set out Article 4:~~
  - ~~name, complete address of the headquarter company and, if it concerns a Belgian legal entity, the VAT number or the national number of the mother company that establishes and publishes the consolidated accounts in the name of which the exemption is authorised :~~

B. Information to be completed by the credit institution of a subsidiary or a joint subsidiary

Name, complete address of the headquarter and, if it concerns a Belgian legal entity, the VAT number or the national number of the mother company and mention if this mother company establishes and publishes consolidated accounts in which the credit institution accounts are integrated by the consolidation**:

Ultimate parent	Immediate parent
Euroclear Holding SA/NV	Euroclear SA/NV
1 Boulevard du Roi Albert II	1 Boulevard du Roi Albert II
1210 Brussels	1210 Brussels
Belgium	Belgium
BE 700.808.073	BE 423.747.369

~~If the mother company is under foreign law, place where the above-mentioned consolidated accounts can be obtained**:~~

* Delete where not appropriate.

** Where the accounts of the enterprise are consolidated at different levels, the information should be given for the consolidated aggregate at the highest level on the one hand and the lowest level on the other hand of which the enterprise is a subsidiary and for which consolidated are prepared and published.

Social report

As at 31 December 2024

Numbers of joint industrial committees which are competent for the enterprise: 310

I. Statement of the persons employed

A. Number of employed persons for whom a DIMONA declaration has been introduced by the company or who are recorded in the general personnel register during the financial period

	Total	1. Men	2. Women
1. During the financial year			
a. Average number of staff			
- Full-time	782	369	412
- Part-time	139	23	116
- Total full-time equivalents (FTE)	887	387	500
b. Effective hours worked			
- Full-time	1,132,134	550,787	581,347
- Part-time	142,980	24,714	118,266
- Total	1,275,116	575,502	699,614
c. Personnel expenses (€'000)			
- Full-time	84,254	42,963	41,291
- Part-time	10,942	1,938	9,003
- Total	95,196	44,901	50,294
d. Benefits in addition to wages (€'000)	1,053	471	583

	P. Total	1P. Men	2P. Women
2. During the previous financial year			
a. Average number of staff	857	369	488
b. Effective hours worked	1,233,008	559,597	673,411
c. Personnel expenses (€'000)	87,540	40,935	46,605
d. Benefits in addition to wages (€'000)	1,021	459	562

In accordance with the applicable regulations, please note that the population reflected in the staff survey does not agree with the figures presented in Note C5.23 of the financial statements. The reason is that the latter present figures related to the legal entity, i.e. including its foreign branches and representative offices, whereas the former exclusively shows figures associated with the headquarters in Belgium.

Social report (continued)

As at 31 December 2024

I. Statement of the persons employed (continued)

A. Number of employed persons for whom a DIMONA declaration has been introduced by the company or who are recorded in the general personnel register during the financial period (continued)

	Full-time	Part-time	Total (T) or total full-time equivalents (FTE)
3. At the end of the financial year			
a. Number of staff in the personnel register	770	141	876
b. Breakdown by type of employment contract			
- Contract of unlimited duration	768	141	874
- Contract of limited duration	2	-	2
- One-job contract	-	-	-
- Interim substitution contract	-	-	-
c. Breakdown by sex and school degree			
- Men	363	23	380
Primary school	-	-	-
Secondary school	14	3	17
Higher non-academic degree	105	6	109
Academic degree	244	14	255
- Women	407	118	496
Primary school	-	-	-
Secondary school	34	12	42
Higher non-academic degree	122	34	146
Academic degree	251	72	307
d. Breakdown by professional occupation			
- Management	205	24	225
- Employees	565	117	651
- Manual workers	-	-	-
- Other	-	-	-

B. Temporary personnel and persons placed at the disposal of the enterprise

During the year	Hired personnel	Personnel put at disposal
1. Average number of people	-	-
2. Effective hours worked	-	-
3. Expenses incurred by the Company (€'000)	-	-

Social report (continued)

As at 31 December 2024

II. List of personnel movements during the financial period

	1. Full-time	2. Part-time	3. Total full-time equivalents
A. New employment contracts			
1. Number of staff engaged during the financial year	**33**	**5**	**37**
2. Breakdown by type of employment contract			
a. Contract of undefined duration	33	5	37
c. One-job contract	-	-	-
d. Interim substitution contract	-	-	-
B. Employment contracts terminated			
1. Number of employment contracts terminated during the financial year	**45**	**7**	**50**
2. Breakdown by type of employment contract			
a. Contract of undefined duration	45	7	50
c. One-job contract	-	-	-
d. Interim substitution contracts	-	-	-
3. Breakdown by motive for the termination of the contract			
a. Retirement	1	3	3
c. Dismissal	2	-	2
d. Other reason	42	4	45
- Of which the number of staff that continues to provide services to the Company as an independent on at least a half-time basis	-	-	-

Social report (continued)

As at 31 December 2024

III. Information on vocational training for personnel during the financial period

(€'000)	Men	Women
1. Continued training initiatives with a formal character at the expense of the Company		
a. Number of staff involved	392	529
b. Number of training hours	6,457	12,051
c. Expenses incurred by the Company (€'000)	1,329	1,787
- of which gross charges directly linked to training	1,314	1,770
- of which contributions paid to collective funds	15	17
- of which subsidies and other financial advantages received	-	-
2. Continued training initiatives with less formal or informal character at the expense of the Company		
a. Number of staff involved	15	23
b. Number of training hours	45	69
c. Expenses incurred by the Company (€'000)	3	5
3. Initial training initiatives at the expense of the Company		
a. Number of staff involved	-	-
b. Number of training hours	-	-
c. Expenses incurred by the Company	-	-

Complementary Information

As at 31 December 2024

I. Pension Plans

Euroclear Bank has several defined benefit pension plans covering employees in Belgium and Japan, as well as medical plans and termination indemnities.

The most recent full actuarial valuation of the plans was made by independent qualified professional actuaries as of 31 December 2024, in compliance with IAS19. The valuation shows a deficit of €7,556,000 (2023: €12,560,000).

Pension plans deficit is classified as 'provisions', while pension plans surplus are presented as deferred charges. The service and interest cost (respectively recorded as Wages and salaries and financial charge), and actuarial result (recorded as movements in provisions) are fully expensed in the current year. The contributions (directly reducing the pension provisions) reflect employers' contributions for funded plans and benefit disbursements for unfunded plans. Funding levels are monitored on an annual basis and contributions are made to comply with minimum requirements as determined by local regulations and internal funding policy.

The actuarial valuation at 31 December 2024 is detailed as follows:

(€'000)	2024	2023
Balance at 1 January	**(12,560)**	**(12,501)**
Movements		
a. Contributions	4,891	6,706
b. Service cost	(7,050)	(6,158)
c. Interest cost	(312)	(325)
d. Transfers	13	170
e. Foreign currency difference	70	43
f. Actuarial gains (/losses)	7,392	(495)
Balance at 31 December	**(7,556)**	**(12,560)**

The main assumptions used are the following :

	2024	2023
Discount rate	3.38%	3.18%
Expected inflation rate	2.00%	2.10%
Future salary increases	3.00%	3.09%
Expected medical cost trend rate	2.50%	2.60%

The above percentages are weighted averages of the assumptions used for individual plans.

