access Holdings

FROM SCALE TO VALUE

Access Holdings Plc

Sustainability Report for the Year Ended 2025

OUR APPROACH TO

Sustainability

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FROM SCALE... TO VALUE

FOREWORD

At Access Holdings, we believe sustainability is not simply about managing risks, it is about unlocking opportunities, driving innovation, and creating long-term value for our stakeholders and the communities we serve.

As Africa continues to navigate economic, social, and environmental transitions, we remain committed to building a resilient institution that supports inclusive growth while contributing meaningfully to sustainable development. Sustainability considerations are increasingly embedded across our governance, strategy, risk management, and business operations, strengthening our ability to respond to evolving stakeholder expectations and emerging opportunities.

This report presents our sustainability-related and climate-related disclosures for the year ended 31 December 2025, prepared in accordance with the IFRS Sustainability Disclosure Standards (IFRS S1 and IFRS S2), with complementary reference to the GRI Standards and SASB framework.

The progress highlighted in this report reflects our commitment to transparency, accountability, and continuous improvement. While we are encouraged by the strides made during the year, we recognise that the journey towards a more sustainable future requires ongoing collaboration, innovation, and disciplined execution.

As we look ahead, we remain focused on creating shared value for our shareholders, customers, employees, communities, and the broader African economy, while advancing our vision of becoming Africa's most respected and sustainable financial institution.

ABOUT THIS REPORT

Statement of Compliance and Reporting Framework

This report has been prepared in accordance with the IFRS Sustainability Disclosure Standards issued by the International Sustainability Standards Board (ISSB), specifically IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information and IFRS S2 Climate-related Disclosures, which serve as the Group's primary sustainability reporting framework.

The Group's sustainability reporting is supported by internally approved sustainability, risk management and governance frameworks, policies and guidance documents, which provide the foundation for the identification, assessment, management and disclosure of sustainability-related and climate-related risks and opportunities across the business.

In preparing these disclosures, the Group has applied IFRS S1 and IFRS S2 as the primary reporting framework. Where no specific IFRS Sustainability Disclosure Standard directly applies to a sustainability-related risk or opportunity, the Group has exercised judgement in accordance with IFRS S1 and considered the applicability of relevant SASB disclosure topics and metrics. The Group has also referred to the GRI Standards only where such guidance provides useful supplementary context and does not conflict with the requirements of IFRS Sustainability Disclosure Standards.

The Group has considered the applicability of disclosure topics and metrics contained within the SASB Standards consistent with the guidance provided in IFRS S1. The Group has further referred to select GRI Standards, where relevant, to provide additional context on sustainability impacts and stakeholder-related matters, provided such references do not conflict with IFRS Sustainability Disclosure Standards.

Reporting Structure and Presentation

This Sustainability Report presents the Access Holdings Plc's ("the Group") sustainability-related and climate-related disclosures for the 2025 financial year. It is structured around the four core disclosure pillars of governance, strategy, risk management, and metrics and targets, in line with the IFRS Sustainability Disclosure Standards, while also incorporating relevant SASB and GRI considerations to support material sustainability disclosures on the Group's sustainability-related information.

The report is intended to be read in conjunction with the Group's consolidated financial statements and aligns with the reporting period of the Group's consolidated financial statements.

The report has been developed in a format intended to be clear and accessible to our diverse range of stakeholders, including investors and other primary users of general-purpose financial reports, as well as broader stakeholders relevant to the Group's GRI-aligned disclosures. In doing so, it brings together the matters most relevant to understanding both how sustainability-related and climate-related risks and opportunities could reasonably be expected to affect the Group's business, cash flows, access to finance, and cost of capital over the short, medium, and long term, and how the Group's activities impact the economy, environment, and society.

Reporting Entity, Period and Boundary

This sustainability report covers Access Holdings Plc and its direct operating subsidiaries: Access Bank Plc, Hydrogen Payment Services Company Limited, Access ARM Pensions Limited, Access Insurance Brokers Limited, and Oxygen X Finance Company Limited. Together, these entities represent the Group's principal business verticals of banking, payments, pensions, insurance, and lending.

While this report has been prepared for the Access Holdings Group and its subsidiaries, given that Access Bank Plc represents the most significant component of the Group's operations, the disclosures presented in this report predominantly reflect Access Bank's sustainability-related performance, except where otherwise stated. Going forward, Access Holdings intends to continue strengthening its alignment with IFRS Sustainability Disclosure Standards by improving the data consolidation, consistency, and coverage of sustainability-related and climaterelated disclosures across the Group in subsequent reporting cycles.

The disclosures presented in this report cover the period from 1 January 2025 to 31 December 2025. In preparing these sustainability-related (including climate-related) disclosures, the Group has used all reasonable and supportable information available at the reporting date without undue cost or effort, and has employed approaches commensurate with the skills, capabilities, and resources available.

Data and assumptions used in preparing these sustainability-related financial disclosures are, to the extent possible, consistent with the corresponding data and assumptions used in preparing the Group's related consolidated financial statements.

Where specific metrics or disclosures are subject to different methodological boundaries, estimation approaches, data limitations, or a high level of measurement uncertainty, these are indicated in the relevant sections.

Significant Judgements

In preparing these disclosures, the Group has made the following significant judgements:

a. The determination of material sustainability-related risks and opportunities (see Section 2.0).

b. The definition of short-term (0–1 year), medium-term (2–3 years), and long-term (3–5 years) time horizons (see Section 4.1).

c. The selection of climate scenarios, underlying assumptions, and sector-level parameters used in the climate transition risk assessment, including the choice of the IEA's Stated Policies Scenario (STEPS) and Net Zero Emissions by 2050 (NZE) pathways, and the application of the 1in1000 TRISK platform and PACTA framework to assess portfolio-level impacts (see Section 4.2).

HIGHLIGHTS OF OUR SUSTAINABILITY PERFORMANCE

28.47%
Reduction in Operational Emissions

₦92.14B
Green Asset Portfolio

₦72.3B
Deployed under Sustainable Finance Framework

2.528M
Low-income individuals with financial access

US$185.38M
Mobilised from DFIs & Donor Agencies (₦266.83B)

US$1.269B
Cummulative Sustainability-Focused Loan Book

₦4.8B
Sustainability Budget Allocated in 2025

2.8B
Transactions Processed in 2025

2,528,117
Low-income individuals supported with finance access

78,438
New MSMEs onboarded to financing platform

354,156
Loans totalling ₦67.48 to women & women-owned business

24%
Of total loan portfolio to women (N33.2B to individuals + ₦34.2B to enterprises)

100%
Employee Participation in Voluntering

359,500
Total Volunteer Hours

10+
Countries with EVP Activity

50,000+
Trees planted

28.47%
Reduction in Operational GHG Emissions (2022 baseline)

263
Branches with Solar Infrastructure

323
Solar-Powered ATMs Deployed

199
Locations with Waste Recycling Programmes

80,000
Women & Youth
Women & Youth Empowerment

4,500
Women trained
Women Digital Entrepreneuship

4,500+
graduates
Digital Gap Empowerment

4,250
Women certified
She Enabled Initiative

48,000
MSMEs trained
MSME Toolkit Initiative

Over 100 global, regional and local recognitions across 15+ countries in 2025

Innocent C. Ike
Group Managing Director / Chief Executive Officer
Access Holdings Plc

Our commitment to building a more sustainable, inclusive, and resilient future remained at the forefront of our strategic priorities, guiding how we create value, manage risk, and support economic development across our markets.

Our commitment to building a more sustainable, inclusive, and resilient future remained at the forefront of our strategic priorities, guiding how we create value, manage risk, and support economic development across our markets. As Africa continues to navigate a rapidly evolving economic, social, and environmental landscape, Access Holdings has continued to strengthen its position as a catalyst for sustainable growth and shared prosperity, advancing its sustainability agenda while building resilience for the future.

During the year, we continued to make measurable progress across our environmental, social, and governance priorities. We reduced operational emissions by 28.47% from our 2022 baseline, expanded solar infrastructure across our network, grew our green asset portfolio to ₦92.14 billion, and deployed ₦72.3 billion under our Sustainable Finance Framework. Through our financial inclusion initiatives, we extended access to financial services and economic opportunities to about 2.528 million low-income individuals, reinforcing our commitment to inclusive growth.

Beyond performance metrics, sustainability became more deeply embedded across the Group. ESG considerations are now more firmly integrated into our governance structures, enterprise risk management processes, credit assessments, procurement decisions, and strategic planning. We also strengthened our climate risk capabilities through the adoption of internationally recognised methodologies for measuring financed emissions, supporting our long-term decarbonisation ambitions.

Importantly, we continued to prioritise transparency and accountability in how we measure and report impact. During the year, we enhanced our impact measurement approach to focus on verified outcomes and long-term value creation, ensuring that our disclosures remain credible, decision-useful, and reflective of real impact.

The opportunities ahead are significant. As we pursue our green asset targets, expand sustainable finance solutions, and advance our net-zero aspirations, we remain focused on enabling prosperity, supporting resilient economies, and creating lasting value for all stakeholders.

We are confident that through innovation, responsible leadership, and purposeful execution, Access Holdings will continue to play a leading role in shaping a more inclusive, sustainable, and prosperous future for Africa.

"Sustainability became more deeply embedded across the Group, with ESG considerations firmly integrated into governance, risk management, credit, procurement, and strategic planning."

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Who We Are and What We Stand For

1.0

Who We Are and What We Stand For

1.1 About Access Holdings Plc

Access Holdings Plc is a leading African financial services group, headquartered in Lagos, Nigeria. Through its principal banking subsidiary, Access Bank Plc, one of Africa's largest banks by total assets, customer base, and geographic footprint, the Group delivers a comprehensive suite of financial services spanning commercial banking, digital finance, insurance, payments, and pensions. Access Holdings operates as a purpose-driven, non-operating holding company incorporated in 2021 and licensed in 2022, anchoring five (5) subsidiaries Access Bank Plc, Hydrogen Payment Services Limited, Access ARM Pensions Limited, Access Insurance Brokers Limited, and Oxygen X Finance Company Limited that together serve customers across 24 countries spanning three continents.

Access Holdings Plc creates value through an integrated financial services model that combines banking, payments, pensions, insurance brokerage, and consumer finance services. Through its subsidiaries, the Group mobilises capital, facilitates trade and investment, provides digital financial solutions, manages retirement savings, enables financial inclusion, and supports economic development across Africa and international markets. Its value creation process is driven by financial capital, technology, human capital, partnerships, and stakeholder trust, delivering sustainable returns to shareholders while creating positive outcomes for customers, employees, regulators, communities, and the environment. The Group's value chain spans capital mobilisation, product development, service delivery, customer engagement, risk management, and impact generation across its markets of operation.

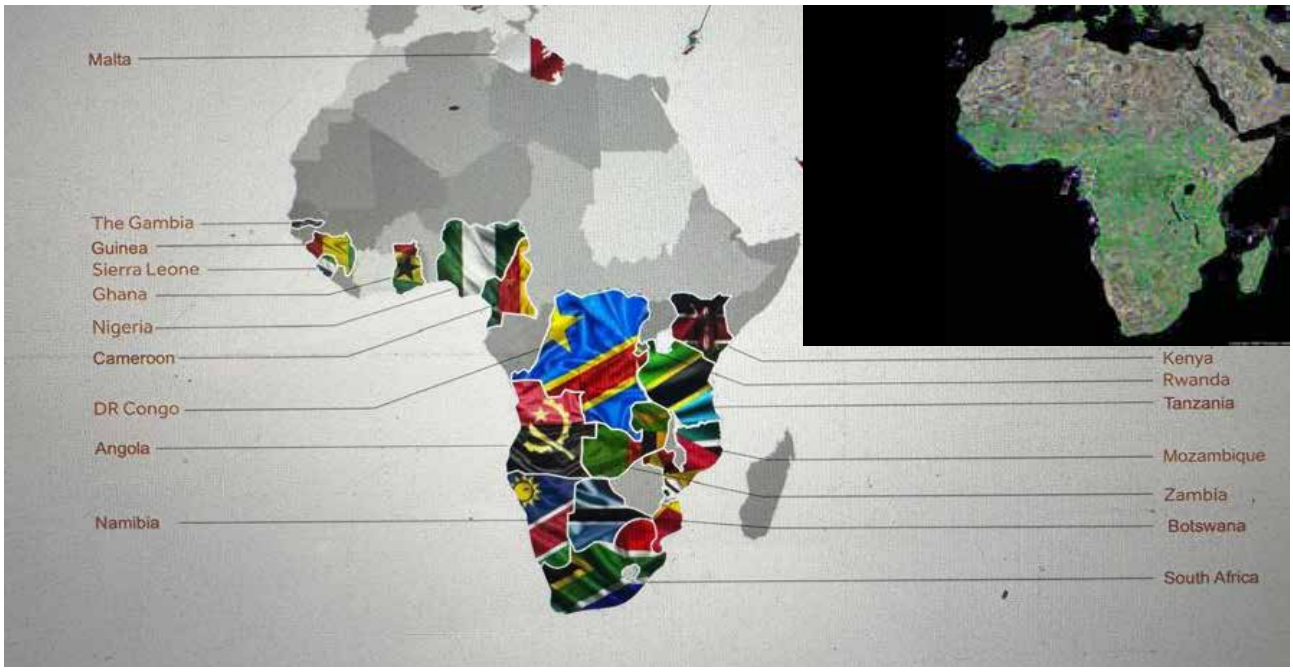
The Group's corporate architecture reflects a deliberate strategy of diversification and resilience, ensuring that its ability to create value is not contingent on any single market, product, or revenue stream. At every level, from the Board to branch operations, Access Holdings is guided by a commitment to performance with integrity, innovation for impact, and growth that is inclusive and sustainable.

1.2 Our Purpose, Vision & Values

Access Holdings Plc exists to make positive impact in Africa, providing the financial infrastructure, products, and expertise that enable individuals to prosper, businesses to grow, and communities to thrive. Our purpose is articulated through four enduring values that govern how we operate:

"Our mission is to be the most respected African financial service Group, connecting Africa's people, businesses, and institutions to a world of opportunities."

- **Excellence**
- **Integrity**
- **Innovation**
- **Service**



1.3 Geographic Footprint

Access Holdings operates one of the most expansive pan-African financial institution franchises on the continent. Access Bank Plc, the Group's principal banking subsidiary, operates through a network of more than 700 branches and service outlets spanning three continents and 24 countries, including Nigeria, Ghana, Kenya, Rwanda, Tanzania, Uganda, Zambia, Zimbabwe, Mozambique, Angola, Cameroon, Guinea, Sierra Leone, Gambia, DRC, and Botswana, with representative offices and correspondent banking relationships extending the Group's reach into the United Kingdom, Europe, Asia, and the Caribbean.

This breadth of presence positions the Group not merely as a financial institution, but as a catalyst for intra-African trade, cross-border investment, and financial inclusion at scale. Each subsidiary operates with embedded local expertise while leveraging the Group's shared infrastructure, technology platforms, risk management frameworks, and brand equity.

24 Countries | 3 Continents

60M+ Banking Customer Base

31,000+ Employees

5 Active subsidiaries

1.4 Market Evolution & Strategic Direction

The 2025 operating environment has been shaped by continued macroeconomic volatility, currency pressures, regulatory evolution, and the accelerating digitisation of financial services across African markets. Access Holdings has responded to these dynamics with strategic agility, strengthening its capital position, expanding its digital product suite, and deepening its sustainability credentials.

The Group's diversified business model, spanning retail banking, corporate and investment banking, digital finance, and non-banking financial services provides a structural buffer against market-specific risk, while the holding company architecture facilitates strategic optionality and disciplined capital allocation.

