Pillar III Report 2024

Regulatory Capital Disclosures

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Notes to Reader

General information

The objective of Pillar 3 disclosure is to provide existing and potential stakeholders of Credit Europe Bank N.V (hereafter referred to as CEB or the "Bank") a higher transparency to assess banks' capital structures, risk exposures, risk management processes and its overall capital adequacy.

The Pillar 3 disclosures are prepared at CEB consolidated basis and should be read in conjunction with the Annual Report of the Bank[1]. There are no differences between the scope of consolidation for prudential purposes and the scope of consolidation for accounting purposes. All amounts are in thousands of Euros.

CEB prepares the report twice a year. Middle year version disclosed in a condensed format with key metrics and year end version is a comprehensive version, which fulfils the standardised reporting and disclosure obligations to facilitate the comparability of information for benefiting all market participants.

Regulatory Framework

CEB applied following regulatory framework to prepare pillar 3 report.

- Part Eight of Regulation (EU) No 575/2013 of the European Parliament and of the Council of June 26, 2013 on prudential requirements for credit institutions and investment firms, amending Regulation (EU) No 648/2012 as amended by (EU) 2024/3172 of the European Parliament and of the Council of 29 November 2024 (hereinafter referred to as CRR)[2]
- Final draft ITS on public disclosures by institutions under Part Eight of Regulation (EU) No 575/2013[3]

Waiver policy (templates and tables that are not applicable to the Bank)

The following templates are excluded from CEB's reporting framework, as they are not applicable to the bank.

1 Financials (nexentbank.com)
2 https://www.eba.europa.eu/regulation-and-policy/single-rulebook/interactive-single-rulebook/ 11764
3 https://www.eba.europa.eu/regulation-and-policy/transparency-and-pillar-3/its-of-institutions-public-disclosures-of-the-information-referred-to-in-titles-ii-and-iii-of-part-eight-of-regulation-eu-no-575-2013

Key metrics and overview of risk-weighted exposure amounts

EU OV1 – Overview of risk weighted exposure amounts

		Total risk exposure amounts (TREA:RWA)		Total own funds requirements
	(In '000)	Dec-24	Dec-23	Dec-24
1	Credit risk (excluding CCR)	**3,257,745**	**2,933,762**	**260,620**
2	Of which the standardised approach	3,257,745	2,933,762	260,620
3	Of which the Foundation IRB (F-IRB) approach			
4	Of which slotting approach			
EU 4a	Of which equities under the simple riskweighted approach			
5	Of which the Advanced IRB (A-IRB) approach			
6	Counterparty credit risk - CCR	**66,010**	**32,260**	**5,281**
7	Of which the standardised approach	44,990	23,432	3,599
8	Of which internal model method (IMM)			
EU 8a	Of which exposures to a CCP			
EU 8b	Of which credit valuation adjustment - CVA	21,020	8,829	1,682
9	Of which other CCR			
15	Settlement risk			
16	Securitisation exposures in the non-trading book (after the cap)			
17	Of which SEC-IRBA approach			
18	Of which SEC-ERBA (including IAA)			
19	Of which SEC-SA approach			
EU 19a	Of which 1250% / deduction			
20	Position, foreign exchange and commodities risks (Market risk)	**94,860**	**147,045**	**7,589**
21	Of which the standardised approach	94,860	147,045	7,589
22	Of which IMA			
EU 22a	Large exposures			
23	Operational risk	**447,006**	**400,369**	**35,760**
EU 23a	Of which basic indicator approach			
EU 23b	Of which standardised approach	447,006	400,369	35,760
EU 23c	Of which advanced measurement approach			
24	Amounts below the thresholds for deduction (subject to 250% risk weight)	0	0	0
29	**Total**	**3,865,620**	**3,513,435**	**309,250**

EU KM1 - Key metrics template

	(In '000)	Dec-24	Sep-24	Jun-24	Mar-24	Dec-23
	Available own funds (amounts)					
1	Common Equity Tier 1 (CET1) capital	615,623	605,085	584,238	566,925	560,173
2	Tier 1 capital	663,348	651,073	630,945	613,956	605,498
3	Total capital	764,368	744,911	729,030	688,973	678,409
	Risk-weighted exposure amounts					
4	Total risk exposure amount	3,865,620	3,438,289	3,731,639	3,725,225	3,513,229
	Capital ratios (as a percentage of risk-weighted exposure amount)					
5	Common Equity Tier 1 ratio (%)	15.93%	17.60%	15.66%	15.22%	15.94%
6	Tier 1 ratio (%)	17.16%	18.94%	16.91%	16.48%	17.23%
7	Total capital ratio (%)	19.77%	21.67%	19.54%	18.49%	19.31%
	Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure					
EU 7a	Additional own funds requirements to address risks other than the risk of excessive leverage (%)	1.65%	1.65%	1.10%	1.10%	1.10%
EU 7b	of which: to be made up of CET1 capital (percentage points)	0.93%	0.93%	0.62%	0.62%	0.62%
EU 7c	of which: to be made up of Tier 1 capital (percentage points)	1.24%	1.24%	0.83%	0.83%	0.83%
EU 7d	Total SREP own funds requirements (%)	11.84%	11.84%	13.06%	13.06%	13.06%
	Combined buffer and overall capital requirement (as a percentage of risk-weighted exposure amount)					
8	Capital conservation buffer (%)	2.50%	2.50%	2.50%	2.50%	2.50%
EU 8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	0%	0%	0%	0%	0%
9	Institution specific countercyclical capital buffer (%)	0.42%	0.44%	0.48%	0.42%	0.40%
EU 9a	Systemic risk buffer (%)	0%	0%	0%	0%	0%
10	Global Systemically Important Institution buffer (%)	0%	0%	0%	0%	0%
EU 10a	Other Systemically Important Institution buffer (%)	0%	0%	0%	0%	0%
11	Combined buffer requirement (%)	2.92%	2.94%	2.98%	2.92%	2.90%
EU 11a	Overall capital requirements (%)	16.41%	16.43%	17.14%	17.08%	17.06%
12	CET1 available after meeting the total SREP own funds requirements (%)	9.23%	9.24%	9.64%	9.61%	9.59%
	Leverage ratio					
13	Total exposure measure	5,734,306	5,465,982	5,640,032	5,305,147	5,694,709
14	Leverage ratio (%)	11.57%	11.91%	11.19%	11.57%	10.63%
	Additional own funds requirements to address the risk of excessive leverage (as a percentage of total exposure measure)					
EU 14a	Additional own funds requirements to address the risk of	0%	0%	0%	0%	0%
EU 14b	of which: to be made up of CET1 capital (percentage points)	0%	0%	0%	0%	0%
EU 14c	Total SREP leverage ratio requirements (%)	3.00%	3.00%	3.00%	3.00%	3.00%
	Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)					
EU 14d	Leverage ratio buffer requirement (%)	0%	0%	0%	0%	0%
EU 14e	Overall leverage ratio requirement (%)	3.00%	3.00%	3.00%	3.00%	3.00%
	Liquidity Coverage Ratio					
15	Total high-quality liquid assets (HQLA) (Weighted value - average)	1,353,400	1,667,902	1,583,894	1,297,904	1,598,930
EU 16a	Cash outflows - Total weighted value	1,219,427	865,523	902,658	947,659	1,107,169
EU 16b	Cash inflows - Total weighted value	1,673,699	1,199,683	1,442,915	1,201,142	1,195,980
16	Total net cash outflows (adjusted value)	304,857	216,381	225,665	236,915	276,792
17	Liquidity coverage ratio (%)	444%	771%	702%	548%	578%
	Net Stable Funding Ratio					
18	Total available stable funding	4,412,450	4,377,008	4,402,349	4,107,801	4,131,035
19	Total required stable funding	2,156,068	1,885,328	2,084,247	2,008,698	2,150,764
20	NSFR ratio (%)	205%	232%	211%	205%	192%

EU OVC - ICAAP information

CEB conducts a detailed internal capital adequacy assessment on an annual basis. Internal capital adequacy assessment process (ICAAP) is a comprehensive assessment of all the major risks that the Bank is or may be exposed to. CEB is using its own processes and methodologies to identify, quantify and set aside internal capital against unexpected losses. Stress testing and scenario analysis are important parts of ICAAP to ensure capital adequacy under adverse circumstances. The outcome of this assessment is fed back to the Bank's strategic and operational management as well as its risk appetite and capital planning. The Bank maintains a robust and up-to-date capital plan over a medium-term horizon that is compatible with its strategic targets, capital resources and risk appetite framework.

On an annual basis, the summary of the ICAAP and the supporting documentation are shared with the competent authority, DNB for its review. DNB assesses the Bank's ICAAP as a part of the Supervisory Review and Evaluation Process (SREP). The Bank endeavors to fulfil all the regulatory and supervisory requirements like SREP capital requirement, overall capital requirement which includes combined buffer requirement, leverage ratio and MREL.

Risk management policies and objectives

EU OVA - Institution risk management approach & EU OVB - Disclosure on governance arrangements

Risk Management approach and governance arrangements are presented in following chapters:

Objective

The Bank, through a sound risk management, aims to ensure that risks taken and faced through day to day activities are consistent with Bank's strategies, risk appetite and shareholders expectations. Risk management provides the structural means to identify, assess, monitor, manage and report the risks inherent in its business activities. The core elements of the bank's risk management and control framework are:

- Adhering to the risk appetite and strategy set
- Periodically assessing the risk governance structure
- Maintaining capital management in line with the capital strategy
- Managing financial and operational risk in line with the risk appetite and strategy

Risk Governance

CEB has a well-established risk governance structure with clearly defined roles and responsibilities for managing risks and addressing the appropriate risk mitigation solutions. The risk management at CEB is governed by policy level standards in accordance with CRD V and regulations relating to implementation of CRD V published by the Dutch Central Bank (De Nederlandsche Bank – DNB). The CEB risk management philosophy requires direct reporting lines and a clear division of tasks and responsibilities. At the same time, it ensures that bank-wide criteria for acceptance, monitoring, control and management of risks are deeply rooted. We clearly separate risk ownership from business activities.

CEB exercises full control over its subsidiaries' business performance and steers their risk appetite. In addition, we employ the following risk management governance structure:

- Audit & Risk Committees at subsidiary as well as consolidated level;
- Direct reporting of general managers of the banks' subsidiaries to the CEO of CEB;
- Presence of a global CRO function on the Managing Board;
- A uniform credit committee structure at both local and the consolidated level.

Credit Europe Bank's risk management and internal control framework enables the Managing Board to control the financial and non-financial risks of business activities. This framework is governed by a system of policies, procedures, committees, as well as support and control functions. Limits and controls have been put in place to mitigate financial and non-financial risks to an acceptable level in line with Credit Europe Bank's risk appetite. The risk appetite has been approved by the Supervisory Board and is designed to i) set the maximum level of risk the Bank is willing to accept to achieve its business objectives and ii) protect the Bank's activities, not only in terms of profitability, sound capital adequacy and liquidity ratios, but also in terms of reputation and integrity risks. To maintain the quality of financial reports and to increase the effectiveness of reporting, the Bank has implemented internal financial reporting controls.

The risk consolidation is conducted by the Group Risk Management Department (GRMD) which is responsible for measurement and monitoring of risks at consolidated level. Each banking subsidiary has local risk management which reports both to local management and head office management. CEB has also a global Operational Risk Management (ORM) Department whose goal is to consolidate the already-existing ORM activities and coordinate implementation of the framework at locations where there was no prior ORM activity. The framework uses the Risk Control Self-Assessment and Operational Loss database to identify risks and establish risk mitigating action points. Related departments have been given awareness training to ensure that operational-risk management is embedded in day-today operations. The GRMD and ORM operate under the supervision of the Chief Risk Officer

(CRO). The CRO has overall responsibility for developing and maintaining effective controls on financial and non-financial risks, liquidity and capital management principles of CEB.

CEB monitors aggregated risks via specific committees as well as through reporting to the Managing Board and Supervisory Board. More specifically, CEB's risks, capital and liquidity are monitored by The Supervisory Board Sub-committees (e.g. Audit & Risk Committee, Compliance Oversight Committee) and the Managing Board Sub-committees (e.g. Asset-Liability Committee (ALCO), Compliance Management Committee, Non-Financial Risk Committee, Financial Risk Committee, IT Steering Committee, Corporate Credit Committee, FI Credit Committee).

CEB's Managing Board has the overall responsibility for all processes related to strategy definition, risk appetite setting, capital planning, business planning and budgeting, while the Supervisory Board conducts oversight on overall risk management and respective processes, considering applicable local and international legal and regulatory requirements, to respond to the various financial and non-financial risks the Bank is exposed to. The Managing Board is also responsible for implementing and maintaining the risk policies within the organization, and monitoring the risk exposure to ensure that Credit Europe Bank's activities and portfolios are not exposed to unacceptable potential losses or reputational damage. Risk is assessed, managed and reported according to common principles that are approved by the CEO. The management annually reviews the effectiveness of the risk management and internal control framework and oversees that CEB has an adequate internal control framework.

Audit & Risk Committee (ARC) and Compliance Oversight Committee (COC) assist Managing Board in fulfilling its oversight responsibilities concerning the management and control of risk, risk frameworks and controls and processes associated with CEB's operations. These committees at the consolidated level play a pivotal role in CEB's risk governance framework. These committees meet 4 times a year and receive regular reports and updates on the Bank's actual risk appetite with respect to the approved risk appetite statement. The Audit and Risk Committee reviews and monitors the limits for individual types of risks and takes decisions whether principal risks have been properly identified and are being appropriately managed. The Audit & Risk Committee monitors the risk management and internal control framework and findings of the internal audit function. It makes assessments on the existing risk management capacity / know-how of the Bank and raises action items / investment plans –where necessary- to reach the desired level. In addition, regular reports are presented to the Audit & Risk Committee by the management, internal audit, risk management and financial control. Regular risk reports are distributed covering credit risk, market risk, liquidity risk, operational risk, etc. Compliance reports including integrity risks (money laundering, improper conduct, conflicts of interest etc.) are reported to the Compliance Oversight Committee. The risk management and internal control processes provide reasonable assurance that the financial reporting does not contain errors of material importance. This includes its going concern basis and that the risk management and internal control framework regarding financial reporting risks worked properly in the year under review.

In addition, the Managing Board has established the Management Team which includes representation from the business, risk, financial control and treasury divisions in order to facilitate the implementation of robust processes.

Bank implements a “three lines of defense” governance framework to manage risks and exercise adequate oversight and accountability. The first and second lines of defense refer to risk ownership and control mechanisms to manage and oversee risks. The third line of defense provides independent assurance while assessing and managing its risks.

The first line of defense refers to Management and business lines which are risk owners and responsible for directly assessing, controlling and mitigating risks to maintain risk levels within the Bank’s risk appetite. Business divisions are responsible for managing the risks and the compliance of their daily operations. The second line of defense relates to risk, compliance and other control functions. They are responsible for identifying and analyzing risk, implementing effective risk management and assuring that risks are within approved limits and tolerance levels. They also create and maintain the policies and procedures which provide the boundaries for the local and consolidated business activities. The Managing Board ensures that risk management, compliance and other control issues are addressed and discussed with sufficient authority. The structure of the risk organization covers all relevant risks for CEB. The roles and responsibilities of the main control functions within the second line of defense are summarized below.

Corporate and FI Credit Departments

The credit risk assessment of bank’s customers is under Corporate Credit and FI Credit departments responsibilities. The credit departments must assure credit proposals, credit risk assessments and risk classifications are in compliance with established policies and credit risk appetite. Main activities of credit risk departments include: approving credit lines for customers, approving internal ratings and risk classifications of customers, ensuring that credit risk is within the risk appetite set by the Managing Board, ensuring compliance with credit risk policies, monitoring workout activities and conducting assessments of provision adequacy.

Risk Management Department

Risk Management Department independently oversees the implementation of the Bank's risk management framework. It is responsible for identifying, assessing, monitoring and reporting of financial risks such as credit, market, liquidity and interest rate (banking book), and non-financial risks such as operational risk and strategy risk. Risk Management Function provides relevant independent information, analyses and expert judgement on risk exposures, and advices on proposals and risk decisions made by the Managing Board and business or support units as to whether they are consistent with the institution's risk appetite. Risk function recommends improvements to the risk management framework and options to remedy breaches of risk policies, procedures and limits.

Compliance Department

The role of Compliance department is to make sure the Bank conducts its business activities in full compliance with laws, regulations and internal requirements. Compliance department supports the Bank in the identification, assessment, and reporting of all compliance risks related to the organization, to its transactions and conduct of all employees. In addition Compliance is managing non-financial risks like integrity risk, strategy risk, reputational risk, etc.

Information Security Management Department (ISM)

The responsibilities of ISM is to ensure and monitor the implementation of security controls related to confidentiality, integrity and availability of information assets and the continuity of the critical business processes.

In that respect they establish and promote information security policies, standards and procedures, coordinate and support the business units with the implementation of security controls and oversee the effectiveness of the security controls implemented.

The third line of defense is the internal audit function, which assesses the functioning and effectiveness of business units, financial risk management and non-financial risk management activities. In order to guarantee effectiveness of the CEB's risk governance structure, internal and external audit functions provide independent and objective assurance of CEB's corporate governance, internal controls, and compliance and risk management systems as the third line of defense. They assure the effectiveness, completeness and efficiency of the internal controls in the first and second lines of defense. Internal Audit Department regularly reviews the implementation and effectiveness of the risk management framework and ensures the integrity of the risk management process. The internal audit function is organized in three units: internal audit, compliance audit and IT audit. Each unit has specific knowledge in their area and works closely together.

Risk appetite framework

CEB has developed a Risk Appetite Framework (RAF) where the Bank articulates risk tolerance levels and corresponding limits, targets, thresholds and acceptable boundaries for main significant risks categories. The risk appetite of CEB's defined on a consolidated level and applies to all subsidiaries and branches. It is based on the Bank's business plan (i.e. business strategy and company objectives), in addition to the guiding principles set by the Managing Board and is endorsed by the Supervisory Board. CEB has defined the following roles and responsibilities with regard to its risk appetite.

Supervisory Board

The Supervisory Board approves the risk appetite framework and performs strategic oversight and assessment to ensure that the Bank's activities are in line and are appropriate in the context of the approved Risk Appetite Policy and CEB's overall strategy.

Managing Board

The Managing Board established a risk appetite which is consistent with the strategy, business and capital plans and risk capacity. The Managing Board ensures that the risk appetite is appropriately translated into risk limits for business lines to incorporate risk appetite into their strategic and financial planning and decision-making processes. It is the responsibility of the Managing Board to ensure that the Bank operates within the boundaries of the approved risk appetite and regularly report to the supervisory board on the risk profile relative to risk appetite. Should they exceed these boundaries, it is also the duty of the Managing Board to implement remedial measures to realign the Bank's risk profile with the approved risk appetite.

Supervisory Board Sub-committees

The Supervisory Board sub-committees assist the Supervisory Board in its oversight of the management of CEB's key risks and the alignment of the actual risk profile of CEB with the approved risk appetite.

Managing Board Sub-committees

Managing Board sub-committees assist the Managing Board with the implementation of CEB's risk management strategy and ensure that the Bank's exposures are in line with the risk appetite as documented in this Policy.

2nd line of Defense

2nd line of defense (Risk Management, inclusive of both Financial and Non-Financial Risk Management Divisions, Compliance, Corporate Credit Risk and FI Credit &Risk Analytics) enables the identification of the inherent risks in daily operation of the business by establishing frameworks, policies, tools, and techniques to support risk and compliance management. 2nd LOD has further responsibility for measuring, monitoring, and reporting these risks. They monitor the Bank's actual risk profile in relation to these limits and regularly report on the alignment to the Managing Board, Supervisory Board, and the respective Sub-committees of the Supervisory Board.

Sustainability Officer

The Sustainability Officer is responsible for supporting both 1st and 2nd Lines of Defense in ESG-related risk identification, inherent risk assessment and helping development as well as effective adoption of appropriate ESG risk management action plans.

Division and Department Managers

Division and department managers are responsible for managing their areas in line with the risk appetite levels and limit framework described in the Risk Appetite Policy and the relevant policies and procedures.

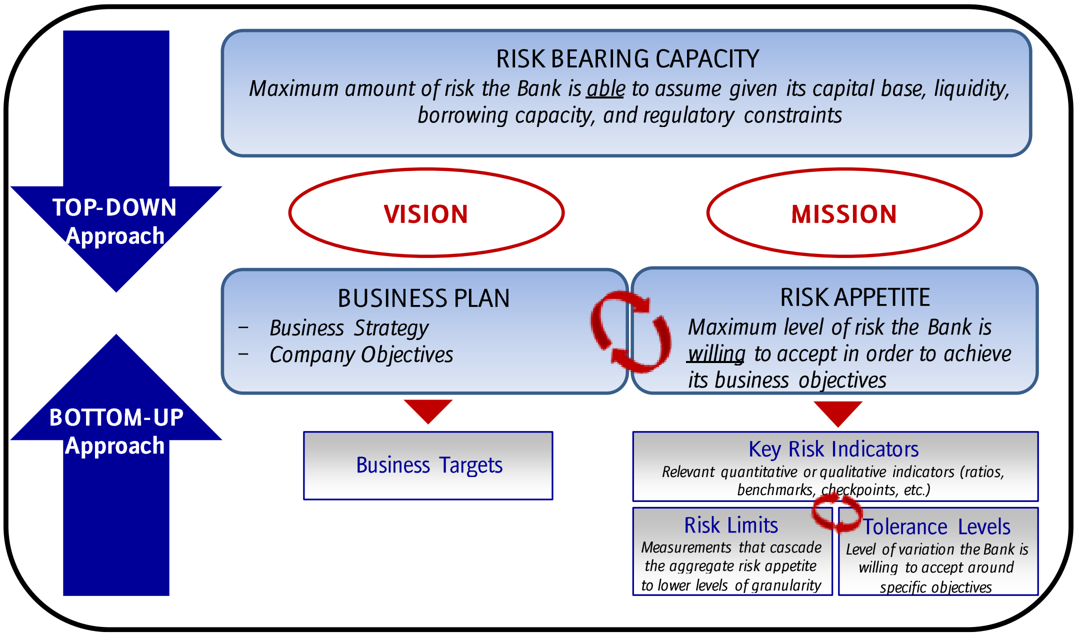
Internal Audit

The Internal Audit function performs internal audit activities on the risk appetite framework to ascertain that the internal governance arrangements, processes, and mechanisms are sound and effective, implemented and consistently applied.

Risk Appetite Framework

The Bank’s risk appetite is directly connected to the 3-year business plan alongside our strategic objectives. These objectives define the high-level boundaries of the risk appetite within which we must operate. The Risk Appetite Statement (RAS) specifies the risk appetite per risk type and defines the level of risk we are willing to accept to achieve our business objectives. The risk-bearing capacity of the Bank is quantified and is used in business activities to assess the desired risk profile against the risk-reward profile of a given activity.

The material types of risks inherent in our business model and strategic plan are actively identified, assessed, mitigated, and monitored. The risk appetite is embedded across CEB within principles, policies, procedures, key risk indicators (KRI), limits and controls. The combination of a escalation process and appropriate governance ensures an adequate and timely response to a risk that is pressuring or has even exceeded our risk appetite. Figure 1 outlines the key components of CEB's Risk Appetite Framework.



The Bank employs a combination of a top-down and bottom-up approach in establishing its risk appetite framework:

- The top-down approach implies that the Bank's risk appetite framework is established in line with the Bank's business strategy and company objectives. Risk appetite statement is supported by KRIs and risk limits allocated to business units through a variety of methods (e.g., regulatory requirements, analysis of financial performance, analysis of historical risk data, stress testing and scenario analysis);
- The bottom-up approach means that the business units provide their estimates regarding risk and capital needs (e.g., as a result of risk and control self-assessments, analysis of an individual unit's strategies and needs).

