

Banque de Patrimoines Privés

Pillar 3 Disclosure Report 2024



TABLE OF CONTENTS

INDEX OF ABBREVIATIONS	5
1. OVERVIEW	6
1.1. Purpose	6
1.2. Regulatory framework.....	6
1.2.1. Pillar 1	6
1.2.2. Pillar 2	6
1.2.3. Pillar 3	6
1.3. Frequency and location of disclosure	7
1.4. Materiality	7
1.5. Proprietary or confidential information	7
2. COMPANY OVERVIEW AND ACTIVITIES	8
3. GOVERNANCE	8
3.1. Board of Directors.....	8
3.1.1. Oversight.....	8
3.1.2. Composition	9
3.2. Authorized Management.....	10
3.3. Risk Management Department	10
3.4. Compliance Department	10
3.5. Internal Audit Department.....	11
4. RISK MANAGEMENT FRAMEWORK.....	12
4.1. Risk Management objectives and policies	12
4.1.1. Three Lines of Defence	12
4.2. Risk Management Framework.....	13
4.3. Risk identification and notification.....	13
4.4. Risk appetite	14
4.5. Risk limits and mitigation	15
4.6. Pillar 2.....	16
4.7. Stress testing framework	16
4.8. Recovery Plan	17
4.9. Declaration on the adequacy of Risk Management arrangements	17
5. CAPITAL MANAGEMENT AND OWN FUNDS	18

5.1.	Solvency	18
5.1.1.	Regulatory Own Funds	18
5.1.2.	Capital Ratios.....	20
5.1.3.	Leverage Ratio.....	21
5.1.4.	Capital Buffers.....	23
6.	PILLAR 1 RISK CATEGORIES	24
6.1.	Credit and Counterparty risk.....	24
6.1.1.	Non-Performing and Forborne Exposures.....	26
6.1.2.	Changes in the stock of specific credit risk adjustments	26
6.1.3.	Changes in the stock of defaulted and impaired loans and debt securities	27
6.1.4.	Credit Risk Mitigation	27
6.2.	Market risk.....	31
6.2.1.	Interest rate risk	31
6.3.	Operational risk.....	32
6.3.1.	Reporting, measurement, and mitigation	32
6.4.	Liquidity risk.....	33
6.4.1.	Overview	33
6.4.2.	Reporting, measurement, and mitigation	35
6.4.3.	Declaration of adequacy	37
7.	REMUNERATION DISCLOSURE	38
7.1.	Context, Objectives and Scope of Application	38
7.2.	Guiding Principles and Objectives	38
7.3.	RISK PROFILE AND MATERIAL RISK TAKERS.....	39
7.3.1.	Bank Activities.....	39
7.3.2.	Identification of Material Risk Takers (MRTs).....	39
7.3.3.	Application of the Proportionality Principle	40
7.4.	PERFORMANCE MANAGEMENT	41
7.4.1.	Performance Evaluation System	41
7.4.2.	Link Between Performance and Variable Remuneration.....	41
7.5.	BONUS ALLOCATION PROCESS.....	41
7.6.	REMUNERATION STRUCTURE.....	42
7.6.1.	Structure and Equal Treatment	42
7.6.2.	Fixed Remuneration.....	42
7.6.3.	Variable Remuneration	42

7.6.4.	Variable Remuneration Rules and Limits	43
7.7.	Special clauses.....	43
7.7.1.	Adjustments to Variable Remuneration	43
7.7.2.	Guaranteed Variable Remuneration.....	43
7.7.3.	Long Term Incentive Plan (LTIP)	44
7.7.4.	Discretionary Pension Benefits	44
7.8.	GOVERNANCE	44
7.8.1.	The Board of Directors	44
7.8.2.	The Nomination & Remuneration Committee.....	44
7.8.3.	The Executive Committee	45
7.8.4.	Human Resources & Control Functions	46
7.9.	Remuneration tables.....	47
7.9.1.	EU REM1 - Remuneration awarded for the financial year.....	47
7.9.2.	EU REM2 - Special payments to staff whose professional activities have a material impact on institutions' risk profile (identified staff).....	48
7.9.3.	EU REM3 - Deferred remuneration	49
7.9.4.	EU REM4 - Remuneration of 1 million EUR or more per year.....	49
7.9.5.	EU REM5 - Information on remuneration of staff whose professional activities have a material impact on institutions' risk profile (identified staff)	49
ANNEX I	50
ANNEX II	51
ANNEX III	55
ANNEX IV	61