Our sustainability strategy continues to evolve in response to both stakeholder expectations and regulatory imperatives. This report has been prepared in accordance with the IFRS Sustainability Disclosure Standards issued by the International Sustainability Standards Board (ISSB) specifically IFRS S1 (General Requirements for Disclosure of Sustainability-related Financial Information) and IFRS S2 (Climate-related Disclosures) as the primary reporting basis. The GRI Standards (2021) have been applied as a complementary source of guidance to support disclosures across economic, environmental, and social dimensions. SASB Standards for Commercial Banks, Asset Management and Custody Activities, Insurance, and Consumer Finance are also referenced. All sustainability disclosures are aligned with the United Nations Sustainable Development Goals (SDGs). Our Board Human Resources and Sustainability Committee provides governance oversight of all sustainability matters, ensuring accountability at the highest level.

1.5 Our People, Culture & Workforce Diversity

As a diversified financial services group with over 31,000 employees across multiple jurisdictions, Access Holdings recognises that its people are central to achieving its sustainability ambitions. The Group recorded an employee satisfaction score of 87% in 2025, exceeding its internal target of 80%. The Group's staff attrition rate declined from approximately 13% in 2024 to approximately 11% in 2025, reflecting strengthened retention programmes including an enhanced Employee Value Proposition (EVP), career development initiatives, and an Employee Assistance Programme (EAP) providing confidential support services.

Women represent 49% of the Group's total workforce, reflecting a sustained commitment to gender-inclusive employment. Workforce gender composition by subsidiary as at 31 December 2025 is as follows:

Subsidiary	Male	Female
Access Holdings HoldCo	53%	47%
Access Banking Group	54%	46%
Access ARM Pensions	52%	48%
Hydrogen Payment Services	51%	49%
Oxygen X Finance	42%	58%
Access Insurance Brokers	78%	22%

Learning and development budget utilisation reached approximately 70% in 2025, with a new Group-wide Learning Management System (LMS) approved for implementation to standardise and scale training delivery.

Diversity, Equity and Inclusion (DEI) programme delivery achieved 70–75% of full year plans, with initiatives including career development sessions for female senior managers, executive mentoring, and participation in external DEI programmes.

At the Board level, Access Holdings is committed to maintaining a diverse and inclusive governance structure. As at 31 December 2025, the Access Holdings Board comprised nine (9) directors with 45% female representation (4 female directors: Fatimah Bintah Bello-Ismail, Ibironke Adeyemi, Ojinika Olaghere, and Bolaji Agbede). The Access Bank Plc Board comprised 14 directors, with six female directors representing approximately 43% of the Board. Board composition across all five subsidiaries reflects the Group's commitment to gender balance and diversity of skills and experience at the highest level of oversight. In line with Central Bank of Nigeria requirements, Access Holdings intends to appoint a dedicated Executive Director responsible for Sustainability, further embedding ESG accountability at the executive level.

87%

Employee Satisfaction Score (Target: 80%)

49%

Women in Total Workforce

11%

Staff Attrition Rate (Down from 13%)

45%

Female Board Representation

1.6 Awards & Recognition

Access Holdings and its subsidiaries received more than 100 awards and citations during 2025, recognising excellence across sustainability, corporate social responsibility, digital innovation, banking performance, gender inclusion, and stakeholder engagement. These recognitions, conferred by some of the world's most respected rating bodies, financial publications, and regional award authorities affirm the Group's standing as a leader in responsible finance and institutional excellence across Africa and globally.

The awards span a remarkable breadth of geographies and categories, reflecting the Group's commitment not only to financial performance, but to its role as a purposeful corporate citizen. Highlights include recognition for CSR leadership in West and East Africa, sustainability excellence in Nigeria, Zambia, and Ghana, digital banking innovation, and gender-inclusive leadership.

AWARDS AND RECOGNITIONS 2025

Over 100 global, regional and local recognitions across 15+ countries in 2025

S/N	Award	Awarding Body	Subsidiary	Category
1	Best Retail Bank in Nigeria	Asian Banker Global Excellence in Retail Finance Awards 2025	Nigeria	Global
2	Best Bank in Ghana	Euromoney	Ghana	Global
3	Best Bank in Gambia	Euromoney	Gambia	Global
4	Best Sustainable Bank Gambia 2025	World Economic Magazine	Gambia	International
5	Best Financial Inclusion Initiative Gambia 2025	World Economic Magazine	Gambia	International
6	Best Environmental Initiative in Banking/Finance	World Economic Magazine	Mozambique	International
7	Fastest Growing Corporate Bank	Global Brands Magazine	Zambia	International
8	Fastest Growing Retail Banking Brand	Global Brands Magazine	Zambia	International
9	Most Innovative CEO – Lishala C. Situmbeko	Global Brands Magazine	Zambia	International
10	Company of the Year	Zambia Business Awards	Zambia	Local
11	Bank of the Year	Zambia Business Awards	Zambia	Local
12	Lifetime Achievement Award in Corporate Governance	Zambia Business Awards	Zambia	Local
13	Best Multinational Commercial Bank Nigeria 2025	World Business Outlook	Nigeria	International
14	Best CSR Bank Nigeria 2025	World Business Outlook	Nigeria	International
15	Best Mobile Banking Initiative Nigeria 2025	World Business Outlook	Nigeria	International
16	Leading Personal and Business Banking Platform Nigeria 2025	World Business Outlook	Nigeria	International
17	Bank of the Year – Sustainability	The Industry Magazine	Nigeria	Local
18	Lagos Ambassador for Circular Economy	WAMASON Lagos Council & Eko Waste Summit	Nigeria	Local
19	Most Sustainable Bank Nigeria 2025	World Economic Magazine	Nigeria	International
20	Best Bank in Ghana	Global Finance Award	Ghana	International
21	Most Innovative SME Empowerment Initiative (Banking)	International Finance Award	Ghana	International
22	Excellence in Data Security Award	Innovation and Excellence Awards	Ghana	Local
23	Excellence in Digital Payment Innovation 2025	International Center for Strategic Alliances (ICSA)	Kenya	Local
24	Most Preferred International Bank	Consumer Choice Awards Kenya	Kenya	Local
25	Trailblazer Woman in Banking Award – Lillian Odhiambo	ICSA	Kenya	Local

S/N	Award	Awarding Body	Subsidiary	Category
26	Best SME Financing Company – Nigeria 2025	International Finance	Nigeria	International
27	Most Socially Responsible Company – Nigeria 2025	International Finance	Nigeria	International
28	Best CSR Bank	Global Banking and Finance Award	Zambia	International
29	Best Community Engagement ESG Initiative Zambia 2025	Global Banking and Finance Award	Zambia	International
30	Best CSR Brand Awards	National Humanitarian Recognition	Sierra Leone	Local
31	Most Sustainable Bank in Nigeria	World Finance	Nigeria	International
32	Award for Sustainable Building Design and Environmental Leadership	American Society of Civil Engineers – SIRA	Nigeria	Local
33	Outstanding Corporate Leadership in Social Impact	African Voice Magazine	Nigeria	Local
34	Best Transaction Bank in Nigeria	Euromoney	Nigeria	Global
35	Best SME Bank	Global Finance	Nigeria	International
36	Best CSR Initiative in West Africa	The Digital Banker Awards	Nigeria	International
37	Best Mobile Banking App	The Digital Banker Award	Nigeria	International
38	Best CSR Bank Nigeria 2025	Global Brands Magazine	Nigeria	International
39	Forbes Best Employer Award	Forbes	Nigeria	International
40	Forbes World's Top Companies for Women 2025	Forbes	Nigeria	International
41	MSME Finance Bank of the Year (International Category)	African Global Economic Forum	Nigeria	International
42	Most Outstanding Sustainability Initiatives	Corporate Awards	UK	International
43	Best Bank for Sustainable Development	Global Banking and Finance Review	Rwanda	International
44	Best CSR Initiative	Digital Banker	Angola	International
45	Best ESG Initiative – Central Africa	Digital Banker	Cameroon	International
46	Best Bank Sustainability and Operational Excellence	HESS Awards	Ghana	Local
47	Outstanding Employee Volunteering	CSR & Sustainability Leadership Awards	Ghana	Local
48	Top 50 Sustainability Brands of the Year	CSR & Sustainability Leadership Awards	Ghana	Local
49	Best CSR Initiative – East Africa	The Digital Banker	Kenya	International
50	Best Bank for Social Impact – Kenya 2025	Global Brands Magazine	Kenya	International
51	Best Corporate Social Responsible Bank – DR Congo 2025	International Finance Magazine	D.R. Congo	International
52	Best CSR Bank	Global Banking and Finance Review	Angola	International
53	Outstanding Sustainable Project Financing	Karlsruhe Awards	Ghana	International

These recognitions are not ending in themselves. They serve as external validation of the Group's internal commitments to governance integrity, social responsibility, digital transformation, and stakeholder value creation and inspire us to continuously raise the bar in all dimensions of our performance.

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Stewardship That Builds Trust (Governance)

2.0

Stewardship That Builds Trust (Governance)

2.1 Governance Framework for Sustainability and Climate-related Matters

We recognise that effective sustainability governance is the cornerstone of sustainable business performance at Access Holdings. Accordingly, we have intentionally designed our governance framework to ensure that sustainability and climate-related risks and opportunities receive the dedicated attention and oversight they require in today's fast-evolving operating environment.

Access Holdings Board of Directors have the ultimate responsibility for the oversight of sustainability-related[1] risks and opportunities across the Group. This responsibility is exercised through the Board's standing committee structure, with the Board Human Resources and Sustainability Committee serving as the primary governance body charged with oversight of sustainability matters. The Committee advises the Board on its responsibilities in relation to the Group's sustainability practices, human resource policies, plans, processes, and procedures. Through this Committee, sustainability-related and climate-related matters are reviewed at Board level, and recommendations are escalated to the full Board as required. The committee also has oversight on progress achieved on set targets on a regular basis.

The composition of the Board Human Resources and Sustainability Committee during the year 2025 is set out below:

***Table 2:** Composition of the Board Human Resources and Sustainability Committee*

No.	Director	Designation
1.	Mrs. Ojinika Olaghere	Chairman
2.	Mr. Abubakar Jimoh	Vice-Chairman
3.	Mr. Olusegun Ogbonnewo	Member
4.	Mrs. Fatimah Bello-Ismail	Member
5.	Mrs. Ibironke Adeyemi	Member
6.	Mr. Innocent C. Ike	Member
7.	Ms. Bolaji Agbede	Member

The Board Human Resource and Sustainability Committee convenes on a quarterly basis. Sustainability matters are therefore presented to the Committee regularly throughout the year, with significant issues escalated to the Board as appropriate.

Access Holdings is committed to maintaining a diverse and inclusive Board that reflects a broad range of skills, perspectives, and experiences relevant to overseeing the Group's strategy, including its sustainability agenda. As at 31 December 2025, the Board comprised 9 directors, with 45% female representation. During the reporting period, two Non-Executive Directors, Mr. Oluseyi Kumapayi and Mr. Roosevelt Ogbonna, retired from the Board. Two additional Directors were appointed, namely Mr. Innocent Ike (Group Managing Director/Chief Executive Officer) and Mrs. Ibironke Adeyemi (Independent Non-Executive Director). The Group continues to monitor and strengthen Board diversity in line with emerging best practices and regulatory expectations.

Board composition across the Group's principal subsidiaries during the reporting year is presented below. Changes to board composition occurred across all entities during the period, except for Hydrogen Payment Services and Oxygen X Finance. Details of these changes are reflected within the respective entity annual reports for the reporting period.

Table 3: *Composition of the Access Holdings Board of Directors*

No.	Name	Status	Gender
1	Aigboje Aig-Imoukhuede	Chairman/Non-Executive Director	Male
2	Abubakar Jimoh	Independent Non-Executive Director	Male
3	Fatimah Bintah Bello-Ismail	Independent Non-Executive Director	Female
4	Ibironke Adeyemi	Independent Non-Executive Director	Female
5	Olusegun Ogbonnewo	Non-Executive Director	Male
6	Ojinika Olaghere	Non-Executive Director	Female
7	Innocent C. Ike	Group Managing Director/CEO	Male
8	Bolaji Agbede	Executive Director	Female
9	Lanre Bamisebi	Executive Director	Male

[1] References to sustainability-related risks and opportunities as well as sustainability-related matters in this report include climate-related matters unless explicitly stated otherwise or specifically differentiated

Table 4: *Composition of the Access Bank's Board of Directors*

S/N	Name	Status	Gender
1	Paul Usoro	Chairman/Non-Executive Director	Male
2	Ifeyinwa Osime	Independent Non-Executive Director	Female
3	Okey Nwuke	Non-Executive Director	Male
4	Hassan Usman	Independent Non-Executive Director	Male
5	Omosalewa Fajobi	Non-Executive Director	Female
6	Titilayo Osuntoki	Non-Executive Director	Female
7	Uche Orji	Independent Non-Executive Director	Male
8	Akinyemi Odusolu	Independent Non-Executive Director	Male
9	Roosevelt Ogbonna	Managing Director	Male
10	Chizoma Okoli	Deputy Managing Director, Retail South	Female
11	Gregory Jobome	Executive Director, Risk Management Division	Male
12	Hadiza Ambursa	Executive Director, Commercial Banking Division	Female
13	Oluseyi Kumapayi	Executive Director, African Subsidiaries	Male
14	Iyabo Soji-Okusanya	Executive Director, Corporate and Investment Banking Division	Female

Table 5: *Composition of the Access ARM Pensions Limited Board of Directors*

S/N	Name	Status	Gender
1	Gbenga Oyebode	Chairman/Non-Executive Director	Male
2	Chijioke Ugochukwu	Independent Non-Executive Director	Female
3	Obafunmilayo Agusto	Independent Non-Executive Director	Male
4	Remilekun A. Odunlami	Independent Non-Executive Director	Female
5	Oritsedere Otubu	Non-Executive Director	Male
6	Bolaji Agbede	Non-Executive Director	Female
7	Austin Opara	Non-Executive Director	Male
8	Okey Nwuke	Non-Executive Director	Male
9	Robert Imowo	Non-Executive Director	Male
10	Afolabi Folayan	Executive Director	Male
11	Nuhu Modibbo	Executive Director	Male
12	Abimbola Suleiman	Acting Managing Director/CEO	Female

Table 6: *Composition of the Access Insurance Brokers Limited Board of Directors*

S/N	Name	Status	Gender
1	Peggy Onwu	Chairman/Non-Executive Director	Female
2	Adeyemi Odusanya	Independent Non-Executive Director	Male
3	Njideka Esomeju	Non-Executive Director	Female
4	Adaeze Ume	Non-Executive Director	Female
5	Godwin Onyeke	Managing Director	Male

Table 7: *Composition of the Hydrogen Payment Services Company Limited Board of Directors*

S/N	Name	Status	Gender
1	Michael Babajide Ogundare	Chairman/Independent Non-Executive	Female
2	Kehinde Aluko	Independent Non-Executive Director	Female
3	Abimbola Akeredulu	Independent Non-Executive Director	Female
4	Lanre Bamisebi	Non-Executive Director	Male
5	Bayo Adewolu	Non-Executive Director	Male
6	Robert Giles	Non-Executive Director	Male
7	Kemi Okusanya	Managing Director	Female

Table 8: *Composition of the Oxygen X Finance Company Limited Board of Directors*

S/N	Name	Status	Gender
1	Obeahon Asekhame Ohiwerei	Chairman/Non-Executive Director	Male
2	Olufemi Paul Johnson	Independent Non-Executive Director	Male
3	Egbe Otubu	Independent Non-Executive Director	Female
4	Olusegun Babalola Ogbonnewo	Non-Executive Director	Male
5	Kolawole Augustine Ajimoko	Non-Executive Director	Male
6	Daniel Babatola Awe	Non-Executive Director	Male

2.2 Board Oversight Responsibilities

At Access Holdings, both the Board Risk Management Committee and the Board Human Resources and Sustainability Committee provide oversight on sustainability matters, with their responsibilities designed to complement each other.