KRIs and risk limits are used to cascade the aggregate risk appetite framework to more granular levels for day-to-day risk management. The Managing Board delineates the KRIs and establishes the limit framework in harmony with the overarching risk appetite. The KRI limit framework and the Banks alignment with these limits are presented to Managing Board and relevant Supervisory Board sub-committees quarterly. In case of a trigger of any early warning signal (EWS), Risk Management contacts the responsible Division Director(s). The responsible Division Director(s) should provide information to the Risk Management about the increase in risk measures and the expected trend. The business unit needs to take necessary preventive actions to avoid breaching the actual limit. In case of any financial or non-financial risk exposure exceeding a risk limit, limit breach must immediately be reported to Risk Management and CRO by the manager of the department or unit detecting the breach. In case limit breach is detected by Risk Management, they must inform CRO and Division Director(s) of the related 1st and 2nd LoD functions about the breach of the risk limit. Subsequently, the responsible Division Director(s) must submit their action plan to the Managing Board and Risk Management functions. This plan should clarify the extent of the actions together with the anticipated timeframe when CEB complies with its limit framework again. Individual country limit breaches are subject to the review of FI Credits and Risk Analytics Division.

Risk Types

Pillar I Risks

In pillar I, which forms the base for the regulatory capital requirement, three risk types are covered: credit risk, market risk and operational risk.

Credit Risk

Credit risk is defined as the current or prospective threat to CEB's earnings and capital as a result of counterparty's failure to comply with financial or other contractual obligations. Credit risk constitutes the most significant risk of CEB and arises mainly from its trade finance, lending, treasury, mortgage and leasing businesses. Credit risk both stem from idiosyncratic risk factors and systematic factors like country risk and industry risk. Idiosyncratic risk factors are managed through counterparty risk assessment and monitoring while portfolio diversification is adopted as the main portfolio strategy to control country, industry and single name concentration risks.

Market Risk in the Trading Book

This type of market risk arises due to positions in the trading book which have been taken on by the Bank with the intention of benefiting in the short-term from actual and/or expected differences between their buying and selling prices, or interest rate variations; or which arise from market-making. The term "position" includes proprietary positions and positions arising from client servicing and market-making. Financial instruments in the trading book should be in line with the guidelines and principles set out in the policies regarding treasury products and loans. In line with its business plan CEG has a limited risk appetite for all trading-related risks. CEG aims at regular measuring and monitoring of the market risk associated with adverse market movements affecting the trading components of its Treasury and FI portfolio. CEG's trading book is regularly monitored against a set of risk limits, which facilitates the mitigation of the market risk.

Operational Risk

Operational risk is defined as the risk of loss resulting from inadequate or failed internal processes, people, and systems or from external events. The operational risk appetite takes into account the types, nature and levels of operational risk that the Bank is willing to accept.

Pillar II Risks

Concentration risks

This includes single-name, sector and country concentration risks. Calculation of capital requirements for the credit risk under Pillar I do not consider a buffer for credit risk concentrations, therefore an assessment of additional required capital due to concentration risk is conducted under Pillar II. GRMD prepares regular concentration reports to monitor its concentration risks on different levels. Concentration risk is managed with the limit structure and credit risk mitigation techniques.

Interest rate risk in the banking book

The Bank defines interest rate risk as the current or prospective risk to earnings and capital arising from adverse movements in interest rates. The trading book is also subject to interest-rate risk, but this type of risk is dealt with under the Market Risk Value-at-Risk section. Subsidiaries are not allowed to carry interest-rate positions and are expected to transfer their positions to the parent Bank, where centralized ALM and funding principles are in place. The Bank has a limited risk tolerance towards interest-rate risk in its banking book.

Credit spread risk in the banking book

The Bank defines CSRBB as the risk driven by changes of the market price for credit risk, for liquidity and for potentially other characteristics of credit risky instruments, which is not captured by another existing prudential framework such as IRRBB or by expected credit default risk. In 2024, CEB began assessing CSRBB risk within its internal capital framework. The impact of CSRBB risk is very limited

Liquidity risk

Liquidity risk arises when an institution is unable to meet its due liabilities, since it is unable to borrow on an unsecured basis or does not have sufficient good quality assets to borrow against or does not have sufficient liquid assets to sell in order to raise immediate cash without severely damaging its net asset value. CEB's liquidity risk appetite is low and the Bank keeps maintaining a sizeable liquidity buffer against liquidity shocks.

Business Risks

Business risk management is the process of identifying, quantifying, and mitigating any risk that affects or is inherent in a bank's business strategy, strategic objectives, and strategy execution. We assume these risks due to potential changes in general business conditions, such as our market environment, client behavior and technological progress. This can affect our results if we fail to adjust quickly to these changing conditions.

CEB acknowledges that business risk is one of the key non-financial risks since the Bank's selected growth-oriented business plan is sensitive to political, fiscal, regulatory, economic, market or industry changes. The 3-year business plan is reviewed once a year; however certain economic developments and major changes in market conditions may trigger an immediate review of the business plan.

Capital Management

Fundamentals of Capital Management Framework

A capital level commensurate with the bank's risk profile is the key to financial resilience. CEB operates with an optimum level and mix of capital resources. CEB has defined seven fundamental items for its capital management framework that it deems necessary in order to allow for the framework to soundly and adequately work. These items cover (i) an appropriate risk management that allows for an accurate risk assessment and risk control; solid methodologies for (ii) loss estimation as well as for (iii) capital resource estimation, which in turn will allow for (iv) a sound assessment of CEB's capital adequacy. In addition, CEB's fundamental items cover (v) a comprehensive capital policy and capital planning practices that allow CEB to determine adequate capital targets, -levels and -compositions. The above mentioned items are backed-up by (vi) an effective governance approach and (vii) robust internal controls. The fundamentals are summarised on the figure below accordingly.

Capital Management

Fundament 1: Sound foundational risk management

CEB has a sound risk measurement and risk management infrastructure in place that supports the identification, measurement, assessment, and control of all material risks arising from its exposures and business activities.

Fundament 2: Effective loss estimation methodologies

CEB has effective processes in place that allow for translating its risk measures into estimates of potential, expected losses including stress testing scenarios and the aggregation of those estimated losses across CEB.

Fundament 3: Solid resource estimation methodologies

CEB has a clear view on available capital resources and an effective process for estimating available capital resources (including the projection of retained earnings and under the consideration of stress testing scenarios).

Fundament 4: Coherent capital adequacy impact assessment

CEB has processes in place for bringing together estimates of losses and capital resources to assess the combined impact on its capital adequacy in relation to CEB's pre-defined targets for the level and composition of its capital.

Fundament 5: Comprehensive capital policy and capital planning

CEB has a comprehensive capital policy and robust capital planning practices for establishing capital targets, determining appropriate capital levels and composition of capital, making decisions about capital actions, and maintaining capital contingency plans.

Fundament 6: Effective governance

CEB has effective management board and senior management oversight of its capital management, including (i) the periodic review of CEB's risk infrastructure and loss-/resource-estimation methodologies; (ii) the evaluation and re-assessment of capital targets; (iii) the assessment of the appropriateness of the stress testing scenarios considered; (iv) the regular review of any limitations and uncertainties in all aspects of CEB's capital management; and (v) the approval of CEB's decisions related to capital management.

Fundament 7: Robust internal controls

CEB has robust internal controls in place governing the capital adequacy process components, including policies and procedures, change control, model validation and independent review, comprehensive documentation and regular review by CEB's internal audit division.

CEB's philosophy and objectives of capital management are shareholder as well as stakeholder oriented. Therefore, CEB's approach to capital management is dedicated to optimizing the shareholder's value by optimizing the return on capital while at the same time keeping CEB in a position, that allows it to maintain ready access to funding, meet its obligations to creditors and other counterparties, as well continue to serve as a credit intermediary before, during and after stress conditions. This status shall be held at all times and at all relevant levels of CEB, i.e. at a consolidated, a sub-consolidated and a solo level across all subsidiaries accordingly. In order to meet the above mentioned status, CEB is asked to be in financial resilience which in turn it defines as an adequate capital level that is commensurate with its overall risk profile. Consequentially, CEB will operate with an optimum level and mix of capital resources, adequately balancing its shareholder and stakeholder orientation.

A centralized capital management framework plays a major role in this approach and consists of four key guiding principles outlined in the following in greater detail accordingly.

Firstly, the framework, though being centrally run out of the Netherlands, features all relevant levels of CEB. I.e. risks and capital are efficiently managed at the consolidated group level of CEG, the sub-consolidated level of CEB NV as well as at the solo level of CEB NV.

Secondly, the framework is designated to ensure CEB has sufficient capital resources available in order to meet the capital requirements of its regulators; i.e. those of DNB as well as those of the local regulators in the subsidiaries' operating countries. Moreover, the framework will also take into account the expectations on CEB's capital base from additional stakeholders like investors, creditors and rating agencies. Further, the framework shall ensure that CEB has sufficient capital resources available in order to meet its own risk appetite and defined internal principles and guidelines.

Thirdly, CEB allocates its capital under the consideration of the risk/return thresholds defined in the risk appetite statement. CEB's business units are required to fully understand the inherent risk/reward profile of their businesses and to generate a defined level of return on the capital deployed.

Fourthly, the framework excels due to its clear definition of roles and responsibilities across CEB's organizational structure. While the capital management framework is centrally held and operated by the risk, financial control and treasury divisions of CEB NV, the Managing Board and business units in the subsidiaries are required to contribute and are held responsible for the functioning of the framework accordingly.

Conclusively, CEB may summarize the above stated functioning of its capital management framework under four clearly defined guiding principles as outlined in the following figure.

Guiding principles for capital management

Guiding principle 1: ‘group- and subsidiary-level oriented’	▪ CEB efficiently manages its capital and risks at group- as well as at subsidiary-level; ▪ Accordingly, CEB’s (i) risk appetite, (ii) adequate capital ratios and (iii) capital allocation are determined by the managing board and are managed at group- as well as at subsidiary-level in line with CEB’s high level strategy guidance, single business strategies and targets accordingly.
Guiding principle 2: ‘multiple views oriented’	▪ CEB manages capital and risk, taking into account multiple views for capital adequacy; ▪ Holding adequate capital against risk is mandatory and needed to protect the bank against legal insolvency, regulatory actions and to maintain its external ratings at an adequate level; ▪ Incorporating stress-testing views complements the economic perspective of risk capital.
Guiding principle 3: ‘value oriented’	▪ CEB allocates capital efficiently to support growth and opportunities of its business units while optimising the shareholders’ value accordingly; therefore, the cost of capital is optimised via (i) an increased predictability of earnings and capital usage, (ii) the leveraging of the shareholder’s equity across CEB’s subsidiaries depending on the existing business opportunities and their respective risk/return profile as well as via (iii) a disciplined management of capital requirements; the above is ensured by a prospective, clear and transparent view on CEB’s risks and capital position.
Guiding principle 4: ‘responsibility oriented’	▪ An effective capital organisation requires clearly defined roles and responsibilities across CEB’s organisational structure including corresponding accountability.

Applying these four guiding principles in turn will allow CEB to meet its capital management objectives that are to (i) optimize the shareholder’s value, (ii) maintain sufficient capital resources in order to meet DNB’s minimum regulatory capital requirements; (iii) ensure that locally regulated subsidiaries can meet their minimum capital requirements accordingly ; (iv) achieve adequate capital levels to support CEB’s risk appetite and internal capital requirements; (v) maintain a strong capital base to meet and re-assure the respective expectations set not only by regulators, but also investors, creditors and market participants, and finally (vi) to sustain CEB’s future business development accordingly.

CEB’s capital management process

With its capital management process CEB’s covers current, future and potential capital needs. While these three dimensions of capital need to be feed from CEB’s strategy outline and its risk appetite statement, they in turn feed into the application of CEB’s capital policy, capital planning and capital targets accordingly. These items finally allow CEB to define its capital management strategy that is covering a distinct period of time and is subject to continuous update.

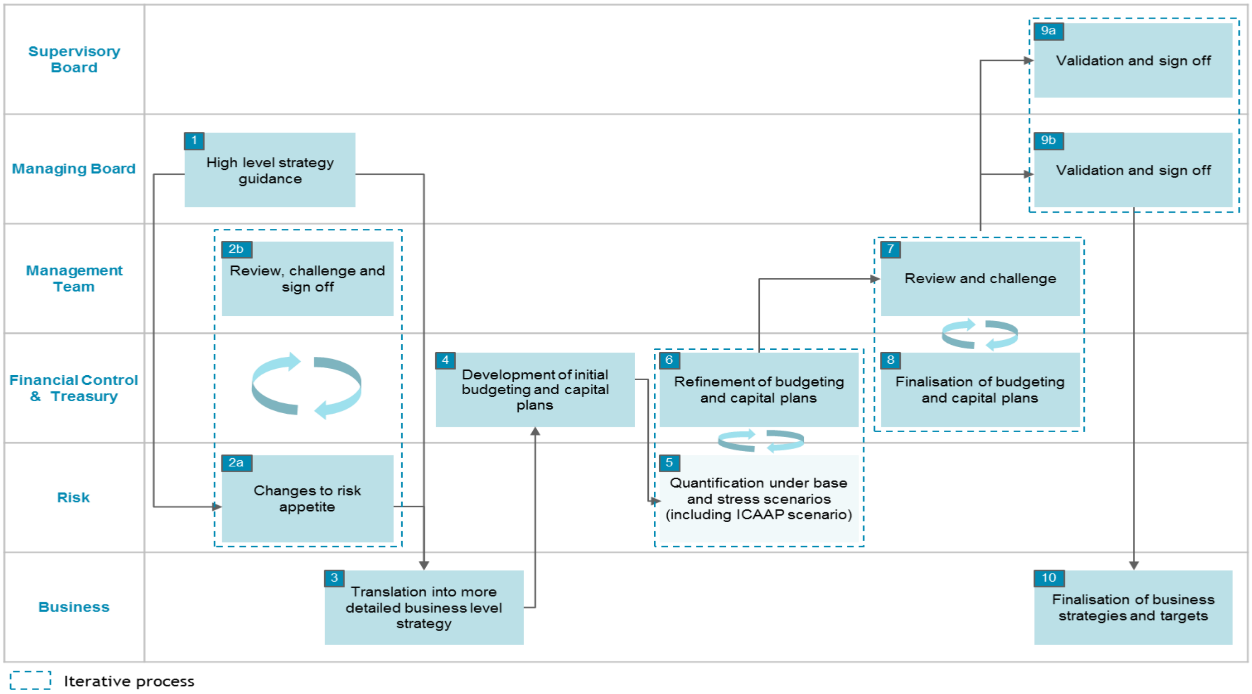
In terms of adequately managing these three dimensions of capital needs, CEB has defined five core activities that in summary build up to its capital management process: CEB will (i) measure, monitor and challenge its defined capital metrics and risk/return thresholds; (ii) estimate its capital (needs) into the future on the basis of its planning and budgeting efforts; (iii) allocate its capital on the basis of overall defined rules and policies; (iv) optimize its capital structure and (v) adequately communicate to external stakeholders. The activities are closely linked to CEB's risk appetite statement as well as to the planning and budgeting process. For a high-level overview of the activities refer to the figure below accordingly.

Per definition, CEB holds capital in order to cover unexpected losses on the basis of its given risk profile. Amount and quality of this capital is subject to policies and guidelines as well as to the expectations of CEB's different stakeholders (i.e. regulators, investors, creditors, rating agencies and market participants) and the CEB Managing Board (on the basis of and according to its risk appetite statement).

CEB measures, monitors and challenges its available and required capital (and hence its capital adequacy) on an ongoing basis. Measuring, monitoring and challenging the respective capital metrics, here, is set against CEB's actual risk appetite statement, which defines the respective capital targets per above view accordingly.

The estimation of capital is the process of projecting expected use and generation of capital that is derived from CEB's business planning and budgeting process. Under the consideration of CEB's high level strategy guidance, the capital projection will cover a multi-year period into the future. Further, the process covers analyzing the evolution of CEB's capital ratios against CEB's long-term strategic objectives and goals. The process ultimately feeds back into advising on CEB's ICAAP, CEB's risk appetite statement and, in case necessary, into CEB's capital actions and capital contingency planning under its overall recovery plan. The graph below outlines the overall processes flow from initial high level strategy guidance over risk appetite setting, capital planning and budgeting to final business strategy and target setting accordingly.

Capital Planning Process



Recovery Plan

Recovery Plan has been prepared addressing the Bank's liquidity and capital situation under unforeseen events or crises. The Bank developed a robust Recovery Plan that has been set-up to comply with the requirements set by both the Dutch Central Bank and the Financial Stability Board. CEB’s Recovery Plan outlines the array of measures the Bank proposes to adopt in the event of a material deterioration of its financial situation triggered by idiosyncratic problems, market wide stresses or a combination of both. CEB’s Recovery Plan is embedded within the Bank’s risk management and internal control framework and can be readily implemented in the event of a situation of severe stress.

CEB acknowledges the criticality of implementing sufficient measures to survive a severe crisis and restore the long-term viability of the Bank. As a minimum, CEB has set the following objectives for its Recovery Plan:

(i) to ensure an adequate and timely response to a near-default stress scenario on its own strength;

(ii) to reduce the impact of a crisis on the Bank thereby minimizing the probability of default; and

(iii) to effect the integration of appropriate supportive measures into CEB’s existing risk management and internal control framework.

CEB's Recovery Plan is not restricted to any one specific stress scenario but rather assesses whether the array of recovery measures proposed are sufficiently robust and varied in their nature to withstand a wide range of shocks.

The Recovery Plan is built upon CEB's business-as-usual ("BAU") operations which facilitate the proactive identification, monitoring, management and mitigation of the risk of near-default stress scenarios. These BAU activities are embedded within the Bank's risk management and internal control framework which aims to protect and strengthen CEB's foundation of capital and liquidity through escalating periods of stress.

Key developments in 2024

In 2024, the following events required the specific attention of the Managing Board:

<u>Data-Driven Compliance Initiatives</u>

Various data-driven compliance initiatives were launched, aimed at improving risk identification, monitoring, and reporting processes. Leveraging advanced data analytics and automation, these initiatives were taken to enhance the effectiveness and efficiency of compliance programs. The Bank plans to build on these initiatives in 2025, further integrating data-driven approaches to strengthen compliance risk management.

<u>Risk Appetite</u>

CEB revised its Risk Appetite Policy and enhanced its limit monitoring framework by introducing Loss Given Default (LGD)based concentration limits alongside nominal limits. In 2024, CEB successfully transitioned to the LGD-based risk appetite framework by refining and automating the risk calculation process, integrating it into a dashboard for daily monitoring, and extending the knowledge and awareness across all stakeholders, including subsidiaries. We consider this project as a major step to further improve CEB's risk metrics regarding asset quality and credit concentration.

<u>Alignment with Changing Regulations</u>

The Bank carried on monitoring regulatory developments applicable to CEB and align its operations with evolving requirements. In 2024, several risk assessment and reporting frameworks were successfully adapted to meet new regulatory expectations. Key achievements included enhancing the risk management framework for Credit Spread Risk in the Banking Book (CSRBB), updating the reporting framework for Interest Rate Risk in Banking Book and ensuring a smooth transition from CRR2 to CRR3.

In addition, the Bank improved its credit risk assessment procedures. In 2024, CEB initiated updates to its corporate credit risk scorecard models, with plans to complete the revision of its Balance Sheet Lending model by 2025.

In 2024, CEB also continued its efforts to integrate ESG and Sustainability into its core business strategy. During

2024, the Bank prepared itself for the first Sustainability Statements. In that respect, the Bank performed a first round of Double Materiality Assessments, outcomes of which will enable the Bank to further integrate its ESG risk management practices and align with reporting directives. Furthermore, the efforts will continue to integrate rapidly evolving regulatory requirements and supervisory expectations around ESG risk management.

NFRM Framework

CEB implemented several initiatives to strengthen its NonFinancial Risk Management Framework (NFRM Framework), with a focus on improving Governance, Risk, and Compliance (GRC) data quality. CEB replaced its centralized software for policy and procedure management that includes embedded workflows for policy creation, review, and approval. Additionally, usage of the GRC tool was extended for second-line recommendation, registration and follow-up. The Risk and Control Self-Assessment (RCSA) process was implemented/improved based on the headquarters methodology in the Bank's subsidiaries in Romania (for key retail processes) and in Switzerland (across all areas). CEB also completed its control testing improvement project, while CEB Suisse established a Control Plan executed by its independent Operational Risk Management (ORM) function. Furthermore, the Product Approval and Review Process (PARP) documentation for the head office's Corporate Banking team was revised.

The Bank reinforced its cyber security measures to counter emerging financial industry cyber threats, along with implementing enhancements in information security, cloud system security, data protection, and business continuity, as further detailed in the Sustainability Statements of this report. CEB completed its gap analysis against Digital Operational Resilience Act (DORA), closed the design gaps with necessary policies, frameworks and tools within 2024 and started the execution of Third-Party Risk Management, IT Risk and Control Framework, Threat Led Penetrating Testing, Cyber Security Incident Management, and Business Continuity Management. Execution of the frameworks is still ongoing, particularly with regards to 3rd party risk management and IT Risk and Control Framework.

Areas of improvement for 2025

In 2025, the Bank will continue to prioritize proactive measures to address evolving regulatory requirements and ensure full compliance with upcoming changes. Through the initiatives mentioned below, the Bank aims to ensure full compliance with evolving regulatory frameworks, while enhancing operational resilience, transparency, and customer trust. These initiatives will be supported by increased collaboration between all locations of the Bank and further adoption of data-driven solutions to meet regulatory requirements efficiently and effectively.

Regulatory Monitoring

The Bank will maintain a strong focus on monitoring regulatory developments at both national and international levels across all locations. This includes staying informed on key legislative updates, engaging with regulators, and participating in industry forums in jurisdictions where the Bank has a presence to anticipate and prepare for changes effectively throughout the organization.

Maintenance of Financial Crime Prevention Framework

On 30 May 2024, a new European Union (EU) anti-money laundering/countering the financing of terrorism (AML/CFT) regime was officially adopted. This new regime is nothing short of a revolution in EU financial services law. For the first time, rules governing the private sector will be uniformly applied through a directly enforceable EU AML Regulation, moving away from previous reliance on national transpositions of EU AML Directives. This shift is expected to reduce the legal fragmentation that has historically hindered a coherent EU-wide response to money laundering and terrorism financing risks. The new EU AML/CFT regime will not come into immediate effect. The implementation period is three years, which means that the entire regime is expected to become applicable mid-2027. Across all locations, the Bank will further study and prepare the implementation of the EU AML/CFT regime.

The scope of application

EU LI1 - Differences between accounting and regulatory scopes of consolidation and mapping of financial statement categories with regulatory risk categories

CEB’s differences between accounting and regulatory scope are SPVs, which are non-financial institutions.