INDEX OF ABBREVIATIONS

AML	Anti-Money Laundering
BIA	Basic Indicator Approach
BRRD	Bank Recovery and Resolution Directive
CAFG	Credit Andorra Financial Group
CEBS	Committee of European Banking Supervisors
CET1	Common Equity Tier 1 ratio
CFT	Combating the Financing of Terrorism
CRD IV	The Capital Requirements Directive IV
CRR	The Capital Requirements Regulation
CSSF	Commission de Surveillance du Secteur Financier
EBA	European Banking Authority
ECAI	External Credit Assessment Institution
HQLA	High Quality Liquid Assets
IAS	International Accounting Standards
ICAAP	Internal Capital Adequacy Assessment Process
ILAAP	Internal Liquidity Adequacy Assessment Process
KYC	Know Your Customer
LCR	Liquidity Coverage Ratio
LTI	Long Term Incentive
NSFR	Net Stable Funding Ratio
RAS	Risk Appetite Statement
RCSA	Risk and Control Self-Assessment
SREP	Supervisory Review and Evaluation Process
VAR	Value-at-Risk

1. OVERVIEW

1.1. Purpose

This document presents the Pillar 3 disclosure report of Banque de Patrimoines Privés (also referred as “the Bank”).

The purpose of this report is to provide information on the implementation of the Basel III framework and risk assessment processes in accordance with the Pillar 3 requirements, part XIX “Disclosure by Credit Institutions” of the Commission de Surveillance du Secteur Financier (“CSSF”) circular 06/273 as amended, and Circular CSSF 15/618 transposing EBA guidelines on “Pillar 3 disclosures”. In particular, the CSSF Circular 06/273 sets out the requirements related to the own funds adequacy in the financial sector by transposing into Luxembourg Law directives 2006/48/EC and 2006/49/EC of the European Parliament and the Council derived from the recommendations of the Basel Committee (Basel III).

The disclosures presented in this document are complimentary to other work undertaken by the Bank in its assessment of capital requirements under the Internal Capital Adequacy Assessment Process and Internal Liquidity Adequacy Assessment Process (also referred as “ICAAP/ILAAP”).

1.2. Regulatory framework

The Basel framework has established a more risk sensitive approach to capital management, and this is comprised of three pillars. Doing so enables the market to have a greater scope of visibility to its constituents.

1.2.1. Pillar 1

This is the **Minimum Capital Requirement** related to credit, market, and operational risks that the Bank incurs. This further extends beyond solvency requirements and covers the Bank’s liquidity requirements.

1.2.2. Pillar 2

Pillar 2 lays out the requirements for **Supervisory Review and Evaluation Process** (“SREP”) and the settling of individual capital requirements of the Bank, taking into consideration the Bank’s own assessment of capital requirements. Doing so allows supervisors to evaluate the Bank’s assessment of its own risks and determine whether the assessment seems reasonable.

1.2.3. Pillar 3

The aim of Pillar 3 is **Market Discipline** which aims to produce disclosure which allows market participants to assess the capital position, risk exposure and risk management processes. This includes all material risks thus enabling a comprehensive view of the Bank’s risk profile. The purpose here is to have greater transparency in Bank’s financial reporting thus enabling marketplace participants to better strengthen the risk management environment.

The Pillar 3 disclosure will comprise of both quantitative disclosures relating primarily to actual risk exposures and qualitative disclosures relating to risk management practices.

A further qualitative disclosure has been applied by presenting a summary of the Bank’s Remuneration Policy.

1.3. Frequency and location of disclosure

This document is prepared and updated at least annually and more frequently if deemed necessary. Unless stated otherwise, all figures are as of December 31st, 2024.