Oversight responsibilities for sustainability-related risks and opportunities are reflected in the Board Risk Management Committee (BRMC) Charter which defines its mandate, purpose, composition, duties, and reporting lines to the Board. The Board Human Resources and Sustainability Committee is responsible for reviewing the Group's sustainability strategy, monitoring performance against sustainability-related targets and overseeing the integration of sustainability-related considerations into the Group's broader governance and decision-making processes, as articulated in the Board Human Resources and Sustainability Committee Charter.

In exercising its oversight, the Committee considers sustainability-related risks and opportunities as part of its review of the Group's strategy, major transactions, and risk management processes, including consideration of trade-offs associated with those risks and opportunities. The Committee also oversees the setting of targets related to sustainability-related and climate-related matters and monitors progress towards those targets.

2.3 Board Committee Structure

The Board exercises its wider governance responsibilities through six standing committees:

1. Board Audit Committee
2. Board Digital and Information Technology Committee
3. Board Finance and Investment Committee
4. Board Governance, Nomination and Remuneration Committee
5. Board Human Resources and Sustainability Committee
6. Board Risk Management Committee

Each committee operates under a charter that defines its purpose, composition, structure, duties, tenure, and reporting lines to the Board. While these committees review matters within their respective mandates, ultimate responsibility for the Group's affairs, including sustainability-related matters, remains with the Board.

This structure supports integrated oversight of the broader matters that shape the Group's sustainability agenda, including governance, risk, finance, internal control, technology, and people. Sustainability oversight is not treated as a standalone process but is embedded within the wider governance framework through which the Board directs and supervises the Group.

2.4 Escalation and Reporting Mechanisms

Sustainability-related matters are escalated to the Board through two complementary reporting channels:

1. Board Human Resources and Sustainability Committee: Serves as the primary channel for sustainability strategy, governance, policy approvals, and performance monitoring. For urgent matters arising outside of scheduled meeting cycles, written resolutions are utilised to communicate with Directors, ensuring timely decision-making on critical sustainability issues.

2. Board Risk Management Committee (BRMC): Receives sustainability-related risk reporting, particularly concerning green and ESG-related credit facilities, the issuance of green credits, and sustainable finance transactions. This channel ensures that climate-related financial risks are integrated within the Group's broader risk governance.

The two committees operate under distinct charters with separate mandates, ensuring complementarity without duplication. The HR and Sustainability Committee that exist in the Banking Group & Holding Company addresses the broader sustainability strategy and governance, while the BRMC focuses on sustainability-related credit risk and portfolio-level exposures. Together, they provide the Board with a comprehensive, multi-dimensional view of sustainability across both strategic and risk perspectives.

The Company Secretariat facilitates governance processes through the Board Diligence platform, an electronic system used to share board packs, reports, and sustainability-related documentation with Directors, supporting timely and paperless communication.

2.5 Management's Role in Sustainability Governance

At management level, execution and coordination of sustainability-related matters are supported through the following governance structures, which operate across the Holding Company and its subsidiaries:

- Management Committee (MANCO)
- ESG/Sustainability Committee
- Group Committee of CEOs of Subsidiaries
- Group Risk Management Committee (GRMC)
- Executive Committee (EXCO) at the various subsidiaries
- Risk Committees at the various subsidiaries
- Management Credit Committee (MCC)
- Group Asset and Liability Committee (Group ALCO)
- Digital Steering Committee (DSC)
- Information Security Council (ISC)
- Operational Risk Management Committee (ORMC)

These management-level structures support the implementation, coordination, and oversight of sustainability-related risks and opportunities across the Group's operations. They use targeted controls and procedures that are integrated with the Group's broader internal governance and risk management functions.

The oversight of sustainability-related risks and opportunities is supported by a system of internal controls designed to ensure the accuracy, completeness, and reliability of sustainability-related data across the Group. These controls include established sustainability policies, sustainability sub-committee structures across African subsidiaries, internal and external audits, Group Support functions, and defined procedures for reviewing data sources, collection methods, calculation methodologies, and tracking systems used within the Group's sustainability reporting processes. Sustainability governance at the management level is further reinforced through the integration of sustainability objectives into the Group's performance management systems. Key governance mechanisms include:

Capital allocation for climate risk: The Environmental & Social Risk Management & Risk Analytics team manages the Internal Capital Adequacy Assessment Process (ICAAP), which includes explicit capital allocation for climate and ESG risk, ensuring that sustainability-related financial exposures are reflected in the Group's capital planning.

Sustainability budget governance: The Group make budgetary allocation from its Profit Before Tax (PBT) specifically for Sustainability initiatives, providing a structured and predictable funding mechanism for the sustainability programme. In 2025, this resulted in a sustainability budget allocation of ₦4.8 billion, representing a significant increase from ₦2.1 billion in 2024, showing the growth in the Group's profitability and its deepening commitment to the sustainability agenda.

Operational sustainability targets: At the operational level, cost-reduction initiatives aligned with sustainability

objectives including car-pooling systems, electric vehicle deployment, energy-saving measures such as earlier branch shutdowns, and the transition to paperless operations are tracked through the Finance function and integrated into management reporting.

Sustainability accountability is reinforced through performance management. Sales-facing staff in the banking subsidiary have green portfolio targets within their individual KPIs, with a defined percentage of their performance rating tied to the proportion of their portfolio classified as green or sustainable. Where thresholds are not met, this directly affects the overall performance rating, with results escalated through the Finance Committee (FinCom). This mechanism establishes a clear link between strategic sustainability targets and individual performance outcomes.

2.6 Climate-related and Sustainable Finance Governance

For climate-related and sustainable finance matters within the Group, particularly Access Bank, governance is further strengthened through the ESG Committee. The Committee has oversight responsibility for:

- Driving green banking, climate risk disclosures, and carbon accounting;
- Governing portfolio greening activities, limits, and target setting;
- Supporting internal emissions reduction;
- Recommending the Bank's Portfolio Greening Policy for approval through the Policy MCC;
- Overseeing implementation of the Portfolio Greening Strategy across the enterprise;
- Reviewing methodologies and tools for the identification, measurement, monitoring, and impact reporting of green assets;
- Approving the Green Asset Register; and
- Reviewing and approving the Environmental & Social Impact Report of the Sustainable Finance Programme.

The Group ESG Committee is jointly chaired by the Group MD/CEO alongside the MD/CEO Access Bank and includes the heads of the following key functions:

- Environmental and Social Risk Management (ESRM)
- Enterprise Business Support
- Strategic Business Units (SBUs)
- Sustainability
- Human Resources
- Credit Risk Management (CRM)
- Project and Structured Finance (PSF)
- Product Development
- Information Technology (IT)
- Legal
- Chief Finance Officer
- Group Chief Compliance Officer
- Country Managing Directors (Banking Subsidiaries)
- CEO Hydrogen
- CEO Oxygen
- CEO Access Insurance
- CEO Access Arm Pensions

This composition provides climate-related and sustainable finance matters with a defined governance structure incorporating representation from both control and business functions.

The ESRM function serves as the operational backbone of the Group's climate-related and environmental governance. During the 2025 reporting period, the Group maintained its zero regulatory penalties record related to sustainability for the second consecutive year, while reducing the proportion of the loan book exposed to high environmental and social risk (Category A) from approximately 8% to 7% as at year end 2025. Climate and environmental risk are fully integrated into the credit risk management system through the ESG Toolkit embedded in the credit approval platform, ensuring that all facilities are reviewed against IFC Performance Standards, the Equator Principles, and World Bank sector guidelines prior to approval.

Governance over environmental and social risk is further strengthened through the following mechanisms:

- Transactions on the Group's exclusion list are automatically blocked within the credit system;
- An E&S Monitoring Team conducts periodic site visits and audits for high-risk (Category A facilities; and inclusive of Category B, project-related loans as well as IFC PS triggered transactions.
- The ESRM team was fortified during 2025 to enhance monitoring capacity and oversight effectiveness.

2.7 Implementation Responsibilities under the Portfolio Greening Strategy

Implementation responsibilities under the Portfolio Greening Strategy are clearly allocated across relevant functions:

- The ESRM team, working with the Sustainability team, has ownership of green assets policy development, policy amendments, target-setting recommendations, and integration of evolving climate financing guidance.
- Green asset portfolio creation, green loan relationship management, and green loan portfolio growth are

jointly owned by the Corporate and Investment Banking Division (CIBD), the Commercial Banking Division (CBD) and the Retail Banking Division.

This allocation embeds governance for climate-related and sustainable finance matters within both policy oversight and day-to-day business execution.

2.8 Group-wide Sustainability Governance

Sustainability governance extends beyond the Holding Company through established structures at country level. Across the African subsidiaries, ESG sub-committee structures and ESG policies were established and operational in several countries during the 2025 reporting period, reflecting a governance approach supported through country-level implementation mechanisms across the Group's operations.

The Group maintains a centralised governance process over sustainability-related communications to ensure consistency, accuracy, and authenticity across its diverse operating markets. The Brand Management function works in close collaboration with the Sustainability and Investor Relations teams through a structured feedback loop whereby sustainability content is developed, reviewed for alignment and accuracy by the Sustainability team, and cleared by Investor Relations for investor-facing material prior to deployment.

In 2025, the Group adopted a Global Communications Strategy designating sustainability as a key strategic pillar, supported by updated marketing, internal communications, and social media policies. Sustainability messaging is cascaded through an annual communications calendar to all operating regions, with localised executions reviewed by the Group Sustainability office to mitigate greenwashing risk. Reputational risk is actively monitored through dedicated tools including Brandwatch, Repustate, and Prowly, which recorded an overall positive brand sentiment of approximately 97% during the reporting period.

During the reporting period, Access Holdings continued to strengthen country-level sustainability governance across its African footprint. ESG sub-committees were established and operational in 12 countries, while ESG policies were in place across 13 countries. Capacity-building training was implemented across all countries, and Sustainability Champions were active across the Group's operating footprint to support local ownership of sustainability priorities.

This structure is important to the management of material topics because it allows the Group to translate Board and management-level sustainability commitments into market-level action. It also supports consistent implementation of the Group's priorities on sustainable operations, responsible finance, employee engagement, supply chain practices, customer trust and community impact. In addition, sustainability-focused vendor training was delivered in selected subsidiaries, including Sierra Leone, Kenya, Rwanda and The Gambia, with sessions focused on environmental responsibility, ethical sourcing, compliance standards and long-term value creation.

2.9 Board and Management Capacity-Building

Strengthening the Board's skills, competencies, and capabilities to effectively oversee sustainability matters at Access Holdings remains critical to our long-term growth and business success. The Board's capacity development is driven through a Directors' Orientation and Continuous Education Policy. Under this framework, Directors are exposed to domestic and international training to strengthen decision-making capacity and support effective oversight. New Directors receive a personalised induction programme covering the Strategic Business Units, Board processes and policies, together with an induction pack containing committee charters, significant reports, important statutes and policies, minutes of previous Board meetings, and a calendar of Board activities. The Board also approves an annual training plan and budget for Directors.

To ensure informed oversight of sustainability-related matters, the Board undertakes dedicated training on an ongoing basis. In November 2025, a Board training session covering the IFRS Sustainability Disclosure Standards (IFRS S1 and S2) was conducted as part of the Board's annual master classes. The session was designed to strengthen Directors' understanding of evolving climate reporting requirements and their governance implications.

In addition to this group session, seven Non-Executive Directors individually completed specialised development programmes at leading international institutions during 2025, including Imperial College London, the Institute of Directors London, Harvard Business School, Stanford Graduate School of Business, INSEAD, and Chicago Booth. These programmes covered areas including risk management, corporate strategy, portfolio management, corporate governance, organisational culture, innovation leadership, and corporate revitalisation, collectively enhancing the Board's capacity to provide effective governance over matters integral to the Group's sustainability and long-term value creation agenda.

Board training programmes completed during the reporting period include the Risk Management Programme, Accelerated Certificate in Company Direction, Diploma in Company Direction – Developing Board Performance, Women Leaders – Advancing Together, Culture as a Competitive Advantage, Corporate Strategy for Board Members, Portfolio Management, Leading and Building a Culture of Innovation, and Designing and Executing Corporate Revitalisation.

The Board Governance, Nomination and Remuneration Committee is responsible for ensuring the Board maintains an appropriate mix of skills and adequate composition to oversee the Group's strategy, including sustainability-related matters. The Committee approves an annual training budget based on each director's assessed development needs, while an independent board performance evaluation and corporate governance assessment is conducted annually by external consultants, who identify any skill gaps and provide recommendations. At management level, capability-building is embedded within the Group's sustainability governance framework, supported by a structured Director's Orientation programme for newly appointed executives. Capacity Building Training and Sustainability Champions were operational across all countries in which the Group operates, helping to strengthen awareness, implementation, and accountability across the business.

2.10 Ethics, Integrity and Compliance

The Group maintains a strong ethics and compliance framework anchored on policies covering anti-corruption, anti-money laundering, fraud prevention, and conflicts of interest. These policies are operationalised across all subsidiaries through the "Access Way", a Group-wide policy framework supplemented by localised provisions that reflect country-specific legal and regulatory requirements. In the reporting period, the Group recorded zero material regulatory penalties relating to sustainability for the second consecutive year, demonstrating its continued commitment to high standards of ethical conduct, integrity, and regulatory compliance.

2.11 Speaking Up, Grievance and Escalation Mechanisms

Effective governance depends not only on formal oversight structures, but also on the existence of mechanisms through which concerns can be raised, reviewed and addressed in a timely manner. Access Holdings maintains governance processes that support the escalation of critical concerns and the review of issues relating to conduct, compliance, operational integrity and sustainability-related matters. These mechanisms form part of the Group's broader internal control environment and support early identification and resolution of issues that may affect performance, stakeholder trust or regulatory standing.

The Group's reporting and escalation structures are designed to facilitate communication between management and the Board on material sustainability-related and climate-related matters. This enables relevant issues to be reviewed at the appropriate level and supports accountability across the Group's lines of defense. As the sustainability reporting process continues to mature, these escalation and issue-management processes remain important to the Group's governance effectiveness and responsible business conduct.

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Our Blueprint for Sustainable Value Creation (Strategy)

3.0

Our Blueprint for Sustainable Value Creation (Strategy)

Access Holdings' sustainability strategy is anchored in its corporate purpose: We exist to make a positive impact in Africa. This is guided by the core values of excellence, innovation, service, and integrity. The Group recognises that climate change and wider sustainability dynamics present both material financial risks and significant strategic opportunities, with direct implications for portfolio composition, earnings stability, and long-term value creation.

The Group's 5-Year Sustainability Strategy (2023–2027) serves as the roadmap for this agenda, focusing efforts on three key pillars where the Group can drive the most meaningful impact. Central and key to this strategy is a commitment to meeting the world's financial needs in economically, socially, and environmentally responsible ways, while creating lasting value to the communities it serves.

3.1 Our Approach to Materiality Assessment

Understanding the sustainability matters that are most significant to our stakeholders and most influential to our long-term success is central to Access Holdings' approach to responsible business. Our material issues reflect the economic, environmental, social, and governance (EESG) factors that guide our sustainability strategy and ensure our efforts remain focused on areas of greatest strategic and stakeholder relevance.