The value of assets in the plans and the expected rates of return were:

(€'000)	2024	2023
Value of assets		
Equities	60,001	49,765
Bonds	38,073	31,659
Cash	451	372
Other	7,028	6,569
Total market value of assets	**105,553**	**88,365**

Complementary Information (continued)

As at 31 December 2024

II. Additional clarification on staff survey

In accordance with the applicable regulations, please note that the population reflected in the staff survey does not agree with the figures presented in Note C5.23 of the financial statements. The reason is that the latter present figures related to the legal entity, i.e. including its foreign branches and representative offices, whereas the former exclusively shows figures associated with the headquarters in Belgium.

III. Windfall contribution

Regulation (EU) No 2024/1469 provides for the obligation for CSDs such as Euroclear Bank holding more than €1,000,000 of assets and reserves of the Central Bank of Russia ("CBR Assets") to contribute to the European Union 99.7% of the "net profits" generated from the CBR assets from 15 February 2024 (the "Windfall Contribution"). Net profits are determined in respect of revenues accruing from or generated by the redeposit of the CBR immobilised cash balances, in accordance with Belgian GAAP, after deduction of all relevant expenses linked to or resulting from the management of the immobilised assets and the risk management associated with the immobilised assets, and after deduction of corporate tax under the general regime of Belgium.

Euroclear Bank may provisionally retain 10% of the windfall contribution for a period of 5 years to cover future losses and exposures.

(€000)	CBR from 15/02/2024 to 31/12/2024	Windfall contribution (99.7%)
Net interest income	5,386,755	-
Windfall contribution	-	(4,008,685)
of which Windfall Contribution - 90%	-	(3,604,962)
of which Windfall Contribution - 10% provisionally retained	-	(403,723)
Administrative expenses	(25,758)	-
Operating profit before tax	5,360,997	(4,008,685)
Taxation	(1,340,249)	-
Profit for the year	4,020,748	(4,008,685)

Out of the total windfall contribution of €4,008,685,000, €1,547,368,000 were paid in July 2024, €2,057,594,000 are payable in March 2025 (recorded under Other amounts payable), and €403,723,000 are accrued and will become payable after 5 years (recorded under Accrued charges).

IV. Russian claims

As a direct consequence of the sanctions and countermeasures, Euroclear Bank faces multiple proceedings in Russian courts. Since Russia considers international sanctions against public order, Russian claimants initiated legal proceedings aiming mainly to be compensated for assets blocked in Euroclear Bank's books, by claiming an equivalent amount in Russian Ruble and enforcing their claim in Russia. Russian asset holders are litigating against Euroclear Bank not only for the notional blocked amounts, but also lost income and other damages. The potential impact of these claims is currently unknown. Despite all legal actions taken by Euroclear and the considerable resources mobilised, the probability of unfavourable rulings in Russian courts is high since Russia does not recognise the international sanctions. A best estimate of the costs claimed that Euroclear Bank may need to support is recorded in the profit and loss account as soon as a claim is accepted by a Russian court.

Valuation rules

As at 31 December 2024

The financial statements of Euroclear Bank SA/NV and its subsidiary undertakings are made up as at, and for the period ending, 31 December. The valuation rules used to draw up the group's accounts and the stand-alone accounts of Euroclear Bank have been prepared in accordance with the Royal Decree of 23 September 1992 ('the Royal Decree'), relating to the annual accounts of credit institutions.

This document contains the specification of the valuation rules in a number of areas, where the Royal Decree allows alternative treatments, where significant management estimates are required, or which are very significant areas in the financial statements.

Those areas are:

- a] Income and expenditure recognition
- b] Provisions for bad and doubtful debts
- c] Provisions for liabilities and charges
- d] Leasing
- e] Intangible fixed assets
- f] Tangible fixed assets
- g] Subsidiary undertakings
- h] Debt securities and equity shares
- i] Sale and repurchase transactions
- j] Pensions and other post-retirement benefits
- k] Derivatives and other financial instruments
- l] Foreign currencies
- m] Fund for general banking risks

a] Income and expenditure recognition

Interest income is recognised in the profit and loss account as it accrues.

Interest expense include the windfall contribution imposed by Regulation (EU) No 2024/1469. This regulation provides for the obligation for CSDs such as Euroclear Bank holding more than €1,000,000 of assets and reserves of the Central Bank of Russia ("CBR Assets") to contribute to the European Union 99.7% of the "net profits" generated from the CBR assets as of 15 February 2024 (See complementary information). Euroclear considers, that by nature and based on its reading of the regulation, the new contribution best meets the definition of an interest expense as it distributes the interest earned on the redeposits of the CBR immobilised assets.

Dividend income is recognised in the profit and loss account when received.

Fees receivable, which represent a return for services provided, are credited to income when the related service is performed.

Fees receivable, which represent a return for credit risk borne or which are in the nature of interest, are taken to the profit and loss account over the period of the loan, or on a systematic basis over the expected life of the transaction to which they relate.

Expenditure is accounted for on an accrual basis.

b] Provisions for bad and doubtful debts

Specific provisions are made against advances when, in the opinion of the directors, credit risks or economic or political factors make recovery doubtful. The need to adjust provisions is reviewed regularly in the light of actual experience. The provisions which are made during the year (less amounts released and recoveries of bad debts previously written off) are charged against operating profit. Bad debts are written off in part or in whole when a loss has been confirmed.

c] Provisions for liabilities and charges

Specific provisions are recognised where there is a present obligation arising from a past event, there is a probable outflow of resources, and the outflow can be estimated reliably.

Human resources-related provisions are recognised when a decision has been made, a formal plan exists and the main features are known by those affected. Human resources-related provisions include provisions for voluntary early retirement and retirement incentive plans. The provisions represent the best estimate of the full cost of implementing the plans. The expected cost depends on a number of factors that are determined on an actuarial basis using a number of assumptions, including the eligible population and success rate.

d] Leasing

Contracts to lease assets are classified as finance leases where they transfer substantially all the risks and rewards of ownership of the asset to the customer. Contracts not deemed to be finance leases are treated as operating leases.

Rentals payable and receivable under operating leases are accounted for on the straight-line basis over the period of the lease.

e] Intangible fixed assets

Intangible fixed assets are amortised in equal instalments over their estimated useful lives.

f] Tangible fixed assets

Depreciation of tangible fixed assets is provided on a straight-line basis over their estimated useful lives as follows:

- Leasehold improvements: shorter of economic life and period of lease
- Data processing and communications equipment: 3 to 5 years
- Furniture and fixtures: 7 years

g] Subsidiary undertakings

Investments in Euroclear Bank's subsidiary undertakings are stated in the parent company's stand-alone accounts at cost less dividends received from pre-acquisition reserves and any impairment in value.

h] Debt securities and equity shares

Securities and shares intended for use on a continuing basis in the group's activities are classified as investment securities and are stated at cost less provision for any impairment in value. The carrying value of investment securities is adjusted over the period to maturity to allow for the amortisation of premiums or discounts on an actuarial basis. Such amortisation is included in interest receivable.

i] Sale and repurchase transactions

Securities that have been sold with an agreement to repurchase continue to be shown on the balance sheet and the sale proceeds recorded as a deposit. Securities acquired in reverse repurchase transactions are not recognised in the balance sheet and the purchase price is treated as a loan. The difference between the sale price and repurchase price is accrued evenly over the life of the transaction and charged or credited to the profit and loss account as interest payable or receivable.

j] Pensions and other post-retirement benefits

The Company operates a number of post-retirement benefit schemes for its employees, including both defined contribution and defined benefit pension plans.