The report will be published on the Bank's website (www.creand.lu) and will not be subject to external audit, except to the extent that any disclosures are equivalent to those made under accounting requirements. The disclosures presented in this report do not constitute any form of audited financial statement.

These disclosures have been reviewed and verified by the Authorized Management and by the Board of Directors of the Bank.

1.4. Materiality

CRR Article 432(1) provides that a firm may omit one or more of the required disclosures if the information provided by such disclosures is not regarded as material. Information is considered as material if its omission or misstatement could change or influence the assessment or decision of a user relying on it for the purpose of making economic decisions.

1.5. Proprietary or confidential information

CRR Article 432(2) provides that an Institution may omit one or more items of information included in the disclosures listed in Titles II and III if those items include information which is regarded as proprietary or confidential in accordance with the second and third subparagraphs, except for the disclosures laid down in Articles 437 and 450.

Information shall be considered as proprietary to a firm if disclosing it publicly would undermine its competitive position and may include information on products or systems which, if shared with competitors, would render the firm's investments therein less valuable. Information is regarded as confidential if there are obligations to customers or other counterparty relationships binding the firm to confidentiality.

Where information has been omitted from these disclosures in accordance with either CRR Article 432(1) or Article 432(2), this has been stated in the relevant section.

2. COMPANY OVERVIEW AND ACTIVITIES

Banque de Patrimoines Privés was incorporated in Luxembourg on 1 July 2010 as a limited company under Luxembourg Law. Since 9 April 2011, the Bank is a wholly owned subsidiary of Crédit Andorrà Financial Group (hereinafter “the Parent Company”, “the Group” or “CAFG”).

The Bank has its registered office at 30 Boulevard Royal, Luxembourg and is authorized and regulated by the CSSF and as such is subject to minimum regulatory capital requirements. Although the official name of the Bank is Banque de Patrimoines Privés, since June 14th, 2021, it has been rebranded to Creand Wealth and Securities to meet the image of the Creand Group.

The Bank established as its core strategy to expand and strengthen its market presence in the Wealth Management, Corporate & Funds Services and Depositary & Custody Services. The Bank has developed a unique and structured platform able to provide an all-in-one offer to customers, compiling all services from the setup to the daily management and discontinuity of very specific financial vehicles.

The Bank’s objective is to propose custom-made solutions for their customers avid to create any investment vehicle types or to settle down to the Grand Duchy via domiciled companies. The Bank’s services include the preparation and the constitution of companies and investment funds, their domiciliation, with possibility for administrative and accounting management, as well as the missions of the depositary bank which ensue from it.

The Bank also proposes wealth management services to customers, aiming for both short-term stability and long-term profitability and leveraging on the international experience of the Group.

3. GOVERNANCE

3.1. Board of Directors

3.1.1. Oversight

The Board has the ultimate responsibility for limiting and monitoring the Bank’s risk exposure as well as for setting targets for the capital ratios and risk appetite.

- Responsible for creating and delivering value by governing the Bank’s business while meeting the interest of shareholders and other stakeholders
- Establish, document, and communicate the internal capital planning, management, and adequacy in relation to the Bank’s risk profile.
- Establish the framework to actively promote an internal risk culture among the various operational departments.
- Monitor and approve the implementation of the principles, strategies, and objectives setup as the risk appetite of the Bank.
- Review key documentation such as the ICAAP/ILAAP exercise, as well as key business activity, material risk taking and risk-related control processes.

The Board of Directors meet on a quarterly basis, and it is supported by Specialized Committees; namely the Audit, Risk and Compliance (“ARC”) Committee and the Nomination and Remuneration Committee. The role of these committees is to provide the BoD with critical assessment in respect to the Bank’s organisation in order to enable the members of the BoD to fulfil their supervisory mission and to take on their responsibilities. Both committees are held, at least, on a quarterly basis.

Specifically, the ARC Committee was established with the objective of providing follow up, assessment and adequacy on the yearly planning and scope of work of the 2nd and 3rd line of defence. This ensures transversal view of topic linked to the internal control environment. During 2024, the ARC Committee met a total of 7 times.