In adopting the IFRS Sustainability Disclosure Standards, our materiality process evaluates the sustainability-related risks and opportunities that could reasonably affect our business prospects, financial position, performance, or resilience. While meeting investor-focused disclosure requirements, we also recognise that issues affecting customers, employees, regulators, and communities can quickly evolve into material financial considerations.

To meet these diverse needs, Access Holdings applies a double materiality approach, assessing sustainability topics through both financial materiality (how sustainability and climate-related matters may affect the Group's enterprise value) and impact materiality (how the Group's activities may affect people, society, and the environment) perspectives. The financial materiality approach is aligned with the IFRS Sustainability Disclosure Standards, while the impact materiality approach is aligned with the GRI Standards. A combination of both approaches to achieve a double materiality approach takes into cognisance the interoperability consideration of the IFRS Sustainability Disclosure Standards. The double materiality approach ensures a comprehensive view of our sustainability impacts and dependencies while meeting the financial materiality requirement of the IFRS Sustainability Disclosure Standards.

Our 2025 materiality assessment provides a clear basis for the disclosures presented, ensuring that our disclosures remain focused on the issues most relevant to decision-making as it relates to users of general-purpose financial statements, most meaningful to stakeholders and most critical to the Group's long-term outlook.

3.2 Materiality Assessment Process

Access Holdings adopted a structured process to determine its material topics for the reporting year. The process combined topic identification, stakeholder input, assessment, prioritisation, and validation, ensuring that the selected material topics accurately reflected both the organisation's strategic priorities and the expectations of

its stakeholders.

Stakeholder groups engaged as part of the materiality assessment process included executive management, employees, and select external stakeholders, ensuring that the perspectives of the Group's most significant internal and external stakeholder groups were reflected in the identification and prioritisation of material topics.

Table 1: *Materiality Assessment Process*

S/N	Step	Description
1	**Identification of topics** Understand the organisational context, and identify actual and potential impacts	Relevant sustainability-related (including climate-related) matters were identified through a review of internal and external inputs, including the Group's business model and value chain, strategic priorities, peer and industry benchmarking, applicable sustainability standards (IFRS S1/S2, GRI Standards, SASB Standards), regulatory developments, and matters emerging through the wider reporting process.
2	**Stakeholder engagement** Gather internal and external perspectives	Inputs were obtained through multiple channels, including a structured materiality assessment workshop, and materiality surveys deployed to key stakeholders. Internal perspectives were further informed through sustainability data analysis and engagement with contributors across the sustainability management and reporting process. External stakeholders provided an additional perspective on expectations, impacts and the broader significance of the identified issues.
3	**Assessment and prioritisation** Evaluate significance using defined criteria	Identified topics were evaluated and scored using defined materiality criteria to determine their relative significance for reporting. For financial materiality, topics were assessed based on their likelihood of occurrence and the magnitude of their potential impact on the Group's financial performance. For impact materiality, topics were evaluated in terms of the scale, scope, severity, and likelihood of the Group's actual or potential effects on the economy, environment, and people. Subsequently, the assessment results were analysed and normalised to enable a clear prioritisation of the issues presented in this report.
4	**Validation** Review and Sign-off	The outcome of the assessment was reviewed and validated by the management team prior to finalisation, to confirm that the identified material topics were relevant, complete, and appropriate for inclusion in the Group's 2025 sustainability disclosures.

At the community level, engagement is delivered through Corporate Social Investment programmes and strategic partnerships, while collaboration with development finance partners, including the International Finance Corporation, Deutsche Investitions- und Entwicklungsgesellschaft, and Entrepreneurial Development Bank of the Netherlands , is maintained through structured ongoing dialogue to support capital mobilisation and alignment with international sustainability standards.

3.3 Material Topics Identified

The following topics were identified as material for the 2025 reporting period and form the basis for the disclosures presented in this report. Together, they represent the sustainability-related and climate-related matters assessed as most significant, both in terms of their potential to affect the Group's financial prospects (financial materiality), and the Group's most significant impacts on the economy, the environment, and people (impact materiality).

The topics are organised across four dimensions of environment, economic, social and governance:

Environmental Matters:

1. Climate Change Mitigation & Transition
2. GHG Emissions & Energy Management
3. Resource Use, Waste & Conservation
4. Sustainable Infrastructure & Supply Chain

Economic Matters:

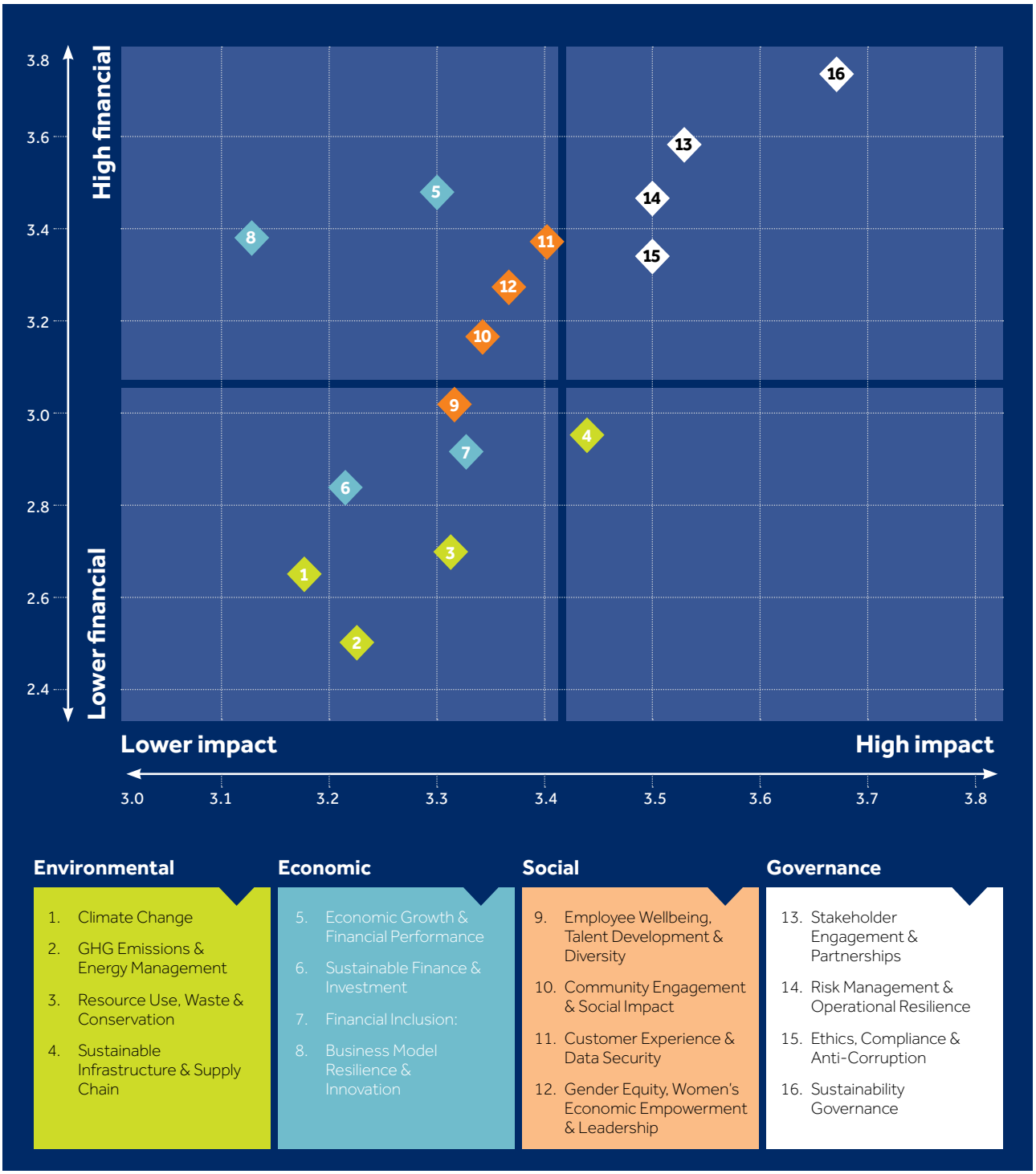
1. Economic Growth & Financial Performance
2. Sustainable Finance & Investment
3. Financial Inclusion
4. Business Model Resilience & Innovation

Social Matters:

1. Employee Wellbeing, Talent Development & Diversity
2. Customer Experience & Data Security
3. Community Engagement & Social Impact
4. Gender Equity, Women's Economic Empowerment & Leadership
5. Stakeholder Engagement & Partnerships

Governance Matters:

1. Risk Management & Operational Resilience
2. Ethics, Compliance & Anti-Corruption
3. Sustainability Governance



3.4 Stakeholder Engagement

Engagement with stakeholders is facilitated through audience-tailored channels designed to support meaningful and consistent dialogue. Customers are engaged through email correspondence, social media platforms, dedicated customer feedback systems, and community-facing initiatives such as the annual Lagos City Marathon. Employees are engaged through the Group's internal social platform (Yamma), town hall sessions, and the Employee Volunteering Programme, which collectively support information sharing, dialogue, and cultural alignment. For investors and analysts, the Group leverages investor presentations, quarterly disclosures, and structured engagements with ESG rating agencies.

Engagement with regulators is sustained through active participation in over four global sustainability working groups, including the Nigerian Sustainable Banking Principles (NSBP) Implementation Committee and the United Nations Environment Programme Finance Initiative (UNEPFI) Principles for Responsible Banking (PRB) working group, while Board members are supported through the Board Diligence digital platform for governance-related communications.

3.5 Sustainability-related Risks and Opportunities

At Access Holdings, we identified the material sustainability-related and climate-related risks and opportunities that could reasonably be expected to affect the Group's cash flows, access to finance, and cost of capital over the short, medium, and long term. In line with the Group's strategic planning framework, these time horizons are defined as follows:

Table 9: *Definition of Time Horizons for Sustainability-related Risks and Opportunities*

Time Horizon	Definition
Short term	0–1 year
Medium term	2–3 years
Long term	3–5 years

These definitions have been applied consistently across reporting periods. Progress against the targets associated with each identified risk and opportunity is monitored on an ongoing basis and reported in the sections that follow.

3.6 Sustainability-related Risks

The following table summarises the key sustainability-related risks identified across the Group and its entities, their impacts on the business model, and the mitigating controls and planned responses in place:

Table 10: *Sustainability-related Risks, Effects, and Mitigating Controls*

Sustainability Risk	Time Horizon	Current Effect on Access Holdings		Anticipated Effect on Access Holdings	Mitigating Controls and Planned Response
		2024	2025		
Groupwide Risk					
Regulatory Compliance Risk	Short - Medium	Zero regulatory penalties recorded.	Zero regulatory penalties recorded.	Legal or regulatory sanctions, reputational loss, and associated financial and business impacts.	Regular monitoring of adherence to regulatory requirements and internal compliance policies.
Money Laundering Risk	Short - Medium	Zero loss of earnings recorded from non-compliance with anti-money laundering and anti-terrorism financing regulations and policy.	Zero loss of earnings recorded from non-compliance with anti-money laundering and anti-terrorism financing regulations and policy.	Loss of earnings or capital arising from non-compliance with anti-money laundering and anti-terrorism financing regulations and policies.	Filing of Suspicious Activity Reports (SARs) with relevant authorities when suspicious activities are identified. Mandatory training for employees on anti-money laundering.
Cyber Risk	Short	Zero cybersecurity breaches recorded.	Zero cybersecurity breaches recorded.	Potential disruption to operations, data breaches, and associated reputational and financial impacts, particularly as the roup continues to expand through ergers and cquisitions.	Network access control, network security, and application security measures.
Environmental and Social (E&S) Risk	Short - Medium - Long	Approximately 8% of the loan book was vulnerable to E&S risks.	Approximately 8% of the Nigeria loan book was assessed as vulnerable to E&S risks, while the corresponding exposure at the Group level was 4%. In addition, the Group remains exposed to physical climate risks, including notable flooding incidents in Kenya, as well as coastal erosion and extreme heat, which directly affected branch operations and the wider network.	Environmental and social performance and climate risk may have financial, legal, and reputational implications for the Group's business and assets.	Robust system for continuous E&S risk evaluation. Regular training programmes to enhance E&S risk management skills.

Sustainability Risk	Time Horizon	Current Effect on Access Holdings		Anticipated Effect on Access Holdings	Mitigating Controls and Planned Response
		2024	2025		
Groupwide Risk					
Fraud Risk	Short	₦1.69 billion in losses incurred.	₦1.24 billion in losses incurred.	Potential constraint on growth opportunities, increased likelihood of adverse regulatory action, and impact on asset quality and business continuity.	Two-factor authentication on key channels and applications. Fraud awareness training for customers and employees. Electronic fraud Monitoring solutions for key banking channels. Deployment of the following initiatives. Enhanced Fraud Risk Prevention capabilities, Regulatory compliance and automated AML/ CFT Reporting, and Quickbucks 3.0
Reputational Risk	Short - Medium	3,205,348 complaints received. 99.25% resolution rate achieved	3,055,829 complaints received. 99.79% resolution rate achieved	Loss of current or future customers and loss of public confidence.	REPUSTATE monitoring. Staff competence development, support, and continuous tracking of staff attrition rates.
Value Chain Exposure Risk	Medium - Long	Facilities are categorised as: • Category A (High E&S risk): 7%, • Category B (Medium E&S risk): 39% • Category C (Low E&S risk): 55%	Facilities are categorised as: • Category A (High E&S risk): 4%, • Category B (Medium E&S risk): 35 % • Category C (Low E&S risk): 61%	Funding risk from high financed emissions, and operational disruptions from climate-affected suppliers and clients.	Financed emissions measurement, expanded green lending products, climate-based supplier criteria, and client transition support.
Market Risk	Medium - Long	No material risk crystallised	No material risk crystallised	New carbon taxes and climate disclosure mandates across the Group's operating jurisdictions could raise compliance costs, reduce returns on carbon-exposed assets, and increase the Group's cost of funding as investors apply stricter screening.	• Availability of Exclusion List covering gambling, armaments, forced/ child/tied labour, HFCs, ozone-depleting substances, and other items aligned with IFC and DFI partner standards. • Automatic blocking of exclusion list transactions • E&S risk categorisation (A/B/C) per IFC Performance Standards • Green Loan Identifier for green-eligible transactions
Bank Risk					
Credit Risk	Medium - Long	No material risk crystallised	Zero transactions were declined or restructured due to E&S risk in 2025.	Higher loan defaults and collateral devaluation as borrowers in carbon-intensive sectors face tightening regulations and extreme weather events.	Climate-sensitive loan screening, climate-adjusted provisioning, sector exposure limits, and borrower transition readiness assessments. ESG Toolkit embedded directly into the credit risk management system.

Initiatives deployed to mitigate fraud risk include Enhanced Fraud Risk Prevention capabilities, strengthened regulatory compliance measures, the implementation of an automated AML/CFT issuance solution, and Quickbucks

3.0. Collectively, these initiatives contributed to a reduction in fraud-related losses during the year.

Climate-related transition risks may affect the carrying amounts of loans and advances to customers in carbon-intensive sectors through increased probability of default and reduced collateral values over the medium to long term. Climate-related physical risks (flooding, extreme weather events) may affect the Group's property and equipment and collateral values underpinning secured lending, principally over the medium to long term.