A defined contribution plan is a pension plan under which the Company pays fixed contributions into a separate entity and has no legal or constructive obligation to pay further contributions if the fund does not hold sufficient funds to pay all employees the benefits relating to employee service in the current and prior periods.

A defined benefit plan is a post-employment benefit plan other than a defined contribution plan.

The provision recognised in the balance sheet in respect of defined benefit plans is the present value of the defined benefit obligation at the balance sheet date less the fair value of plan assets. The defined benefit obligation is calculated annually by independent actuaries using the projected unit credit method. The present value of the defined benefit obligation is determined by discounting the estimated future cash outflows using interest rates of high-quality corporate bonds that are denominated in the currency in which the benefits will be paid, and that have terms to maturity approximating the terms of the related pension liability.

All actuarial gains and losses arising from experience adjustments and changes in actuarial assumptions are recognised in the income statement in the period in which they occur.

Past service cost is recognised immediately in the profit and loss account.

The costs of defined contribution plans are charged to the income statement in the period in which they fall due.

The Company provides post-retirement healthcare benefits to their retirees. The expected costs of these benefits are accrued over the period of employment using an accounting methodology similar to that for defined benefit pension plans. Actuarial gains and losses arising from experience adjustments, and changes in actuarial assumptions, are charged or credited to the income statement. These obligations, recorded under the form of provisions, are valued annually by independent qualified actuaries.

k] Derivatives and other financial instruments

Transactions are undertaken in derivative financial instruments (derivatives) for hedging purposes, which include interest rate swaps, futures, options and similar instruments. A derivative is designated as non-trading as there is an offset between the effects of potential movements in market rates on the derivative and the designated non-trading asset, liability or position being hedged. Non-trading derivatives are reviewed regularly for their effectiveness as hedges.

Non-trading derivatives are accounted for on an accruals basis, consistent with the assets, liabilities or positions being hedged. Income and expense on non-trading derivatives are recognised as they accrue over the life of the instruments as an adjustment to the income or expense of the hedged item.

Where a non-trading derivative no longer represents a hedge because either the underlying non-trading asset, liability or position has been derecognised, or the effectiveness of the hedge has been undermined, it is restated at fair value and any change in value is taken directly to the profit and loss account and reported within 'Profit from (loss on) financial operations'. Thereafter, the derivative is classified as a trading instrument and accounted for accordingly.

In other circumstances, where non-trading derivatives are terminated, any resulting gains and losses are amortised over the remaining life of the hedged asset, liability or position. Unamortised gains and losses are reported within 'Other assets' and 'Other liabilities' on the balance sheet.

Derivatives hedging anticipatory transactions are accounted for on a basis consistent with the relevant type of transaction. i.e. gains and losses are not recognised until the period the anticipated transactions occur. When anticipatory transactions do not actually occur, related derivatives are restated at fair value and changes in value are taken directly to the profit and loss account and reported within ‘Profit from (loss on) financial operations’.

Treasury swaps are initiated by Euroclear Bank in order to convert balances in non-core currencies into euro or US dollars, and reduce reinvestment risk. Treasury swap are derivative contracts that involve the exchange of interest payments, as well as the exchange of principal amounts. The exchange of interest is recorded as interest expense/income.

l] Foreign currencies

Monetary assets and liabilities denominated in foreign currencies are translated into euros at rates prevailing at the balance sheet date. Profit and loss amounts in foreign currencies are translated into euros at the rates prevailing on the date of the transaction.

Non-monetary assets and liabilities denominated in foreign currencies are translated into euros at historical exchange rates.

Spot foreign exchange contracts are translated into euros at market rates and the resulting gains or losses are taken into the profit and loss account.

The results of branches in foreign currencies are translated at average exchange rates for the year. Exchange differences arising on consolidation of the Company’s branches are taken to the profit and loss account.

m] Fund for general banking risks

Additions to, and the uses of, a fund for general banking risks are determined by the Board of directors of Euroclear Bank SA/NV.

Statutory auditor's report to the shareholders' meeting of Euroclear Bank SA for the year ended 31 December 2024 - Annual accounts

In the context of the statutory audit of the annual accounts of Euroclear Bank SA (the "company"), we hereby submit our statutory audit report. This report includes our report on the annual accounts and the other legal and regulatory requirements. These parts should be considered as integral to the report.

We were appointed in our capacity as statutory auditor by the shareholders' meeting of 25 April 2024, in accordance with the proposal of the board of directors ("bestuursorgaan" / "organe d'administration") issued upon recommendation of the audit committee and presentation of the works council. Our mandate will expire on the date of the shareholders' meeting deliberating on the annual accounts for the year ending 31 December 2026. We have performed the statutory audit of the annual accounts of Euroclear Bank SA for 7 consecutive periods.

Report on the annual accounts

Unqualified opinion

We have audited the annual accounts of the company, which comprises the balance sheet as at 31 December 2024 and the income statement for the year then ended, as well as the explanatory notes. The annual accounts show total assets of 211 822 801 (000) EUR and the income statement shows a profit for the year ended of 2 135 600 (000) EUR.

In our opinion, the annual accounts give a true and fair view of the company's net equity and financial position as of 31 December 2024 and of its results for the year then ended, in accordance with the financial reporting framework applicable in Belgium.

Basis for the unqualified opinion

We conducted our audit in accordance with International Standards on Auditing (ISA), as applicable in Belgium. In addition, we have applied the International Standards on Auditing approved by the IAASB applicable to the current financial year, but not yet approved at national level. Our responsibilities under those standards are further described in the "Responsibilities of the statutory auditor for the audit of the annual accounts" section of our report. We have complied with all ethical requirements relevant to the statutory audit of the annual accounts in Belgium, including those regarding independence.

We have obtained from the board of directors and the company's officials the explanations and information necessary for performing our audit.

We believe that the audit evidence obtained is sufficient and appropriate to provide a basis for our opinion.