2024 (In '000)	Carrying values as reported in published financial statements	Carrying values under scope of regulatory consolidation	Subject to credit risk framework	Subject to counterparty credit risk framework	Subject to the securitisation framework	Subject to the market risk framework	Not subject to capital requirements or subject to deduction from capital
Assets							
Cash and balances at central banks	1,267,118	1,267,118	1,267,118				
Financial assets measured at FVTPL							
- Trading assets	85,062	85,062				85,062	
- Non-trading assets mandatorily at FVTPL	18,479	18,479	18,479				
Financial investments	444,658	444,658	444,658				
Loans and advances to banks	968,650	968,649	968,649				
Derivative financial instruments	164,958	164,958		164,958			
Loans and advances to customers	2,551,050	2,555,612	2,543,376	-			12,236
Current tax assets	518	518	518				
Deferred tax assets	30,934	30,934	6,200				24,734
Other assets	39,295	35,199	28,873				6,326
Investment in associates and joint ventures	(0)	-	-				
Property and equipment	34,597	34,597	34,597				
Investment property	768	533	533				
Intangible assets	11,892	11,892	-				11,892
Total Assets	**5,617,976**	**5,618,208**	**5,313,001**	**164,958**	**-**	**85,062**	**55,188**

Liabilities							
Due to banks	284,843	284,843					284,843
Derivative financial instruments	229,342	229,342		229,342			-
Due to customers	4,203,909	4,208,237					4,208,237
Current tax liabilities	2,858	2,858					2,858
Other liabilities	31,006	26,911					26,911
Provisions	12,942	12,942					12,942
Deferred tax liabilities	27,180	27,180					27,180
Subordinated liabilities	149,376	149,376					149,376
Total Liabilities	**4,941,457**	**4,941,689**	**-**	**229,342**		**-**	**4,712,347**

2023 (In '000)	Carrying values as reported in published financial statements	Carrying values under scope of regulatory consolidation	Subject to credit risk framework	Subject to counterparty credit risk framework	Subject to the securitisation framework	Subject to the market risk framework	Not subject to capital requirements or subject to deduction from capital
Assets							
Cash and balances at central banks	1,639,420	1,639,420	1,639,420				
Financial assets measured at FVTPL							
- Trading assets	171,789	171,789				171,789	
- Non-trading assets mandatorily at FVTPL	25,915	25,915	25,915				
Financial investments	382,936	382,936	382,936				
Loans and advances to banks	321,353	320,807	320,807				
Derivative financial instruments	110,215	110,215		110,215			
Loans and advances to customers	2,711,128	2,735,369	2,718,848	-			16,521
Current tax assets	61	61	61				
Deferred tax assets	55,833	55,833	7,558				48,275
Other assets	96,503	47,426	45,947				1,479
Investment in associates and joint ventures	0	-	-				
Property and equipment	59,886	35,784	35,784				
Investment property	3,664	17,302	17,302				
Intangible assets	9,919	9,870	-				9,870
Total Assets	**5,588,622**	**5,552,729**	**5,194,579**	**110,215**	**-**	**171,789**	**76,145**
Liabilities							
Due to banks	505,475	505,475					505,475
Derivative financial instruments	136,577	136,577		136,577			-
Due to customers	4,031,242	4,033,714					4,033,714
Current tax liabilities	4,103	4,103					4,103
Other liabilities	52,946	28,682					28,682
Provisions	12,596	12,450					12,450
Deferred tax liabilities	18,182	18,182					18,182
Subordinated liabilities	169,650	169,650					169,650
Total Liabilities	**4,930,769**	**4,908,832**	**-**	**136,577**		**-**	**4,772,255**

EU LI2 - Main sources of differences between regulatory exposure amounts and carrying values in financial statements

CEB's differences between accounting and regulatory scope are SPVs, which are non-financial institutions.

(In '000)	Total	Items subject to			
Dec-24		Credit risk framework	Securitisation framework	Counterparty credit risk framework	Market risk framework
Assets carrying value amount under the scope of prudential consolidation (as per template LI1)	5,618,208	5,313,001	-	164,958	85,062
Liabilities carrying value amount under the scope of prudential consolidation (as per template LI1)	229,342			229,342	
Total net amount under the scope of prudential consolidation	**5,388,866**	**5,313,001**	**-**	**-**	**85,062**
Off-balance-sheet amounts	1,390,135	1,390,135		-	
Differences in valuations	117,450			117,450	
Differences due to different netting rules, other than those already included in row 2					
Differences due to consideration of provisions					
Differences due to the use of credit risk mitigation techniques (CRMs)	(243,875)	(243,875)		-	
Differences due to credit conversion factors	(1,065,561)	(1,065,561)			
Differences due to Securitisation with risk transfer					
Other differences					
Exposure amounts considered for regulatory purposes	**5,587,014**	**5,393,699**	**-**	**117,450**	**85,062**

(In '000)	Total	Items subject to			
Dec-23		Credit risk framework	Securitisation framework	Counterparty credit risk framework	Market risk framework
Assets carrying value amount under the scope of prudential consolidation (as per template LI1)	5,552,729	5,194,579	-	110,215	171,789
Liabilities carrying value amount under the scope of prudential consolidation (as per template LI1)	136,577			136,577	
Total net amount under the scope of prudential consolidation	**5,416,152**	**5,194,579**	**-**	**-**	**171,789**
Off-balance-sheet amounts	1,739,573	1,739,573		192,874	
Differences in valuations	52,592			52,592	
Differences due to different netting rules, other than those already included in row 2					
Differences due to consideration of provisions					
Differences due to the use of credit risk mitigation techniques (CRMs)	(403,030)	(211,840)		(191,189)	
Differences due to credit conversion factors	(1,154,472)	(1,154,472)			
Differences due to Securitisation with risk transfer					
Other differences					
Exposure amounts considered for regulatory purposes	**5,650,815**	**5,567,840**	**-**	**54,277**	**171,789**

**Off-balance sheet amounts in the first column are original exposures, prior to the use of credit conversion factors. Exposures reported in second column onwards are after application of the credit conversion factors (CCFs)*

EU LI3 - Outline of the differences in the scopes of consolidation (entity by entity)

2024		Method of prudential consolidation					Description of the entity
Name of the entity	Method of accounting consolidation	Full consolidation	Proportional consolidation	Equity method	Neither consolidated nor deducted	Deducted	
Credit Europe Bank (N.V).	Full consolidation	X					Credit institution
Credit Europe Bank (Dubai) Ltd	Full consolidation	X					Credit institution
Credit Europe Bank (Suisse) SA	Full consolidation	X					Credit institution
Credit Europe Bank (Romania) SA	Full consolidation		X (99.37%)				Credit institution
JSC Credit Europe Bank (Ukraine)	Full consolidation		X (99.99%)				Credit institution
Credit Europe Leasing (Ukraine) LLC	Full consolidation	X					Immaterial leasing company
Credit Europe Asset Management S.A	Full consolidation	X					Immaterial leasing company
Other SPVs* (Vessels, Shipyards, Commerical real estate)							
Angora Yacht Ltd	Full consolidation			X			Immaterial Non-financial corporation
Seyir Gayrimenkul Yatirim A.S.	Full consolidation			X (53.00%)			Immaterial Non-financial corporation

2023		Method of prudential consolidation					Description of the entity
Name of the entity	Method of accounting consolidation	Full consolidation	Proportional consolidation	Equity method	Neither consolidated nor deducted	Deducted	
Credit Europe Bank (N.V).	Full consolidation	X					Credit institution
Credit Europe Bank (Dubai) Ltd	Full consolidation	X					Credit institution
Credit Europe Bank (Suisse) SA	Full consolidation	X					Credit institution
Credit Europe Bank (Romania) SA	Full consolidation		X (99.34%)				Credit institution
JSC Credit Europe Bank (Ukraine)	Full consolidation		X (99.99%)				Credit institution
Credit Europe Leasing (Ukraine) LLC	Full consolidation	X					Immaterial leasing company
Credit Europe Asset Management S.A	Full consolidation	X					Immaterial leasing company
Other SPVs* (Vessels, Shipyards, Commerical real estate)							
Yenikoy Enterprises B.V.	Full consolidation			X (51.00%)			Non-financial corporation
Hitit Shipping Ltd	Full consolidation			X			Immaterial Non-financial corporation
Angora Yacht Ltd	Full consolidation			X			Immaterial Non-financial corporation
Feniks Gayrimenkul Yatirim A.S.	Full consolidation			X			Immaterial Non-financial corporation
Seyir Gayrimenkul Yatirim A.S.	Full consolidation			X (53.00%)			Immaterial Non-financial corporation

EU LIA - Explanations of differences between accounting and regulatory exposure amounts & EU LIB - Other qualitative information on the scope of application

CRR requires only financial institutions to be included under prudential consolidation. CEB had 2 SPVs (Seyir and Angora-Yacht) that were not included in prudential consolidation. This clarifies the difference between financial consolidation and prudential consolidation.

EU PV1: Prudent valuation adjustments (PVA)

Based on article 34 of CRR, Institutions shall apply the requirements of Article 105 to all their assets measured at fair value when calculating the amount of their own funds and shall deduct from Common Equity Tier 1 capital the amount of any additional value adjustments necessary.

CEB NV calculated prudent valuation deduction adjustment by using simplified method, as the sum of the absolute value of assets and liabilities measured at fair value as reported in the institution's financial statements in accordance with the applicable accounting framework is less than EUR 15 billion.

EU PV1 table required by EBA is mainly designed for Core approach, thus the bank does not present this table under this session. Total prudent valuation adjustment deducted from own funds is 607,517 as of 31 Dec 2024. (compare to Dec 2023, the prudent valuation adjustment was 667,012)

Own funds

EU CC1 - Composition of regulatory own funds

The bank's total own funds consist of Core Tier I capital (also named as Common Equity Tier I, CET 1), Additional Tier I capital (AT 1) and Tier II capital. CEB ensures that it holds enough capital to cover its material risks. The nature and quality of the capital which can be included into total own funds for the purposes of capital requirement calculation is subject to regulatory restrictions set out by CRD and the Dutch Central Bank. The table below presents information on the components of regulatory capital.

	Dec 2024 ('000)	Amounts	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
	Common Equity Tier 1 (CET1) capital: instruments and reserves		
1	Capital instruments and the related share premium accounts	726,748	CC2-26 & 27
	of which: Paid in Capital	726,748	
2	Retained earnings	85,470	CC2-29
3	Accumulated other comprehensive income (and other reserves)	-176,953	CC2-30
EU-3a	Funds for general banking risk		
4	Amount of qualifying items referred to in Article 484 (3) CRR and the related share premium accounts subject to phase out from CET1		
5	Minority interests (amount allowed in consolidated CET1)	240	CC2-32
EU-5a	Independently reviewed interim profits net of any foreseeable charge or dividend	35,942	
6	**Common Equity Tier 1 (CET1) capital before regulatory adjustments**	**671,446**	
	Common Equity Tier 1 (CET1) capital: regulatory adjustments		
7	Additional value adjustments (negative amount)	-608	
8	Intangible assets (net of related tax liability) (negative amount)	-11,892	CC2-15
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)	-24,734	CC2-10
11	Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value		
12	Negative amounts resulting from the calculation of expected loss amounts		
13	Any increase in equity that results from securitised assets (negative amount)		
14	Gains or losses on liabilities valued at fair value resulting from changes in own credit standing		
15	Defined-benefit pension fund assets (negative amount)		
16	Direct, indirect and synthetic holdings by an institution of own CET1 instruments (negative amount)		
17	Direct, indirect and synthetic holdings of the CET 1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)		
18	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)		
19	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)		
EU-20a	Exposure amount of the following items which qualify for a RW of 1250%, where the institution opts for the deduction alternative		
EU-20b	of which: qualifying holdings outside the financial sector (negative amount)		
EU-20c	of which: securitisation positions (negative amount)		
EU-20d	of which: free deliveries (negative amount)		
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in Article 38-(3) CRR are met) (negative amount)		
22	Amount exceeding the 17,65% threshold (negative amount)		
23	of which: direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities		
25	of which: deferred tax assets arising from temporary differences		
EU-25a	Losses for the current financial year (negative amount)	-218	
EU-25b	Foreseeable tax charges relating to CET1 items except where the institution suitably adjusts the amount of CET1 items insofar as such tax charges reduce the amount up to which those items may be used to cover risks or losses (negative amount)		
27	Qualifying AT1 deductions that exceed the AT1 items of the institution (negative amount)		
27a	Other regulatory adjustments	-18,345	
28	**Total regulatory adjustments to Common Equity Tier 1 (CET1)**	-55,795	
29	**Common Equity Tier 1 (CET1) capital**	**615,651**	

	Additional Tier 1 (AT1) capital: instruments		
30	Capital instruments and the related share premium accounts	47,725	CC2-24
31	of which: classified as equity under applicable accounting standards		
32	of which: classified as liabilities under applicable accounting standards	47,725	
33	Amount of qualifying items referred to in Article 484 (4) CRR and the related share premium accounts subject to phase out from AT1		
EU-33a	Amount of qualifying items referred to in Article 494a(1) CRR subject to phase out from AT1		
EU-33b	Amount of qualifying items referred to in Article 494b(1) CRR subject to phase out from AT1		
34	Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties		
35	of which: instruments issued by subsidiaries subject to phase out		
36	**Additional Tier 1 (AT1) capital before regulatory adjustments**	**47,725**	
	Additional Tier 1 (AT1) capital: regulatory adjustments		
37	Direct, indirect and synthetic holdings by an institution of own AT1 instruments (negative amount)		
38	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)		
39	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)		
40	Direct, indirect and synthetic holdings by the institution of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)		
42	Qualifying T2 deductions that exceed the T2 items of the institution (negative amount)		
42a	Other regulatory adjustments to AT1 capital		
43	**Total regulatory adjustments to Additional Tier 1 (AT1) capital**	**0**	
44	**Additional Tier 1 (AT1) capital**	**47,725**	
45	**Tier 1 capital (T1 = CET1 + AT1)**	**663,376**	
	Tier 2 (T2) capital: instruments		
46	Capital instruments and the related share premium accounts	101,020	CC2-24
47	Amount of qualifying items referred to in Article 484(5) CRR and the related share premium accounts subject to phase out from T2 as described in Article 486(4) CRR		
EU-47a	Amount of qualifying items referred to in Article 494a(2) CRR subject to phase out from T2		
EU-47b	Amount of qualifying items referred to in Article 494b(2) CRR subject to phase out from T2		
48	Qualifying own funds instruments included in consolidated T2 capital (including minority interests and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties		
49	of which: instruments issued by subsidiaries subject to phase out		
50	Credit risk adjustments		
51	**Tier 2 (T2) capital before regulatory adjustments**	**101,020**	
	Tier 2 (T2) capital: regulatory adjustments		
52	Direct, indirect and synthetic holdings by an institution of own T2 instruments and subordinated loans (negative amount)		
53	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)		
54	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)		
55	Direct, indirect and synthetic holdings by the institution of the T2 instruments and subordinated loans of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)		
EU-56a	Qualifying eligible liabilities deductions that exceed the eligible liabilities items of the institution (negative amount)		
EU-56b	Other regulatory adjustments to T2 capital		
57	**Total regulatory adjustments to Tier 2 (T2) capital**	**0**	
58	**Tier 2 (T2) capital**	**101,020**	
59	**Total capital (TC = T1 + T2)**	**764,396**	
60	**Total Risk exposure amount**	**3,865,620**	

	Capital ratios and requirements including buffers	
61	Common Equity Tier 1 capital	15.93%
62	Tier 1 capital	17.16%
63	Total capital	19.77%
64	Institution CET1 overall capital requirements	
65	of which: capital conservation buffer requirement	2.50%
66	of which: countercyclical capital buffer requirement	0.4%
67	of which: systemic risk buffer requirement	0%
EU-67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer requirement	0%
EU-67b	of which: additional own funds requirements to address the risks other than the risk of excessive leverage	0%
68	**Common Equity Tier 1 capital (as a percentage of risk exposure amount) available after meeting the minimum capital requirements**	
	Amounts below the thresholds for deduction (before risk weighting)	
72	Direct and indirect holdings of own funds and eligible liabilities of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold	
73	Direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 17.65% thresholds and net of eligible short positions)	
75	Deferred tax assets arising from temporary differences (amount below 17,65% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met)	
	Applicable caps on the inclusion of provisions in Tier 2	
76	Credit risk adjustments included in T2 in respect of exposures subject to standardised approach (prior to the application of the cap)	
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach	
78	Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)	
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach	
	Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2014 and 1 Jan 2022)	
80	Current cap on CET1 instruments subject to phase out arrangements	
81	Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)	
82	Current cap on AT1 instruments subject to phase out arrangements	
83	Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)	
84	Current cap on T2 instruments subject to phase out arrangements	
85	Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)	

	Dec 2023 ('000)	Amounts	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
	Common Equity Tier 1 (CET1) capital: instruments and reserves		
1	Capital instruments and the related share premium accounts	726,748	CC2-26 & 27
	of which: Paid in Capital	726,748	
2	Retained earnings	66,541	CC2-29
3	Accumulated other comprehensive income (and other reserves)	-184,764	CC2-30
EU-3a	Funds for general banking risk		
4	Amount of qualifying items referred to in Article 484 (3) CRR and the related share premium accounts subject to phase out from CET1		
5	Minority interests (amount allowed in consolidated CET1)	310	CC2-32
EU-5a	Independently reviewed interim profits net of any foreseeable charge or dividend	28,146	
6	**Common Equity Tier 1 (CET1) capital before regulatory adjustments**	**636,980**	
	Common Equity Tier 1 (CET1) capital: regulatory adjustments		
7	Additional value adjustments (negative amount)	-662	
8	Intangible assets (net of related tax liability) (negative amount)	-9,870	CC2-15
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)	-48,275	CC2-10
11	Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value		
12	Negative amounts resulting from the calculation of expected loss amounts		
13	Any increase in equity that results from securitised assets (negative amount)		
14	Gains or losses on liabilities valued at fair value resulting from changes in own credit standing		
15	Defined-benefit pension fund assets (negative amount)		
16	Direct, indirect and synthetic holdings by an institution of own CET1 instruments (negative amount)		
17	Direct, indirect and synthetic holdings of the CET 1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)		
18	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)		
19	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)		
EU-20a	Exposure amount of the following items which qualify for a RW of 1250%, where the institution opts for the deduction alternative		
EU-20b	of which: qualifying holdings outside the financial sector (negative amount)		
EU-20c	of which: securitisation positions (negative amount)		
EU-20d	of which: free deliveries (negative amount)		
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in Article 38-(3) CRR are met) (negative amount)		
22	Amount exceeding the 17,65% threshold (negative amount)		
23	of which: direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities		
25	of which: deferred tax assets arising from temporary differences		
EU-25a	Losses for the current financial year (negative amount)		
EU-25b	Foreseeable tax charges relating to CET1 items except where the institution suitably adjusts the amount of CET1 items insofar as such tax charges reduce the amount up to which those items may be used to cover risks or losses (negative amount)		
27	Qualifying AT1 deductions that exceed the AT1 items of the institution (negative amount)		
27a	Other regulatory adjustments	-18,000	
28	**Total regulatory adjustments to Common Equity Tier 1 (CET1)**	-76,808	
29	**Common Equity Tier 1 (CET1) capital**	**560,173**	

	Additional Tier 1 (AT1) capital: instruments		
30	Capital instruments and the related share premium accounts	45,325	CC2-24
31	of which: classified as equity under applicable accounting standards		
32	of which: classified as liabilities under applicable accounting standards	45,325	
33	Amount of qualifying items referred to in Article 484 (4) CRR and the related share premium accounts subject to phase out from AT1		
EU-33a	Amount of qualifying items referred to in Article 494a(1) CRR subject to phase out from AT1		
EU-33b	Amount of qualifying items referred to in Article 494b(1) CRR subject to phase out from AT1		
34	Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties		
35	of which: instruments issued by subsidiaries subject to phase out		
36	**Additional Tier 1 (AT1) capital before regulatory adjustments**	**45,325**	
	Additional Tier 1 (AT1) capital: regulatory adjustments		
37	Direct, indirect and synthetic holdings by an institution of own AT1 instruments (negative amount)		
38	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)		
39	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)		
40	Direct, indirect and synthetic holdings by the institution of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)		
42	Qualifying T2 deductions that exceed the T2 items of the institution (negative amount)		
42a	Other regulatory adjustments to AT1 capital		
43	**Total regulatory adjustments to Additional Tier 1 (AT1) capital**	**0**	
44	**Additional Tier 1 (AT1) capital**	**45,325**	
45	**Tier 1 capital (T1 = CET1 + AT1)**	**605,498**	
	Tier 2 (T2) capital: instruments		
46	Capital instruments and the related share premium accounts	72,916	CC2-24
47	Amount of qualifying items referred to in Article 484(5) CRR and the related share premium accounts subject to phase out from T2 as described in Article 486(4) CRR		
EU-47a	Amount of qualifying items referred to in Article 494a(2) CRR subject to phase out from T2		
EU-47b	Amount of qualifying items referred to in Article 494b(2) CRR subject to phase out from T2		
48	Qualifying own funds instruments included in consolidated T2 capital (including minority interests and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties		
49	of which: instruments issued by subsidiaries subject to phase out		
50	Credit risk adjustments		
51	**Tier 2 (T2) capital before regulatory adjustments**	**72,916**	
	Tier 2 (T2) capital: regulatory adjustments		
52	Direct, indirect and synthetic holdings by an institution of own T2 instruments and subordinated loans (negative amount)		
53	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)		
54	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)		
55	Direct, indirect and synthetic holdings by the institution of the T2 instruments and subordinated loans of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)		
EU-56a	Qualifying eligible liabilities deductions that exceed the eligible liabilities items of the institution (negative amount)		
EU-56b	Other regulatory adjustments to T2 capital		
57	**Total regulatory adjustments to Tier 2 (T2) capital**	**0**	
58	**Tier 2 (T2) capital**	**72,916**	
59	**Total capital (TC = T1 + T2)**	**678,414**	
60	**Total Risk exposure amount**	**3,513,435**	

	Capital ratios and requirements including buffers	
61	Common Equity Tier 1 capital	15.94%
62	Tier 1 capital	17.23%
63	Total capital	19.31%
64	Institution CET1 overall capital requirements	
65	of which: capital conservation buffer requirement	2.50%
66	of which: countercyclical capital buffer requirement	0.4%
67	of which: systemic risk buffer requirement	0%
EU-67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer requirement	0%
EU-67b	of which: additional own funds requirements to address the risks other than the risk of excessive leverage	0%
68	**Common Equity Tier 1 capital (as a percentage of risk exposure amount) available after meeting the minimum capital requirements**	
	Amounts below the thresholds for deduction (before risk weighting)	
72	Direct and indirect holdings of own funds and eligible liabilities of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of	
73	Direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 17.65% thresholds and net of eligible short positions)	
75	Deferred tax assets arising from temporary differences (amount below 17,65% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met)	
	Applicable caps on the inclusion of provisions in Tier 2	
76	Credit risk adjustments included in T2 in respect of exposures subject to standardised approach (prior to the application of the cap)	
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach	
78	Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)	
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach	
	Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2014 and 1 Jan 2022)	
80	Current cap on CET1 instruments subject to phase out arrangements	
81	Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)	
82	Current cap on AT1 instruments subject to phase out arrangements	
83	Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)	
84	Current cap on T2 instruments subject to phase out arrangements	
85	Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)	

EU CC2 - reconciliation of regulatory own funds to balance sheet in the audited financial statements

	Dec 2024 ('000)	Balance sheet as in published financial statements 2024	Under regulatory scope of consolidation 2024	Reference
	Assets			
1	Cash and balances at central banks	1,267,118	1,267,118	
2	Financial assets measured at FVTPL	-	-	
3	- Trading assets	85,062	85,062	
4	- Non-trading assets mandatorily at FVTPL	18,479	18,479	
5	Financial investments	444,658	444,658	
6	Loans and advances to banks	968,650	968,649	
7	Derivative financial instruments	164,958	164,958	
8	Loans and advances to customers	2,551,050	2,555,612	
9	Current tax assets	518	518	
10	Deferred tax assets	30,934	30,934	CC1-8
11	Other assets	39,295	35,199	
12	Investment in associates and joint ventures	(0)	-	
13	Property and equipment	34,597	34,597	
14	Investment property	768	533	
15	Intangible assets	11,892	11,892	CC1-10
16	**Total assets**	5,617,976	5,618,208	
	Liabilities			
17	Due to banks	284,843	284,843	
18	Derivative financial instruments	229,342	229,342	
19	Due to customers	4,203,909	4,208,237	
20	Current tax liabilities	2,858	2,858	
21	Other liabilities	31,006	26,911	
22	Provisions	12,942	12,942	
23	Deferred tax liabilities	27,180	27,180	
24	Subordinated liabilities	149,376	149,376	CC1-30 & 46
25	**Total liabilities**	4,941,457	4,941,689	
	Shareholders' Equity			
26	Share capital	563,000	563,000	CC1-1
27	Share Premium	163,748	163,748	CC1-1
28	CY P&L	74,446	74,446	
29	Retained Earnings	50,811	50,811	
30	Revaluation Reserve (incl. tangibles & Intangibles/hedging/foreign currency translation/Fair value reserves)	(176,953)	(176,953)	
31	Equity attributable to shareholders of the parent company	675,052	675,052	
32	Equity attributable to minority interests	1,467	1,467	
33	**Total shareholders' equity**	676,519	676,519	