In line with this risk profile, approximately 8% of the Nigeria loan book was assessed as vulnerable to E&S risks following detailed screening and due diligence. This subset of the portfolio highlights exposures concentrated in sectors with elevated climate risk characteristics, showing both physical and transition risk drivers. Notably, agriculture (₦699.04b) is exposed to very high physical risk due to climate-related factors such as drought, flooding, and rainfall variability, while construction (₦798.31b) and real estate activities (₦474.86b) face high to very high physical risks linked to flooding, heat stress, and infrastructure vulnerability. In addition, significant transition risk exposures are evident in carbon-intensive sectors such as oil and gas upstream (₦562.53b), downstream (₦248.43b), and services (₦378.17b), as well as in cement (₦102.80b) and power and energy (₦282.68b), driven by decarbonisation pressures and evolving regulatory requirements. The general sector, with exposure of ₦4.48b, represents a significant concentration within the assessed portfolio, with risk levels dependent on underlying borrower activities and therefore potentially masking specific environmental and social vulnerabilities.

3.7 Sustainability-related Opportunities

The table below summarises the key sustainability-related opportunities identified across the Group and its entities:

Table 11: *Sustainability-related Opportunities and Effects*

Opportunity	Time Horizon	Current Effect on Access Holdings		Anticipated Effect on Access Holdings
		2024	2025	
Groupwide opportunities				
Community Engagement and Corporate Social Investment (CSI)	Short - Medium	**Budget:** ₦2.10 billion **Environment:** 54,204 trees **Entrepreneurship:** 3,367,699 entrepreneurs **Health:** 6,720,584 individuals **Education:** 4,976,909 young people	**Budget:** ₦4.3 billion **Environment:** 50,000 trees **Entrepreneurship:** 407,642 entrepreneurs **Health:** 803,761 individuals **Education:** 733,446 young people	Strengthens corporate social investment, enhances public perception, and contributes to social impact as well as supports market penetration
Sustainable Supply Chain	Short - Medium	Empowerment and capacity building for vendors.	Periodic vendors engagement and capacity building sessions (Annual Compliance Training Session for Vendors and Third Parties) Improved vendor onboarding criteria	Minimises environmental risks, enhances supply chain resilience, promotes responsible sourcing, and mitigates risks such as reputational damage, regulatory challenges, and supply chain disruptions.
Employee Engagement in Sustainability	Short	350,000 volunteer hours dedicated to community development programmes.	359,500 hours volunteered (Each professional staff required to volunteer minimum of 52 hours in a year)	Enhances employee morale, fosters a culture of sustainability, drives internal innovation and facilitates top talent attraction and retention

Opportunity	Time Horizon	Current Effect on Access Holdings		Anticipated Effect on Access Holdings
		2024	2025	
Groupwide opportunities				
			Internal Sustainability Champions Training Conducted across subsidiaries Digital Advocacy Webinar conducted across the Group. 2,000+ Sustainability Champions across the group	
Digital Transformation for Sustainability	Medium	No material effects crystallised.	Integrated sustainability criteria into Process Maker Approval to determine the emissions factor of purchases and recommend offset strategies. (developed in 2025, launched in 2026).	Optimises resource use, reduces operational costs, and supports the shift to a digital, low-carbon future.
ESG Data & Analytics Capability	Medium	Revalidated the standardised ESG reporting templates to ensure accuracy, consistency, and alignment with reporting requirements.	An automated Group data collection and analysis system is under development to improve data quality and streamline reporting processes.	Enhanced ability to identify climate-exposed assets early, reduce portfolio losses, and monetise ESG insights through client-facing analytics products
Bank opportunities				
Sustainable Investments	Short - Medium - Long	Sustainability Loan Book- $580.24m. Green Financing - ₦72.32b deployed to green projects in Nigeria. DFI Inflows - $437.42m (₦400.24b) inflow recorded.	Sustainability Loan Book by $1.269b, with African subsidiaries contributing $687,517,399.9 (₦989,976,929,638.01) to the pool across key sectors like Agriculture, Energy, SME Finance, Health, Education and Infrastructure Green Financing - ₦92.14 billion green asset portfolio. DFI Inflows - $185.38 million (₦266.83b) inflow recorded. Edge Certification - Full Edge certification of 2 infrastructures in Nigeria and Ghana **Nigeria** Access Towers, Head Office Lagos, Nigeria Certification Level: EDGE Certified 20% less energy consumption 33% water savings 99% reduction in embodied carbon in materials **Ghana** Access Bank Ghana Head Office. Certification Level: EDGE Certified	Enhances brand reputation, attracts socially responsible investors and eco-conscious customers, and generates new income streams.

Opportunity	Time Horizon	Current Effect on Access Holdings		Anticipated Effect on Access Holdings
		2024	2025	
Bank opportunities				
Sustainable Investments			29% energy savings through high performance glass, insulated walls, and energy-efficient cooling systems 25% water savings with low-flow fixtures and aerators 99% reduction in embodied carbon in materials, drastically lowering the environmental footprint.	
Innovation in Sustainable Products	Short - Medium	Launched the Access Sustainable Finance Accelerator programme.	Launched the Solar Health Initiative and financed hospitals in Kwara, Kaduna, Enugu, Lagos, Launched Switch to Solar Initiative financing volume to the tune of ₦443,341,018	Encourages sustainable business practices among clients and opens up new market opportunities.
Just Transition Financing	Medium - Long	Developed the Switch-to-Solar	Currently invested into 13 Electric vehicles purchase Conversion of 20 diesel vehicles to CNG operated vehicles	New revenue from lending and products that support communities transitioning to a low-carbon economy.
Gender-Lens Investing & Women-Focused Products	Short - Medium	• W-Power loans • W-Health Loans • Maternal Health Support Scheme (MHSS)	• W-Power loans • Womenpreneur Picth-a-thon • Level-Up Initiative Number of loans made to women: 354,156 (a) Individuals: 50,989 (b) Women -owned businesses: 3,167 Total value of all lending made to women: ₦67,445,349,342 (a) Individual women: ₦33,247,555,645 (b) Women -owned businesses: 34,197,793,697 (c) Percentage of total loan portfolio: 24%	Access to an underserved market, improved portfolio diversification, and enhanced appeal to development finance partners.

At Access Holdings, financial inclusion sits at the centre of Access Holdings' sustainable finance programme. In 2025, the Group extended access to finance to 2,528,117 low-income individuals and onboarded 78,438 new MSMEs onto its financing platform, two metrics that reflect the breadth of the Group's reach beyond its formal banking customer base. Gender-lens investing has moved from a targeted initiative into a core portfolio strategy. The results achieved in 2025 demonstrate that products designed around women's specific financial needs generate measurable commercial returns alongside social impact, strengthening the case for further product development in this segment.

The Group processed 2.8 billion transactions in 2025, up significantly from the prior year. This positions Access Holdings not only as a lender but as a critical piece of financial infrastructure for Africa's real economy.

Sustainability-related opportunities (green portfolio growth, DFI partnerships, sustainable product innovation) are expected to positively affect interest income, fee and commission income, and borrowing costs over the short to medium term. The Group expects its financial position

to change as green assets grow, with corresponding growth in interest income from sustainable lending.

New carbon taxes where applicable and climate disclosure mandates across the Group's operating jurisdictions could possibly increase operating expenses (compliance costs) and reduce net interest income on carbon-exposed assets over the medium term.

The Group engages and partners with key stakeholders including customers, employees, shareholders and investors, regulators such as the Central Bank of Nigeria and the Securities and Exchange Commission, suppliers, host communities, industry associations e.g., Nigerian Exchange Group and development finance partners such as the International Finance Corporation and African Development Bank, to inform its response to these risks and opportunities, supporting sustainable product innovation, and regulatory compliance.

In managing its sustainability-related risks and opportunities, the Group has considered the following trade-offs in its strategy and decision-making:

I. Portfolio transition vs. client relationships: The Group's deliberate rebalancing from carbon-intensive sectors toward sustainable assets (from ₦22 billion green assets in 2021 to ₦92.14 billion in 2025) involves managed reduction of exposures to existing fossil fuel clients, which must be balanced against the Group's role in supporting just transition financing for these clients and the communities that depend on them.

II. Short-term compliance costs vs. long-term resilience: Investment of ₦8.23 billion in 2025 on sustainability infrastructure, ESRM systems, and ESG data platforms creates near-term cost pressure on operating expenses but is expected to strengthen long-term portfolio resilience, access to more DFI funding, and competitive positioning.

III. Financial inclusion vs. climate risk concentration: The Group's commitment to expanding access to finance for MSMEs and low-income individuals (78,438 new MSMEs and 2.528 million low-income individuals served in 2025) is a core strategic objective that creates revenue diversification and social license benefits. However, many of these borrowers operate in climate-vulnerable geographies and sectors (agriculture, informal trade, transport) with limited adaptive capacity. The Group balances the development opportunity of financial inclusion against the portfolio-level physical climate risk that accompanies lending into climate-exposed segments.

These trade-offs have directly informed the Group's decision to impact more communities, accelerating sustainable portfolio growth and operational decarbonisation while continuing to serve clients and communities across its operating markets. Going forward, the Board will formally reassess these trade-offs as part of each annual strategic planning cycle, ensuring that the Group's sustainability approach adapts to evolving climate risks, regulatory developments, and stakeholder expectations.

The soul of Access Holdings' community impact commitment resides not merely in financial investment, but in the engagement, passion, and expertise of its people. The Group's Employee Volunteering Programme (EVP) represents an intentional mechanism for translating corporate purpose into personal action enabling thousands of employees to invest their time, skills, and compassion in causes that matter.

In 2025, Access Holdings achieved 100% employee participation in volunteering across the Group, a milestone that reflects an organisational culture in which community engagement is embedded as a professional and institutional commitment, not merely an elective activity. Employees across Africa collectively contributed 359,500 volunteer hours, surpassing the prior year target of 350,000 hours.

Among the most significant employee-led initiatives in 2025 were: the AidReady Kids programme in Ghana, through which Enterprise Resource Group staff invested 3,904 hours to deliver first aid training across 16 schools, benefiting over 40,000 individuals; the Upcycle 4 Impact initiative, in which 350 employees from the Retail Banking Unit contributed 14,534 hours and GHS 200,000 to transform textile and plastic waste into 5,000 upcycled bags across 8 Ghanaian regions; the Cameroon Hands of Hope initiative, through which 180+ employees invested 455+ hours and XAF 9,492,000 in holistic support for displaced communities; and the Kenya Kijani Initiative, through which employee-facilitated tree planting positioned Access Bank Kenya as a strategic partner in Kenya's national 15 billion trees by 2032 environmental commitment.

3.3 Climate Resilience and Scenario Analysis

In 2023, Access Bank partnered with the International Finance Corporation (IFC) and 1in1000 to conduct a pilot climate transition risk assessment. This exercise leveraged the 1in1000 TRISK platform, an asset-level, bottom-up climate stress testing tool, alongside the Paris Agreement Capital Transition Assessment (PACTA) framework to examine how the Group's corporate lending portfolio, specifically exposures in oil and gas, cement, and steel industries, would perform under various climate transition pathways aligned with the Paris Agreement.

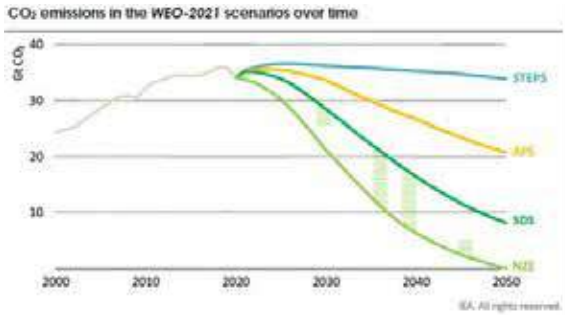
The assessment was conducted using two scenarios from the International Energy Agency's (IEA) World Energy Outlook (WEO):

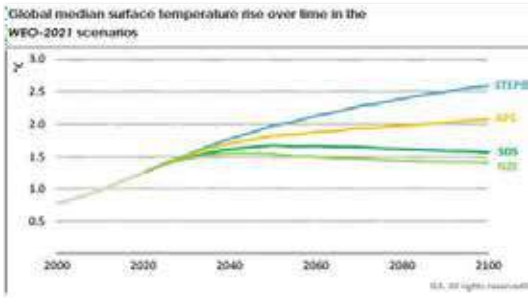
Table 12: *Climate Scenario Descriptions*

Scenario	Description
Stated Policies Scenario (STEPS) - Baseline	Reflects the trajectory of the global energy system under the existing policy framework and announced intentions. This scenario is not Paris-aligned, with projected warming exceeding 2.5°C by century end.
Sustainable Development Scenario (SDS) - Shock	Explores the energy outlook under significantly stricter climate policies, holding temperature rise to just above 1.5°C by 2100, consistent with the Paris Agreement.

The results, which remained valid and applicable during the 2025 reporting period, indicated differentiated sectoral impacts:

- **Oil and Gas:** Projections indicate mounting pressure, with production and profitability declining sharply from 2026 onward under the shock scenario, signaling the need for proactive portfolio recalibration.
- **Power Generation:** The Group's renewable energy-focused power portfolio demonstrates robust growth potential, effectively transforming transition risk into strategic opportunity.





These findings are actively informing the Group's capital allocation, risk appetite, and long-term strategy, supporting its positioning for a low-carbon economy.

Drawing on these insights, the Group has identified clear priorities to further strengthen its climate resilience framework. These include completing physical climate risk modelling and fully integrating it into its Internal Capital Adequacy Assessment Process (ICAAP); and expanding the green loan portfolio, which has grown from ₦22 billion in 2021 to ₦92.14 billion in 2025, toward a long-term target of ₦475 billion, with increased financing for electric vehicles and other climate-friendly assets, supported by ₦72.3 billion deployed under the Sustainable Finance Framework during the reporting period. The Group is also continuing to leverage development finance institution partnerships, having mobilised $185.38 million (₦266.83 billion) in concessional DFI funding in 2025 alone, to improve sustainability.

3.4 Integration into Financial Planning

At Access Holdings, sustainability has become a core driver of financial planning and capital allocation across the Group's operations. We recognise that embedding sustainability into its financial strategy is essential to unlocking long-term value, strengthening resilience, and positioning the Group as a leading force in Africa's transition to a sustainable economy. This commitment is reflected in the financial resources dedicated to advancing the Group's sustainability agenda, as summarised below:

***Table 13:** Integration of Sustainability into Business Model and Value Chain*

Focus	Amount	Description
Sustainability Budget	₦4.8 billion	Allocated in 2025, covering execution of CSI programmes and process improvements.
Concessional DFI Funding	₦266.83 billion	Mobilised from DFIs in 2025, demonstrating the financial value of the Group's sustainability positioning.
Green Asset Portfolio	₦92.14 billion	As of 31 December 2025, deployed towards eligible environmentally beneficial projects under the Portfolio Greening Strategy.
Sustainable Finance Deployment	₦72.3 billion	Deployed in 2025 towards eligible environmentally friendly projects under the Sustainable Finance Framework.
Long-term Green Asset Target	₦475 billion	The Group's primary medium-to-long-term sustainable finance objective.