Key audit matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the annual accounts of the current period. These matters were addressed in the context of our audit of the annual accounts as a whole and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

Key audit matters	How our audit addressed the key audit matters
Key audit matter 1: Revenue recognition The Company's 31 December 2024 Annual Accounts show "Interests and similar income" and "Commissions received" captions amounting to 8 443 195 (000) EUR, and 1 639 653 (000) respectively. The aggregated amount of these captions represents the majority of the revenues of Euroclear. We identified these revenues as a Key Audit Matter due to (i) the significance of the balance, (ii) the accounting treatment applied, (iii) the risks surrounding the revenue recognition related to frozen liabilities in application of the sanctions regime and (iv) the dependency on IT systems.	We focused our audit effort on: • Assessing the appropriateness of the design and operating effectiveness of the internal control framework relating to the billing system of Euroclear in the circumstances; • Assessing the appropriateness of the design and operating effectiveness of the internal control framework relating to the investment portfolio; • Assessing the appropriateness of the design of the internal control framework relating to the compliance with sanctions regime; • Testing the IT Systems and IT General Controls over the fee and interest income system infrastructure. We performed specific testing on the appropriateness of the access rights and the system changes brought to the IT systems; • Performing substantive analytical procedures on the fee income charged by comparing monthly evolution of the volumes to the evolution of the related fee income; • Testing a representative sample of invoices, the existence and accuracy of the amount recorded in the general ledger as commissions received; • For the interest margin, performing substantive analytical procedures by extrapolating the interest income and expense based on the balances recognized on the balance sheet and the interest rates applied contractually; • Reviewing and validating the accounting technical analysis related to the revenue recognition of the interests generated from the reinvestment of the frozen balances; • Assessing the adequacy of a representative sample of manual journals impacting the reported fee amount.

Key audit matter 2 : Technology risk The IT infrastructure of the group and its resilience is essential to the activity of the company and to the financial reporting processes. We have identified the operating systems (including the mainframe), the databases, the applications and their interfaces as key elements of the IT infrastructure. We consider the general computer controls and controls over application interfaces as being key in mitigating technology risk across the IT infrastructure. This assessment is based on: • The multiplicity of applications; • the very high volume of transactions; • the importance of adequate (privileged) user access management to ensure data integrity; and • the continuous development by Euroclear of the IT systems in terms of access management and change management.	Our review procedures involve the participation of IT experts. In accordance with our defined audit approach we tested the design, implementation and operating effectiveness of internal control and governance procedures relating to General IT Controls (GITC) applicable to the components considered as key in the financial reporting process. The scope includes privileged access management and change management procedures on: • Operating systems • Databases • Applications When required, we have also tested additional business controls and conducted audit procedures to obtain sufficient comfort.
Key audit matter 3 : Russian Sanctions The Russian sanctions led to significant changes in the structure of the balance sheet of Euroclear Bank and the related accounting treatment. The Russian sanctions and related continuous increase of the balance sheet are considered as pervasive to the financial statements. We identified 3 main areas of focus related to the Russian sanctions: • Litigations and related accrued charges • The accounting treatment, classification and determination of the Windfall Contribution following the EU Council Regulation 2024/576: The Windfall Contribution amounts to 4 008 685 (000) EUR as per 31 December 2024. We refer to the ‘Complementary Information – Section III’ of the annual statements. • The increase of the deposits from Russian counterparties and their reinvestment.	Our key audit procedures related to the Russian sanctions entail: • Assessing the appropriateness of the design of the internal control framework relating to the accounting balances linked to Russian sanctions; • Reviewing the legal claims (if any), assessing the adequacy of the related accrued charges recorded and the underlying assumptions; • Sending confirmation letters to lawyers handling any litigations related to the Russian sanctions; • Reviewing and assessing the impacts of the latest Decrees (both from Russia and EU) and other European Union decisions; • Performing substantive analytical procedures by extrapolating the the interest margin generated on the re-investment of the frozen assets; • Reconciling the frozen assets to the accounting ledger; • Reviewing the accounting treatment of the C and I-accounts; • Reviewing the accounting treatment, classification and determination of the Windfall Contribution;

	• Perform subsequent event procedures on the claims and litigations; • Reviewing the correspondence of Euroclear Bank with the regulator on the potential modification of the prudential treatment of the activities and related requirements in terms of capital, liquidity, etc. • Reading the various minutes of the committee to follow the actions taken by Euroclear Bank. • Reviewing the appendix of the financial statements on the Windfall Contribution.

Responsibilities of the board of directors for the preparation of the annual accounts

The board of directors is responsible for the preparation and fair presentation of the annual accounts in accordance with the financial reporting framework applicable in Belgium and for such internal control as the board of directors determines is necessary to enable the preparation of the annual accounts that are free from material misstatement, whether due to fraud or error.

In preparing the annual accounts, the board of directors is responsible for assessing the company’s ability to continue as a going concern, disclosing, as applicable, matters to be considered for going concern and using the going concern basis of accounting unless the board of directors either intends to liquidate the company or to cease operations, or has no realistic alternative but to do so.

Responsibilities of the statutory auditor for the audit of the annual accounts

Our objectives are to obtain reasonable assurance about whether the annual accounts as a whole are free from material misstatement, whether due to fraud or error, and to issue a statutory auditor’s report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISA will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these annual accounts.

During the performance of our audit, we comply with the legal, regulatory and normative framework as applicable to the audit of annual accounts in Belgium. The scope of the audit does not comprise any assurance regarding the future viability of the company nor regarding the efficiency or effectiveness demonstrated by the board of directors in the way that the company’s business has been conducted or will be conducted.

As part of an audit in accordance with ISA, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- identify and assess the risks of material misstatement of the annual accounts, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from an error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control;
- obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the company's internal control;
- evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the board of directors;
- conclude on the appropriateness of the use of the going concern basis of accounting by the board of directors and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our statutory auditor's report to the related disclosures in the annual accounts or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our statutory auditor's report. However, future events or conditions may cause the company to cease to continue as a going concern;
- evaluate the overall presentation, structure and content of the annual accounts, and whether the annual accounts represent the underlying transactions and events in a manner that achieves fair presentation.

We communicate with the audit committee regarding, amongst other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

We also provide the audit committee with a statement that we have complied with relevant ethical requirements regarding independence, and we communicate with them about all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.

From the matters communicated to the audit committee, we determine those matters that were of most significance in the audit of the annual accounts of the current period and are therefore the key audit matters. We describe these matters in our report unless law or regulation precludes any public disclosure about the matter.

Other legal and regulatory requirements

Responsibilities of the board of directors

The board of directors is responsible for the preparation and the content of the directors' report on the annual accounts, including the sustainability statement and other matters disclosed in the annual report, for the preparation and content of the documents to be filed according to the legal and regulatory requirements, for maintaining the company's accounting records in compliance with the legal and regulatory requirements applicable in Belgium, as well as for the company's compliance with the Code of companies and associations and the company's articles of association.

Responsibilities of the statutory auditor

As part of our mandate and in accordance with the Belgian standard complementary to the International Standards on Auditing (ISA) as applicable in Belgium, our responsibility is to verify, in all material respects, the directors' report on the annual accounts, and other matters disclosed in the annual report, those documents to be filed according to the legal and regulatory requirements and compliance with certain obligations referred to in the Code of companies and associations and the articles of association, as well as to report on these matters.

Aspects regarding the directors' report and other information disclosed in the annual report

The annual report contains the sustainability statement which is the subject of our separate limited assurance report on the sustainability statement. This section does not pertain to the assurance on the sustainability statement included in the annual report. For this part of the annual report, we refer to our report on the matter.