Dec 2023 ('000)	Balance sheet as in published financial statements 2023	Under regulatory scope of consolidation 2023	Reference
Assets			
1 Cash and balances at central banks	1,639,420	1,639,420	
2 Financial assets measured at FVTPL	-	-	
3 - Trading assets	171,789	171,789	
4 - Non-trading assets mandatorily at FVTPL	25,915	25,915	
5 Financial investments	382,936	382,936	
6 Loans and advances to banks	321,353	320,807	
7 Derivative financial instruments	110,215	110,215	
8 Loans and advances to customers	2,711,128	2,735,369	
9 Current tax assets	61	61	
10 Deferred tax assets	55,833	55,833	CC1-8
11 Other assets	96,503	47,426	
12 Investment in associates and joint ventures	0	-	
13 Property and equipment	59,886	35,784	
14 Investment property	3,664	17,302	
15 Intangible assets	9,919	9,870	CC1-10
16 Total assets	5,588,622	5,552,729	
Liabilities			
17 Due to banks	505,475	505,475	
18 Derivative financial instruments	136,577	136,577	
19 Due to customers	4,031,242	4,033,714	
20 Current tax liabilities	4,103	4,103	
21 Other liabilities	52,946	28,682	
22 Provisions	12,596	12,450	
23 Deferred tax liabilities	18,182	18,182	
24 Subordinated liabilities	169,650	169,650	CC1-30 & 46
25 Total liabilities	4,930,769	4,908,832	
Shareholders' Equity			
26 Share capital	563,000	563,000	CC1-1
27 Share Premium	163,748	163,748	CC1-1
28 CY P&L	62,193	62,193	
29 Retained Earnings	38,396	38,396	
30 Revaluation Reserve (incl. tangibles & Intangibles/hedging/foreign currency translation/Fair value reserves)	(184,764)	(184,764)	
31 Equity attributable to shareholders of the parent company	642,572	642,572	
32 Equity attributable to minority interests	15,280	1,324	
33 Total shareholders' equity	657,853	643,897	

EU CCA: Main features of regulatory own funds instruments and eligible liabilities instruments

	Qualitative or quantitative information - Free format	Common Equity Tier I	Tier I	Tier II
1	Issuer		Credit Europe Bank N.V	Credit Europe Bank N.V
2	Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)			XS0854926671
2a	Public or private placement		Private	Irish Stock Exchange
3	Governing law(s) of the instrument	Dutch Law	Dutch Law	Dutch Law
3a	Contractual recognition of write down and conversion powers of resolution authorities	N/A	N/A	N/A
	Regulatory treatment			
4	Current treatment taking into account, where applicable, transitional CRR rules	Common equity tier 1	Additional Tier 1	Tier 2
5	Post-transitional CRR rules			
6	Eligible at solo/(sub-)consolidated/ solo&(sub-)consolida	Solo & consolidated	Solo & consolidated	Solo & consolidated
7	Instrument type (types to be specified by each jurisdictio	AT1 EU 575/2013 art 26	AT1 EU 575/2013 art 5	AT1 EU 575/2013 art 6
8	Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent			
9	Nominal amount of instrument		50 million USD	150 million USD
EU-9a	Issue price			100%
EU-9b	Redemption price			
10	Accounting classification		Subordinated liabilities	Subordinated liabilities
11	Original date of issuance		18-Dec-2017	9-Nov-2017
12	Perpetual or dated		Perpetual	Dated
13	Original maturity date			9-Nov-2027
14	Issuer call subject to prior supervisory approval			
15	Optional call date, contingent call dates and redemption a		18-Dec-2022	9-Nov-2022 Regulatory & Tax call (100% nominal
16	Subsequent call dates, if applicable			
	Coupons / dividends			
17	Fixed or floating dividend/coupon		Fixed	Fixed
18	Coupon rate and any related index		8.95%	7.25%
19	Existence of a dividend stopper		No	No
EU-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)		Mandatory	Mandatory
EU-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)		Mandatory	Mandatory
21	Existence of step up or other incentive to redeem		No	No
22	Noncumulative or cumulative		N/A	N/A
23	Convertible or non-convertible		Convertible	Convertible
24	If convertible, conversion trigger(s)		at any time the Common Equity Tier 1 Capital Ratio of the borrower on a solo consolidated, sub consolidated or consolidated basis falls below 5.125%	
25	If convertible, fully or partially		Fully	
26	If convertible, conversion rate			
27	If convertible, mandatory or optional conversion		mandatory	
28	If convertible, specify instrument type convertible into		Convert into Ordinary Share	
29	If convertible, specify issuer of instrument it converts into		Convert into Credit Europe Bank	
30	Write-down features			
31	If write-down, write-down trigger(s)			
32	If write-down, full or partial			
33	If write-down, permanent or temporary			
34	If temporary write-down, description of write-up mechanism			
34a	Type of subordination (only for eligible liabilities)			
EU-34b	Ranking of the instrument in normal insolvency proceedings			
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)			
36	Non-compliant transitioned features			
37	If yes, specify non-compliant features			
37a	Link to the full term and conditions of the instrument (signposting)			

(1) Insert ‘N/A’ if the question is not applicable

Countercyclical capital buffers

EU CCyB1 - Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer

Dec 2024 ('000)	General credit exposures		Relevant credit exposures – Market risk		Securitisation exposures Exposure value for non-trading book	Total exposure value	Own fund requirements				Risk-weighted exposure amounts	Own fund requirements weights (%)	Countercyclical buffer rate (%)
	Exposure value under the standardised approach	Exposure value under the IRB approach	Sum of long and short positions of trading book exposures for SA	Value of trading book exposures for internal models			Relevant credit risk exposures - Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book	Total			
Country:													
ROMANIA	416,253	N/A	-	-	-	**416,253**	22,008	-	-	**22,008**	275,102	10.006086%	1.0%
UNITED KINGDOM	166,719	N/A	-	-	-	**166,719**	13,134	-	-	**13,134**	164,180	5.971616%	2.0%
NETHERLANDS	162,141	N/A	-	-	-	**162,141**	12,793	-	-	**12,793**	159,919	5.816605%	2.0%
GERMANY	74,836	N/A	-	-	-	**74,836**	5,976	-	-	**5,976**	74,706	2.717230%	0.8%
LUXEMBOURG	70,807	N/A	-	-	-	**70,807**	5,665	-	-	**5,665**	0	2.575427%	0.5%
FRANCE	66,174	N/A	-	-	-	**66,174**	5,291	-	-	**5,291**	66,142	2.405724%	1.0%
IRELAND	25,082	N/A	-	-	-	**25,082**	2,007	-	-	**2,007**	25,082	0.912281%	1.5%
BELGIUM	22,714	N/A	-	-	-	**22,714**	1,816	-	-	**1,816**	22,703	0.825743%	1.0%
ESTONIA	8,052	N/A	-	-	-	**8,052**	644	-	-	**644**	0	0.292858%	1.5%
CZECH REPUBLIC	4,050	N/A	-	-	-	**4,050**	162	-	-	**162**	2,029	0.073803%	1.3%
LITHUANIA	351	N/A	-	-	-	**351**	28	-	-	**28**	351	0.012749%	1.0%
CYPRUS	42	N/A	-	-	-	**42**	1	-	-	**1**	15	0.000531%	1.0%
CROATIA	1	N/A	-	-	-	**1**	0	-	-	**0**	1	0.000021%	1.5%
HUNGARY	11	N/A	-	-	-	**11**	1	-	-	**1**	8	0.000306%	0.5%

Dec 2023 ('000)	General credit exposures		Relevant credit exposures – Market risk		Securitisation exposures Exposure value for non-trading book	Total exposure value	Own fund requirements				Risk-weighted exposure amounts	Own fund requirements weights (%)	Countercyclical buffer rate (%)
	Exposure value under the standardised approach	Exposure value under the IRB approach	Sum of long and short positions of trading book exposures for SA	Value of trading book exposures for internal models			Relevant credit risk exposures - Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book	Total			
Country:													
ROMANIA	492,721	N/A	-	-	-	**492,721**	27,158	-	-	**27,158**	339,472	12.697505%	1.0%
UNITED KINGDOM	192,093	N/A	-	-	-	**192,093**	14,146	-	-	**14,146**	176,830	6.614109%	2.0%
NETHERLANDS	173,743	N/A	-	-	-	**173,743**	14,014	-	-	**14,014**	175,169	6.551972%	1.0%
GERMANY	63,511	N/A	-	-	-	**63,511**	5,064	-	-	**5,064**	63,298	2.367564%	0.8%
LUXEMBOURG	40,318	N/A	-	-	-	**40,318**	3,225	-	-	**3,225**	0	1.508046%	0.5%
CROATIA	38,235	N/A	-	-	-	**38,235**	3,059	-	-	**3,059**	38,235	1.430116%	1.0%
LITHUANIA	32,207	N/A	-	-	-	**32,207**	2,577	-	-	**2,577**	32,207	1.204675%	1.0%
FRANCE	19,174	N/A	-	-	-	**19,174**	1,530	-	-	**1,530**	19,131	0.715555%	0.5%
IRELAND	18,556	N/A	-	-	-	**18,556**	1,484	-	-	**1,484**	18,556	0.694062%	1.0%
CZECH REPUBLIC	16,369	N/A	-	-	-	**16,369**	778	-	-	**778**	9,722	0.363653%	2.0%
CYPRUS	6,536	N/A	-	-	-	**6,536**	521	-	-	**521**	6,509	0.243443%	0.5%
HONG KONG	58	N/A	-	-	-	**58**	2	-	-	**2**	20	0.000757%	1.0%
DENMARK	1	N/A	-	-	-	**1**	0	-	-	**0**	1	0.000030%	2.5%
Total	**1,093,521**		-	-	-	**1,093,521**	**73,557**	**0**	**0**	**73,557**	**879,148**	**34.39%**	

EU CCyB2 - Amount of institution-specific countercyclical capital buffer

The countercyclical capital buffer (CCyB) is designed to counter procyclicality in the financial system. When it is determined that cyclical systemic risk is rising, institutions are required to invest in capital to build up buffers that will make the banking industry more resilient when losses do occur. This will lessen the financial cycle's downturn and assist maintain the economy's access to credit. During the financial cycle's upswing, the CCyB can also aid in reducing the expansion of excessive credit.

The CCyB rate slightly increased this is mainly due to the increase of the countercyclical capital buffer rate for The Netherlands that increased from 1% in 2023 to 2% in 2024.

Dec 2024 ('000)	
Total risk exposure amount	3,865,620
Institution specific countercyclical capital buffer rate	0.42054%
Institution specific countercyclical capital buffer requirement	16,256,613

Dec 2023 ('000)	
Total risk exposure amount	3,513,435
Institution specific countercyclical capital buffer rate	0.39544%
Institution specific countercyclical capital buffer requirement	13,893,486

Leverage ratio

EU LRA: Disclosure of LR qualitative information

The leverage ratio measures the level of the Tier 1 Capital compared to its non-risk based exposure defined by the Capital Requirements Regulation, with a minimum requirement at 3%. CEB presents its leverage ratio using the particular EBA templates in accordance with regulatory standards. These EBA templates show the advantage ratio as it was determined in accordance with CCR/CRD specifications.

Throughout 2024, CEB maintained its strong capital ratios. CEB is currently one of the least leveraged banks in the Netherlands.

EU LR1 - LRSum: Summary reconciliation of accounting assets and leverage ratio exposures

	Dec 2024 ('000)	Applicable amount
1	Total assets as per published financial statements	7,008,111
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of regulatory consolidation	232
3	(Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference)	
4	(Adjustment for temporary exemption of exposures to central bank (if applicable))	
5	(Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting framework but excluded from the leverage ratio total exposure measure in accordance with point (i) of point (i) of Article 429a(1) CRR)	
6	Adjustment for regular-way purchases and sales of financial assets subject to trade date accounting	
7	Adjustment for eligible cash pooling transactions	
8	Adjustments for derivative financial instruments	(77,313)
9	Adjustment for securities financing transactions (SFTs)	-
10	Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	(1,073,751)
11	(Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital)	
EU-11a	(Adjustment for exposures excluded from the leverage ratio total exposure measure in accordance with point (c) of Article 429a(1) CRR)	
EU-11b	(Adjustment for exposures excluded from the leverage ratio total exposure measure in accordance with point (j) of Article 429a(1) CRR)	
12	Other adjustments	(122,972)
13	**Leverage ratio total exposure measure**	**5,734,306**

	Dec 2023 ('000)	Applicable amount
1	Total assets as per published financial statements	7,135,321
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of regulatory consolidation	(35,894)
3	(Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference)	
4	(Adjustment for temporary exemption of exposures to central bank (if applicable))	
5	(Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting framework but excluded from the leverage ratio total exposure measure in accordance with point (i) of point (i) of Article 429a(1) CRR)	
6	Adjustment for regular-way purchases and sales of financial assets subject to trade date accounting	
7	Adjustment for eligible cash pooling transactions	
8	Adjustments for derivative financial instruments	(67,239)
9	Adjustment for securities financing transactions (SFTs)	3,905
10	Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	(1,216,733)
11	(Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital)	
EU-11a	(Adjustment for exposures excluded from the leverage ratio total exposure measure in accordance with point (c) of Article 429a(1) CRR)	
EU-11b	(Adjustment for exposures excluded from the leverage ratio total exposure measure in accordance with point (j) of Article 429a(1) CRR)	
12	Other adjustments	(124,651)
13	**Leverage ratio total exposure measure**	**5,694,709**

EU LR2 - LRCom: Leverage ratio common disclosure

		Dec-24
	On-balance sheet exposures (excluding derivatives and SFTs)	
1	On-balance sheet items (excluding derivatives, SFTs, but including collateral)	5,453,250
2	Gross-up for derivatives collateral provided where deducted from the balance sheet assets pursuant to the applicable accounting framework	(46,585)
3	(Deductions of receivables assets for cash variation margin provided in derivatives transactions)	(67,784)
4	(Adjustment for securities received under securities financing transactions that are recognised as an asset)	
5	(General credit risk adjustments to on-balance sheet items)	
6	(Asset amounts deducted in determining Tier 1 capital)	(55,188)
7	**Total on-balance sheet exposures (excluding derivatives and SFTs)**	**5,283,693**
	Derivative exposures	
8	Replacement cost associated with SA-CCR derivatives transactions (ie net of eligible cash variation margin)	52,964
EU-8a	Derogation for derivatives: replacement costs contribution under the simplified standardised approach	
9	Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions	81,266
EU-9a	Derogation for derivatives: Potential future exposure contribution under the simplified standardised approach	
EU-9b	Exposure determined under Original Exposure Method	
10	(Exempted CCP leg of client-cleared trade exposures) (SA-CCR)	
EU-10a	(Exempted CCP leg of client-cleared trade exposures) (simplified standardised approach)	
EU-10b	(Exempted CCP leg of client-cleared trade exposures) (Original exposure method)	
11	Adjusted effective notional amount of written credit derivatives	
12	(Adjusted effective notional offsets and add-on deductions for written credit derivatives)	
13	**Total derivatives exposures**	**134,229**
	Securities financing transaction (SFT) exposures	
14	Gross SFT assets (with no recognition of netting), after adjustment for sales accounting transactions	-
15	(Netted amounts of cash payables and cash receivables of gross SFT assets)	-
16	Counterparty credit risk exposure for SFT assets	-
EU-16a	Derogation for SFTs: Counterparty credit risk exposure in accordance with Articles 429e(5) and 222 CRR	
17	Agent transaction exposures	
EU-17a	(Exempted CCP leg of client-cleared SFT exposure)	
18	**Total securities financing transaction exposures**	**-**
	Other off-balance sheet exposures	
19	Off-balance sheet exposures at gross notional amount	1,390,135
20	(Adjustments for conversion to credit equivalent amounts)	(1,073,751)
21	(General provisions associated with off-balance sheet exposures deducted in determining Tier 1 capital)	
22	**Off-balance sheet exposures**	**316,384**

	Excluded exposures	
EU-22a	(Exposures excluded from the leverage ratio total exposure measure in accordance with point (c) of Article 429a(1) CRR)	
EU-22b	(Exposures exempted in accordance with point (j) of Article 429a (1) CRR (on and off balance sheet))	
EU-22c	(Excluded exposures of public development banks - Public sector investments)	
EU-22d	(Excluded promotional loans of public development banks: - Promotional loans granted by a public development credit institution - Promotional loans granted by an entity directly set up by the central government, regional governments or local authorities of a Member State - Promotional loans granted by an entity set up by the central government, regional governments or local authorities of a Member State through an intermediate credit institution)	
EU-22e	(Excluded passing-through promotional loan exposures by non-public development banks (or units): - Promotional loans granted by a public development credit institution - Promotional loans granted by an entity directly set up by the central government, regional governments or local authorities of a Member State - Promotional loans granted by an entity set up by the central government, regional governments or local authorities of a Member State through an intermediate credit institution)	
EU-22f	(Excluded guaranteed parts of exposures arising from export credits)	
EU-22g	(Excluded excess collateral deposited at triparty agents)	
EU-22h	(Excluded CSD related services of CSD/institutions in accordance with point (o) of Article 429a(1) CRR)	
EU-22i	(Excluded CSD related services of designated institutions in accordance with point (p) of Article 429a(1) CRR)	
EU-22j	(Reduction of the exposure value of pre-financing or intermediate loans)	
EU-22k	**(Total exempted xposures)**	-
	Capital and total exposure measure	
23	**Tier 1 capital**	**663,376**
24	**Leverage ratio total exposure measure**	**5,734,306**
	Leverage ratio	
25	Leverage ratio	11.57%
EU-25	Leverage ratio (without the adjustment due to excluded exposures of public development banks - Public sector investments) (%)	11.57%
25a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves)	11.57%
26	Regulatory minimum leverage ratio requirement (%)	3%
EU-26	Additional leverage ratio requirements (%)	0%
27	Required leverage buffer (%)	0%
	Choice on transitional arrangements and relevant exposures	
EU-27	Choice on transitional arrangements for the definition of the capital measure	
	Disclosure of mean values	
28	Mean of daily values of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivable	
29	Quarter-end value of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables	
30	Total exposures (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	
30a	Total exposures (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	
31	Leverage ratio (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	
31a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	

(*) In the course of 2021, the Bank’s application for deductibility of interest component of net investment hedge
contracts for the years 2013-2015 was approved by Dutch tax authorities. As

		Dec-23
	On-balance sheet exposures (excluding derivatives and SFTs)	
1	On-balance sheet items (excluding derivatives, SFTs, but including collateral)	5,442,514
2	Gross-up for derivatives collateral provided where deducted from the balance sheet assets pursuant to the applicable accounting framework	(19,199)
3	(Deductions of receivables assets for cash variation margin provided in derivatives transactions)	(48,506)
4	(Adjustment for securities received under securities financing transactions that are recognised as an asset)	
5	(General credit risk adjustments to on-balance sheet items)	
6	(Asset amounts deducted in determining Tier 1 capital)	(76,145)
7	**Total on-balance sheet exposures (excluding derivatives and SFTs)**	**5,298,664**
	Derivative exposures	
8	Replacement cost associated with SA-CCR derivatives transactions (ie net of eligible cash variation margin)	31,119
EU-8a	Derogation for derivatives: replacement costs contribution under the simplified standardised approach	
9	Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions	31,055
EU-9a	Derogation for derivatives: Potential future exposure contribution under the simplified standardised approach	
EU-9b	Exposure determined under Original Exposure Method	
10	(Exempted CCP leg of client-cleared trade exposures) (SA-CCR)	
EU-10a	(Exempted CCP leg of client-cleared trade exposures) (simplified standardised approach)	
EU-10b	(Exempted CCP leg of client-cleared trade exposures) (Original exposure method)	
11	Adjusted effective notional amount of written credit derivatives	
12	(Adjusted effective notional offsets and add-on deductions for written credit derivatives)	
13	**Total derivatives exposures**	**62,175**
	Securities financing transaction (SFT) exposures	
14	Gross SFT assets (with no recognition of netting), after adjustment for sales accounting transactions	192,874
15	(Netted amounts of cash payables and cash receivables of gross SFT assets)	(191,189)
16	Counterparty credit risk exposure for SFT assets	2,220
EU-16a	Derogation for SFTs: Counterparty credit risk exposure in accordance with Articles 429e(5) and 222 CRR	
17	Agent transaction exposures	
EU-17a	(Exempted CCP leg of client-cleared SFT exposure)	
18	**Total securities financing transaction exposures**	**3,905**
	Other off-balance sheet exposures	
19	Off-balance sheet exposures at gross notional amount	1,546,699
20	(Adjustments for conversion to credit equivalent amounts)	(1,216,733)
21	(General provisions associated with off-balance sheet exposures deducted in determining Tier 1 capital)	
22	**Off-balance sheet exposures**	**329,966**

	Excluded exposures	
EU-22a	(Exposures excluded from the leverage ratio total exposure measure in accordance with point (c) of Article 429a(1) CRR)	
EU-22b	(Exposures exempted in accordance with point (j) of Article 429a (1) CRR (on and off balance sheet))	
EU-22c	(Excluded exposures of public development banks - Public sector investments)	
EU-22d	(Excluded promotional loans of public development banks: - Promotional loans granted by a public development credit institution - Promotional loans granted by an entity directly set up by the central government, regional governments or local authorities of a Member State - Promotional loans granted by an entity set up by the central government, regional governments or local authorities of a Member State through an intermediate credit institution)	
EU-22e	(Excluded passing-through promotional loan exposures by non-public development banks (or units): - Promotional loans granted by a public development credit institution - Promotional loans granted by an entity directly set up by the central government, regional governments or local authorities of a Member State - Promotional loans granted by an entity set up by the central government, regional governments or local authorities of a Member State through an intermediate credit institution)	
EU-22f	(Excluded guaranteed parts of exposures arising from export credits)	
EU-22g	(Excluded excess collateral deposited at triparty agents)	
EU-22h	(Excluded CSD related services of CSD/institutions in accordance with point (o) of Article 429a(1) CRR)	
EU-22i	(Excluded CSD related services of designated institutions in accordance with point (p) of Article 429a(1) CRR)	
EU-22j	(Reduction of the exposure value of pre-financing or intermediate loans)	
EU-22k	**(Total exempted xposures)**	-
	Capital and total exposure measure	
23	**Tier 1 capital**	**605,498**
24	**Leverage ratio total exposure measure**	**5,694,709**
	Leverage ratio	
25	Leverage ratio	10.63%
EU-25	Leverage ratio (without the adjustment due to excluded exposures of public development banks - Public sector investments) (%)	10.63%
25a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves)	10.63%
26	Regulatory minimum leverage ratio requirement (%)	3%
EU-26	Additional leverage ratio requirements (%)	0%
27	Required leverage buffer (%)	0%
	Choice on transitional arrangements and relevant exposures	
EU-27	Choice on transitional arrangements for the definition of the capital measure	
	Disclosure of mean values	
28	Mean of daily values of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivable	
29	Quarter-end value of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables	
30	Total exposures (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	
30a	Total exposures (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	
31	Leverage ratio (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	
31a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	

(*) In the course of 2021, the Bank's application for deductibility of interest component of net investment hedge
contracts for the years 2013-2015 was approved by Dutch tax authorities. As

EU LR3 - LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)

	Dec 2024 ('000)	CRR leverage ratio exposures
EU-1	**Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:**	5,453,250
EU-2	Trading book exposures	85,062
EU-3	Banking book exposures, of which:	5,368,189
EU-4	Covered bonds	-
EU-5	Exposures treated as sovereigns	1,596,079
EU-6	Exposures to regional governments, MDB, international organisations and PSE **not** treated as sovereigns	107,050
EU-7	Institutions	899,341
EU-8	Secured by mortgages of immovable properties	123,977
EU-9	Retail exposures	142,101
EU-10	Corporate	2,350,402
EU-11	Exposures in default	37,483
EU-12	Other exposures (eg equity, securitisations, and other non-credit obligation assets)	111,756

	Dec 2023 ('000)	CRR leverage ratio exposures
EU-1	**Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:**	5,321,042
EU-2	Trading book exposures	171,789
EU-3	Banking book exposures, of which:	5,149,253
EU-4	Covered bonds	-
EU-5	Exposures treated as sovereigns	1,933,829
EU-6	Exposures to regional governments, MDB, international organisations and PSE **not** treated as sovereigns	204,108
EU-7	Institutions	290,188
EU-8	Secured by mortgages of immovable properties	141,911
EU-9	Retail exposures	142,209
EU-10	Corporate	2,270,592
EU-11	Exposures in default	37,096
EU-12	Other exposures (eg equity, securitisations, and other non-credit obligation assets)	129,321

Liquidity requirements

EU LIQA - Liquidity risk management

Strategies and processes in management of liquidity risk

CEB has policies, procedures and systems that enable it to identify measure, manage and monitor liquidity risk over different time horizons to ensure that it maintains adequate levels of available liquidity. These systems and controls are tailored for centralized liquidity management.