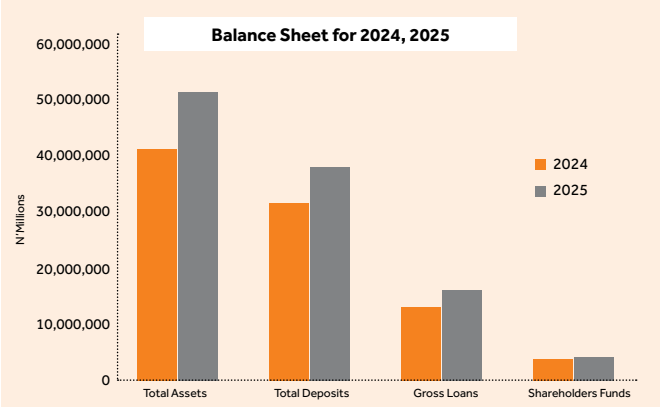
Economic Value Generated and Distributed

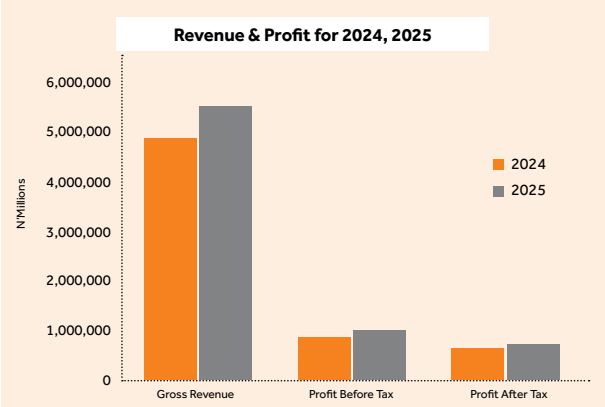
At Access Holdings Plc, strong financial performance remains a key enabler of sustainable value creation for shareholders, customers, employees, regulators, and the communities in which the Group operates. The Group continued to strengthen its financial position between 2024 and 2025, demonstrating resilience, profitability, and sustained growth despite a dynamic operating environment.

Total assets increased from ₦41.50 trillion in 2024 to ₦51.56 trillion in 2025, representing a growth of approximately 24.2%. This significant expansion reflects the Group's growing market presence, strategic investments, and enhanced capacity to support economic development across its markets. Customer deposits grew from ₦31.83 trillion in 2024 to ₦38.29 trillion in 2025, reflecting sustained customer confidence in the Group's products, services, and financial strength. The increase in deposits further strengthened the Group's liquidity position and ability to provide financing to businesses and individuals. Gross loans and advances increased from ₦13.07 trillion in 2024 to ₦16.24 trillion in 2025, demonstrating the Group's continued commitment to supporting economic growth, entrepreneurship, and financial inclusion through responsible lending activities. The Group's shareholders' funds increased from ₦3.76 trillion in 2024 to ₦4.33 trillion in 2025, reflecting improved capitalisation and a stronger foundation for long-term growth and value creation. This growth enhances the Group's capacity to withstand economic uncertainties while pursuing strategic opportunities. Gross revenue increased during the reporting period from ₦4.88 trillion in 2024 to ₦5.53 trillion in 2025.

This performance was driven by growth across key business segments and the successful execution of strategic initiatives aimed at expanding revenue streams and improving operational efficiency.

Profitability also improved over the period, with profit before tax increasing from ₦867 billion in 2024 to ₦1.01 trillion in 2025, while profit after tax grew from ₦642 billion to ₦743 billion. These results demonstrate the Group's ability to generate sustainable returns while maintaining a disciplined approach to risk management and operational excellence.





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Resilience Through Preparedness and Effective Risk Management

4.0

Resilience Through Preparedness and Effective Risk Management

4.1 Overview

Access Holdings Plc has established processes and related policies to identify, assess, prioritise, and monitor sustainability-related and climate-related risks and opportunities across the Group. These processes are embedded within the Group's enterprise-wide risk management framework, supported by dedicated tools, governance structures, and a three-lines-of-defense model.

4.2 Risk Identification and Assessment

The Group adopts a risk-based approach that combines qualitative judgement with quantitative methodologies to identify, assess, and categorise sustainability-related and climate-related risks.

These processes apply to all Group lending, investment, and advisory activities across Access Holdings' operations in all countries where the Group maintains a presence, as well as to the holding company's strategic investment decisions.

Transactions are assessed and categorised according to the following risk classification framework:

Table 14: *Environmental and Social Risk Classification Framework*

Risk Category	Due Diligence Approach
Low / Category C	Limited additional due diligence; periodic annual review or upon initiation of a new transaction.
Medium / Category B	Enhanced environmental and social due diligence, including desktop reviews, stakeholder engagement, Environmental and Social Management System (ESMS) assessment, and evaluation of client track record.
High / Category A	Rigorous due diligence, including site visits, independent third-party reviews, Environmental and Social Impact Assessment (ESIA), and Environmental and Social Action Plans (ESAPs) embedded in loan covenants.

In addition, project finance and advisory requests are assessed using the Environmental and Social Toolkit within Credit360 FINTRAK, which categorises projects by their potential environmental and social impacts, and evaluates client commitment, capacity, and track record. The Equator Principles guide due diligence and monitoring for Category A and Category B projects.

Climate-related risks are integrated into credit assessments through ESAPs for high-risk exposures and, where needed, through adjustments to Probability of Default (PD) and Loss Given Default (LGD) parameters. Forward-looking transition risk insights are generated through climate scenario analysis using the 1in1000 TRISK platform.

In 2025, 100% of commercial and industrial loans, as well as project finance transactions, were screened in line with the Equator Principles, and environmental and social risk assessments were conducted across the entire loan portfolio.

The Group has enhanced the processes it uses to identify, assess, prioritise, and monitor environmental, social, and climate-related risks through the integration of the ESG Toolkit into the FINTRAK system to streamline transaction-level screening, the embedding of sustainability and emissions considerations into the procurement approval system, and the enhancement of financed emissions measurement through the adoption of PCAF methodologies.

4.3 Risk Monitoring and Reporting

The Group monitors sustainability-related risks through ESG risk dashboards that track portfolio-level indicators, early warning signals, and climate risk data using TRISK scenario analytics and PCAF emissions metrics. Client ESG ratings are reassessed during new transactions or when material changes occur. Where persistent non-compliance with ESG requirements is identified, issues are escalated, including potential default classification where warranted.

Regular updates on ESG risk, sustainability performance, and regulatory developments are reported to senior management and the Board, supporting transparent disclosure in line with the Group's sustainability reporting obligations.

The Group is working to expand the use of dashboards to

cover the business verticals and other risk areas, which will strengthen our monitoring and reporting systems, aligned with the IFRS Sustainability Disclosure Standards.

4.4 Risk Mitigation Strategies

The Group adopts a structured mitigation approach anchored in its ESRM Policy and Sustainable Finance Framework. The key mitigation strategies are summarised below:

Table 15: *Key Sustainability Risk Mitigation Strategies*

Mitigation Strategy	Description
Exclusion List	Restricts financing of environmentally or socially harmful activities. The list is reviewed periodically to ensure alignment with regulatory requirements and DFI expectations.
ESAPs in Loan Agreements	Corrective measures are formalised for transactions with identified environmental and social risks. These are embedded in loan covenants and monitored throughout the facility lifecycle.
Risk-based Pricing	ESG risk is reflected in loan pricing to ensure the cost of capital appropriately reflects the sustainability risk profile of individual exposures.
Sector-specific ESG Standards	Minimum ESG standards are applied for high-risk industries, including oil and gas, power, cement, and agriculture, consistent with IFC Performance Standards and the Equator Principles.
Portfolio Diversification	Deliberate rebalancing from carbon-intensive sectors toward sustainable assets. The Group's green asset portfolio grew from ₦22 billion in 2021 to ₦92.14 billion in 2025 (₦72.32 billion in 2024).
Sustainable Finance Framework	Channels capital to eligible green and social projects with robust governance, project evaluation, and use-of-proceeds reporting.
Carbon Offsets Policy	No carbon offsets were applied during the year; the Group focused on direct emissions reduction and environmental initiatives, consistent with its strategy of using offsets only as a last resort.
Capacity Building	Structured training programmes for employees, clients, and stakeholders enhance ESG awareness and risk management capabilities across the Group.

4.5 Integration into Enterprise Risk Management

The Group does not manage sustainability-related risks in isolation. Rather, these risks are fully integrated into the enterprise-wide risk management framework, operating across all three lines of defense:

- **First line** - Business units own and manage sustainability risks at the transaction level. Account officers conduct environmental and social screening and apply ESG policies and ESRM requirements in their day-to-day credit and business activities.
- **Second line** - Risk and Compliance function provides independent oversight by developing ESG risk methodologies, performing enhanced due diligence on high-risk transactions, monitoring portfolio exposures, and reporting to senior management and the Board Risk Management Committee.
- **Third line** - Internal Audit offers independent assurance over the effectiveness of the sustainability risk framework, ESRM policy compliance, data governance, and external disclosures.

Sustainability-related risks are incorporated into the Group's risk taxonomy, risk appetite statement, and annual Material Risk Assessment, informing strategic planning and capital allocation decisions. Access Holdings continues to strengthen its capabilities through improved data quality, enhanced climate risk modelling, stronger ESRM governance, and alignment with evolving regulatory expectations.

4.6 Processes for Identifying and Managing Sustainability-related Opportunities

Access Holdings adopts a structured and systematic approach to identifying sustainability-related opportunities across its operations and throughout its value chain. At Access Holdings, opportunity identification is informed by multiple inputs, including:

- Materiality assessment, which serves as the primary mechanism for surfacing risks and opportunities that could substantially affect the Group's business prospects, financial position, and performance over time;
- Regulatory and policy horizon scanning, through which the Sustainability and ESG teams monitor evolving

regulations, central bank guidelines, and national climate commitments;

- DFI engagement, whereby partnerships with multilateral and bilateral development institutions identify concessional and blended finance opportunities;
- Market and sector analysis, assessing demand trends for green and sustainable financial products across the Group's operating jurisdictions; and
- Internal strategic planning, through which the Sustainability Steering Committee and Board-level committees review the sustainability landscape to identify opportunities aligned with the Group's long-term strategy.

Once identified, sustainability-related opportunities are assessed against the Group's strategic priorities, risk criteria, and capital allocation framework. Opportunities are prioritised based on their potential contribution to long-term value creation, alignment with the Group's Sustainable Finance Framework, and feasibility of execution within the Group's operational capacity. Progress in pursuing prioritised opportunities is monitored through defined key performance metrics, including growth in the green asset portfolio, volume of DFI inflows mobilised, and the number of beneficiaries reached through financial inclusion initiatives. These metrics are reported to the Sustainability Committee and the Board on a periodic basis.

The Group's approach to sustainability extends beyond risk mitigation. Alongside its risk management processes, the Group actively pursues material sustainability-related opportunities through a series of targeted initiatives:

- Expand the green asset portfolio towards a long-term target of ₦475 billion, with the portfolio having grown from ₦22 billion in 2021 to ₦92.14 billion in 2025.
- Strengthen DFI partnerships to mobilise concessional and blended finance for sustainable projects. In 2025, the Group attracted $185.38m in DFI inflows.
- Scale renewable energy and clean infrastructure financing as part of the Group's broader sustainable finance strategy.
- Advanced financial inclusion, including the onboarding of 78,438 MSMEs and reaching 2.528 million low-income individuals during the reporting period.

Leveraged ESG-linked capital market opportunities to diversify funding sources and attract sustainability-focused investors.

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Tracking Progress (Metrics and Target)

5.0 Tracking Progress (Metrics and Target)

5.1 Overview

At Access Holdings, we believe that strategic ambition must be supported by measurable results. Our commitment to sustainability is embedded within our broader business strategy and demonstrated through transparent metrics and clearly defined targets. To ensure robust, comparable, and globally aligned disclosure, our reporting approach is guided by leading international frameworks, including the Global Reporting Initiative (GRI), the Sustainability Standards and Certification Initiative (SSCI), the Sustainability Accounting Standards Board (SASB), the United Nations Global Compact (UNGC), and the United Nations Environment Programme Finance Initiative (UNEP FI) Principles for Responsible Banking (PRB).

Our performance measurement framework has been purpose-built to track progress against our five-year sustainability strategy, ensuring that our actions are closely aligned with our long-term ambitions. The metrics were developed internally and validated by CSR-In-Action as an independent third party, incorporating insights from global best practice to ensure they are both relevant and decision-useful. These indicators are organised around Access Holdings' three strategic pillars: Sustainable Operations, Sustainable Development Finance, and Corporate Social Investment.

Headline performance against the Group's strategic targets in 2025 includes: a 28.47% reduction in operational emissions (against a 40% target by 2026); US$185.38 million in DFI capital mobilisation; sustainable loan book growth of $1.269 billion; 78,438 new MSMEs onboarded; 2.528 million low-income individuals reached; and 2,439,480 CSI beneficiaries impacted across Africa.

To enhance transparency and support informed stakeholder evaluation, we report absolute metrics that provide clear, quantifiable performance data. Our targets are benchmarked against a 2022 base year to ensure consistency and comparability over time. The methodologies used in defining and calculating these metrics, including greenhouse gas (GHG) emissions, have remained consistent throughout the reporting period, enabling reliable trend analysis, meaningful performance tracking, and confidence in the integrity of our disclosures.

Table 16: *Sustainability Performance Against Strategic Targets*

Pillar	2027 Targets	Metrics	2024 Performance	2025 Performance
Sustainable Operations	Achieve 50% reduction in operational emissions viz-a-viz baseline (68,996MtCO_2e)	Percentage reduction in operational missions compared to baseline	57,176.28 MTCO_2e representing a 17.13% reduction from baseline	Achieved 49,352.03 MTCO_2e representing a 28.47% reduction from baseline
		Number of locations with waste segregation and collection for recycling	181 locations	199 locations
		Number of new locations with solar installation	167 locations	263 locations
		Number of solar powered ATMs	160 ATMs	323 ATMs
	BBB ESG rating by MSCI and achieve Medium ESG rating by Sustainalytics	ESG rating	BB ESG rating by MSCI	Achieved BB ESG rating by MSCI
	Sustainability reporting and disclosures to relevant stakeholders	Publication of sustainability report aligned with the IFRS Sustainability Disclosure Standards	Published the 2024 Access Group Sustainability Report using the IFRS S1 and S2 Standards	Sustainability report ongoing using the IFRS S1 and S2 standards
Sustainable Development Finance	Raise $1billion DFIs/Donor agency funds impacting a minimum of 10million MSMEs beneficiaries	Value of Donor agency Funding Number of MSMEs beneficiaries onboarded	Raised $437.42m (₦677.56b) from DFIs/Donor Agencies Onboarded 3.9m MSMEs beneficiaries	Raised $185.38m (₦266.83b) DFI Funds Onboarded 78,438 new MSMEs beneficiaries
	Grow Sustainability-focused loan book to $3billion	Value of sustainability focused loan book	$580.24m (₦898.19b) cumulative	$1.269 b (₦1.95t) cumulative

	Increase access to finance for 1 million low-income individuals	Number of low-income Individual beneficiaries	1,680,593 low-income individuals	2,528,117 low income individuals
Corporate Social Investment (CSI)	Reach 100 million individuals in Africa through interventions in: Education, Environment, Entrepreneurshi p & Health	Number of direct and indirect beneficiaries across Education, Environment, Entrepreneurship and Health	a. 4,976,909 individuals in Education b. 3,367,699 individuals in Entrepreneurship c. 6,720,584 individuals in Health d. 6,214, 334 individuals in Environment	a. 733,446 individuals in Education b. 407,642 individuals in Entrepreneurship c. 803,761 individuals in Health d. 494, 631 individuals in Environment

Within this impact-focused framework, the Group applies deliberate beneficiary targeting, with at least 70% of beneficiary impact directed to women and youth and a minimum 0.5% allocation to persons with disabilities. The Group's volunteering model requires each professional staff member to contribute a minimum of 52 volunteer hours per annum, with evidence of participation forming part of staff appraisal. Flagship programmes delivered during the reporting period include:

- The STEAM Fun Fest, Global Money Week, and the She Reads programme (Education);
- Women & Youth Empowerment training, Women Digital Entrepreneurship, and the MSME Toolkit (Entrepreneurship);
- The End Malaria Project, Access United Steps Against Cancer, and the renovation of a maternity ward at the University Teaching Hospital, Zambia (Health); and
- The Kijani Initiative in Kenya, reforestation projects in Rwanda and Angola, and Upcycle 4 Impact in Ghana (Environment).