3.1.2. Composition

The members of the Board of Directors are selected based on their skills and experience, by taking in consideration the business profile of the Bank. The conformation of the Board is done by considering profiles with management experience, preferably in the field of banking or financial institutions, in order to ensure qualified and adequate management, control, supervision and advise in all the activities performed by the Bank.

The Bank, in order to achieve the proper conformation of the Board, applies individual assessment of the qualifications and knowledge of each member of the Board. The individual review is performed on a yearly basis. Each member of the Board is duly authorised to act as a director by the CSSF which assessed their professional standing, experience and reputation in accordance to the law of 5 April 1993 on the financial sector, as amended.

Also, a self-assessment is performed on an annual basis (or when there is a material change to the business model, risk appetite or strategy) by the Chairman of the BoD to ensure proper composition and functioning. The assessment covers, at least, but not limited to:

- Review of the adequacy of the composition of the BoD in terms of competencies, knowledge, skills, and reputation based on the minimum requirements deemed necessary to consider that the members of the Board have good expertise. In case of specific skills are required, the Chairman of the Board will assess the training needs.
- Review of the mandates held by the directors.
- Identification of conflict of interests.
- Availability.
- Adequacy of the frequency of the BoD.
- Assessment of the quality and dissemination of the preparatory documents received.

The results are evaluated by the relevant Committee in order to ensure that the objectives and strategy are properly achieved. Alternatively, where needed, the BoD proposes the changes needed in order to comply with the objective’s setup of the relevant year.

As of December 31st, 2024, the Board of Directors is composed by the following persons:

Name	Position	Number of directorships
Francesc Xavier Cornella	Vice-Président	8
Geoffroy Bazin	Président du Conseil	4
Carlos Fernandez-Rubies	Administrateur - Directeur Général	2
Esteban Estevez Zurita	Administrateur	8
Jean-Pascal Nepper	Administrateur	2

3.2. Authorized Management

- Implement sound and effective processes to identify, manage, report, and mitigate all material risks, in relation to the established risk-bearing capacity.
- Establish internal reporting tools which allow a proper oversight of the risks identified.
- Ensure the proper management of risks in case that they materialize in a way that might affect the operational effectiveness of the Bank.
- Ensure that proper internal control systems IT systems are setup, ensuring the follow up of risks.
- Ensure that regulatory requirements, such as ESG regulation is incorporated in the operational and risk appetite framework of the Bank.

3.3. Risk Management Department

- Analyse, monitor and control the risks arising during the business activity of the Bank.
- Develop and maintain the Bank's risk management procedures and policies in order to ensure a continuous monitoring over the proper regulatory compliance.
- Provide relevant independent information, analysis and expert judgement on risk exposures and risk decisions.
- Assist the Authorized Management and the Board of Directors in order to take informed decisions regarding risk management.
- Assist in the embedding of risk management framework within all areas of the business.

A more detailed description of the objectives, processes and strategies of the Risk Management department is available in Section 4 of this document.

3.4. Compliance Department

- Ensure the Bank remains relevant to the current regulatory guidance and requirements.
- Assisting in the designing of appropriate risk identification, assessment, and reporting processes to facilitate the adherence to regulatory requirements.

3.5. Internal Audit Department

- Assist the Board of Directors in their oversight responsibilities relating to financial matters, including corporate reporting, risk management and internal control.
- Oversee the quality and integrity of accounting and reporting practices and the performance of the internal audit function and independent external auditors.
- Ensure, through independent audits, that the adequacy of the risk control and management procedures, as well as the compliance monitoring is performed as per the established framework in place.