CEB's key funding principles also form an essential part of its liquidity risk appetite which are further explained in the Funding Plan document:

(1) Alignment with the asset profile and asset strategy

(2) Alignment with the liquidity risk appetite

(3) Minimizing any funding deficit risk by ensuring granular and stable funding

(4) Support the Bank's overall objective of achieving an investment grade rating

(5) Satisfy any minimum requirements from regulatory authorities

(6) Management of asset encumbrance

(7) Self-funded subsidiary structures

Structure and organisation of the liquidity risk management function (authority, statute, other arrangements)

CEB's Managing Board set strategies regarding the Bank's liquidity risk management framework through the Risk Appetite statement, which is approved and endorsed by the Supervisory Board. Managing Board delegates the execution, monitoring and oversight of the funding and liquidity strategy to the Asset Liability Management Committee (ALCO), a sub-committee of the Managing Board. This Committee executes the board-approved strategies within the principles outlined in ILAAP. Treasury in CEB is responsible for the operational and day-to-day execution of this strategy. Risk Management Division is segregated from the operational functions and provides independent monitoring function. Risk Management regularly updates the Audit & Risk Committee (a sub-committee of the Supervisory Board) over the Bank's liquidity risk profile, for supervision and oversight of the Managing Board purposes. The checks and balances in the form of segregation of duties between operational departments and the different systems, control procedures, limits monitoring and reconciliations ensure the integrity of the Bank's liquidity risk management. The integrity of liquidity risk management is further safeguarded by the Internal Audit Department and through its independent regular reviews.

The degree of centralisation of liquidity management and interaction between the group's units

CEB applies a centralised approach towards liquidity risk policies, measurement methodologies and monitoring of the group-wide liquidity position. Centralisation covers both the operational functions (Treasury departments) and monitoring functions (Risk Management departments). Therefore, all related functions have dual responsibilities at solo and consolidated levels with respect to liquidity risk management.

In close coordination with local Treasury departments, the Treasury is responsible for day-to-day operations while monitoring the various funding options under the prevailing market conditions. Treasury monitors both solo and consolidated liquidity position and assesses the Group's liquidity position on a daily basis. By taking into account the Bank's cash position, future cash flows and pipeline transactions, settlement activities and margin requirements and intra-group positions, Treasury conducts the day-to-day liquidity operations. The Treasury operates within the boundaries of CEB's liquidity risk appetite and the decisions taken by the ALCO.

Additionally, subsidiaries need to comply with local statutory requirements.

Scope and nature of liquidity risk reporting and measurement systems

CEB's methodologies are designed in view of the Bank's risk appetite and set the boundaries of CEB liquidity risk control through limits. These limits are relevant for all business lines in terms of duration, product, currency and geography. These thresholds are used for day-to-day liquidity management and they ensure that CEB operates under market stress at both solo and group levels without any disruption.

Policies for hedging and mitigating the liquidity risk and strategies and processes for monitoring the continuing effectiveness of hedges and mitigants

CEB ensures that the Bank maintains a 'cushion' of unencumbered liquid assets to be held against potential liquidity stress scenarios. The size and composition of the available liquidity are defined such that the Bank can mobilize these resources in a relatively short time horizon.

CEB takes into account the nature of its activities, concentrations and funding dynamics to design relevant liquidity stress scenarios. CEB targets to maintain adequate 'available liquidity' to offset the impacts of these scenarios.

CEB not only focuses on short-term liquidity generation capacity, but also targets matched asset-liability structure in the medium to longer term. At the solo level, CEB's liquidity risk management framework also takes into account the mismatch between asset and liabilities among group entities. Targeting self-reliant subsidiaries, CEB manages its intra-group exposures with respect to pre-defined limits.

Outline of the bank`s contingency funding plans

CEB’s crisis communication plan provides the structure applied as well as procedural steps and guidelines for accurate and timely communication within CEB, and between CEB and any entity belonging to CEB, as well as any third party in the event of a potential/actual crisis, including controversial issue.

In order to support timely and decisive action in a stressed situation, CEB has defined a number of early warning indicators that are used to monitor the development of CEB-specific and/or market-wide negative trends. These indicators help in measuring the adequacy of CEB’s financial resources with the aim of prompting timely action and avoiding the potential failure of the Bank in a situation of severe financial distress.

The monitoring of the indicators is embedded within CEB’s normal operating processes and existing risk management framework.

Stress testing

The Bank uses stress testing to verify that its liquidity buffer is adequate to withstand severe but plausible funding conditions. The outcome of the stress testing shows the Bank the level of required liquidity across different time horizons. In this respect, the design and frequency of the stress test scenarios reveal the Bank’s risk appetite and preparedness to withstand a liquidity crisis.

A declaration approved by the management body on the adequacy of liquidity risk management arrangements of the institution providing assurance that the liquidity risk management systems put in place are adequate with regard to the institution’s profile and strategy.
CEB’s Supervisory Board approves the strategy and provides guidance over liquidity management in the Bank’s Risk Appetite statement. The Asset Liability Management Committee (ALCO) ensures that the Bank operates in line with the Supervisory Board liquidity risk appetite described in CEB’s Risk Appetite statement. The governance of the liquidity management process is conducted by the Audit & Risk Committee. The ARC ensures that the ALCO takes the steps necessary to monitor and control liquidity risk. During its quarterly meetings, the Committee is informed by Risk Management regularly over the liquidity risk profile of the Bank and immediately if there are any material changes in the Bank’s current or prospective liquidity position.

Any major changes pertaining to the design of the Bank’s liquidity risk management oversight or the principles are thoroughly discussed in the Committee and become effective if and when ARC approves those revisions.

A concise liquidity risk statement approved by the management body succinctly describing the institution's overall liquidity risk profile associated with the business strategy. This statement shall include key ratios and figures (other than those already covered in the EU LIQ1 template under this ITS) providing external stakeholders with a comprehensive view of the institution's management of liquidity risk, including how the liquidity risk profile of the institution interacts with the risk tolerance set by the management body.

CEB's liquidity risk appetite is low, and the Bank maintains a large liquidity portfolio with a healthy liquidity buffer. CEB's liquidity risk measurement metrics and all liquidity ratios (LCR and NSFR) are well above regulatory limits and internal targets. CEB ensures that the Bank maintains a 'cushion' of unencumbered liquid assets to be held at all times against potential liquidity stress scenarios. The size and composition of the available liquidity are defined such that the Bank can mobilize these resources in a relatively short time horizon.

EU LIQ1 - Quantitative information of LCR

		a	b	c	d	e	f	g	h
	2024 ('000)	Total unweighted value (average)				Total weighted value (average)			
EU 1a	Quarter ending on (31 Dec 2024)	T	T-1	T-2	T-3	T	T-1	T-2	T-3
EU 1b	Number of data points used in the calculation of averages	12	12	12	12	12	12	12	12
HIGH-QUALITY LIQUID ASSETS									
1	Total high-quality liquid assets (HQLA)					1,496,021	1,572,421	1,373,235	1,347,220
CASH - OUTFLOWS									
2	Retail deposits and deposits from small business customers, of which:	1,077,667	1,026,057	951,142	929,723	83,026	78,059	69,411	65,199
3	*Stable deposits*	590,860	589,731	616,245	662,964	29,543	29,487	30,812	33,148
4	*Less stable deposits*	486,808	436,326	334,898	266,759	53,483	48,572	38,599	32,051
5	Unsecured wholesale funding	1,216,712	1,211,524	1,169,122	1,148,740	596,288	585,119	570,448	561,420
6	*Operational deposits (all counterparties) and deposits in networks of cooperative banks*	33,826	77,885	120,281	171,292	8,457	19,471	30,070	42,823
7	*Non-operational deposits (all counterparties)*	1,182,885	1,133,639	1,048,841	977,448	587,831	565,648	540,378	518,597
8	*Unsecured debt*	-	-	-	-	-	-	-	-
9	*Secured wholesale funding*					1,009	1,009	1,250	417
10	Additional requirements	408,818	374,546	356,307	355,459	111,947	100,718	94,876	91,261
11	*Outflows related to derivative exposures and other collateral requirements*	67,038	62,821	57,318	51,069	67,038	62,821	57,318	51,069
12	*Outflows related to loss of funding on debt products*	-	-	-	-	-	-	-	-
13	*Credit and liquidity facilities*	341,781	311,726	298,990	304,390	44,909	37,897	37,558	40,192
14	Other contractual funding obligations	4,195	3,650	2,291	1,809	4,195	3,650	2,291	1,809
15	Other contingent funding obligations	1,118,803	1,159,050	1,187,914	1,169,084	161,926	172,604	185,788	190,828
16	TOTAL CASH OUTFLOWS					958,390	941,158	924,063	910,934
CASH - INFLOWS									
17	Secured lending (e.g. reverse repos)	22,275	7,025	-	-	16,358	4,504	-	-
18	Inflows from fully performing exposures	1,478,858	1,377,199	1,319,967	1,244,445	1,249,706	1,144,251	1,097,741	1,032,626
19	Other cash inflows	14,455	10,043	7,921	6,635	8,716	4,965	3,245	2,418
EU-19a	(Difference between total weighted inflows and total								
EU-19b	(Excess inflows from a related specialised credit institution)								
20	TOTAL CASH INFLOWS	1,515,588	1,394,267	1,327,889	1,251,080	1,274,780	1,153,721	1,100,986	1,035,044
EU-20a	*Fully exempt inflows*								
EU-20b	*Inflows subject to 90% cap*								
EU-20c	*Inflows subject to 75% cap*					1,297,296	1,165,306	1,107,745	1,039,879
TOTAL ADJUSTED VALUE									
EU-21	LIQUIDITY BUFFER					1,496,021	1,572,421	1,373,235	1,347,220
22	TOTAL NET CASH OUTFLOWS					239,597	235,290	231,016	227,734
23	LIQUIDITY COVERAGE RATIO					624%	668%	594%	592%

EU LIQB - Qualitative information on LCR, which complements template EU LIQ1

Main drivers of LCR

The main drivers of LCR are the high-quality liquid assets and the net cash outflows represented by deposits and commitments. The consolidated LCR is 624% at the end of December 2024, based on a 12-month rolling average.

Changes in the LCR over time

The Bank maintained a strong liquidity position based on quarterly averages in 2024, with LCR well above the regulatory requirements. The highest liquidity was in Q3 due to increased buffers. The Q4 level of 624% indicates a solid liquidity profile and a strong capacity to meet short-term obligations under stress.

Concentration of funding sources

CEB maintains at all times an optimal mix of different funding sources such as retail deposits, corporate deposits, funding from other banks, instruments issued via international capital markets and equity. The largest funding source was retail deposits (58%) in Q4.

Composition of the institution`s liquidity buffer.

CEB's liquid assets buffer consists of assets of extremely high liquidity and credit quality (Level 1 assets in the form of cash, central bank reserves and qualifying unencumbered securities) and assets of high liquidity and credit quality (Level 2 assets) as in the definition of high-quality liquid assets (HQLA) as defined in LCR DA.

Derivative exposures and potential collateral calls

Additional margin calls and collateral requirements are calculated by using the Historical Lookback method according to the definition of EBA's RTS on additional liquidity outflows and are taken into account in LCR.

Currency mismatch in the LCR

CEB steers LCR above 100% in aggregated currencies and also monitors and reports LCR for significant currencies to the regulator. Additionally, CEB reviews its maturity ladders and liquidity mismatches across different currencies and entities, monitors its funding gap in different time buckets as well as the cumulative net liquidity surplus or deficit.

Other items in the LCR calculation

The LCR disclosure template only presents the consolidated LCR. The bank also monitors, reports and steers the LCR on solo level.

EU LIQ2: Net Stable Funding Ratio

		a	b	c	d	e
Dec 2024 (in currency amount)('000)		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
Available stable funding (ASF) Items						
1	Capital items and instruments	**667**	**-**	**150**	**-**	**818**
2	*Own funds*	667	-	150	-	818
3	*Other capital instruments*					
4	Retail deposits		**1,982**	**390**	**460**	**2,677**
5	*Stable deposits*		1,312	323	429	1,983
6	*Less stable deposits*		669	67	31	694
7	Wholesale funding:		**1,561**	**66**	**0**	**594**
8	*Operational deposits*		-	-	-	-
9	*Other wholesale funding*		1,561	66	0	594
10	Interdependent liabilities		-	-	-	-
11	Other liabilities:	**31**	**-**	**-**	**324**	**324**
12	*NSFR derivative liabilities*	31				
13	*All other liabilities and capital instruments not included in the above categories*		-	-	324	324
14	**Total available stable funding (ASF)**					**4,412**
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					**3**
EU-15a	Assets encumbered for more than 12m in cover pool		**-**	**-**	**-**	**-**
16	Deposits held at other financial institutions for operational purposes		**-**	**-**	**-**	**-**
17	Performing loans and securities:		**2,542**	**251**	**902**	**1,623**
18	*Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut*		-	11	-	5
19	*Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions*		871	85	81	206
20	*Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:*		1,215	147	717	1,367
21	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*		-	-	-	-
22	*Performing residential mortgages, of which:*		11	8	103	-
23	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*		-	-	-	-
24	*Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products*		444	-	-	44
25	Interdependent assets		-	-	-	-
26	Other assets:		**63**	**-**	**407**	**458**
27	*Physical traded commodities*				-	-
28	*Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs*				-	-
29	*NSFR derivative assets*				-	-
30	*NSFR derivative liabilities before deduction of variation margin posted*				80	4
31	*All other assets not included in the above categories*		9	-	53	50
32	Off-balance sheet items		**1,078**	**71**	**92**	**68**
33	**Total RSF**					**2,156**
34	**Net Stable Funding Ratio (%)**					205%

Credit Risk

Credit risk quality

EU CRA: General qualitative information about credit risk

Credit risk arises from the possibility of losses stemming from the failure of customers or counterparties to meet their financial obligations with Credit Europe Bank. The Bank undertakes credit risk by offering loans, guarantees and other credit products. Credit risk is the primary risk factor in the Bank's operations and taking on credit risk is a core activity of the Bank. The Bank has policies and procedures for accepting, measuring and managing credit risk. The objective of credit risk management is to achieve an appropriate balance between risk and return and to minimize potential adverse effects of credit risk on the Bank's financial performance.

The points below define the general approach towards credit risk at Credit Europe Bank:

- Group level policies and procedures to identify, measure, monitor, control and report material risks in all countries.
- Establishment of effective and efficient internal control mechanisms to ensure the integrity of credit processes.
- Group level Credit Risk Management function covers: Sovereign/Counterparty/Treasury/Corporate-Commercial/Retail and SMEs.
- Control and setting of local Credit Limit powers in all subsidiaries.
- Establish a comprehensive risk appetite framework and ensure credit risks are only accepted and managed within that risk appetite.
- Application of consistent Internal Credit Risk Rating Models in all subsidiaries.
- Establishment and maintenance of a sound internal rating system supported with an adequate number of rating models and processes to ensure its robustness across all lending types.
- Establishment and maintenance of a sound IFRS9 Impairment Calculation Framework supported with an adequate governance and processes to ensure accuracy and robustness of impairment calculations.
- Building a regular cycle of IFRS9 model validation that includes validation of the general framework and periodic monitoring of model performance and stability; and model improvement where necessary.
- Stress testing of loan portfolios under alternative scenarios.
- Standardisation of all product and facility definitions at Group level.

- Regulatory and Internal Concentration Limits are set at the Group level: Country / Single Name / Sector.
- CRR, standards and guidelines published by European Banking Authority (EBA) and DNB regulations.

EU CRB: Additional disclosure related to the credit quality of assets

The Credit Exposure Classification and Treatment Policies for corporate as well as retail clients define the minimum standards for, and establish a single view, on identification and treatment of non-performing corporate credit exposures in Credit Europe Bank N.V. and all of its subsidiaries.

The policies also set minimum standards and explain the processes to be followed for the identification and treatment of obligors whose creditworthiness and repayment capacity of their performing exposures may potentially deteriorate or have already deteriorated, even though their credit exposures are still performing. CEB differentiates between the following categories of assets in the loan portfolio:

- Fully performing: Fully performing exposures are defined as credit exposures that are not past-due or exposures past-due up to 30 days, provided that there is no significant increase in credit risk since origination. An exposure is past due when any amount of principal, interest or fee has not been paid at the date it was due.
- Underperforming: Underperforming exposures belong to a sub-category of the performing asset class, where the Bank observes a significant increase in credit risk since origination. Underperformance might become evident if an exposure is past-due more than 30 days, subject to forbearance measures, or the assigned PD has increased significantly since the origination of the exposure (applicable for corporate exposures, measured by CEB's internal PD Master Scale).
- Non-performing: Non-performing exposures (NPE) are defined as exposures that satisfy either or both of the following criteria:
    1) material exposures which are more than 90 days past-due.
    2) the obligor is assessed as unlikely to pay its credit obligations in full without realization of collateral, regardless of the existence of any past-due amount or of the number of days past-due.

An exposure is past-due only if there is a legal obligation to make a payment and this payment is compulsory. The counting of days past-due starts as soon as any amount of principal, interest or fee has not been paid to CEB at the date this obligation was due.

To be able to monitor delinquent corporate loans in a more structured way the Bank developed NPL & forbearance screens on solo level and strive to spread the system across subsidiaries.

Impairment allowances

IFRS 9 introduced forward-looking expected loss model for impairment allowances. Expected credit loss (ECL) amount is calculated on a probability-weighted basis as the difference between the cash flows that are due to the Group in accordance with the contractual terms of a financial instrument and the cash flows that the Group expects to receive. The Group classifies its financial assets in ‘three-stage’ model (‘general model’) for impairment based on changes in credit quality since initial recognition.

Stage 1 includes financial instruments that have not had a significant increase in credit risk since initial recognition. For these assets, 12-month expected credit losses (‘ECL’) are recognized and interest revenue is calculated on the gross carrying amount of the asset (that is, without deduction for credit allowance). 12-month ECL is the expected credit losses that result from default events that are possible within 12 months after the reporting date. It is not the expected cash shortfalls over the 12-month period but the entire credit loss on an asset weighted by the probability that the loss will occur in the next 12 months.

Stage 2 includes financial instruments that have had a significant increase in credit risk since initial recognition (unless they have low credit risk at the reporting date) but that do not have objective evidence of impairment. For these assets, lifetime ECL are recognized, but interest revenue is still calculated on the gross carrying amount of the asset. Lifetime ECL are the expected credit losses that result from all possible default events over the expected life of the financial instrument. Expected credit losses are the weighted average credit losses with the probability of default (‘PD’) as the weight.

Stage 3 includes financial assets that have objective evidence of impairment at the reporting date. In line with the Capital Requirement Regulations (CRR) the Bank defines defaulted exposures as exposures that satisfy either or both of the following criteria:

- material exposures which are more than 90 days past-due
- the obligor is assessed as unlikely to pay its credit obligations in full without realization of collateral, regardless of the existence of any past-due amount or of the number of days past-due.

The Bank aligns the definition of credit impaired under IFRS 9 (Stage 3) with default definition of CRR. For these assets, lifetime ECL is recognized and interest revenue is calculated on the net carrying amount (that is, net of credit allowance).

The Bank recognizes a loss allowance for expected credit losses on amortized cost financial assets, debt securities classified as at FVOCI, and off-balance sheet loan commitments and financial guarantees in accordance with IFRS9.