These programmes are delivered in collaboration with strategic partners including HACEY Health Initiative, NerdzFactory Foundation, MTN, United Nations Children's Fund (UNICEF), and the Kenya Forest Service.

The reduction in reported community impact figures for 2025 reflects a Board mandated review of the Group's impact measurement methodology. This review informed a strategic shift towards deeper, long-term outcomes for priority beneficiary groups, including more stringent impact definitions, revised indicators, and enhanced beneficiary validation. As a result, reported figures for the year prioritise quality, sustainability, and measurable long-term impact over volume, and are not directly comparable with prior reporting periods.

The Group achieved a 28.47% reduction in operational emissions during the reporting period, driven primarily by the expansion of branch solarisation to 263 locations and 323 solar-powered ATMs, primarily across Access Bank Nigeria. The 16% year-on-year increase in Scope 2 emissions reflects improved availability and uptake of national grid electricity supply, alongside business expansion across the Group's operating footprint. Waste recycling programmes are operational across 199 locations spanning the banking Group's African subsidiaries, where waste is segregated at source and collected by recycling partners for processing. Recyclable categories include plastic bottles, glass, and electronic waste (e-waste). Water consumption is currently tracked at the head office and annex facilities in Nigeria.

In 2025, sustainability emission considerations were integrated into the Group's internal procurement approval system (Process Maker), enabling the assessment of emissions factors associated with purchases and the recommendation of offset strategies at the point of procurement. Environmental and social criteria are also embedded within vendor management and supply chain policies. The Group conducts an Annual Compliance Training Session for Vendors and Third Parties and has committed to awarding a defined percentage of contracts to female-led businesses.

Sustainability communications are governed through a structured feedback loop between Brand Management, Sustainability, and Investor Relations, with reputational sentiment monitored through dedicated tools (Brandwatch, Repustate, and Prowly), which recorded approximately 97% positive brand sentiment during the reporting period.

5.2 Climate-related Targets

Our greenhouse gas (GHG) emissions are measured and monitored in line with the Greenhouse Gas Protocol, the globally recognised standard for corporate emissions accounting. This ensures that our climate-related disclosures remain consistent, comparable, and credible.

For financed emissions across our lending and investment portfolio, we plan to adopt the Partnership for Carbon Accounting Financials (PCAF) methodology. This approach enables us to quantify the carbon intensity of our financial intermediation activities, ensuring that our climate disclosures reflect both our direct operational footprint and our indirect impacts through capital allocation.

Our operational emissions inventory is defined using the operational control approach prescribed by the GHG Protocol. Under this methodology, we account for 100% of emissions from operations over which Access Holdings maintains operational control across our African footprint.

For the reporting period, our emissions data covers operational emissions linked to the activities of Access Bank across its African operations, which represent the largest share of our organisational footprint. As we advance on our sustainability journey, the Group remains strategically focused on enhancing the consolidation of emissions data across all subsidiaries to provide a holistic view of GHG emissions at Access Holdings.

Table 17: *GHG emissions data collection across approach all three scopes of emissions*

Scope	Emission Sources	Data Collection Method	Calculation Approach
Scope 1	• Fuel consumed by the Bank's vehicle fleet • Diesel consumed from use of power generating sets	Primary activity data from fuel records, facility meters, and operational logs	Emissions are quantified using GHG Protocol calculation methodologies, applying the most appropriate approach based on emission source type and data quality. This includes direct measurement, activity-based calculations with emission factors, and spend-based methodologies where primary data is unavailable. Emission factors used for calculations are sourced from reliable sources such as: • Electricity (WRI, GHG Protocol, 2009) • Diesel (EU Commission: www.europa.eu) • Fuel (us.epa.org) • Business Travels (www.carbonfund.org, carbonindependent.org)
Scope 2	Purchased electricity	Utility bills and energy meter readings	
Scope 3	Business travel (uber and air travel)	Travel bookings	

Our energy mix comprises diesel generation, alongside electricity sourced from the national grid, and Solar This energy profile is reflected in the Group's emissions footprints, where Scope 1 emissions, arising primarily from diesel and petrol use account for approximately 61.7% of total emissions. Scope 2 emissions, associated with purchased electricity, represent 34.9%, while Scope 3 emissions, mainly from air travel and ride-hailing services such as Uber and Bolt, contribute 3.4% of total emissions.

Scope 3 emissions from business travel reduced by approximately 49%, from 3,293 tCO_2e in 2024 to 1,668 tCO_2e in 2025, supported by a budget optimisation programme prioritising essential travel and the increased adoption of digital collaboration tools.

Table 18: *Greenhouse Gas Emissions by Scope*

Scope	2024 Performance	2025 Performance
Scope 1	39,065.94	30,445.68
Scope 2	14,817.00	17,237.51
Scope 3	3,293.33	1,668.84
	57,176.28	**49,352.03**

[1] For the Access Banking Group entities outside Nigeria, only air travel was reported under Scope 3.

5.3 Workforce Composition and Diversity

As a diversified financial services group with over 31,000 employees across multiple jurisdictions, Access Group recognises that its people are central to achieving its sustainability ambitions. The metrics presented below provide an overview of workforce composition, diversity, employee wellbeing, and engagement during the 2025 reporting period.

Table 19: Workforce Gender Composition by Subsidiary

Subsidiary	Male	Female
Access Holdings (HoldCo)	53%	47%
Banking Group	54%	46%
Access ARM Pensions	52%	48%
Hydrogen Payment Services	51%	49%
Oxygen X Finance	42%	58%
Access Insurance Brokers	78%	22%

Employee Wellbeing: The Group recorded an employee satisfaction score of 87% in 2025, exceeding the internal target of 80%. Wellbeing programmes operational during the year included internal wellness workshops conducted with external vendors, gym membership subsidies, standard HMO/health insurance coverage across all employees, and an Employee Assistance Programme (EAP) providing confidential support services.

Attrition and Retention: The Group's attrition rate decreased from approximately 13% in 2024 to approximately 11% in 2025. Retention initiatives included the maintenance of a key talent pool, enhanced Employee Value Proposition (EVP) assessments, regular communication during merger and acquisition integration periods, social events and team-building activities, and active promotion of work-life balance. Career opportunity concerns were cited as the primary reason for voluntary departures.

Diversity, Equity, and Inclusion (DEI): DEI targets are embedded in the Group's broader corporate communications and sustainability objectives. Initiatives delivered in 2025 included career development and networking sessions for female senior managers, career conversations for female employees, knowledge-sharing sessions for female middle managers, executive mentoring sessions, and participation in external DEI programmes. Overall achievement was assessed at 70-75% of full DEI plans for the year.

Training and Development: Learning and development budget utilisation reached approximately 70% in 2025. A new Learning Management System (LMS) has been approved and is being implemented to standardise and scale training delivery across the Group. Each division engages teams in CSR and sustainability-related projects as part of internal development programming.

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Looking Ahead

6.0

Looking Ahead

Access Holdings has established a foundation of sustainability and will continue to deepen its integration across governance, strategy, risk management, and performance measurement, to better mitigate against sustainability related risks and capitalise on emerging sustainability-related opportunities.

The Group will continue to strengthen Board and management oversight over sustainability matters, embedding sustainability more firmly into decision-making and incentive structures. To support effective governance and regulatory compliance, Access Holdings intends to appoint an Executive Director responsible for Sustainability in line with Central Bank of Nigeria (CBN) requirements. Strategically, the Group will accelerate the transition of its portfolio toward low-carbon and climate-resilient assets, supported by enhanced climate analytics, scenario analysis, and tighter integration of climate risks into financial planning and capital allocation.

Risk management practices will continue to evolve through stronger integration of ESG considerations, enhanced monitoring, and improved environmental and social due diligence. The Group will prioritise improvements in data quality, particularly for financed emissions and Scope 3 measurement, to enable more decision-useful, investor grade disclosures.

Furthermore, the Group's operational decarbonisation efforts, including renewable energy adoption and energy efficiency initiatives, will be scaled, alongside deeper integration of sustainability into procurement and enterprise systems

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Independent Assurance Report

on Selected Sustainability Information

ACCESS HOLDINGS PLC

2025 Sustainability Report
For the year ended 31 December 2025

CSR-in-Action Consulting Limited
Lagos, Nigeria
July 2026

CSR·in·Action Consulting

Independent Report on Selected Sustainability Information

To the Board of Directors of Access Holdings Plc

Scope of our engagement

We were engaged by Access Holdings Plc ("Access Holdings" or "the Group") to provide independent assurance over the selected sustainability information identified in Appendix A and included in the Access Holdings Plc 2025 Sustainability Report ("the Sustainability Report") for the year ended 31 December 2025. The engagement was undertaken using a hybrid assurance approach, comprising reasonable assurance over specified quantitative information and limited assurance over specified quantitative and qualitative disclosures.

The respective assurance level, management-reported value or nature of disclosure, applicable criteria and report reference for each item of selected sustainability information are set out in Appendix A. Our assurance does not extend to information outside the selected sustainability information identified in Appendix A, nor to comparative information, forward-looking statements, targets, projections, or other information linked from the Sustainability Report.

Our conclusions

Limited assurance conclusion

Based on the procedures performed and evidence obtained, nothing has come to our attention that causes us to believe that the selected sustainability information identified in Appendix A as subject to limited assurance has not been prepared, in all material respects, in accordance with the applicable reporting criteria described below.

Reasonable assurance opinion

In our opinion, the selected sustainability information identified in Appendix A as subject to reasonable assurance has been prepared, in all material respects, in accordance with the applicable reporting criteria described below.

Basis for our conclusions

We conducted our engagement in accordance with the International Standard on Assurance Engagements (ISAE) 3000 (Revised), Assurance Engagements Other than Audits or Reviews of Historical Financial Information, issued by the International Auditing and Assurance Standards Board.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less extensive than, those performed in 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 over the same subject matter.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our limited assurance conclusion and reasonable assurance opinion.

Applicable reporting criteria

Management prepared the selected sustainability information using the criteria described in the Sustainability Report, including, as applicable:

- IFRS S1, General Requirements for Disclosure of Sustainability-related Financial Information;
- IFRS S2, Climate-related Disclosures;
- the GRI Standards (2021), applied as complementary guidance;
- the applicable SASB Standards referenced in the Sustainability Report;

- the Greenhouse Gas Protocol Corporate Accounting and Reporting Standard;
- the Partnership for Carbon Accounting Financials methodology, where applicable; and
- Access Holdings' internally developed definitions, policies, methodologies, calculation approaches and reporting boundaries described in the Sustainability Report.

The suitability of the criteria is evaluated in the context of the intended users' need to understand the selected sustainability information. Different entities may apply different but acceptable measurement and reporting practices, which may affect comparability between entities and over time.

Responsibilities of management

Management is responsible for the preparation and presentation of the Sustainability Report and the selected sustainability information in accordance with the applicable reporting criteria. This responsibility includes:

- selecting and applying appropriate reporting criteria and determining the reporting boundary;
- designing, implementing and maintaining internal controls relevant to the preparation of sustainability information that is free from material misstatement, whether due to fraud or error;
- maintaining adequate records and supporting documentation;
- making estimates, assumptions and judgements that are reasonable in the circumstances; and
- assessing material sustainability-related and climate-related risks, opportunities and impacts and presenting the related disclosures.

Our responsibilities

Our responsibility is to plan and perform the engagement to obtain reasonable assurance or limited assurance, as applicable, about whether the selected sustainability information is free from material misstatement and to issue an independent assurance report containing our conclusions. Misstatements can arise from fraud or error and are considered material if, individually or in aggregate, they could reasonably be expected to influence the decisions of intended users made on the basis of the selected sustainability information.

We exercised professional judgement and maintained professional scepticism throughout the engagement. We also:

- identified and assessed the risks of material misstatement in the selected sustainability information;
- designed and performed procedures responsive to the assessed risks and the applicable level of assurance;
- obtained an understanding of the processes and controls relevant to the preparation of the selected sustainability information, without expressing an opinion on the effectiveness of the Group's overall system of internal control; and
- evaluated the appropriateness of the reporting criteria, methodologies, estimates and presentation used by management.

Independence and quality management

CSR-in-Action Consulting has maintained its independence throughout this engagement and has complied with the applicable ethical principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour in the planning, execution and reporting of this assurance engagement.

To support the consistent delivery of high-quality assurance engagements, the firm maintains documented quality management policies and procedures covering engagement acceptance, planning, supervision, review, evidence evaluation, reporting, independence, confidentiality and compliance with applicable professional standards and relevant legal and regulatory requirements. These policies are designed to provide reasonable assurance that our assurance engagements are conducted with due professional care and in accordance with the requirements of ISAE 3000 (Revised).

Summary of work performed

Our work was performed on a risk-based and sample basis. The nature, timing and extent of procedures depended on the assurance level assigned to each item of selected sustainability information and included, as applicable:

- obtaining an understanding of the Group's sustainability governance, reporting processes, reporting boundaries and relevant control environment;
- conducting interviews with management and process owners responsible for sustainability, finance, human resources, risk management, compliance, information security, procurement, customer experience and corporate governance;
- reviewing relevant policies, frameworks, governance records, committee materials, methodologies and management schedules;
- performing walkthroughs of selected data collection, consolidation, review and reporting processes;
- testing selected quantitative information to supporting records and source documentation on a sample basis;
- recalculating selected metrics and assessing mathematical accuracy and consistency across the Sustainability Report;
- assessing the organisational and operational boundaries, activity data, emission factors and calculation methods used for greenhouse gas emissions;
- evaluating evidence supporting green assets, sustainable finance deployment, development finance funding, workforce, gender, financial inclusion, women-focused lending, community impact, fraud and cybersecurity disclosures;
- assessing selected qualitative disclosures against supporting governance, risk, policy and operational documentation; and
- evaluating the overall presentation of the selected sustainability information, including the resolution of identified inconsistencies.

For the selected sustainability information subject to reasonable assurance, we performed more extensive procedures, including expanded substantive testing, independent recalculation, corroboration of evidence from multiple sources and enhanced evaluation of relevant controls. The nature, timing and extent of these procedures exceeded those performed for information subject to limited assurance. Information presented for comparative purposes in the Sustainability Report was not subject to assurance, however. To the extent that current-year performance indicators reported in the Sustainability Report include baseline information (e.g., the 28.47% reduction in operational GHG emissions from the 2022 baseline), our procedures were designed to evaluate whether management had accurately calculated and presented the 2025 performance indicator using the established baseline. We did not perform assurance procedures on the underlying 2022 baseline information.

Inherent limitations

Sustainability information is subject to inherent limitations arising from the nature of the information, the use of estimates and assumptions, the availability and quality of underlying data, evolving methodologies and the absence, for some indicators, of established and consistent measurement practices. Greenhouse gas quantification is subject to scientific and estimation uncertainty arising from the measurement of activity data and the selection and application of emission factors.

Certain disclosures in the Sustainability Report are forward-looking and include ambitions, targets, scenarios, commitments and expected outcomes. Such information is based on assumptions regarding future events and actions that may not occur as anticipated. We do not provide assurance on future performance or the achievement of future targets.