In our opinion, after performing the specific procedures on the directors' report on the annual accounts, the directors' report on the annual accounts is consistent with the annual accounts for that same year and has been established in accordance with the requirements of article 3:5 and 3:6 of the Code of companies and associations.

In the context of our statutory audit of the annual accounts we are responsible to consider, in particular based on information that we became aware of during the audit, if the directors' report on the annual accounts and other information disclosed in the annual report, i.e.:

- Risk Management;
- Acting Responsibly;
- Capital Management.

is free of material misstatements, either by information that is incorrectly stated or otherwise misleading. In the context of the procedures performed, we are not aware of such a material misstatement.

Statement on the social balance sheet

The social balance sheet, to be filed at the National Bank of Belgium in accordance with article 3:12, § 1, 8° of the Code of companies and associations, includes, both in form and in substance, all of the information required by this Code, including those relating to wages and training, and is free from any material inconsistencies with the information available to us in the context of our mission.

Statements regarding independence

- Our audit firm and our network have not performed any prohibited services and our audit firm has remained independent from the company during the performance of our mandate.
- The fees for the additional non-audit services compatible with the statutory audit of the annual accounts, as defined in article 3:65 of the Code of companies and associations, have been properly disclosed and disaggregated in the notes to the annual accounts.

Other statements

- Without prejudice to certain formal aspects of minor importance, the accounting records are maintained in accordance with the legal and regulatory requirements applicable in Belgium.
- The appropriation of results proposed to the general meeting is in accordance with the relevant legal and regulatory requirements.
- We do not have to report any transactions undertaken or decisions taken which may be in violation of the company's articles of association or the Code of companies and associations.
- This report is consistent with our additional report to the audit committee referred to in article 11 of Regulation (EU) N° 537/2014.
- The board of directors has taken the decisions described in the directors' report, with financial consequences as a result. In accordance with article 7:115 of the Code of companies and associations, the board of directors has informed the shareholders of the personal and direct financial interest of the executive members related to the issued recommendation for the approval of their remuneration (incl. the pension regime) considering they are directly benefiting from the proposed remuneration.

  We have assessed the financial consequences for the company relating to the decisions taken in respect of the conflict of interest as described in the directors' report and we have nothing to report.
- In the context of article 7:213 of the Code of companies and associations, an interim dividend was distributed during the financial year on which we have issued the attached report in accordance with the legal requirements.

Signed at Zaventem.

The statutory auditor

Digitally signed by
Franky Wevers
DocuSign
Signed By: Franky Wevers (Signature)
Signing Time: 03-apr-2025 | 21:40 CEST
C: BE
Issuer: Citizen CA
5DA7F74FB4D54D67BE71189BA10C8A7D

Deloitte Bedrijfsrevisoren/Réviseurs d'Entreprises BV/SRL
Represented by Franky Wevers

Deloitte Bedrijfsrevisoren/Réviseurs d'Entreprises BV/SRL
Registered Office: Gateway building, Luchthaven Brussel Nationaal 1 J, B-1930 Zaventem
VAT BE 0429.053.863 - RPR Brussel/RPM Bruxelles - IBAN BE90 4350 2974 5132 - BIC KREDBEBB

Member of Deloitte Touche Tohmatsu Limited

Limited assurance report of the statutory auditor on the sustainability statement of Euroclear Bank SA/NV

To the general shareholders' meeting

In the framework of our legal limited assurance engagement on the sustainability statement of Euroclear Bank SA/NV ("the company"), we hereby submit our report on this mission.

We were appointed by the general meeting dated 25 April 2024, in accordance with the proposal of the board of directors issued upon recommendation of the audit committee and as proposed by the works council of the company, to perform a limited assurance engagement on the sustainability statement of the company, included in the section "Acting responsibly" of the Director's report as at 31 December 2024 and for the financial year then ended (the "sustainability statement").

Our mandate expires on the date of the general meeting deliberating on the financial statements for the financial year ended 31 December 2026. We have performed our limited assurance engagement on the sustainability statement of the company for the first time during the current reporting period.

Limited assurance conclusion

We have performed a limited assurance engagement on the sustainability statement of the company.

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the sustainability statement, in all material respects:

- has not been prepared in accordance with the requirements stipulated in article 3:6/3 of the Code of Companies and Associations, in accordance with the applicable European Sustainability Reporting Standards (ESRS);
- has not been prepared in accordance with the process carried out by the company to identify the information reported in the sustainability statement (the "process") as set out in the note "Double Materiality Assessment ";
- does not comply with the requirements of Article 8 of EU Regulation 2020/852 (the "Taxonomy Regulation") regarding the disclosures in subsection "EU Taxonomy disclosures" within the environment section of the sustainability statement.

Basis for conclusion

We conducted our limited assurance engagement in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised), Assurance engagements other than audits or reviews of historical financial information ("ISAE 3000 (Revised)"), as applicable in Belgium.

Our responsibilities under this standard are described in more detail in the section of our report "Responsibilities of the statutory auditor relating to the limited assurance engagement on the sustainability statement".

We have complied with all ethical requirements relevant to limited assurance engagements on the sustainability statement in Belgium, including those regarding independence.

We apply the International Standard on Quality Management 1 (ISQM 1), which requires us to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We have obtained from the board of directors and the company's officials all explanations and information required for our limited assurance engagement.

We believe that the evidence we have obtained in the framework of our limited assurance engagement is sufficient and appropriate to provide a basis for our conclusion.

Other matters

The scope of our work is limited to our limited assurance engagement on the sustainability statement of the company for the year ended 31 December 2024. Our limited assurance engagement does not extend to information related to the comparative figures included in the sustainability statement.

Responsibilities of the board of directors relating to the preparation of the sustainability statement

The board of directors of the company is responsible for designing and implementing a process and for disclosing this process in the note “Basis of preparation“ of the sustainability statement. This responsibility includes:

- understanding the context in which the company’sactivities and business relationships take place and developing an understanding of its affected stakeholders;
- the identification of the actual and potential impacts (both negative and positive) related to sustainability matters, as well as risks and opportunities that affect, or could reasonably be expected to affect, the company’s financial position, financial performance, cash flows, access to finance or cost of capital over the short-, medium-, or long-term;
- the assessment of the materiality of the identified impacts, risks and opportunities related to sustainability matters by selecting and applying appropriate thresholds; and
- making assumptions and estimates that are reasonable in the circumstances.

The board of directors of the company is also responsible for the preparation of the sustainability statement, which includes the information established by the process,

- in accordance with the requirements set out in article 3:6/3 of the Code of Companies and Associations, including the applicable European Sustainability Reporting Standards (ESRS);
- in compliance with the requirements of Article 8 of the Taxonomy Regulation regarding the disclosure of the information included in subsection “EU Taxonomy disclosures” within the environment section of the sustainability statement.

This responsibility comprises:

- designing, implementing and maintaining such internal control that the board of directors deems necessary for the preparation of the sustainability statement that is free from material misstatement, whether due to fraud or error; and
- the selection and application of appropriate sustainability reporting methods and making assumptions and estimates that are reasonable in the circumstances.

The audit committee and board of directors are responsible for overseeing the company’s sustainability reporting process.