EU CR1: Performing and non-performing exposures and related provisions

		a	b	c	d	e	f
		Gross carrying amount/nominal amount					
		Performing exposures			Non-performing exposures		
	Dec 2024 ('000)	Total	Of which stage 1	Of which stage 2	Total	Of which stage 2	Of which stage 3
005	**Cash balances at central banks and other demand deposits**	***1,355,387***	-	-	-	-	-
010	**Loans and advances**	***3,528,209***	***3,421,858***	***106,351***	***60,139***	***12***	***60,127***
020	*Central banks*	-	-	-	-	-	-
030	*General governments*	50,909	50,909	-	-	-	-
040	*Credit institutions*	918,385	918,385	-	-	-	-
050	*Other financial corporations*	353,890	353,830	60	-	-	-
060	*Non-financial corporations*	1,952,915	1,881,064	71,851	31,787	-	31,787
070	*Of which SMEs*	-	-	-	-	-	-
080	*Households*	252,110	217,669	34,440	28,352	12	28,340
090	**Debt securities**	***316,840***	***316,840***	-	-	-	-
100	*Central banks*	-	-				
110	*General governments*	284,799	284,799				
120	*Credit institutions*	14,657	14,657				
130	*Other financial corporations*	-	-				
140	*Non-financial corporations*	17,384	17,384				
150	**Off-balance-sheet exposures**	***1,390,135***	-	-	-	-	-
160	*Central banks*	-					
170	*General governments*	1,500					
180	*Credit institutions*	391,619					
190	*Other financial corporations*	-					
200	*Non-financial corporations*	767,076			-		
210	*Households*	229,941					
220	***Total***	***5,235,184***	***3,738,698***	***106,351***	***60,139***	***12***	***60,127***

		g	h	i	j	k	l	m	n	o
		Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						Accumulated partial write-off	Collateral and financial guarantees received	
		Performing exposures – accumulated impairment and provisions			Non-performing exposures – accumulated impairment, accumulated negative changes in fair value due to credit risk and				On performing exposures	On non-performing exposures
	Dec 2024 ('000)	Total	Of which stage 1	Of which stage 2	Total	Of which stage 2	Of which stage 3			
005	**Cash balances at central banks and other demand deposits**	-	-	-	-	-	-	-	-	-
010	**Loans and advances**	***(12,904)***	***(8,301)***	***(4,602)***	***(22,293)***	***(12)***	***(22,281)***	-	-	-
020	*Central banks*	-	-	-	-	-	-	-	-	-
030	*General governments*	-	-	-	-	-	-	-	-	-
040	*Credit institutions*	(425)	(425)	-	-	-	-	-	-	-
050	*Other financial corporations*	(762)	(761)	(2)	-	-	-	-	-	-
060	*Non-financial corporations*	(9,334)	(5,634)	(3,701)	(9,058)	-	(9,058)	-	-	-
070	*Of which SMEs*	-	-	-	-	-	-	-	-	-
080	*Households*	(2,383)	(1,483)	(900)	(13,235)	(12)	(13,223)	-	-	-
090	**Debt securities**	-	-	-	-	-	-	-	-	-
100	*Central banks*									
110	*General governments*									
120	*Credit institutions*									
130	*Other financial corporations*									
140	*Non-financial corporations*									
150	**Off-balance-sheet exposures**	-	-	-	-	-	-			
160	*Central banks*									
170	*General governments*									
180	*Credit institutions*									
190	*Other financial corporations*									
200	*Non-financial corporations*									
210	*Households*									
220	***Total***	***(12,904)***	***(8,301)***	***(4,602)***	***(22,293)***	***(12)***	***(22,281)***	-	-	-

	Dec 2023 ('000)	a	b	c	d	e	f
		Gross carrying amount/nominal amount					
		Performing exposures			Non-performing exposures		
		Total	Of which stage 1	Of which stage 2	Total	Of which stage 2	Of which stage 3
005	**Cash balances at central banks and other demand deposits**	***1,768,676***	-	-	-	-	-
010	**Loans and advances**	***2,946,522***	***2,737,076***	***209,446***	***76,848***	-	***76,848***
020	*Central banks*	-	-	-	-	-	-
030	*General governments*	199,709	199,709	-	-	-	-
040	*Credit institutions*	177,158	177,158	-	-	-	-
050	*Other financial corporations*	184,130	182,854	1,276	-	-	-
060	*Non-financial corporations*	2,123,585	1,952,850	170,735	34,396	-	34,396
070	*Of which SMEs*	-	-	-	-	-	-
080	*Households*	261,940	224,505	37,435	42,452	-	42,452
090	**Debt securities**	***331,788***	***331,788***	-	-	-	-
100	*Central banks*	-	-				
110	*General governments*	304,688	304,688				
120	*Credit institutions*	18,830	18,830				
130	*Other financial corporations*	-	-				
140	*Non-financial corporations*	8,271	8,271				
150	**Off-balance-sheet exposures**	***1,546,699***	-	-	-	-	-
160	*Central banks*	-					
170	*General governments*	-					
180	*Credit institutions*	413,249					
190	*Other financial corporations*	-					
200	*Non-financial corporations*	931,023			-		
210	*Households*	202,427					
220	***Total***	***4,825,009***	***3,068,864***	***209,446***	***76,848***	-	***76,848***

		g	h	i	j	k	l	m	n	o
		Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						Accumulated partial write-off	Collateral and financial guarantees received	
		Performing exposures – accumulated impairment and provisions			Non-performing exposures – accumulated impairment, accumulated negative changes in fair value due to credit risk and				On performing exposures	On non-performing exposures
	Dec 2023 ('000)	Total	Of which stage 1	Of which stage 2	Total	Of which stage 2	Of which stage 3			
005	**Cash balances at central banks and other demand deposits**	-	-	-	-	-	-	-	-	-
010	**Loans and advances**	***(23,261)***	***(8,975)***	***(14,285)***	***(26,410)***	-	***(26,410)***	-	-	-
020	*Central banks*	-	-	-	-	-	-	-	-	-
030	*General governments*	-	-	-	-	-	-	-	-	-
040	*Credit institutions*	(49)	(49)	-	-	-	-	-	-	-
050	*Other financial corporations*	(979)	(972)	(8)	-	-	-	-	-	-
060	*Non-financial corporations*	(19,235)	(5,956)	(13,278)	(6,768)	-	(6,768)	-	-	-
070	*Of which SMEs*	-	-	-	-	-	-	-	-	-
080	*Households*	(2,997)	(1,998)	(999)	(19,642)	-	(19,642)	-	-	-
090	**Debt securities**	-	-	-	-	-	-	-	-	-
100	*Central banks*									
110	*General governments*									
120	*Credit institutions*									
130	*Other financial corporations*									
140	*Non-financial corporations*									
150	**Off-balance-sheet exposures**	-	-	-	-	-	-			
160	*Central banks*									
170	*General governments*									
180	*Credit institutions*									
190	*Other financial corporations*									
200	*Non-financial corporations*									
210	*Households*									
220	***Total***	***(23,261)***	***(8,975)***	***(14,285)***	***(26,410)***	-	***(26,410)***	-	-	-

EU CR1-A: Maturity of exposures

		a	b	c	d	e	f
		Net exposure value					
	Dec 2024 ('000)	**On demand**	**<= 1 year**	**> 1 year <= 5 years**	**> 5 years**	**No stated maturity**	**Total**
1	Loans and advances	-	2,403,434	676,459	255,099	218,159	**3,553,152**
2	Debt securities	-	57,235	209,959	49,646	-	**316,840**
3	**Total**	**-**	**2,460,669**	**886,418**	**304,745**	**218,159**	**3,869,992**

		a	b	c	d	e	f
		Net exposure value					
	Dec 2023 ('000)	On demand	<= 1 year	> 1 year <= 5 years	> 5 years	No stated maturity	Total
1	Loans and advances	-	1,648,803	654,356	410,232	260,308	**2,973,699**
2	Debt securities	-	141,218	129,541	61,029	-	**331,788**
3	Total	-	1,790,021	783,897	471,261	260,308	3,305,487

EU CR2: Changes in the stock of non-performing loans and advances

	Dec 2024 ('000)	Gross carrying amount
010	**Initial stock of non-performing loans and advances**	86,903
020	Inflows to non-performing portfolios	25,665
030	Outflows from non-performing portfolios	(52,398)
040	Outflows due to write-offs	(3,072)
050	Outflow due to other situations	(49,326)
060	**Final stock of non-performing loans and advances**	60,171

	Dec 2023 ('000)	Gross carrying amount
010	**Initial stock of non-performing loans and advances**	170,748
020	Inflows to non-performing portfolios	25,605
030	Outflows from non-performing portfolios	(119,505)
040	Outflows due to write-offs	(19,659)
050	Outflow due to other situations	(99,846)
060	**Final stock of non-performing loans and advances**	76,848

EU CR2a: Changes in the stock of non-performing loans and advances and related net accumulated recoveries

	Dec 2024 ('000)	Gross carrying amount	Related net accumulated recoveries
010	**Initial stock of non-performing loans and advances**	86,903	
020	Inflows to non-performing portfolios	25,665	
030	Outflows from non-performing portfolios	(52,398)	
040	Outflow to performing portfolio	(6,822)	
050	Outflow due to loan repayment, partial or total	(41,226)	
060	Outflow due to collateral liquidations		
070	Outflow due to taking possession of collateral		
080	Outflow due to sale of instruments		
090	Outflow due to risk transfers		
100	Outflows due to write-offs	(3,072)	
110	Outflow due to other situations	(1,278)	
120	Outflow due to reclassification as held for sale	-	
130	**Final stock of non-performing loans and advances**	**60,171**	

	Dec 2023 ('000)	Gross carrying amount	Related net accumulated recoveries
010	**Initial stock of non-performing loans and advances**	170,748	
020	Inflows to non-performing portfolios	25,605	
030	Outflows from non-performing portfolios	(119,505)	
040	Outflow to performing portfolio	(4,037)	
050	Outflow due to loan repayment, partial or total	(62,298)	
060	Outflow due to collateral liquidations		
070	Outflow due to taking possession of collateral		
080	Outflow due to sale of instruments		
090	Outflow due to risk transfers		
100	Outflows due to write-offs	(19,659)	
110	Outflow due to other situations	(33,511)	
120	Outflow due to reclassification as held for sale	-	
130	**Final stock of non-performing loans and advances**	**76,848**	

EU CQ1: Credit quality of forborne exposures

		a	b	c	d	e	f	g	h
		Gross carrying amount/nominal amount of exposures with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collateral received and financial guarantees received on forborne exposures	
			Non-performing forborne						
	Dec 2024 ('000)	Performing forborne		Of which defaulted	Of which impaired	On performing forborne exposures	On non-performing forborne exposures		Of which collateral and financial guarantees received on non-performing exposures with forbearance
005	**Cash balances at central banks and other demand deposits**	-	-	-	-	-	-	-	-
010	**Loans and advances**	**10,891**	**29,377**	**29,377**	**29,377**	**(221)**	**(8,703)**	**22,642**	**12,179**
020	*Central banks*	-	-	-	-	-	-	-	-
030	*General governments*	-	-	-	-	-	-	-	-
040	*Credit institutions*	-	-	-	-	-	-	-	-
050	*Other financial corporations*	-	-	-	-	-	-	-	-
060	*Non-financial corporations*	6,997	22,855	22,855	22,855	(121)	(5,384)	15,869	8,992
070	*Households*	3,893	6,522	6,522	6,522	(100)	(3,319)	6,774	3,186
080	Debt Securities	-	-	-	-	-	-	-	-
090	**Loan commitments given**	-	-	-	-	-	-	-	-
100	***Total***	**10,891**	**29,377**	**29,377**	**29,377**	**(221)**	**(8,703)**	**22,642**	**12,179**

	Dec 2023 ('000)	a	b	c	d	e	f	g	h
		Gross carrying amount/nominal amount of exposures with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collateral received and financial guarantees received on forborne exposures	
		Performing forborne	Non-performing forborne	Of which defaulted	Of which impaired	On performing forborne exposures	On non-performing forborne exposures		Of which collateral and financial guarantees received on non-performing exposures with forbearance
005	Cash balances at central banks and other demand deposits	-	-	-	-	-	-	-	-
010	**Loans and advances**	**39,499**	**42,612**	**42,612**	**42,612**	**(928)**	**(6,699)**	**71,772**	**33,620**
020	*Central banks*	-	-	-	-	-	-	-	-
030	*General governments*	-	-	-	-	-	-	-	-
040	*Credit institutions*	-	-	-	-	-	-	-	-
050	*Other financial corporations*	-	-	-	-	-	-	-	-
060	*Non-financial corporations*	31,802	34,291	34,291	34,291	(628)	(2,488)	55,926	29,581
070	*Households*	7,697	8,321	8,321	8,321	(300)	(4,210)	15,846	4,039
080	Debt Securities	-	-	-	-	-	-	-	-
090	Loan commitments given	-	-	-	-	-	-	-	-
100	***Total***	**39,499**	**42,612**	**42,612**	**42,612**	**(928)**	**(6,699)**	**71,772**	**33,620**

CEB's NPE stock has been decreasing steadily since 2018 Year end . CEB is committed to maintaining an NPL ratio below 3% in line with its risk appetite.

EU CQ2: Quality of forbearance

	Dec 2024 ('000)	Gross carrying amount of forborne exposures
010	Loans and advances that have been forborne more than twice	3,982
020	Non-performing forborne loans and advances that failed to meet the non-performing exit criteria	8,634.71

	Dec 2023 ('000)	Gross carrying amount of forborne exposures
010	Loans and advances that have been forborne more than twice	8,968
020	Non-performing forborne loans and advances that failed to meet the non-performing exit criteria	14,560.61

EU CQ3: Credit quality of performing and non-performing exposures by past due days

		a	b	c	d	e	f	g	h	i	j	k	l
		Gross carrying amount/nominal amount											
		Performing exposures			Non-performing exposures								
	Dec 2024 ('000)		Not past due or past due ≤ 30 days	Past due > 30 days ≤ 90 days		Unlikely to pay that are not past due or are past due ≤ 90 days	Past due > 90 days ≤ 180 days	Past due > 180 days ≤ 1 year	Past due > 1 year ≤ 2 years	Past due > 2 years ≤ 5 years	Past due > 5 years ≤ 7 years	Past due > 7 years	Of which defaulted
005	**Cash balances at central banks and other demand deposits**	**1,355,387**	1,355,384	-	-	-	-	-	-	-	-	-	-
010	**Loans and advances**	**3,528,209**			**60,139**	**28,322**	**6,823**	**1,702**	**3,743**	**13,808**	**798**	**4,944**	**60,139**
020	*Central banks*	-	-	-	-	-	-	-	-	-	-	-	-
030	*General governments*	50,909	50,909	-	-	-	-	-	-	-	-	-	-
040	*Credit institutions*	918,385	918,385	-	-	-	-	-	-	-	-	-	-
050	*Other financial corporations*	353,890	353,890	-	-	-	-	-	-	-	-	-	-
060	*Non-financial corporations*	1,952,915	1,952,915	-	31,787	23,959	-	297	1,292	5,672	-	566	31,787
070	*Of which SMEs*	0	-	-	-	-	-	-	-	-	-	-	-
080	*Households*	252,110	248,645	3,431	28,352	4,362	6,823	1,404	2,451	8,135	798	4,378	28,352
090	**Debt securities**	**316,840**											
100	*Central banks*	-											
110	*General governments*	284,799											
120	*Credit institutions*	14,657											
130	*Other financial corporations*	-											
140	*Non-financial corporations*	17,384											
150	**Off-balance-sheet exposures**	**1,390,135**											
160	*Central banks*	-											
170	*General governments*	1,500											
180	*Credit institutions*	391,619											
190	*Other financial corporations*	-											
200	*Non-financial corporations*	767,076											
210	*Households*	229,941											
220	***Total***	**6,590,571**	**1,355,384**	**-**	**60,139**	**28,322**	**6,823**	**1,702**	**3,743**	**13,808**	**798**	**4,944**	**60,139**

		a	b	c	d	e	f	g	h	i	j	k	l
		Gross carrying amount/nominal amount											
		Performing exposures			Non-performing exposures								
	Dec 2023 ('000)		Not past due or past due ≤ 30 days	Past due > 30 days ≤ 90 days		Unlikely to pay that are not past due or are past due ≤ 90 days	Past due > 90 days ≤ 180 days	Past due > 180 days ≤ 1 year	Past due > 1 year ≤ 2 years	Past due > 2 years ≤ 5 years	Past due > 5 years ≤ 7 years	Past due > 7 years	Of which defaulted
005	**Cash balances at central banks and other demand deposits**	**1,768,676**	1,768,673	-	-	-	-	-	-	-	-	-	-
010	**Loans and advances**	**2,946,522**			**76,848**	**30,909**	**3,275**	**1,845**	**4,084**	**18,738**	**3,372**	**14,623**	**76,848**
020	*Central banks*	-	-	-	-	-	-	-	-	-	-	-	-
030	*General governments*	199,709	199,709	-	-	-	-	-	-	-	-	-	-
040	*Credit institutions*	177,158	177,158	-	-	-	-	-	-	-	-	-	-
050	*Other financial corporations*	184,130	184,130	-	-	-	-	-	-	-	-	-	-
060	*Non-financial corporations*	2,123,585	2,123,585	-	34,396	23,659	1,154	76	39	7,146	1,304	1,017	34,396
070	*Of which SMEs*	0	-	-	-	-	-	-	-	-	-	-	-
080	*Households*	261,940	255,207	6,733	42,452	7,250	2,122	1,769	4,045	11,592	2,069	13,606	42,452
090	**Debt securities**	**331,788**											
100	*Central banks*	-											
110	*General governments*	304,688											
120	*Credit institutions*	18,830											
130	*Other financial corporations*	-											
140	*Non-financial corporations*	8,271											
150	**Off-balance-sheet exposures**	**1,546,699**											
160	*Central banks*	-											
170	*General governments*	-											
180	*Credit institutions*	413,249											
190	*Other financial corporations*	-											
200	*Non-financial corporations*	931,023											
210	*Households*	202,427											
220	***Total***	**6,593,685**	**1,768,673**	**-**	**76,848**	**30,909**	**3,275**	**1,845**	**4,084**	**18,738**	**3,372**	**14,623**	**76,848**

EU CQ4: Quality of non-performing exposures by geography

		a	b	c	d	e	f	g
Dec 2024 ('000)		Gross carrying/nominal amount				Accumulated impairment	Provisions on off-balance-sheet commitments and financial guarantees given	Accumulated negative changes in fair value due to credit risk on non-performing exposures
		Total	Of which non-performing		Of which subject to impairment			
				Of which defaulted				
010	***On-balance-sheet exposures***	***5,260,575***	***60,139***	***60,139***	***5,260,575***	***(35,197)***		
020	*Russia*	7,509	7,090	7,090	7,509	(2,698)		
030	*Turkey*	587,363	7,655	7,655	587,363	(8,639)		
040	*Romania*	519,362	33,297	33,297	519,362	(17,884)		
050	*Ukraine*	27,325	1,525	1,525	27,325	(12)		
060	*Other Emerging Markets*	1,243,446	-	-	1,243,446	(1,937)		
070	*Developed markets*	2,875,569	10,572	10,572	2,875,569	(4,027)		
080	***Off-balance-sheet exposures***	***1,390,135***						
090	*Russia*	-	-	-				
100	*Turkey*	33,809	-	-				
110	*Romania*	235,658	-	-				
120	*Ukraine*	-	-	-				
130	*Other Emerging Markets*	459,176	-	-				
140	*Developed markets*	661,492	-	-				
150	***Total***	**6,650,710**	**60,139**	**60,139**	**5,260,575**	**(35,197)**		

		a	b	c	d	e	f	g
Dec 2023 ('000)		Gross carrying/nominal amount				Accumulated impairment	Provisions on off-balance-sheet commitments and financial guarantees given	Accumulated negative changes in fair value due to credit risk on non-performing exposures
		Total	Of which non-performing		Of which subject to impairment			
				Of which defaulted				
010	***On-balance-sheet exposures***	***5,123,834***	***76,848***	***76,848***	***5,123,834***	***(49,671)***		
020	*Russia*	4,991	4,473	4,473	4,991	-		
030	*Turkey*	480,652	13,692	13,692	480,652	(16,962)		
040	*Romania*	728,934	56,081	56,081	728,934	(26,520)		
050	*Ukraine*	26,292	2,461	2,461	26,292	(1,488)		
060	*Other Emerging Markets*	730,918	-	-	730,918	(2,554)		
070	*Developed markets*	3,152,047	141	141	3,152,047	(2,146)		
080	***Off-balance-sheet exposures***	***1,546,699***						
090	*Russia*	-	-	-				
100	*Turkey*	50,874	-	-				
110	*Romania*	213,205	-	-				
120	*Ukraine*	-	-	-				
130	*Other Emerging Markets*	580,331	-	-				
140	*Developed markets*	702,289	-	-				
150	***Total***	**6,670,533**	**76,848**	**76,848**	**5,123,834**	**(49,671)**		

EU CQ5: Credit quality of loans and advances by industry

		a	b	c	d	e	f
		Gross carrying amount					
			Of which non-performing				
	Dec 2024 ('000)	Total		Of which defaulted	Of which loans and advances subject to impairment	Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures
010	Agriculture, forestry and fishing	1,466	-	-	1,466	(5)	
020	Mining and quarrying	-	-	-	-	-	
030	Manufacturing	323,397	12,351	12,351	323,397	(2,877)	
040	Electricity, gas, steam and air conditioning supply	61,521	-	-	61,521	(66)	
050	Water supply	-	-	-	-	-	
060	Construction	31,344	6,164	6,164	31,344	(3,295)	
070	Wholesale and retail trade	860,783	4,106	4,106	860,783	(1,595)	
080	Transport and storage	63,881	-	-	63,881	(379)	
090	Accommodation and food service activities	137,867	7,090	7,090	137,867	(5,546)	
100	Information and communication	28,494	-	-	28,494	(4)	
110	Financial and insurance actvities	11,024	-	-	11,024	(244)	
120	Real estate activities	192,447	291	291	192,447	(2,676)	
130	Professional, scientific and technical activities	-	-	-	-	-	
140	Administrative and support service activities	237,713	1,566	1,566	237,713	(1,320)	
150	Public administration and defense, compulsory social security	-	-	-	-	-	
160	Education	-	-	-	-	-	
170	Human health services and social work activities	-	-	-	-	-	
180	Arts, entertainment and recreation	-	-	-	-	-	
190	Other services	2,978	218	218	2,978	(385)	
200	***Total***	***1,952,915***	***31,787***	***31,787***	***1,952,915***	***(18,392)***	

	Dec 2023 ('000)	a	b	c	d	e	f
		Gross carrying amount				Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures
		Total	Of which non-performing		Of which loans and advances subject to impairment		
				Of which defaulted			
010	Agriculture, forestry and fishing	14,837	-	-	14,837	(37)	
020	Mining and quarrying	-	-	-	-	-	
030	Manufacturing	366,408	3,311	3,311	366,408	(2,132)	
040	Electricity, gas, steam and air conditioning supply	62,239	-	-	62,239	(44)	
050	Water supply	-	-	-	-	-	
060	Construction	3,874	5,999	5,999	3,874	(2,877)	
070	Wholesale and retail trade	826,411	5,180	5,180	826,411	(2,049)	
080	Transport and storage	61,778	260	260	61,778	(1,251)	
090	Accommodation and food service activities	235,353	11,299	11,299	235,353	(4,766)	
100	Information and communication	10,939	-	-	10,939	(4)	
110	Financial and insurance actvities	11,423	-	-	11,423	(71)	
120	Real estate activities	248,904	6,075	6,075	248,904	(11,118)	
130	Professional, scientific and technical activities	-	-	-	-	-	
140	Administrative and support service activities	271,997	1,453	1,453	271,997	(1,426)	
150	Public administration and defense, compulsory social security	-	-	-	-	-	
160	Education	5,382	-	-	5,382	(0)	
170	Human health services and social work activities	-	-	-	-	-	
180	Arts, entertainment and recreation	-	-	-	-	-	
190	Other services	4,040	818	818	4,040	(226)	
200	***Total***	***2,123,585***	***34,396***	***34,396***	***2,123,585***	***(26,003)***	

EU CQ6: Collateral valuation - loans and advances

		a	b	c	d	e	f	g	h	i	j	k	l
		Loans and advances											
			Performing		Non-performing								
						Unlikely to pay that are not past due or are past due ≤ 90 days	Past due > 90 days						
	Dec 2024 ('000)	**Total**	Total Performing	Of which past due > 30 days ≤ 90 days	Total Non-performing			Of which past due > 90 days ≤ 180 days	Of which: past due > 180 days ≤ 1 year	Of which: past due > 1 years ≤ 2 years	Of which: past due > 2 years ≤ 5 years	Of which: past due > 5 years ≤ 7 years	Of which: past due > 7 years
010	**Gross carrying amount**	**3,588,348**	**3,528,209**	**3,528,209**	**60,139**	**28,322**	**31,818**	**6,823**	**1,702**	**3,743**	**13,808**	**798**	**4,944**
020	*Of which secured*	1,293,442	1,266,484	7,919	26,958	10,262	16,697	4,212	994	1,470	8,695	291	1,034
030	*Of which secured with immovable property*	543,675	498,639	2,806	45,036	17,318	27,718	6,213	1,481	2,447	13,903	790	2,883
040	*Of which instruments with LTV higher than 60% and lower or equal to 80%*	50,813	47,133		3,680	694	2,986						
050	*Of which instruments with LTV higher than 80% and lower or equal to 100%*	399,741	366,856		32,885	14,390	18,495						
060	*Of which instruments with LTV higher than 100%*	16,331	10,710		5,621	666	4,955						
070	**Accumulated impairment for secured assets**	(25,587)	(7,590)		(17,997)	(6,981)	(11,016)	(2,001)	(517)	(1,113)	(5,132)	(498)	(1,754)
080	**Collateral**												
090	*Of which value capped at the value of exposure*	*1,293,442*	1,266,484	18,383	26,958	10,262	16,697	4,212	994	1,470	8,695	291	1,034
100	*Of which immovable property*	*516,131*	489,202	7,918	26,929	10,262	16,668	4,212	964	1,470	8,695	291	1,034
110	*Of which value above the cap*	*1,518,529*	1,479,460	8,906	39,069	14,989	24,080	-	-	-	-	-	-
120	*Of which immovable property*	*718,253*	680,177	8,830	38,076	14,989	23,088	-	-	-	-	-	-
130	**Financial guarantees received**	*107,224*	106,296	74	929	-	929	-	183	746	-	-	-
140	**Accumulated partial write-off**	*(54,153)*	-	-	(54,153)	-	(54,153)	-	-	-	-	(50,517)	(3,635)

		a	b	c	d	e	f	g	h	i	j	k	l
		Loans and advances											
			Performing		Non-performing								
							Past due > 90 days						
	Dec 2023 ('000)	**Total**	Total Performing	Of which past due > 30 days ? 90 days	Total Non-performing	Unlikely to pay that are not past due or are past due ? 90 days		Of which past due > 90 days ? 180 days	Of which: past due > 180 days ? 1 year	Of which: past due > 1 years ? 2 years	Of which: past due > 2 years ? 5 years	Of which: past due > 5 years ? 7 years	Of which: past due > 7 years
010	**Gross carrying amount**	**3,023,370**	**2,946,522**	**2,946,522**	**76,848**	**30,909**	**45,938**	**3,275**	**1,845**	**4,084**	**18,738**	**3,372**	**14,623**
020	*Of which secured*	1,464,490	1,408,285	12,428	56,205	33,215	22,990	1,145	1,145	2,195	9,927	2,388	6,191
030	*Of which secured with immovable property*	703,294	628,448	5,908	74,846	33,860	40,985	1,780	1,738	4,041	18,014	3,363	12,050
040	*Of which instruments with LTV higher than 60% and lower or equal to 80%*	53,509	50,530		2,978	1,711	1,268						
050	*Of which instruments with LTV higher than 80% and lower or equal to 100%*	303,346	250,938		52,409	22,646	29,763						
060	*Of which instruments with LTV higher than 100%*	249,638	238,057		11,581	2,668	8,913						
070	**Accumulated impairment for secured assets**	(37,906)	(16,997)		(20,908)	(5,243)	(15,665)	(634)	(593)	(1,846)	(6,143)	(590)	(5,860)
080	**Collateral**												
090	*Of which value capped at the value of exposure*	*1,464,490*	1,408,285	50,436	56,205	33,215	22,990	1,145	1,145	2,195	9,927	2,388	6,191
100	*Of which immovable property*	*645,634*	594,337	12,428	51,297	28,321	22,976	1,145	1,145	2,195	9,913	2,388	6,191
110	*Of which value above the cap*	*1,749,359*	1,677,764	13,033	71,595	41,869	29,726	-	-	-	-	-	-
120	*Of which immovable property*	*873,667*	807,883	12,991	65,785	36,769	29,015	-	-	-	-	-	-
130	**Financial guarantees received**	*12,283*	11,409	185	873	178	695	695	-	-	-	-	-
140	**Accumulated partial write-off**	*(55,641)*	-	-	(55,641)	-	(55,641)	(23,282)	-	-	(31,355)	(1,004)	-