Other information

Management is responsible for the other information contained in the Sustainability Report. Our assurance conclusions do not cover the other information, and we do not express any form of assurance conclusion thereon. In connection with our engagement, our responsibility is to read the other information and consider whether it is materially inconsistent with the selected sustainability information or with knowledge obtained during the engagement or otherwise appears to be materially misstated.

Use and distribution of our report

This report has been prepared for the Board of Directors of Access Holdings Plc in accordance with the terms of our engagement and is intended to accompany the Access Holdings Plc 2025 Sustainability Report. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than Access Holdings Plc and its Board of Directors for our work, this report, or the conclusions we have reached.

CSR-in-Action Consulting Limited
Lagos, Nigeria
Date: 31 July 2026

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Appendix A: Schedule of Selected Sustainability Information Subject to Assurance

The schedule below identifies the selected sustainability information included in the Access Holdings Plc 2025 Sustainability Report that was subject to assurance as part of our engagement. Each disclosure is presented together with Management's reported 2025 value, the applicable assurance level (reasonable or limited), and its location within the Sustainability Report. Our assurance conclusions apply only to the disclosures identified in this Appendix.

Selected sustainability information	Management's reported value / disclosure (2025)	Assurance level	Applicable criteria	Report reference
Scope 1 GHG emissions	30,445.68 tCO_2e	Reasonable	GHG Protocol; IFRS S2; GRI 305-1	pp. 57-58
Scope 2 GHG emissions	17,237.51 tCO_2e	Reasonable	GHG Protocol; IFRS S2; GRI 305-2	pp. 57-58
Reported operational GHG emissions reduction from the established 2022 baseline (28.47%)	28.47% from the 2022 baseline	Reasonable	GHG Protocol; IFRS S2; GRI 305-5	pp. 6-7, 56-58
Total workforce	32,276	Reasonable	GRI 2-7; internal HR reporting methodology	pp. 10, 58
Workforce gender composition	Group female workforce: 49%. Subsidiary breakdown: HoldCo 47%; Banking Group 46%; Access ARM Pensions 48%; Hydrogen Payment Services 49%; Oxygen X Finance 58%; Access Insurance Brokers 22%.	Reasonable	GRI 2-7 and 405-1; internal HR reporting methodology	pp. 11, 58
Board gender composition	Access Holdings Board: 4 female directors out of 9 directors (44.4%, reported as 45%).	Reasonable	GRI 405-1; corporate governance records	pp. 11, 16-17
Green Asset Portfolio	₦92.14 billion	Reasonable	Portfolio Greening Strategy; internal finance methodology	pp. 6-7, 45
Sustainable Finance Deployment	₦72.3 billion	Reasonable	Sustainable Finance Framework; internal finance methodology	pp. 6-7, 45
Development Finance Institution funding	US$1.269 billion	Reasonable	Internal finance methodology and reconciled DFI funding schedules	Final report reference to be updated
Total operational GHG emissions	49,352.03 tCO_2e	Reasonable	GHG Protocol; IFRS S2	pp. 57-58
Scope 3 GHG emissions (business travel)	1,668.84 tCO_2e	Limited	GHG Protocol; IFRS S2; GRI 305-3	pp. 57-58
Energy mix and operational energy disclosure	Diesel generation, national-grid electricity and solar energy; Scope 1, Scope 2 and Scope 3 represented approximately 61.7%, 34.9% and 3.4% of total reported emissions, respectively.	Limited	IFRS S2; GRI 302; internal methodology	pp. 56-58
Solar infrastructure	263 branches with solar infrastructure and 323 solar-powered ATMs	Limited	Internal environmental reporting methodology	pp. 6, 56
Waste management and recycling	Waste recycling programmes at 199 locations; qualitative disclosures on segregation, recycling and environmental stewardship	Limited	GRI 306; internal environmental methodology	pp. 6, 56, 70-71
Water consumption and management	Qualitative disclosure; water consumption tracked at the Head Office and annex facilities in Nigeria	Limited	GRI 303; internal environmental methodology	p. 56
Climate strategy, climate risk and scenario analysis	Narrative disclosures	Limited	IFRS S2; internal climate-risk methodologies	pp. 39-45
Environmental management and biodiversity	Narrative disclosures	Limited	GRI Standards; internal environmental policies	pp. 56, 62, 70-71
Employee turnover	Approximately 11% attrition rate, down from approximately 13% in 2024	Limited	GRI 401-1; internal HR methodology	pp. 10-11, 58

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Selected sustainability information	Management's reported value / disclosure (2025)	Assurance level	Applicable criteria	Report reference
Employee wellbeing and diversity, equity and inclusion	87% employee satisfaction score; narrative disclosures on wellbeing and DEI initiatives	Limited	GRI 401 and 405; internal HR methodology	pp. 10-11, 58
Financial inclusion	2,528,117 low-income individuals supported with access to finance	Limited	Internal financial inclusion methodology; GRI 203	pp. 6, 59-60
MSME financing	78,438 new MSMEs onboarded to the financing platform	Limited	Internal MSME reporting methodology	p. 6 and related social metrics section
Women-focused lending	354,156 loans to women and women-owned businesses, totalling ₦67.4 billion	Limited	Internal gender-lens lending methodology	pp. 6, 59-60
Community investment and social impact	2,439,480 beneficiaries (also presented in narrative as 2.4 million)	Limited	Internal CSI impact methodology; GRI 203 and 413	pp. 64-75
E&S risk exposure and implementation	Category A exposure: 4% for the Group in 2025; 8% for Nigeria; 7% related to 2024. Narrative disclosures on ESRM implementation.	Limited	ESRM Policy and Toolkit; Equator Principles; internal risk methodology	pp. 48-53
Customer complaints	Narrative disclosures and reported complaint metrics	Limited	GRI 418; internal customer-experience methodology	Pages 126–127
Human rights	Narrative disclosures	Limited	GRI 2-23, 2-25 and 412; Human Rights Policy	pp. 36-38, 83-86
Sustainability governance and Board oversight	Narrative disclosures	Limited	IFRS S1 and S2; GRI 2-9 and 2-12	pp. 16-23
Sustainability-related risks and opportunities management	Narrative disclosures	Limited	IFRS S1 and S2; ESRM Policy and internal risk frameworks	pp. 30-53
Ethics, anti-corruption and business conduct	Narrative disclosures	Limited	GRI 205; Code of Conduct and compliance policies	pp. 34-38
Fraud risk management	Actual fraud loss of ₦1.236 billion (reported in rounded form as ₦1.24 billion)	Limited	Audited financial statements; internal operational-risk methodology	Fraud and forgeries disclosure
Cybersecurity and data privacy	Zero cybersecurity breaches reported; narrative disclosures on controls and governance	Limited	GRI 418; information security policies and internal methodology	pp. 34-38 and relevant risk section
Regulatory compliance	Zero regulatory penalties reported; narrative disclosures	Limited	GRI 2-27; internal compliance methodology	Relevant ethics and compliance section
Sustainable supply chain	Narrative disclosures	Limited	GRI 308 and 414; internal procurement policies	pp. 38, 56
Sustainability strategy	Narrative disclosures	Limited	IFRS S1 and S2; internal sustainability strategy	pp. 24-45
Materiality assessment and stakeholder engagement	Narrative disclosures	Limited	IFRS S1; GRI 3 and 2-29	pp. 24-30
Reporting entity, boundary, methodology and framework alignment	Narrative disclosures, including IFRS S1/S2 as primary basis and GRI Standards (2021) as complementary guidance	Limited	IFRS S1 and S2; GRI Standards; SASB references	pp. 3-5, 82-88
GRI Content Index	GRI Content Index and related cross-references	Limited	GRI Standards (2021)	pp. 82-88

Appendix

List of Abbreviations

Abbreviation	Full Meaning
ABLCM	Access Bank Lagos City Marathon
AGF	African Guarantee Fund
AIDS	Acquired Immunodeficiency Syndrome
ALCO	Asset and Liability Committee
AML/CFT	Anti-Money Laundering / Combating the Financing of Terrorism
ATM	Automated Teller Machine
BRMC	Board Risk Management Committee
CBD	Commercial Banking Division
CBN	Central Bank of Nigeria
CEO	Chief Executive Officer
CHD	Congenital Heart Disease
CIBD	Corporate and Investment Banking Division
CNG	Compressed Natural Gas
CO2e	Carbon Dioxide Equivalent
CRM	Credit Risk Management

Abbreviation	Full Meaning
CSI	Corporate Social Investment
CSR	Corporate Social Responsibility
DEG	Deutsche Investitions- und Entwicklungsgesellschaft/ German Investment Corporation
DEI	Diversity, Equity, and Inclusion
DFI	Development Finance Institution
DRC	Democratic Republic of Congo
DSC	Digital Steering Committee
E & S	Environmental & Social
EAP	Employee Assistance Programme
EDGE	Excellence in Design for Greater Efficiencies
EESG	Environmental, Economic, Social, and Governance
ERM	Enterprise Risk Management
ESAP	Environmental and Social Action Plan
ESG	Environmental, Social, and Governance
ESIA	Environmental and Social Impact Assessment
ESMS	Environmental and Social Management System
ESRM	Environmental and Social Risk Management
EU	European Union
EVP	Employee Value Proposition
EXCO	Executive Committee
FinCom	Finance Committee
FMO	Dutch Entrepreneurial Development Bank
FRC	Financial Reporting Council of Nigeria
FY	Financial Year
GHG	Greenhouse Gas
GHS	Ghanian Cedi
GRI	Global Reporting Initiative
GRMC	Group Risk Management Committee
HFC	Hydrofluorocarbon
HIV	Human Immunodeficiency Virus
HMO	Health Maintenance Organisation
Hold Co	Holding Company
HR	Human Resources
ICAAP	Internal Capital Adequacy Assessment Process
ICSA	International Center for Strategic Alliances
ICT	Information and Communications Technology
IDP	Internally Displaced Persons
IEA	International Energy Agency
IFC	International Finance Corporation
IFC PS	International Finance Corporation Performance Standards
IFRS	International Financial Reporting Standards
ISC	Information Security Committee
ISSB	International Sustainability Standards Board
IT	Information Technology

Abbreviation	Full Meaning
KPI	Key Performance Indicator
Kw	Kilowatt
LGD	Loss Given Default
LMS	Learning Management System
MANCO	Management Committee
MCC	Management Credit Committee
MD/ CEO	Managing Director/ Chief Executive Officer
MHSS	Maternal Health Support Scheme
MPR	Monetary Policy Rate
MSCI	Morgan Stanley Capital International
MSME	Micro, Small, and Medium Enterprises
MTCO	Metric Tonnes of Carbon
NCD	Non-Communicable Disease
NGO	NGO-Governmental Organisation
NZE	Net Zero Emission
ORMC	Operational Risk Management Committee
PACTA	Paris Agreement Capital Transition Assessment
PBT	Profit Before Tax
PCAF	Partnership for Carbon Accounting Financials
PD	Probability of Default
PRB	Principles for Responsible Banking
PSA	Prostrate-Specific Antigen
PSF	Project and Structured Finance
S/N	Serial Number
SAR	Suspicious Activity Report
SASB	Sustainability Accounting Standards Board
SBU	Strategic Business Unit
SDG	Sustainable Development Goals
SDS	Sustainable Development Scenario
SME	Small and Medium Enterprises
SSCI	Sustainable Supply Chain Initiative
STEAM	Science, Technology, Engineering, Arts. And Mathematics
STEPS	Stated Policies Scenario
TAHF	Temitayo Awosika Help Foundation
TRISK	Transition Risk (Climate Stress Testing Platform)
TZS	Tanzanian Shilling
UK	United Kingdom
UNEP FI	United Nations Environment Programme Finance Initiative
UNEP	United Nations Environment Programme
UNGC	United Nations Global Compact
UNICEF	United Nations Children's Fund
WEO	World Energy Outlook
WRI	World Resources Institute
XAF	Central African CFA Franc

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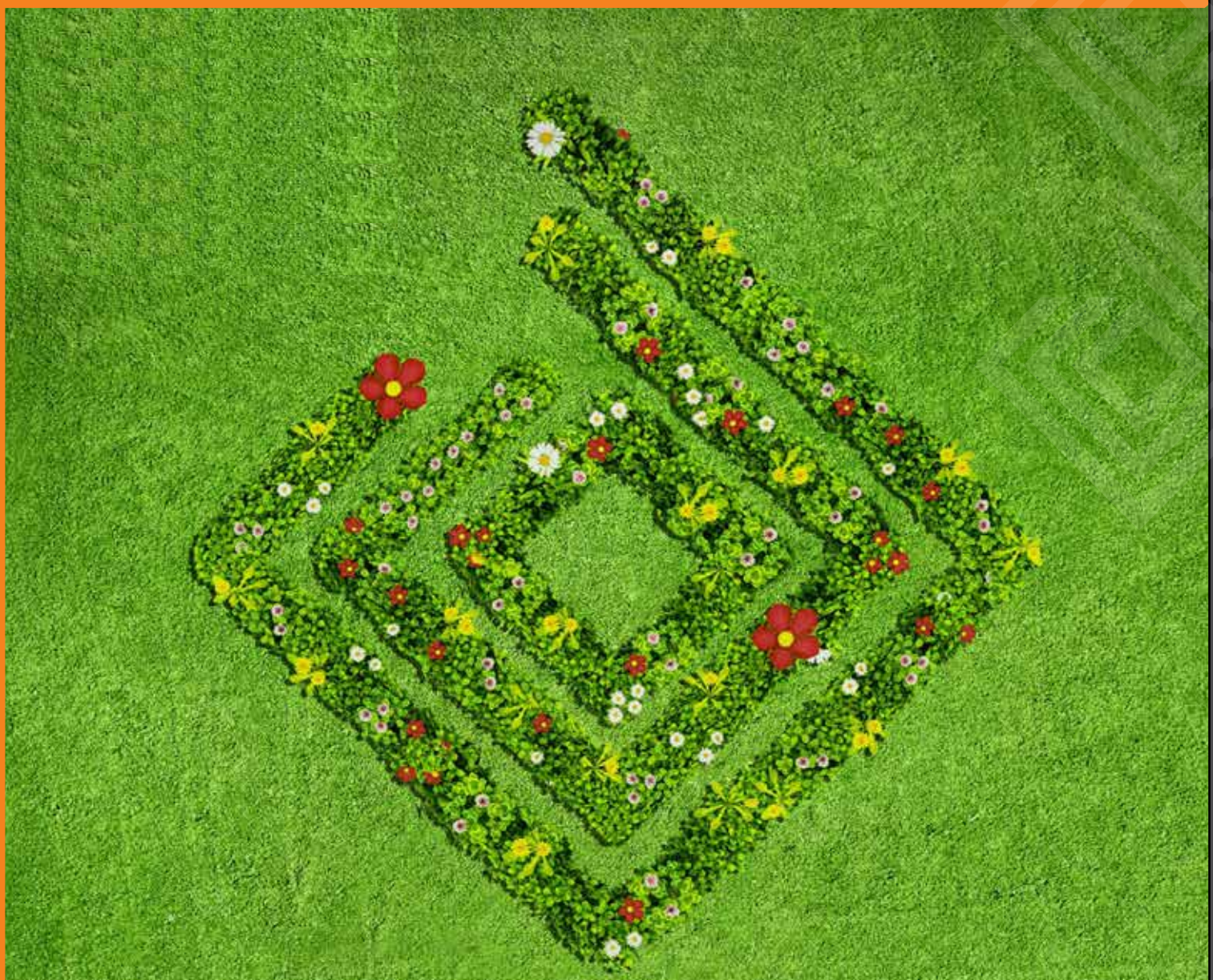

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