Inherent limitations in preparing the sustainability statement

In reporting forward-looking information in accordance with ESRS, the board of directors of the company is required to prepare the forward-looking information on the basis of disclosed assumptions about events that may occur in the future and possible future actions by the company. Actual outcomes are likely to be different since anticipated events frequently do not occur as expected and deviations may be of material importance.

Responsibilities of the statutory auditor relating to the limited assurance engagement on the sustainability statement

Our responsibility is to plan and perform the assurance engagement to obtain limited assurance about whether the sustainability statement is free from material misstatement, whether due to fraud or error, and to issue a limited assurance report that includes our conclusion. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence decisions of users taken based on the sustainability statement.

As part of a limited assurance engagement in accordance with ISAE 3000 (Revised), as applicable in Belgium, we apply professional judgement and maintain professional scepticism throughout the engagement. The work performed in an engagement aiming to obtain a limited level of assurance, for which we refer to the section “Summary of the work performed” is less in scope than in an engagement aiming to obtain a reasonable level of assurance. Therefore, we do not express an opinion with a reasonable level of assurance as part of this engagement.

Since the forward-looking information in the sustainability statement and the assumptions on which it is based, relate to the future, they may be affected by events that may occur in the future and/or by potential actions of the company. The actual outcomes are likely to be different from the assumptions made, as the anticipated events often do not occur as expected, and the deviation from them could be material. Therefore, our conclusion does not provide any assurance that the reported actual outcomes will correspond with those included in the forward-looking information in the sustainability statement.

Our responsibilities in respect of the sustainability statement, in relation to the process, include:

- obtaining an understanding of the process, but not for the purpose of providing a conclusion on the effectiveness of the process, including the outcome of the process; and
- designing and performing procedures to evaluate whether the process is consistent with the company’s description of its process, as disclosed in the note “Basis of preparation”.

Our other responsibilities in respect of the sustainability statement include:

- acquiring an understanding of the company’s control environment, the relevant processes, and information systems for preparing the sustainability statement, but without assessing the design of specific control activities, obtaining supporting information about their implementation, or testing the effective operation of the established internal control measures;
- identifying where material misstatements are likely to arise in the sustainability statement, whether due to fraud or error; and
- designing and performing procedures responsive to where material misstatements are likely to arise in the sustainability statement. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

Summary of the work performed

A limited assurance engagement involves performing procedures to obtain evidence about the sustainability statement. The procedures in a limited assurance engagement vary in nature and timing and are less in extent than procedures performed for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

The nature, timing and extent of the procedures selected depend on professional judgement, including the identification of areas where material misstatements are likely to arise in the sustainability statement, whether due to fraud or error.

In conducting our limited assurance engagement, with respect to the process, we:

- obtained an understanding of the process by:
  - performing inquiries to understand the sources of the information used by management (e.g., stakeholder engagement, business plans and strategy documents); and
  - reviewing the company’s internal documentation of its process; and
- evaluated whether the assurance evidence obtained from our procedures with respect to the process implemented by the company was consistent with the description of the process set out in the note “Double Materiality Assessment”.

In conducting our limited assurance engagement, with respect to the sustainability statement, we have:

- obtained an understanding of the company’s reporting processes relevant to the preparation of its sustainability statement by obtaining an understanding of the company’s / group’s control environment, processes and information system relevant to the preparation of the consolidated sustainability statement but not with the purpose of providing a conclusion on the effectiveness of the company’s internal control;
- evaluated whether the information identified by the process is included in the sustainability statement;
- evaluated whether the structure and the presentation of the sustainability statement has been prepared in accordance with the ESRS;
- performed inquires with relevant personnel and analytical procedures on selected information in the sustainability statement;
- performed substantive assurance procedures on selected information in the sustainability statement;
- compared disclosures in the sustainability statement with the corresponding disclosures in the financial statements;
- obtained evidence on the methods and assumptions for developing estimates and forward-looking information as described in the section “Responsibilities of the statutory auditor related to the limited assurance engagement on the sustainability statement”;
- obtained an understanding of the company’s process to identify taxonomy-eligible and taxonomy-aligned economic activities and the corresponding disclosures in the sustainability statement.

Statement related to independence

Our audit firm and our network have not performed any engagements which are incompatible with the limited assurance engagement, and our audit firm has remained independent of the group throughout the course of our mandate.

Signed at Zaventem.

The statutory auditor

Digitally signed by
Franky Wevers
DocuSign
Signed By: Franky Wevers (Signature)
Signing Time: 03-apr-2025 | 15:46 CEST
C: BE
Issuer: Citizen CA
5DA7F74FB4D54D67BE71189BA10C8A7D

Deloitte Bedrijfsrevisoren/Réviseurs d'Entreprises BV/SRL
Represented by Franky Wevers

Report on the limited review of the statement of assets and liabilities to the board of directors of the company Euroclear Bank SA/NV in the context of the distribution of an interim dividend

In accordance with article 7:213 of the Code of companies and associations and the articles of association of the company Euroclear Bank SA/NV ("the company") and in the context of our appointment as statutory auditor, we hereby report to the board of directors on the limited review of the statement of assets and liabilities for the period ended 31 October 2024.

We have conducted the limited review of the company's enclosed statement of assets and liabilities for the period ended 31 October 2024 which was prepared based on the financial reporting framework applicable in Belgium.

Board of directors' responsibility for the preparation of the statement of assets and liabilities

The board of directors is responsible for the preparation of the statement of assets and liabilities for the period ended 31 October 2024 in accordance with the financial reporting framework applicable in Belgium, following the principles stipulated in article 3:1, § 1, first paragraph, of the Code of companies and associations, as well as for compliance with the conditions set by article 7:213, second paragraph, of the Code of companies and associations.

Statutory auditor's responsibility

Our responsibility is to draw a conclusion on the statement of assets and liabilities, based on the limited review conducted by us.

We conducted our limited review in accordance with ISRE 2410, "Review of interim financial information performed by the independent auditor of the entity". This kind of review consists of making inquiries, primarily with persons responsible for financial and administrative matters, and of applying analytical and other review procedures. A limited review is substantially less in scope than an audit performed in accordance with the International Standards on Auditing (ISA) and consequently does not enable us to obtain any assurance that we would become aware of all significant matters that might be identified during the audit.

Accordingly, we do not express an audit opinion on this statement of assets and liabilities.

Conclusion

Based on our limited review, no facts have come to our attention that cause us to believe that the enclosed statement of assets and liabilities of Euroclear Bank SA/NV for the period ended 31 October 2024 showing total assets of 213 172 618 (000) EUR and a result for the current period of 1 864 834 (000) EUR, has not been prepared, in all material respects, in accordance with the financial reporting framework applicable in Belgium.

Restrictions on the use of our report

This report has solely been prepared in virtue of article 7:213 of the Code of companies and associations and may not be used for any other purposes.

Signed at Zaventem.