EU CQ7: Collateral obtained by taking possession and execution processes

	Dec 2024 ('000)	Collateral obtained by taking possession	
		Value at initial recognition	Accumulated negative changes
010	Property, plant and equipment (PP&E)	-	-
020	Other than PP&E	18,458	(3,018)
030	*Residential immovable property*	9,250	(190)
040	*Commercial Immovable property*	261	(5)
050	*Movable property (auto, shipping, etc.)*	6,086	(1,000)
060	*Equity and debt instruments*	-	-
070	*Other collateral*	2,861	(1,823)
080	***Total***	**18,458**	**(3,018)**

	Dec 2023 ('000)	Collateral obtained by taking possession	
		Value at initial recognition	Accumulated negative changes
010	Property, plant and equipment (PP&E)	-	-
020	Other than PP&E	78,821	(9,962)
030	*Residential immovable property*	11,827	(417)
040	*Commercial Immovable property*	22,878	(2,353)
050	*Movable property (auto, shipping, etc.)*	24,151	-
060	*Equity and debt instruments*	-	-
070	*Other collateral*	19,965	(7,192)
080	***Total***	**78,821**	**(9,962)**

EU CQ8: Collateral obtained by taking possession and execution processes – vintage breakdown

		a	b	c	d	e	f	g	h	i	j	k	l
		Debt balance reducti		Total collateral obtained by taking possession									
						Foreclosed ≤ 2 years		Foreclosed > 2 years ≤ 5		Foreclosed > 5 years		Of which non-	
	Dec 2024 ('000)	Gross carrying amount	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes
010	Collateral obtained by taking possession classified as PP&E	-	-	-	-								
020	Collateral obtained by taking possession other than that classified as PP&E	42,120	(11,875)	18,458	(3,018)	9,063	(1,022)	4,481	(120)	4,914	(1,877)	2,800	-
030	*Residential immovable property*	21,107	(5,951)	9,250	(190)	2,916	(22)	4,481	(120)	1,853	(48)	-	
040	*Commercial immovable property*	596	(168)	261	(5)	-	-	-	-	261	(5)	-	
050	*Movable property (auto, shipping, etc.)*	13,889	(3,916)	6,086	(1,000)	6,086	(1,000)	-	-	-	-	-	
060	*Equity and debt instruments*	-	-	-	-	-	-	-	-	-	-	-	
070	*Other collateral*	6,528	(1,841)	2,861	(1,823)	61	-	-	-	2,800	(1,823)	2,800	
080	***Total***	**42,120**	**(11,875)**	**18,458**	**(3,018)**	**9,063**	**(1,022)**	**4,481**	**(120)**	**4,914**	**(1,877)**	**2,800**	**-**

	Dec 2023 ('000)	a	b	c	d	e	f	g	h	i	j	k	l
		Debt balance reducti		Total collateral obtained by taking possession									
						Foreclosed ? 2 years		Foreclosed > 2 years ? 5		Foreclosed > 5 years		Of which non-	
		Gross carrying amount	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes
010	Collateral obtained by taking possession classified as PP&E	-	-	-	-								
020	Collateral obtained by taking possession other than that classified as PP&E	44,845	(11,964)	78,821	(9,962)	59,793	(1,623)	9,217	(2,452)	9,811	(5,887)	5,450	-
030	*Residential immovable property*	7,229	(1,022)	11,827	(417)	7,084	(332)	3,767	-	976	(85)	-	
040	*Commercial immovable property*	13,983	(5)	22,878	(2,353)	20,061	-	-	-	2,817	(2,353)	-	
050	*Movable property (auto, shipping, etc.)*	14,761	(9,632)	24,151	-	24,151	-	-	-	-	-	-	
060	*Equity and debt instruments*	-	-	-	-	-	-	-	-	-	-	-	
070	*Other collateral*	8,871	(1,305)	19,965	(7,192)	8,497	(1,291)	5,450	(2,452)	6,018	(3,449)	5,450	
080	***Total***	**44,845**	**(11,964)**	**78,821**	**(9,962)**	**59,793**	**(1,623)**	**9,217**	**(2,452)**	**9,811**	**(5,887)**	**5,450**	**-**

Credit risk mitigation techniques

EU CRC – Qualitative disclosure requirements related to CRM techniques

It is CEB's policy to ensure that the loan extension process is conducted under strong evidence of a customer's ability to repay the loan. Nevertheless, collaterals are actively used for the purposes of credit-risk mitigation. The Transactions and Collateral Management Department is organized as a separate department for collateral management of all types of lending. Transactional lending especially relies heavily upon collaterals and documentation.

Valuation reports, survey report updates and insurance policies are followed up systematically. Mainly related to trade finance, Collateral Management Agreements and Collateral Monitoring Agreements are also outsourced to expert collateral management agents who have management and reporting capabilities at the site of the collateral. As a principal, the value of the collateral should not have a material positive correlation with the credit quality of the provider for the risk mitigation effect to be considered.

Due to the application of Standardised Approach, not all available collaterals can be considered for solvency testing. Currently CEB applies Financial Collateral Comprehensive Approach to assess the value of collateral for risk mitigation purposes.

For funded credit protections, following collaterals are recognized as eligible:

- cash on deposit with, or cash-assimilated instruments held by, a lending credit institution;
- debt securities issued by central governments or central banks which securities have a credit assessment that is associated with credit quality step 4 or above;
- debt securities issued by institutions or other entities which securities have a credit assessment that is associated with credit quality step 3 or above;
- debt securities with a short-term credit assessment that is associated with credit quality step 3 or above;
- equities or convertible bonds that are included in a main index or listed on a recognized stock exchange;
- gold;

To reflect the possible fluctuations in the collateral value CEB applies supervisory haircuts set by the Dutch Central Bank, CEB strictly ensures that there is a proper documentation in place which legally enforces the pledge of the collateral to the exposure. Otherwise the collateral is not accepted for risk mitigation purposes. The main documents ensuring that CEB has the right to liquidate collateral in case the customer does not fulfill its credit obligations are Deed of Pledge and Framework Credit Agreements. The next tables show the carrying amount of collateralized exposure broken down by type of collateral obtained.

EU CR3 – CRM techniques overview: Disclosure of the use of credit risk mitigation techniques

		a	b	c	d	e
	Dec 2024 ('000)	**Unsecured carrying amount**	**Secured carrying amount**	Of which **secured by collateral**	Of which **secured by financial guarantees**	Of which **secured by credit derivatives**
1	Loans and advances	3,528,209	1,400,667	1,400,667	107,224	
2	Debt securities	316,840	-	-	-	
3	**Total**	**3,845,049**	**1,400,667**	**1,400,667**	**107,224**	
4	*Of which non-performing exposures*	60,139	27,887	27,887	929	
5	*Of which defaulted*	*60,139*	27,887			

	Dec 2023 ('000)	a Unsecured carrying amount	b Secured carrying amount	c Of which secured by collateral	d Of which secured by financial guarantees	e Of which secured by credit derivatives
1	Loans and advances	2,946,522	1,476,773	1,476,773	12,283	
2	Debt securities	331,788	-	-	-	
3	**Total**	**3,278,310**	**1,476,773**	**1,476,773**	**12,283**	
4	*Of which non-performing exposures*	76,848	57,078	57,078	873	
5	*Of which defaulted*	*76,848*	57,078			

Standardised approach

EU CRD – Qualitative disclosure requirements related to standardised model

For calculating its minimum capital requirements, CEB applies standardised approach for credit risk calculation following methodology as laid down in CRR. Risk exposures is weighted with the designated risk weight. The risk weight is influenced by the external rating issued by eligible credit assessment institutions (ECAIs) and type of the counterparty and is determined separately for each transactions.

According to CRR, CEB uses default long-term credit assessment provided by ECAI from Moody's, Standards & Poor's and Fitch and applies the second best rating among three ECAI as the final credit assessment to assign the risk weight. ECAIs are usually available for the exposure classes Central Governments or Central Banks, and Institutions. CEB ensures to use the credit assessment in a continuous and consistent way over time.

EU CR4 – standardised approach – Credit risk exposure and CRM effects

	Dec 2024 ('000)	a	b	c	d	e	f
	Exposure classes	Exposures before CCF and before CRM		Exposures post CCF and post CRM		RWAs and RWAs density	
		On-balance-sheet exposures	Off-balance-sheet exposures	On-balance-sheet exposures	Off-balance-sheet amount	RWAs	RWAs density (%)
1	Central governments or central banks	1,579,001	-	1,572,001	-	120,774	8%
2	Regional government or local authorities	18,529	-	18,529	-	-	0%
3	Public sector entities						
4	Multilateral development banks						
5	International organisations	-	-	-	-	-	
6	Institutions	1,033,555	373,119	780,767	57,100	424,613	41%
7	Corporates	2,297,709	762,623	2,266,440	168,321	2,429,116	106%
8	Retail	142,101	233,431	142,101	47,620	139,075	98%
9	Secured by mortgages on immovable property	123,977	-	123,977	-	43,392	35%
10	Exposures in default	29,005	-	29,005	-	35,637	123%
11	Exposures associated with particularly high risk						
12	Covered bonds						
13	Institutions and corporates with a short-term credit assessment						
14	Collective investment undertakings						
15	Equity	17,398	962	17,398	192	16,263	93%
16	Other items	76,140	0	76,140	-	61,305	81%
17	**TOTAL**	**5,317,415**	**1,370,135**	**5,026,359**	**273,234**	**3,270,175**	

	Dec 2023 ('000)	a	b	c	d	e	f
	Exposure classes	Exposures before CCF and before CRM		Exposures post CCF and post CRM		RWAs and RWAs density	
		On-balance-sheet exposures	Off-balance-sheet exposures	On-balance-sheet exposures	Off-balance-sheet amount	RWAs	RWAs density (%)
1	Central governments or central banks	1,982,104	-	1,982,104	-	106,197	5%
2	Regional government or local authorities	203,093	-	203,093	-	-	0%
3	Public sector entities						
4	Multilateral development banks						
5	International organisations	-	-	-	-	-	
6	Institutions	339,709	393,249	338,694	80,731	167,814	49%
7	Corporates	2,270,592	923,230	2,149,446	173,062	2,315,369	102%
8	Retail	142,209	208,862	142,126	43,551	134,231	94%
9	Secured by mortgages on immovable property	141,911	-	141,911	-	49,669	35%
10	Exposures in default	37,096	-	37,096	-	44,444	120%
11	Exposures associated with particularly high risk						
12	Covered bonds						
13	Institutions and corporates with a short-term credit assessment						
14	Collective investment undertakings						
15	Equity	32,771	1,357	32,771	271	32,986	101%
16	Other items	98,028	0	98,028	-	80,545	82%
17	TOTAL	5,247,513	1,526,699	5,125,269	297,616	2,931,254	

EU CR5 – standardised approach

Dec 2024 ('000)

	Exposure classes	Risk weight															Total	Of which unrated
		0%	2%	4%	10%	20%	35%	50%	70%	75%	100%	150%	250%	370%	1250%	Others		
1	Central governments or central banks	1,446,026	-	-	-	-	-	51,633	-	-	44,664	25,779	4,650	-	-	-	**1,572,751**	44,659
2	Regional government or local authorities	18,529	-	-	-	-	-	-	-	-	-	-	-	-	-	-	**18,529**	
3	Public sector entities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	**-**	
4	Multilateral development banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	**-**	
5	International organisations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	**-**	
6	Institutions	-	3,679	-	-	474,584	-	250,956	-	-	111,358	71,983	-	-	-	-	**912,561**	9,451
7	Corporates	-	-	-	-	46,775	-	47,557	-	-	2,259,126	111,106	-	-	-	-	**2,464,564**	
8	Retail exposures	-	-	-	-	-	-	-	-	189,721	-	-	-	-	-	-	**189,721**	
9	Exposures secured by mortgages on immovable property	-	-	-	-	-	123,977	-	-	-	-	-	-	-	-	-	**123,977**	
10	Exposures in default	-	-	-	-	-	-	-	-	-	15,740	13,265	-	-	-	-	**29,005**	
11	Exposures associated with particularly high risk	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	**-**	
12	Covered bonds	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	**-**	
13	Exposures to institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	**-**	
14	Units or shares in collective investment undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	**-**	
15	Equity exposures	3,540	-	-	-	-	-	-	-	-	13,858	-	-	-	192	-	**17,591**	
16	Other items	14,835	-	-	-	-	-	-	-	-	61,305	-	-	-	-	-	**76,140**	
17	**TOTAL**	**1,482,930**	**3,679**	**-**	**-**	**521,359**	**123,977**	**350,146**	**-**	**189,721**	**2,506,051**	**222,132**	**4,650**	**-**	**192**	**-**	**5,404,838**	**54,111**

Dec 2023 ('000)

	Exposure classes	Risk weight															Total	Of which unrated
		0%	2%	4%	10%	20%	35%	50%	70%	75%	100%	150%	250%	370%	1250%	Others		
1	Central governments or central banks	1,847,984	-	-	-	-	-	93,237	-	-	12,748	23,508	4,627	-	-	-	**1,982,104**	12,744
2	Regional government or local authorities	203,093	-	-	-	-	-	-	-	-	-	-	-	-	-	-	**203,093**	
3	Public sector entities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	**-**	
4	Multilateral development banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	**-**	
5	International organisations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	**-**	
6	Institutions	-	658	-	-	289,171	-	110,895	-	-	41,735	13,287	-	-	-	-	**455,745**	2,775
7	Corporates	-	-	-	-	-	-	41,730	-	-	2,269,613	27,451	-	-	-	-	**2,338,794**	
8	Retail exposures	-	-	-	-	-	-	-	-	185,677	-	-	-	-	-	-	**185,677**	
9	Exposures secured by mortgages on immovable property	-	-	-	-	-	141,911	-	-	-	-	-	-	-	-	-	**141,911**	
10	Exposures in default	-	-	-	-	-	-	-	-	-	22,399	14,696	-	-	-	-	**37,096**	
11	Exposures associated with particularly high risk	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	**-**	
12	Covered bonds	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	**-**	
13	Exposures to institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	**-**	
14	Units or shares in collective investment undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	**-**	
15	Equity exposures	3,179	-	-	-	-	-	-	-	-	29,592	-	-	-	271	-	**33,043**	
16	Other items	17,483	-	-	-	-	-	-	-	-	80,545	-	-	-	-	-	**98,028**	
17	**TOTAL**	**2,071,740**	**658**	**-**	**-**	**289,171**	**141,911**	**245,861**	**-**	**185,677**	**2,456,632**	**78,943**	**4,627**	**-**	**271**	**-**	**5,475,491**	**15,519**

Counterparty credit risk

EU CCRA – Qualitative disclosure related to CCR

Counterparty credit risk (CCR) is the risk that the counterparty to a transaction could default before the final settlement of the transaction's cash flows. CEB's Counterparty credit risk arises primarily from activities such as over-the-counter (OTC) derivatives and securities financing transactions.

OTC derivative instruments

CEB incurs OTC Derivatives mainly in two activities: 1) held for trading derivatives and 2) derivatives held as economic hedge and hedge accounting derivatives held as economic hedges

Held for Trading Derivatives are closely related to facilitating the needs of our clients. When CEB NV offers transactions in these products, it acts solely as a distributor. As a result, a significant portion of the derivatives in our trading portfolio support clients' risk management needs, such as hedging currency or interest rate exposures. In addition, CEB NV also offers other financial market products that are traded on exchanges.

Derivatives Held as Economic Hedge and Hedge Accounting Derivatives held as economic hedges (i.e. asset-liability management) include transactions that are entered into in accordance with the Bank's hedging objectives but do not qualify for hedge accounting. Derivatives held for economic hedge purposes are measured at fair value in the statement of financial position. Interest income and expenses arising on derivatives held as economic hedge but not designated in a hedge accounting relationship are presented under net interest income. All other gains and losses arising on these transactions are presented under 'valuation results and net trading income'. The Bank designates certain derivatives held for risk management purposes as hedging instruments in qualifying hedge accounting relationships.

On initial designation of the hedge, the Bank formally documents the relationship between the hedging instrument(s) and hedged item(s), including the risk management objective and strategy in undertaking the hedge transaction, together with the method that will be used to assess the effectiveness of the hedging relationship. The Bank makes an assessment, both at the inception of the hedge accounting relationship as well as an ongoing basis, of whether the hedging instrument(s) is (are) expected to be highly effective in offsetting the changes.

Repurchase Transactions and Reverse Repo Transactions

Transactions where financial instruments, such as loans and securities, are sold under a commitment to repurchase (repos) at a predetermined price or are purchased under a commitment to resell (reverse repo) are treated as collateralised borrowing and lending transactions.

Limit setting

The setting of limits for positions exposed to counterparty credit risk is covered under CEB's Trading and banking book policy for Treasury products. This policy outlines the principles for establishing specific risk limits for each derivative portfolio and individual counterparty as well as its governing structure.

Counterparty credit risk calculation approach

CEB calculated its regulatory capital requirements for OTC derivative transactions in accordance with the standardised approach for Counterparty Credit Risk (SA-CCR) as set out in the CRR. Under the SA-CCR, the Exposure at Default captures both current exposure and potential future exposure, providing a comprehensive assessment of counterparty credit risk. To calculate exposures arising from collateral and securities financing transactions (SFTs), CEB applies the financial collateral comprehensive method. Contractual cross-product netting is not used. Additionally, Credit Valuation Adjustments (CVA) are applied to account for the cost of the risk that a counterparty may fail to fulfil its contractual obligations with CEB.

EU CCR1 – Analysis of CCR exposure by approach

		a	b	c	d	e	f	g	h
	Dec 2024 ('000)	Replacement cost (RC)	Potential future exposure (PFE)	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre-CRM	Exposure value post-CRM	Exposure value	RWEA
EU1	EU - Original Exposure Method (for derivatives)				1.4				
EU2	EU - Simplified SA-CCR (for derivatives)				1.4				
1	SA-CCR (for derivatives)	6,379	68,260		1.4	187,921	104,495	104,495	44,990
2	IMM (for derivatives and SFTs)								
2a	*Of which securities financing transactions netting sets*								
2b	*Of which derivatives and long settlement transactions netting sets*								
2c	*Of which from contractual cross-product netting sets*								
3	Financial collateral simple method (for SFTs)								
4	Financial collateral comprehensive method (for SFTs)					-	-	-	-
5	VaR for SFTs								
6	**Total**					187,921	104,495	104,495	44,990

		a	b	c	d	e	f	g	h
	Dec 2023 ('000)	Replacement cost (RC)	Potential future exposure (PFE)	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre-CRM	Exposure value post-CRM	Exposure value	RWEA
EU1	EU - Original Exposure Method (for derivatives)				1.4				
EU2	EU - Simplified SA-CCR (for derivatives)				1.4				
1	SA-CCR (for derivatives)	11,920	22,866		1.4	87,044	48,701	48,701	22,651
2	IMM (for derivatives and SFTs)								
2a	*Of which securities financing transactions netting sets*								
2b	*Of which derivatives and long settlement transactions netting sets*								
2c	*Of which from contractual cross-product netting sets*								
3	Financial collateral simple method (for SFTs)								
4	Financial collateral comprehensive method (for SFTs)					195,094	3,905	3,905	781
5	VaR for SFTs								
6	Total					282,139	52,606	52,606	23,432

EU CCR2 – Transactions subject to own funds requirements for CVA risk

The valuation of financial OTC trades carried out by Credit Europe bank as part of its trading activities includes credit value adjustments (CVAs). CVA is an adjustment of the trading portfolio valuation to take into account the counterparty credit risk. CVA is the fair value of any expected loss arising from counterparty exposure based on the potential positive value of the portfolio, the counterparty default probability and the estimated recovery rate at default. The following table shows the value adjustment for counterparty credit risk (Credit Value Adjustment or CVA):

	Dec 2024 ('000)	Exposure value	RWEA
1	Total transactions subject to the Advanced method		
2	(i) VaR component (including the 3× multiplier)		
3	(ii) stressed VaR component (including the 3× multiplier)		
4	Transactions subject to the Standardised method	76,822	21,020
EU4	Transactions subject to the Alternative approach (Based on the Original Exposure Method)		
5	**Total transactions subject to own funds requirements for CVA risk**	76,822	21,020

	Dec 2023 ('000)	Exposure value	RWEA
1	Total transactions subject to the Advanced method		
2	(i) VaR component (including the 3× multiplier)		
3	(ii) stressed VaR component (including the 3× multiplier)		
4	Transactions subject to the Standardised method	32,462	8,829
EU4	Transactions subject to the Alternative approach (Based on the Original Exposure Method)		
5	Total transactions subject to own funds requirements for CVA risk	32,462	8,829

EU CCR3 – Standardised approach – CCR exposures by regulatory exposure class and risk weights

		a	b	c	d	e	f	g	h	i	j	k	l
	Dec 2024 ('000)	Risk weight											
	Exposure classes	0%	2%	4%	10%	20%	50%	70%	75%	100%	150%	Others	Total exposure value
1	Central governments or central ba	-	-	-	-	-	-	-	-	-	-	-	-
2	Regional government or local authorities	-	-	-	-	-	-	-	-	-	-	-	-
3	Public sector entities	-	-	-	-	-	-	-	-	-	-	-	-
4	Multilateral development banks	-	-	-	-	-	-	-	-	-	-	-	-
5	International organisations	-	-	-	-	-	-	-	-	-	-	-	-
6	Institutions	-	3,679	-	-	68,102	-	-	-	-	38	-	71,819
7	Corporates	-	-	-	-	-	-	-	-	29,802	-	-	29,802
8	Retail	-	-	-	-	-	-	-	-	-	-	-	-
9	Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-
10	Other items	-	-	-	-	-	-	-	-	-	-	-	-
11	**Total exposure value**	-	3,679	-	-	68,102	-	-	-	29,802	38	-	101,621

		a	b	c	d	e	f	g	h	i	j	k	l
	Dec 2023 ('000)	Risk weight											
	Exposure classes	0%	2%	4%	10%	20%	50%	70%	75%	100%	150%	Others	Total exposure value
1	Central governments or central bar	-	-	-	-	-	-	-	-	-	-	-	-
2	Regional government or local authorities	-	-	-	-	-	-	-	-	-	-	-	-
3	Public sector entities	-	-	-	-	-	-	-	-	-	-	-	-
4	Multilateral development banks	-	-	-	-	-	-	-	-	-	-	-	-
5	International organisations	-	-	-	-	-	-	-	-	-	-	-	-
6	Institutions	-	658	-	-	35,662	-	-	-	-	-	-	36,320
7	Corporates	-	-	-	-	-	-	-	-	16,286	-	-	16,286
8	Retail	-	-	-	-	-	-	-	-	-	-	-	-
9	Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-
10	Other items	-	-	-	-	-	-	-	-	-	-	-	-
11	**Total exposure value**	-	658	-	-	35,662	-	-	-	16,286	-	-	52,606

