

**The Board of Directors and Holders of Sustainable Financing Instruments  
Philippine National Bank**  
PNB Financial Center, Pres. Diosdado Macapagal Blvd.  
Pasay City

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## **Independent Limited Assurance Report on the Sustainable Financing Instruments Allocation Report**

### **Conclusion**

We have performed limited assurance procedures on the Eligible Green Loan Portfolio and Eligible Social Loan Portfolio included in the Sustainable Financing Instruments Allocation Report (hereafter the “SFI Allocation Report”) as at August 31, 2025, of Philippine National Bank (the Bank or PNB).

Based on our procedures performed and evidence obtained, nothing has come to our attention that causes us to believe that the Eligible Green Loan Portfolio and Eligible Social Loan Portfolio included in the SFI Allocation Report as at August 31, 2025 are not, in all material respects, prepared in accordance with the Eligibility Criteria as described in the PNB Sustainability Financing Framework dated October 2024 (hereafter the “Framework”).

### **Basis for Conclusion**

We conducted our limited assurance procedures in accordance with the Philippine Standard on Assurance Engagements (PSAE) 3000 (Revised), *Assurance Engagements other than Audits and Review of Historical Financial Information*. Our responsibilities under this standard are further described in the *Our Responsibilities on Limited Assurance Report on the SFI Allocation Report* section of our report. We are independent of the Bank in accordance with the Code of Ethics for Professional Accountants in the Philippines (Code of Ethics) together with the ethical requirements that are relevant to our assurance engagements in the Philippines, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the Code of Ethics. We apply Philippine Standard on Quality Management 1, *Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements*, and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements. We believe that the assurance evidence we have obtained is sufficient and appropriate to provide the basis for our conclusion.

### **Subject Matter Information**

The scope of our work is limited to assurance over the application of the Eligibility Criteria in the SFI Allocation Report as of August 31, 2025.

**Reporting Criteria**

The reporting criteria are the Eligibility Criteria described in the Framework. The SFI Allocation Report needs to be read and understood together with the Eligibility Criteria as described in the Framework.

**Responsibilities of Management and Those Charged with Governance for the SFI Allocation Report**

Management is responsible for the preparation of the SFI Allocation Report, which includes the Eligible Green Loan Portfolio and Eligible Social Loan Portfolio, in accordance with the Eligibility Criteria as described in the Framework, and for such internal control as management determines is necessary to enable the preparation of the SFI Allocation Report that is free from material misstatement, whether due to fraud or error.

Those charged with governance are responsible for overseeing the Bank's reporting process.

**Our Responsibilities on Limited Assurance Report on the SFI Allocation Report**

Our objective is to plan and perform the procedures in a manner that allows us to obtain sufficient and appropriate assurance evidence for our conclusion.

Procedures performed to obtain a limited level of assurance are aimed at determining the plausibility of information and vary in nature and timing from and are less in extent than for a reasonable assurance engagement. The level of assurance obtained in engagements with a limited level of assurance is therefore substantially less than the assurance obtained in audit engagements. Misstatements can arise from fraud or errors and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the decisions of users taken on the basis of the SFI Allocation Report. The materiality affects the nature, timing and extent of our procedures and the evaluation of the effect of identified misstatements on our conclusion.

As part of our procedures in accordance with PSAE, we exercise professional judgment and maintain professional skepticism throughout our work.

**Approach**

The procedures we performed were based on our professional judgment and we believe that the procedures performed, and the assurance evidence obtained are sufficient and appropriate to provide a basis for our conclusion.

Apart from the SFI Allocation Report and bond prospectus, we were not provided copies of any loan documents or any other relevant requirements. Instead, those documents were inspected virtually or onsite at the Bank's premises.

Our work included, among other things, the following procedures:

**General Procedures**

- Identified areas of the SFI Allocation Report where a material misstatement, whether due to fraud or error, are most likely to occur, designing and performing assurance procedures responsive to these areas, and obtaining assurance information that is sufficient and appropriate to provide a basis for our conclusion.
- Considered the internal control relevant to our review in order to determine assurance procedures that are appropriate in the circumstances, but not for the purpose of expressing a conclusion on the effectiveness of the Bank's internal control.
- Reviewed the second opinion from S&P Global, which addresses the applicability of the Eligibility Criteria used in the preparation of the Eligible Green and Social Loan Portfolios in the SFI Allocation Report, and identified key and relevant matters therefrom in the designing and performing assurance procedures.
- Reviewed the application of the Eligibility Criteria used in the preparation of the Eligible Green Loan Portfolio and Eligible Social Loan Portfolio in the SFI Allocation Report.
- Interviewed relevant staff and officers at PNB responsible for managing, reporting, and consolidating the Eligible Green Loan Portfolio and Eligible Social Loan Portfolio.
- Evaluated internal and external documentation, based on limited sampling, to determine whether the information in the Eligible Green Loan Portfolio and Eligible Social Loan Portfolio is plausible in line with the eligibility criteria of the Framework.


**Specific Procedures**

- Reviewed the statement of the sustainability bonds (SFI).
- Reviewed nominated assets/projects that meet the objectives and eligibility criteria of the Framework.
- Use of Proceeds:
  - Reviewed the percentage of net proceeds allocated to Eligible Green and Eligible Social categories.
  - Reviewed if there are any overlaps of nominated assets/projects with other SFI.
- Reporting –
  - Reviewed consistency of information as processed in the Bank's internal account systems and as consolidated and disclosed in the SFI Allocation Report as at August 31, 2025.

**Restriction of Use of Limited Assurance Report**

Our limited assurance report is intended solely for the Board of Directors of PNB and the Holders of Sustainability Bonds issued by PNB and should not be distributed to other parties and used for other purposes. We do not therefore accept or assume responsibility for any other purpose or to any other person or organization.

**PUNONGBAYAN & ARAULLO**

  
**By: Arman B. Neptuno**  
Partner

CPA Reg. No. 0148776  
TIN 428-244-641  
PTR No. 10465912, January 2, 2025, Makati City  
BIR AN 08-002551-048-2023 (until November 14, 2026)  
BOA/PRC Cert. of Reg. No. 0002/P-020 (until August 12, 2027)

September 30, 2025

Allocation Report

The proceeds for the October 2024 PNB Sustainability Bond<sup>1</sup> were fully allocated to renewable energy projects. Details of the allocation to eligible projects are indicated in the table below.

Table 1: Allocation as of 31 August 2025 for the PNB Sustainability Bond

Bond Issuance Amount (USD Million)	Issue Date	Maturity Date	Net Proceeds Allocated to Renewable Energy Projects (USD Million) <sup>2</sup>	Net Proceeds Allocated (USD Milion)	Buffer - Identified Eligible Green Use of Proceeds <sup>3</sup>
300	23 October 2024	23 October 2029	300	300	299

<sup>1</sup> Refers to the Issue of U.S.\$300,000,000 Senior Notes due 2029 under the US\$2,000,000,000 Medium Term Note Programme

<sup>2</sup> Exchange rate as of 31 August 2025: PHP 57.13 (USD 1)

<sup>3</sup> Other identified eligible use of proceeds are under Renewable Energy and Sustainable Water & Wastewater Management Category