The statutory auditor

Digitally signed by
Franky Wevers
DocuSign
Signed By: Franky Wevers (Signature)
Signing Time: 12-dec-2024 | 18:37 CET
C: BE
Issuer: Citizen CA
5DA7F74FB4D54D67BE71189BA10C8A7D

Deloitte Bedrijfsrevisoren/Réviseurs d'Entreprises BV/SRL
Represented by Franky Wevers

Enclosure: Statement of assets and liabilities for the period ended 31 October 2024 and accounting principles of the company

Appendix 1 - Statement of assets and liabilities for the period ended 31 October 2024

B GAAP -

Euroclear Bank (EOC, BHK, BPL, BJP)

Balance sheet (€'000)	Oct-24	Dec-23
Assets		
Cash and balances with central banks	145.105.921	108.675.785
Loans and advances	52.664.072	38.697.603
Financial assets - FVOCI	14.642.877	13.525.560
Financial assets - mandatorily at FVPL	6.817	6.561
Financial assets held for trading	31.953	85.161
Derivatives used for hedging	52.023	49.017
Current income tax assets	13.595	0
Other assets	398.883	297.325
Pre-payments and accrued income	158.138	145.350
Property, plant and equipment	3.172	4.046
Goodwill and intangible assets	95.167	80.859
Total assets	**213.172.618**	**161.567.266**
Liabilities		
Deposits from central banks	(155.665.824)	(115.913.293)
Deposits from banks and customers	(42.823.811)	(33.580.985)
Debt instruments issued	(3.886.274)	(4.216.001)
Financial liabilities - FVPL	(85.243)	(55.001)
Derivatives used for hedging	(22.952)	(19.386)
Other liabilities	(1.835.683)	(272.484)
Accruals and deferred income	(579.320)	(248.234)
Current income tax liabilities	(58.436)	(60.646)
Provisions for liabilities and charges	(1.770)	(1.723)
Pension deficit	(7.687)	(12.560)
Subordinated liabilities	(304.989)	(306.560)
Total liabilities	**(205.271.989)**	**(154.686.871)**
Shareholders' equity		
Called up share capital	(285.497)	(285.497)
Share premium account	(558.008)	(558.008)
Other reserves	(28.550)	(28.550)
Retained earnings	(7.028.574)	(6.008.341)
Total shareholders' equity	**(7.900.628)**	**(6.880.396)**
Total liabilities and shareholders' equity	**(213.172.618)**	**(161.567.266)**

Appendix 2 - Accounting principles of the company

Valuation rules

As at 31 December 2023

The financial statements of Euroclear Bank SA/NV and its subsidiary undertakings are made up as at, and for the period ending, 31 December. The valuation rules used to draw up the group's accounts and the stand-alone accounts of Euroclear Bank have been prepared in accordance with the Royal Decree of 23 September 1992 ('the Royal Decree'), relating to the annual accounts of credit institutions.

This document contains the specification of the valuation rules in a number of areas, where the Royal Decree allows alternative treatments, where significant management estimates are required, or which are very significant areas in the financial statements.

Those areas are:

- a] Income and expenditure recognition
- b] Provisions for bad and doubtful debts
- c] Provisions for liabilities and charges
- d] Leasing
- e] Intangible fixed assets
- f] Tangible fixed assets
- g] Subsidiary undertakings
- h] Debt securities and equity shares
- i] Sale and repurchase transactions
- j] Pensions and other post-retirement benefits
- k] Derivatives and other financial instruments
- l] Foreign currencies
- m] Fund for general banking risks

a] Income and expenditure recognition

Interest income is recognised in the profit and loss account as it accrues.

Dividend income is recognised in the profit and loss account when received.

Fees receivable, which represent a return for services provided, are credited to income when the related service is performed.

Fees receivable, which represent a return for credit risk borne or which are in the nature of interest, are taken to the profit and loss account over the period of the loan, or on a systematic basis over the expected life of the transaction to which they relate.

Expenditure is accounted for on an accrual basis.

b] Provisions for bad and doubtful debts

Specific provisions are made against advances when, in the opinion of the directors, credit risks or economic or political factors make recovery doubtful. The need to adjust provisions is reviewed regularly in the light of actual experience. The provisions which are made during the year (less amounts released and recoveries of bad debts previously written off) are charged against operating profit. Bad debts are written off in part or in whole when a loss has been confirmed.

c] Provisions for liabilities and charges

Specific provisions are recognised where there is a present obligation arising from a past event, there is a probable outflow of resources, and the outflow can be estimated reliably.

d] Leasing

Contracts to lease assets are classified as finance leases where they transfer substantially all the risks and rewards of ownership of the asset to the customer. Contracts not deemed to be finance leases are treated as operating leases.

Rentals payable and receivable under operating leases are accounted for on the straight-line basis over the period of the lease.

e] Intangible fixed assets

Intangible fixed assets are amortised in equal instalments over their estimated useful lives.

f] Tangible fixed assets

Depreciation of tangible fixed assets is provided on a straight-line basis over their estimated useful lives as follows:

- Leasehold improvements: shorter of economic life and period of lease
- Data processing and communications equipment: 3 to 5 years
- Furniture and fixtures: 7 years

g] Subsidiary undertakings

Investments in Euroclear Bank's subsidiary undertakings are stated in the parent company's stand-alone accounts at cost less dividends received from pre-acquisition reserves and any impairment in value.

h] Debt securities and equity shares

Securities and shares intended for use on a continuing basis in the group's activities are classified as investment securities and are stated at cost less provision for any impairment in value. The carrying value of investment securities is adjusted over the period to maturity to allow for the amortisation of premiums or discounts on an actuarial basis. Such amortisation is included in interest receivable.

i] Sale and repurchase transactions

Securities that have been sold with an agreement to repurchase continue to be shown on the balance sheet and the sale proceeds recorded as a deposit. Securities acquired in reverse repurchase transactions are not recognised in the balance sheet and the purchase price is treated as a loan. The difference between the sale price and repurchase price is accrued evenly over the life of the transaction and charged or credited to the profit and loss account as interest payable or receivable.

j] Pensions and other post-retirement benefits

The Company operates a number of post-retirement benefit schemes for its employees, including both defined contribution and defined benefit pension plans.

A defined contribution plan is a pension plan under which the Company pays fixed contributions into a separate entity and has no legal or constructive obligation to pay further contributions if the fund does not hold sufficient funds to pay all employees the benefits relating to employee service in the current and prior periods.

A defined benefit plan is a post-employment benefit plan other than a defined contribution plan.

The provision recognised in the balance sheet in respect of defined benefit plans is the present value of the defined benefit obligation at the balance sheet date less the fair value of plan assets. The defined benefit obligation is calculated annually by independent actuaries using the projected unit credit method. The present value of the defined benefit obligation is determined by discounting the estimated future cash outflows using interest rates of high-quality corporate bonds that are denominated in the currency in which the benefits will be paid, and that have terms to maturity approximating the terms of the related pension liability.

All actuarial gains and losses arising from experience adjustments and changes in actuarial assumptions are recognised in the income statement in the period in which they occur.

Past service cost is recognised immediately in the profit and loss account.

The costs of defined contribution plans are charged to the income statement in the period in which they fall due.