EU CCR5 – Composition of collateral for CCR exposures

		a	b	c	d	e	f	g	h
	Dec 2024 ('000)								
	Collateral type	Collateral used in derivative transactions				Collateral used in SFTs			
		Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral	
		Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated
1	Cash – domestic currency		39,213		46,569				
2	Cash – other currencies		23,273		12,565				
3	Domestic sovereign debt								-
4	Other sovereign debt								-
5	Government agency debt								-
6	Corporate bonds								-
7	Equity securities								
8	Other collateral								
9	**Total**	-	**62,486**	-	**59,135**	-	-	-	-

	Dec 2023 ('000)	a	b	c	d	e	f	g	h
		Collateral used in derivative transactions				Collateral used in SFTs			
		Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral	
	Collateral type	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated
1	Cash – domestic currency		38,258		33,645				
2	Cash – other currencies		20,677		7,972				
3	Domestic sovereign debt								129,983
4	Other sovereign debt								62,891
5	Government agency debt								-
6	Corporate bonds								0
7	Equity securities								
8	Other collateral								
9	**Total**	**-**	**58,935**	**-**	**41,617**	**-**	**-**	**-**	**192,874**

EU CCR6 – Credit derivatives exposures

	Dec 2024 ('000)	a Protection bought	b Protection sold
	Notionals		
1	Single-name credit default swaps	14,431	
2	Index credit default swaps		
3	Total return swaps		
4	Credit options		
5	Other credit derivatives		
6	**Total notionals**	**14,431**	
	Fair values		
7	Positive fair value (asset)	93	
8	Negative fair value (liability)		

CEB had no exposure of Credit derivatives as of year-end 2023

EU CCR8 – Exposures to CCPs

	Dec 2024 ('000)	Exposure value	RWEA
1	**Exposures to QCCPs (total)**		74
2	Exposures for trades at QCCPs (excluding initial margin and default fund contributions); of which	3,679	74
3	(i) OTC derivatives	3,679	74
4	(ii) Exchange-traded derivatives		
5	(iii) SFTs		
6	(iv) Netting sets where cross-product netting has been approved		
7	Segregated initial margin		
8	Non-segregated initial margin		
9	Prefunded default fund contributions		
10	Unfunded default fund contributions		
11	**Exposures to non-QCCPs (total)**		
12	Exposures for trades at non-QCCPs (excluding initial margin and default fund contributions); of which		
13	(i) OTC derivatives		
14	(ii) Exchange-traded derivatives		
15	(iii) SFTs		
16	(iv) Netting sets where cross-product netting has been approved		
17	Segregated initial margin		
18	Non-segregated initial margin		
19	Prefunded default fund contributions		
20	Unfunded default fund contributions		

	Dec 2023 ('000)	Exposure value	RWEA
1	**Exposures to QCCPs (total)**		13
2	Exposures for trades at QCCPs (excluding initial margin and default fund contributions); of which	658	13
3	(i) OTC derivatives	658	13
4	(ii) Exchange-traded derivatives		
5	(iii) SFTs		
6	(iv) Netting sets where cross-product netting has been approved		
7	Segregated initial margin		
8	Non-segregated initial margin		
9	Prefunded default fund contributions		
10	Unfunded default fund contributions		
11	**Exposures to non-QCCPs (total)**		
12	Exposures for trades at non-QCCPs (excluding initial margin and default fund contributions); of which		
13	(i) OTC derivatives		
14	(ii) Exchange-traded derivatives		
15	(iii) SFTs		
16	(iv) Netting sets where cross-product netting has been approved		
17	Segregated initial margin		
18	Non-segregated initial margin		
19	Prefunded default fund contributions		
20	Unfunded default fund contributions		

Market risk

EU MRA: Qualitative disclosure requirements related to market risk

Market risk is defined as the current or prospective threat to the Bank's earnings and capital because of adverse market movements in market prices (security and derivative prices, as well as interest rates and foreign exchange rates) or in parameters such as volatility and correlations.

CEB draws the regulatory boundary between the 'Trading Book' and the 'Banking Book (i.e. the non-trading book) in line with the Trading Book definition provided in Regulation (EU) No 575/2013 on prudential requirements for credit institutions and investment firms (CRR), Article 4 (85) and (86). In this respect, CEB classifies all positions in financial instruments held with trading intent, or in order to hedge those trading positions in its 'Trading book'. CEB has established portfolio-level limit structure per the trading book and the banking book. For the trading book, nominal, PV01, holding period, equity, FX, Value at Risk and capital limits are in place; and for the banking book, nominal, PV01, equity, Structural FX, capital and total capital usage limits are in place. Any breach of the mentioned limits is clearly marked and demonstrated in Risk Management's 'Market Risk Report'. The circulation of this report triggers the escalation process, since the CRO and the division directors of Treasury and Risk Management are among the recipient list. Treasury is expected to provide explanation and the reasoning of the limit breach and in certain cases the time required to eliminate the limit breach.

Certain type of limit breaches are instantly directed to ALCO level, such as the exceedance of nominal limits (i.e. bonds or FX). For other type of limit breaches, particularly "sensitivity-based" metrics such as PV01 or VaR limits, CRO has the authority to grant a grace period (max 1 week) to Treasury to correct the limit breach. In case the issue is not resolved within the grace period, the limit breach is directly escalated to ALCO.

CEB's market risk policy is subject to the approval of CEB's Managing Board and reviewed annually by Risk Management Division. CEB's Audit & Risk Committee is informed about the level of limits and utilization at least on a quarterly basis. The ALCO determines the main pillars of CEB's trading book and banking book management and monitors compliance with the market risk policy, it bears the responsibility to monitor and control the composition, characteristics and diversification of the Bank's regulatory books in line with the overall strategic objectives, and it monitors the current limit utilization and compliance with the limits. The Risk Management Division establishes and maintains systems and controls to manage the risks associated with the regulatory books, it ensures that all entry requirements for either of the regulatory books are satisfied, it monitors all the limits defined in the market risk policy are complied with, and it builds and maintains efficient and accurate risk measurement systems for daily risk monitoring and ICAAP purposes. Treasury Department follows the principles laid down in the market risk policy during the assignment of financial instruments to regulatory books and in coordination with Risk Management, it ensures that all trading and banking book positions are within the limits.

Market Risk Capital Component

From a regulatory perspective, market risk stems from all the positions included in banks' trading book as well as from commodity and foreign exchange risk positions in the whole balance sheet. The standardised approach is used to calculate capital requirements for market risk as shown below.

EU MR1 - Market risk under the standardised approach

Dec 2024 ('000)	RWEAs
Outright products	
Interest rate risk (general and specific)	80,436
Equity risk (general and specific)	-
Foreign exchange risk	38,815
Commodity risk	
Options	
Simplified approach	
Delta-plus approach	
Scenario approach	
Securitisation (specific risk)	
Total	**119,251**

Dec 2023 ('000)	RWEAs
Outright products	
Interest rate risk (general and specific)	108,230
Equity risk (general and specific)	-
Foreign exchange risk	38,815
Commodity risk	
Options	
Simplified approach	
Delta-plus approach	
Scenario approach	
Securitisation (specific risk)	
Total	**147,045**

Market Risk – Internal Models (VaR)

The Bank measures the market risk of its trading book and the foreign-exchange risk of its banking book by using an internal historical simulation method, based on VaR methodology. VaR defines the maximum loss not exceeded with a given probability over a given period under normal market conditions.

The internal historical simulation method of VaR model is used for risk-monitoring purposes and whereas regulatory capital for market risk is calculated and reported quarterly according to the Standard Approach, as specified in the DNB's market-risk regulations.

The internal historical simulation method is used starting from January 2013. The last 250 historical daily returns of market risk factors are used to stress the current trading positions to estimate possible fluctuations caused by market movements while keeping the portfolio fixed.

The internal limit for the 10-day VaR of trading FX positions and treasury products, measured at 99% confidence interval, is EUR 5 million. This implies that diversified VaR from foreign-exchange risk and interest-rate risk in the trading book should not exceed this level.

The Bank also measures the market risk of its loan trading portfolio in the trading book via the internal historical simulation method, based also on VaR methodology, since March 2021. As of December, 31 2024, VaR has been calculated as EUR 0.1 million for the loan trading portfolio in the trading book.

The internal limit for the 10-day VaR of the loan trading portfolio, measured at 95% confidence interval, is EUR 2.8 million.

Other market risks such as liquidity, re-pricing and interest-rate risk on the banking book are measured and monitored through sensitivity and gap analyses.

Value-at-risk figures - Trading Book (2024)	Total	Diversification effect	Interest-rate risk	Foreign-exchange risk
Average	1,823	100%	1,695	128
Maximum	2,529	100%	2,509	392
Minimum	844	100%	754	8
Year-end	1,951	100%	1,930	21

Value-at-risk figures - Trading Book (2023)	Total	Diversification effect	Interest-rate risk	Foreign-exchange risk
Average	630	100%	621	164
Maximum	1,254	100%	1,230	396
Minimum	38	100%	127	23
Year-end	1,254	100%	-	23

Interest-rate risk in the banking book

One of the Bank's major risks under Pillar II is the interest-rate risk on the banking book. The Bank defines interest rate risk as the current or prospective risk to earnings and capital arising from adverse movements in interest rates. The trading book is also subject to interest-rate risk, but this type of risk is dealt with under the Market Risk: Value-at-Risk section. The Bank has a 'limited' risk appetite towards interest-rate risk in its banking book.

The Bank's interest-rate risk is monitored for the banking book by means of static re-pricing gap and interest rate sensitivity analyses once a month at all levels and for each major currency in use. Interest-rate sensitivity in the banking book is calculated according to the economic-value approach. All future cash flows, arising solely from on- and off balance sheet assets and liabilities are discounted back to their present values with zero-coupon yield curves to see the impact of interest-rate changes on the economic value of the Bank. The impact of the curve with the maximum net gain or loss compared to a benchmark curve is then analyzed.

According to the EBA guidelines, CEB applies six additional interest rate shock scenarios on the top of +/-200 bps parallel shock to capture parallel and non-parallel gap risks for Economic Value of Equity (EVE). The capital requirement is based on the maximum EVE impact under all these scenarios. As of December 31, 2023, EVE drops by EUR 4.4 million in case of a parallel down scenario (2023: EUR 9.9 million) in case of a short rates shock up scenario.

The interest rate repricing gap is prepared to determine the Bank's exposure to interest rate risk because of maturity mismatches in its balance sheet. Repricing is based on remaining days to maturity for fixed rate instruments and next repricing date for floating rate instruments.

Additionally, the Bank calculates the projected net interest income for parallel up and down shifts of the yield curve. As of 31 December 2024, NII drops by EUR 5.9 million in case of parallel down shock over 12 months from the reporting date. (2023: EUR 9.9 million in case of +200 bps shock over 12 months from the reporting date)

Credit Spread Risk in the Banking Book

In line with the European Banking Authority (EBA) Guidelines (EBA/GL/2022/14) on the management of interest rate risk and the assessment and monitoring of credit spread risk arising from non-trading book activities, CEB defines Credit Spread Risk in the Banking Book (CSRBB) as the risk driven by changes in the market price of credit risk, liquidity, and other characteristics of credit-risky instruments that are not captured by other prudential frameworks such as Interest Rate Risk in the Banking Book (IRRBB) or expected credit/(jump-to-) default risk. CSRBB specifically reflects the movement of credit spreads while assuming the same level of creditworthiness (i.e., changes within a given rating or probability of default (PD) range).

CSRBB captures two primary components:

i) the changes of the "market credit spread" or "market price of credit risk" representing the credit risk premium required by market participants for a given credit quality and,

ii) the changes of the "market liquidity spread" representing the liquidity premium that sparks market appetite for investments and presence of willing buyers and sellers.

Idiosyncratic elements are included in the scope of CSRBB in line with option 2 in the EBA guideline for the following reasons:

- Idiosyncratic components may not be entirely accounted for in other risk models, making their partial inclusion beneficial for a more conservative assessment.
- It is often challenging to fully disentangle the idiosyncratic portion from the overall spread movements, and their inclusion ensures a more holistic view of credit spread risk.
- Given the structure of our balance sheet, segmentation based on counterparty type (sovereign, corporate, retail, and banks) is particularly relevant, as spread behavior and sensitivity differ significantly across these categories.

CEB is committed to ensuring that its CSRBB framework aligns with regulatory expectations and industry best practices. CSRBB is measured using Economic Value of Equity (EVE) approach. EVE sensitivity measures changes in the net present value of instruments sensitive to credit spread fluctuations over their remaining life. It excludes equity from cash flows and reflects the present value of a bank's assets minus the present value of its liabilities. CEB uses historical market data to calibrate credit spread shocks. CSRBB shock levels have been defined based on rating, currency, and counterparty segments, with a specific credit spread shock determined for each category.

The Bank evaluates the impact of credit spread risk quarterly. As of 31 December 2024, the maximum EVE sensitivity of CEB is EUR 5.3 million corresponding to 0.8% of Tier1 capital.

Operational risk

EU ORA - Qualitative information on operational risk

Operational risk management

The Bank has an Operational Risk Management (ORM) function, the goal of which is to enhance the operational risk culture of the Bank by promoting awareness of the Bank's operational risk management framework and providing oversight of its execution in line with the three lines of defense model.

ORM act as the second line of defense, providing the business line and other functions across the Bank, with support related to the implementation of the identification, assessment, measurement, mitigation, monitoring and reporting of operational risks, which together form a framework for managing the Bank's exposure to operational risk losses.

Operational risk appetite, categorized by business and subsidiary-specific thresholds, is subject to quarterly monitoring by ORM. The presence of early warning limits for operational risk metrics serves to intensify risk monitoring efforts. Additionally, ORM conducts quarterly assessments of a comprehensive set of Key Risk Indicators (KRIs), which were enhanced in 2023.

Operational risk events and significant control incidents are reported and analysed through the Operational Risk Incident Management framework. The effectiveness of the Bank's controls are assessed through the annual Internal Control Framework evaluations and the execution of Risk Control Self-Assessments. The risks identified as being above risk appetite, were reported to Managing Board for further risk mitigation, acceptance for a limited period, transfer or avoidance. Furthermore, in order to：

- Strength the front-line responsibility for operational risk management and assess the effectiveness of key controls

Since 2023, ORM has enhanced the list of key controls and initiated independent control testing to further strength the process. Operational risk thresholds, along with the results of KRI assessments, RCSA, and Control Testing, are reported to both the Non-Financial Risk Committee and the Audit Risk Committee. New products, or changes to existing products, are subject to the Product Approval and Review Process. Key Risk Indicators are established and regularly monitored. In addition, regular training and awareness sessions are provided to employees to ensure that operational risk management continues to be embedded in the Bank's day-to-day operations.

Calculation of operational risk

CEB applies standardised approach for operational risk calculation. Under Standardised approach, the capital requirement for operational risk is calculated as: Average over three years of the sum of annual own funds requirements across all business lines. The annual own funds requirement of each business line is equal to the relevant indicator mapped to the respective business line multiplied by the corresponding beta factor CEB calculates the average over three years of the sum on the basis of the last three twelve-monthly observations at the end of the financial year with the available audited figures.

EU OR1 - Operational risk own funds requirements and risk-weighted exposure amounts

	Banking activities	Relevant indicator			Own funds requirements	Risk weighted exposure amount
		2022	2023	2024		
1	Banking activities subject to basic indicator approach (BIA)					
2	Banking activities subject to standardised (TSA) / alternative standardised (ASA) approaches				35,760	447,006
3	*Subject to TSA:*					
	TRADING AND SALES (TS)	37,013	27,394	37,484		
	COMMERCIAL BANKING (CB)	160,557	198,037	181,591		
	RETAIL BANKING (RB)	19,396	22,226	24,321		
4	*Subject to ASA:*					
5	Banking activities subject to advanced measurement approaches AMA					

	Banking activities	Relevant indicator			Own funds requirements	Risk weighted exposure amount
		2021	2022	2023		
1	Banking activities subject to basic indicator approach (BIA)					
2	Banking activities subject to standardised (TSA) / alternative standardised (ASA) approaches				32,030	400,369
3	*Subject to TSA:*					
	TRADING AND SALES (TS)	11,784	37,013	27,394		
	COMMERCIAL BANKING (CB)	139,096	160,557	198,037		
	RETAIL BANKING (RB)	22,715	22,715	22,226		
4	*Subject to ASA:*					
5	Banking activities subject to advanced measurement approaches AMA					

Remuneration policy

EU REMA - Remuneration policy

CEB's Group Remuneration Policy is in line with national and international regulations. The policy applies to CEB and its subsidiaries. It also covers the remuneration of Managing Board members of CEB and its subsidiaries. Through its conservative remuneration policy, CEB promotes a sound remuneration culture with a long term focus. The Group Remuneration Policy is reviewed and approved by amongst others the Supervisory Board. The Supervisory Board monitors the proper implementation of the policy by the Managing Board. Annually the compliance to the rules and procedures under the policy is reviewed in line with the Control Functions Remuneration Monitoring Procedure. The HR & Remuneration Committee meets at least each quarter and prepares the decision-making process for the Supervisory Board, taking into account the long-term interests of all stakeholders of CEB.

The Supervisory Board determines the level of remuneration for the members of the Managing Board in line with the principles of the Group Remuneration Policy. The remuneration received by the members of the Supervisory Board is not dependent on the (financial) results of the Bank. Each Supervisory Board member receives an appropriate amount of compensation taking into account the total number of hours spent for the tasks and the compensation paid to Supervisory Board members of companies of comparable size and business. The Bank's Remuneration Report is included in the Governance & Leadership section of the annual report and is also made available on the Bank's website. The main elements of the agreement of a Managing Board member with the Bank are not published on the Bank's website as CEB holds the view that sufficient information is disclosed in the Bank's Remuneration Report.

Encumbered and unencumbered assets

EU AE4 - Accompanying narrative information

Encumbered Assets are assets that have been pledged or if it is subject to any form of arrangement to secure, collateralize or credit enhance any transaction from which it cannot be freely withdrawn. CEB's encumbered assets consist primarily of securities designated for the guaranteed deposit protection fund and securities pledged for repurchase agreement. The total amount of encumbered assets represent securities pledged for guaranteed deposit protections.

EU AE1 - Encumbered and unencumbered assets

	Dec 2024 ('000)	Carrying amount of encumbered assets	of which notionally eligible EHQLA and HQLA	Fair value of encumbered assets	of which notionally eligible EHQLA and HQLA	Carrying amount of unencumbered assets	of which EHQLA and HQLA	Fair value of unencumbered assets	of which EHQLA and HQLA
010	**Assets of the reporting institution**	121,488	-			5,496,720	276,465		
030	Equity instruments	-	-	-	-	-	-	-	-
040	Debt securities	-	-	-	-	348,147	276,465	348,147	276,465
050	of which: covered bonds	-	-	-	-	-	-	-	-
060	of which: securitisations	-	-	-	-	-	-	-	-
070	of which: issued by general governments	-	-	-	-	286,771	269,523	286,771	269,523
080	of which: issued by financial corporations	-	-	-	-	43,992	-	43,992	-
090	of which: issued by non-financial corporations	-	-	-	-	17,384	6,942	17,384	6,942
120	Other assets	121,488	-			5,148,573	-		

	Dec 2023 ('000)	Carrying amount of encumbered assets	of which notionally eligible EHQLA and HQLA	Fair value of encumbered assets	of which notionally eligible EHQLA and HQLA	Carrying amount of unencumbered assets	of which EHQLA and HQLA	Fair value of unencumbered assets	of which EHQLA and HQLA
010	**Assets of the reporting institution**	291,312	192,864			5,297,310	141,340		
030	Equity instruments	-	-	-	-	-	-	-	-
040	Debt securities	192,874	192,864	192,874	192,864	173,170	141,340	173,170	141,340
050	of which: covered bonds	-	-	-	-	-	-	-	-
060	of which: securitisations	-	-	-	-	-	-	-	-
070	of which: issued by general governments	192,874	192,864	192,874	192,864	139,005	134,931	139,005	134,931
080	of which: issued by financial corporations	-	-	-	-	27,217	-	27,217	-
090	of which: issued by non-financial corporations	-	-	-	-	6,948	6,409	6,948	6,409
120	Other assets	98,438	-			5,124,140	-		

EU AE2 - Collateral received and own debt securities issued

CEB has no collateral received and own debts securities issued as of year end 2024

EU AE3 - Sources of encumbrance

	Dec 2024('000)	Matching liabilities, contingent liabilities or securities lent	Assets, collateral received and own debt securities issued other than covered bonds and securitisations encumbered
010	**Carrying amount of selected financial liabilities**	**67,784**	**67,784**

	Dec 2023('000)	Matching liabilities, contingent liabilities or securities lent	Assets, collateral received and own debt securities issued other than covered bonds and securitisations encumbered
010	**Carrying amount of selected financial liabilities**	**240,084**	**241,380**

ESG and Climate Risk Management

This section provides an overview of the ESG (Environmental, Social, and Governance) risk assessment methodology and climate-related risk practices of the Bank in 2024, emphasizing the integration of materiality, risk classification, and disclosure standards consistent with regulatory requirements.

Qualitative information on Environmental, Social and Governance (ESG) risk

ESG Risk Assessment Framework

- Risk Identification and Classification: The Bank systematically assesses clients for ESG risks through sectoral risk grading, ESG questionnaires, and ongoing monitoring, ensuring that exposures to environmental and social risks are identified, measured, and categorized.
- Materiality Assessment: The Bank applies thresholds for materiality in line with EU expectations. Financial impacts are considered material if they exceed predefined internal thresholds across short, medium and long-term horizons. Non-material risks are nonetheless documented and monitored for regulatory compliance.
- Risk Grading and Mitigation: ESG risk grades are assigned by combining sector risk grades and the results of client ESG questionnaires, with the possibility of adjustments for mitigating factors. Clients with high ESG risk grades are subject to enhanced monitoring and required to undertake remedial actions.

Climate-Related Risk Integration

- Climate Risk Assessment: The Bank evaluates both physical (e.g., extreme weather) and transition (e.g., regulatory change) climate-related risks at the client and portfolio level.

- Portfolio Coverage: Climate risk analysis currently includes trade finance, marine finance, and commercial real estate, with expansion underway to cover the full credit portfolio.
- Financial Impact Measurement: The impact of climate risk on credit risk is calculated using the Expected Credit Loss (ECL) metric, incorporating macroeconomic and client-specific data. Changes in ECL resulting from climate risk are aggregated and disclosed as per Pillar 3 requirements.
- Resilience and Stress Testing: The Bank uses a combination of scenario analysis and risk heatmaps to assess resilience and ensure alignment with regulatory guidance, such as the ECB Guide on climate-related and environmental risks.

Governance and Disclosure Practices

- Governance Framework: Escalation procedures ensure that material and exceptional ESG risks are reviewed at the appropriate management and committee levels, supporting transparency and accountability.
- Disclosure: The Bank commits to regular, transparent disclosure of ESG and climate-related risks, processes, exposures, and materiality decisions in its reports. This includes the methodology for risk identification and grading, materiality thresholds, and the outcomes of climate risk and environmental materiality assessments.
- Review Cycles: ESG risk assessments are updated on a risk-sensitive schedule: every 5 years (low risk), 3 years (medium), and annually (increased/high risk), with disclosures updated accordingly.