4. RISK MANAGEMENT FRAMEWORK

4.1. Risk Management objectives and policies

The Bank is exposed to a variety of risks as a result of its normal business activities. As such, active and effective risk management is fundamental to the Bank's core competence. In order to support this management requirement, the Bank has developed procedures and policies which help define a structured and formulated approach towards risk management. The key areas which the Risk Management department focuses on are:

- The identification and effective management of all types of risks the Bank is exposed to.
- Use of key risk metrics and business performance indicators to monitor risk levels quantitatively and qualitatively.
- Monitoring the implementation of significant changes in the Bank and their associated impact on the Bank's metrics
- Promoting a culture of ethical conduct, accountability, risk awareness and transparency that extends across the Bank in all its departments and activities carried out.
- Full compliance with applicable regulation, laws, and procedures.

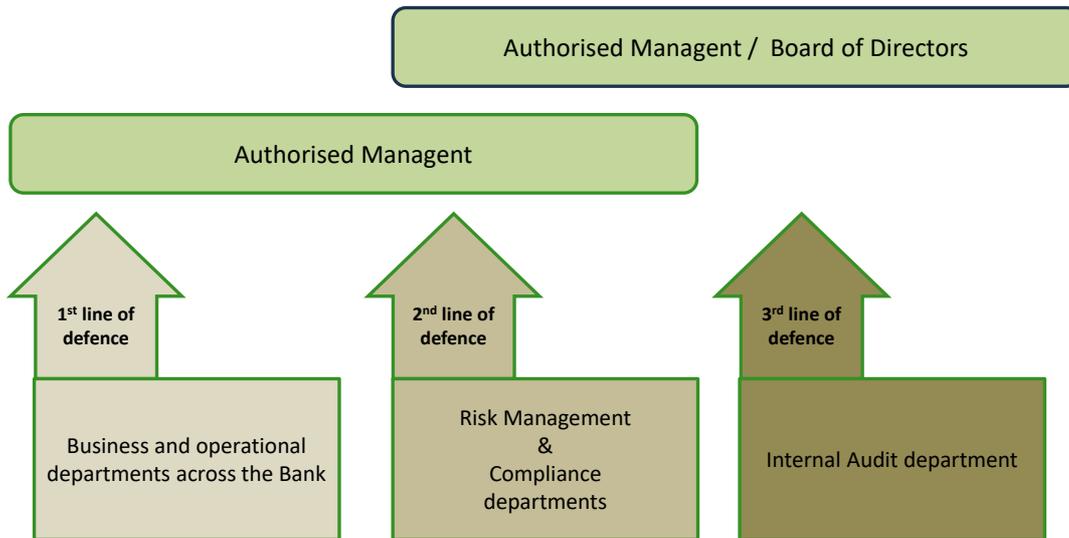
The reporting of risk controls, either scheduled or exceptional, is made to the Authorized Management of the Bank on a periodic basis (either monthly, quarterly, annually, or ad hoc). The risk reports are produced by using tools and databases which have been developed internally, whereby controls are in place to ensure accuracy, completeness, and coherence of the different databases.

Information of the reports is also shared to the Risk Management Department of the Parent Company (*Area de Riscos Globais*), for the purposes of consolidation of the risks faced by the Group.

4.1.1. Three Lines of Defence

The primary goal of the risk management framework of the Bank is to ensure that the outcome of the risk-taking activities across the departments is consistent with the Bank's risk appetite defined by the Board of Directors. The Bank ensures that there is always proper balance between risk and reward, looking to maximize the profits always in the boundaries of the risk limits defined.

In the everyday identification and management of the risks it faces, the Bank operates with a "Three Lines of Defence" model and distributed in the following manner:



4.2. Risk Management Framework

Since its establishment, the Bank has had a Risk Management function in place, which has developed and maintained the risk management framework. The internal risk management approach and monitoring principles of the Bank are established in the Risk Management Policy. The Policy describes how the risks are identified, measured, mitigated, and reported. The Policy is updated and validated by the Board of Directors, at least, once per year.

The risks are defined in various types and subcategories whose granularity reflects the size and complexity of the Bank's operations. The allocation of own funds is determined by using as reference the information already reported to the CSSF within the Circular 06/273, as amended, and complement by adding the identified individual risks and capital requirements that are not covered by these reports and materialized in the ICAAP/ILAAP report.