The Company provides post-retirement healthcare benefits to their retirees. The expected costs of these benefits are accrued over the period of employment using an accounting methodology similar to that for defined benefit pension plans. Actuarial gains and losses arising from experience adjustments, and changes in actuarial assumptions, are charged or credited to the income statement. These obligations, recorded under the form of provisions, are valued annually by independent qualified actuaries.

k] Derivatives and other financial instruments

Transactions are undertaken in derivative financial instruments (derivatives) for hedging purposes, which include interest rate swaps, futures, options and similar instruments. A derivative is designated as non-trading as there is an offset between the effects of potential movements in market rates on the derivative and the designated non-trading asset, liability or position being hedged. Non-trading derivatives are reviewed regularly for their effectiveness as hedges.

Non-trading derivatives are accounted for on an accruals basis, consistent with the assets, liabilities or positions being hedged. Income and expense on non-trading derivatives are recognised as they accrue over the life of the instruments as an adjustment to the income or expense of the hedged item.

Where a non-trading derivative no longer represents a hedge because either the underlying non-trading asset, liability or position has been derecognised, or the effectiveness of the hedge has been undermined, it is restated at fair value and any change in value is taken directly to the profit and loss account and reported within 'Profit from (loss on) financial operations'. Thereafter, the derivative is classified as a trading instrument and accounted for accordingly.

In other circumstances, where non-trading derivatives are terminated, any resulting gains and losses are amortised over the remaining life of the hedged asset, liability or position. Unamortised gains and losses are reported within 'Other assets' and 'Other liabilities' on the balance sheet.

Derivatives hedging anticipatory transactions are accounted for on a basis consistent with the relevant type of transaction. i.e. gains and losses are not recognised until the period the anticipated transactions occur. When anticipatory transactions do not actually occur, related derivatives are restated at fair value and changes in value are taken directly to the profit and loss account and reported within 'Profit from (loss on) financial operations'.

Treasury swaps are initiated by Euroclear Bank in order to convert balances in non-core currencies into euro or US dollars, and reduce reinvestment risk. Treasury swap are derivative contracts that involve the exchange of interest payments, as well as the exchange of principal amounts. The exchange of interest is recorded as interest expense/income..

l] Foreign currencies

Monetary assets and liabilities denominated in foreign currencies are translated into euros at rates prevailing at the balance sheet date. Profit and loss amounts in foreign currencies are translated into euros at the rates prevailing on the date of the transaction.

Non-monetary assets and liabilities denominated in foreign currencies are translated into euros at historical exchange rates.

Spot foreign exchange contracts are translated into euros at market rates and the resulting gains or losses are taken into the profit and loss account.

The results of branches in foreign currencies are translated at average exchange rates for the year. Exchange differences arising on consolidation of the Company's branches are taken to the profit and loss account.

m] Fund for general banking risks

Additions to, and the uses of, a fund for general banking risks are determined by the Board of directors of Euroclear Bank SA/NV.

Acronyms

ACA	Absolute Contraction Approach
ACC/AC	Audit and Compliance Committee/Audit Committee
ACFE	Association of Certified Fraud Examiners
AMC	Advanced Market Commitment
AML	Anti-Money Laundering
ARM	Assessment and Rating Methodology
BCBS	Basel Committee on Banking Supervision
BEGAAP	Belgian Generally Accepted Accounting Principles
BRRD	Bank Recovery and Resolution Directive
CapEx	Capital Expense/Expenditure
CBR	Central Bank of Russia, Combined Buffer
CCO	Chief Compliance Officer
CDR	Carbon Dioxide Removal
CEDA	Comprehensive Environmental Data Archive
CPMI	Committee on Payments and Market Infrastructures
CRD	Capital Requirements Directive
CRR	Capital Requirements Regulation
CSD	Central Securities Depository
CSDR	Central Securities Depositories Regulation
CSO	Corporate Sustainability Office
CSP	Critical Service Providers
CSRD	Corporate Sustainability Reporting Directive
CTF	Counter Terrorist Financing
D²FMI	Data and Digital-Enabled Financial Market Infrastructure
DEI	Diversity, Equity and Inclusion
D-FMI	Digital Financial Market Infrastructure
DL3S	Distributed Ledger for Securities Settlement System
DLT	Distributed Ledger Technology
DMA	Double-Materiality Assessment
DNN	Digitally Native Note
DORA	Digital Operational Resilience Act
D-SI	Digital Securities Issuance
DTCC	Depositary Trust Clearing Corporation
EAC	Energy Attribute Certificate
EBA	European Banking Authority
EBITDA	Earnings Before Interest, Taxes, Depreciation, and Amortization
ECB	European Central Bank
ECMS	Eurosystem Collateral Management System
EFRAG	European Financial Reporting Advisory Group
EMTN	Euro Medium-Term Note
ERM	Enterprise Risk Management
ESES	Euroclear Settlement of Euronext-zone Securities
ESG	Environmental, Social and Governance
ESMA	European Securities and Markets Authority
ESRS	European Sustainability Reporting Standards
ETF/iETF	Exchange-Traded Funds/International Exchange-Traded Funds
EWC	European Works Council

FATF	Financial Action Task Force
FMI	Financial Market Infrastructure
FSMA	Financial Services and Markets Authority
GHG	Greenhouse Gas
GRI	Global Reporting Initiative
GSSS	Green, Social, Sustainable and Sustainability-linked bonds
ICMA	International Capital Market Association
ICSD	International Central Securities Depository
INED	Independent Non-Executive Director
IOB	Investigation Oversight Body
IOSCO	International Organization of Securities Commissions
IRO	Impact, Risk and Opportunity
ISSA	International Securities Services Association
KPI	Key Performance Indicator
KRI	Key Risk Indicator
KSD	Korean Securities Depository
KTB	Korean Treasury Bonds
LSEG	London Stock Exchange Group
MREL	Minimum Requirement for Own Funds and Eligible Liabilities
MSB	Monetary Stabilisation Bonds
NAV	Net Asset Value
NBB	National Bank of Belgium
NGC	Nominations and Governance Committee
NGEU	Next Generation European Union
NGFS	Network for Greening the Financial Sector
NRA	National Resolution Authority
NSD	National Settlement Depository
OECD	Organization for Economic Co-operation and Development
OpEx	Operating Expense/Expenditure
OSP	Outsourcing Service Providers
PCAF	Partnership for Carbon Accounting Financials
RC	Risk Committee
REC	Renewable Energy Certificate
RoE	Return on Equity
RRW	Recovery, Restructuring and Wind-down
SASB	Sustainability Accounting Standards Board
SBT	Science Based Target
SBTi	Science Based Targets initiative
SDA	Sectoral Decarbonization Approach
SME	Subject Matter Expert
SNED	Shareholder (Representative) Non-Executive Director
SRB	Single Resolution Board
T&D	Transmission and Distribution
T2S	TARGET2-Securities
UK BA	UK Bribery Act
UK TPT	UK Transition Plan Taskforce

© 2025 Euroclear Bank SA/NV
1 Boulevard du Roi Albert II, 1210 Brussels, Belgium • Tel: +32 (0)2 326 1211 • RPM Brussels number 0429 875 591

Euroclear's net-zero target has been approved by the Science-based targets initiative (SBTi)

IR4326_2025