The ICAAP/ILAAP presents the various risks to which the Bank is exposed, or may be exposed to, as well as the stress scenarios which allow the Bank's Management to allocate specific capital or liquidity resources to each activity to cover the risk related to such activities. It also serves to implement the necessary procedures to monitor, mitigate and manage the identified risks, and to locate unidentified risks. The report is validated by the Board of Directors and submitted to the CSSF, at least, once per year.

4.3. Risk identification and notification

The Bank's risk identification process is a firm-wide initiative which requires a proactive process of constant monitoring and assessment.

All operational units and employees of the Bank have the duty to identify and quantify potential risks in their areas of responsibility. As a result, all the operational units, including individual employees, (first line of defence) have the duty to identify and quantify potential risks present in their activities.

Once a risk is identified, the operational unit must notify, in a timely manner, the Risk Management Department (second line of defence). The Bank has setup a standardised procedure for recording incidents which is used not only for statistical purposes, but also for proactive risk mitigation.

The Bank's risk identification process is both, statistically based as well as forward-looking. Periodic assessment is done by regular review of processes in order to identify key areas of risk, weak points and points of failure. Similarly, following an incident the Bank conducts a further assessment to push mitigation actions and employ principles of learning from the event.

The Risk Management department ensures that information of the risks identified is available and periodically communicated to the Authorised Management as soon as they are identified and documented. The Authorised Management will determine and articulate remedial actions which will ensure proper mitigation. The Authorised Management communicates actions to the Board of Directors in a timely manner for review and acknowledgement. Also, the summary of the risks identified, and actions are comprised on a quarterly Risk Management report which is submitted to the ARC Committee and the Board of Directors. The Management Body will determine specific actions where needed to the risk appetite, policies, or procedures, where deemed necessary.

4.4. Risk appetite

The general risk appetite defined by the Bank is low/moderate risk in the development of its business activities and strategies. The Risk Appetite Statement clearly defines the Bank's attitude to risk taking in consideration the business objectives, capital targets, shareholders expectations and macroeconomic conditions. This statement and the framework (key ratios, thresholds, and limits) are defined across the Risk Management Policy of the Bank and serve as the basis in the ICAAP/ILAAP exercise. Both documents are validated by the Board of Directors on a yearly basis.

In this sense the Risk Appetite Statement incorporates all material risks facing the Bank and aligns to the strategy using a 3-year business plan (forward-looking approach). In order to ensure alignment to the strategy the Bank uses the following processes:

- Risk Capacity (capital and liquidity) is evaluated and quantified.
- Risks arising from the business strategy are identified (quantitative and qualitative) and assessed.

The risk appetite is approved by the Board of Directors on an annual basis as part of the strategic planning process and is outlined through both quantitative and qualitative measures. This is underpinned by the following planning processes:

- **Capital adequacy:** Hold enough capital to maintain capital ratios above both regulatory and stressed capital requirements.
- **Earning stability:** Limit earnings volatility to support the ability to achieve the defined financial objectives.
- **Funding liquidity risk:** Manage liquidity and funding risk by maintaining enough funds to meet all obligations on both a business-as-usual basis and in periods of liquidity stress.
- **Minimization of reputational risk:** Avoid any transactions or services that bring risk of an unacceptable level which result in damage to the Bank's reputation.

- **Control of operational risk:** Ensure robust management of operational risk in the Bank's day-to-day operations and its forward-looking business strategy.
- **Control of ICT risk:** Ensure that ICT risk is robustly embedded within the operational risk management scope through the constant monitoring of cybersecurity risks and by ensuring that a well-tested BCP is in place.
- **Concentration risk:** Proactively control concentrations within position risk by maintaining a well-diversified funding base.
- **Control legal and regulatory risk:** Conduct business practices that are in line with the Bank's code of conduct and proactively identify sources of risk and/or breaches that may lead to reputational risk or regulatory sanctions.
- **Inclusion of ESG risk:** Ensuring to timely and correctly identify material risks related to the implementation of ESG regulation. Also, by ensuring that regulatory requirements are embedded into the governance and operational framework of the Bank. In this regard, the Bank has established a procedural framework which describe the climate-related and environmental (CRE) risk management. This procedure is aiming to incorporate identification of those risks which the Bank is facing, as well as to define the overall objectives and approaches for identifying, assessing and monitoring CRE risks in the short, medium and long-term. The implementation, along with the reporting will be incorporated in the framework accordingly.

4.5. Risk limits and mitigation

The Bank has several techniques which it employs to mitigate each risk depending on its nature. This includes the use of controls, outsourcing, contingency planning, capital allocation and collateral arrangements.

Based on these techniques, the Bank has developed approved thresholds and limits set out by key risk type. Limits are then used as a basis for defining a more granular risk framework. The Authorized Management and the Chief Risk Officer are responsible for setup and monitoring of specific thresholds and limits which are considered necessary to manage the risk within individual lines of business and across counterparties. The thresholds and limits in place are, but not limited to, the following:

- Credit risk limits are based on a variety of exposure and stress measures including, for example, counterparty exposure and portfolio loss stress metrics. The overall credit risk management is designed to control overall credit quality, collateral arrangements, and mitigation of concentration risk (such as single name) within the portfolio.
- Operational risk thresholds are based on a series of metrics designed to assess control effectiveness across the activities. The Bank has internally designed an operational risk framework which objective is to identify key areas of potential control weakness and helps drive development actions to reduce operational risk. These thresholds are set in both quantitative (considering historical losses and frequency) and qualitative terms (one-off events or change in activities).
- Market risk monitoring is limited to the banking book foreign change exposure risk, IRRBB and CSRBB. As the Bank doesn't have a trading book, methodology or monitoring procedures related to market sensitivity or stress management of interest rate risk on this sense are not applicable.

The Bank has defined a series of thresholds which take in consideration the business-as-usual, as well as the warning levels which allow that the maximum risk appetite is respected. This framework considers management resources, market environment, business strategy and available resources to absorb potential losses. Consequently, limits are set to ensure that those defined risk levels (regulatory or internal) are always respected. The metrics are actively monitored, managed, and communicated to the Authorized Management. In this sense, escalation procedures are in place to ensure that proper actions are taken to ensure that the risk limits are respected. The escalation process is well defined across the Risk Management framework and is followed in respect to any deviation, either from periodic or from ad hoc reviews.

The Risk Management department elaborates a quarterly summary which is evaluated and approved by the Audit, Risk and Compliance Committee, and where mitigation actions or adequations to the risk appetite of the Bank can be evaluated. The reporting framework provides the status, as well as any mitigation actions proposed by Specialized Committees, which are escalated to the Board of Directors which finally approves any of the proposed actions.

4.6. Pillar 2

The Pillar 2 assessment is comprised on the ICAAP/ILAAP evaluation, which is the Bank's methodology to determine the level of capital that adequately supports all the Banks current and future risks in its business activities. The ICAAP/ILAAP focuses on the main risks to the consolidated financial position and examines all risk categories to identify exposure that could put the Bank's capital at risk. The assessment is developed to ensure that capital resources:

- Remain adequate to support the Bank's risk profile and outstanding commitments.
- Maintain capitalisation in events of severe economic downturn stress scenario.
- Meet current and future regulatory requirements.
- Remain consistent with the Bank's strategic and operational goals and our shareholder and investor expectations.

The ICAAP/ILAAP is supported by a scenario analysis which is used to support the determination of a level of capital required for severe but plausible events. It is updated and reviewed annually, with more frequent reviews in the event of a fundamental or anticipated change to the Bank's business. The ICAAP/ILAAP is formally approved by the Authorized Management and Board of Directors, which has the ultimate responsibility for the effective management of risk and approval of the Bank's risk appetite.

4.7. Stress testing framework

Stress testing is a key part of the Bank's planning and risk management processes helping to identify, analyse and manage risks within the business. Capital planning forms part of the ICAAP and a range of stress test and scenario analysis are used to estimate the impact of stress events on capital resources and regulatory capital requirements. In addition, stress testing is conducted for the ILAAP and supports the Recovery Plan and its associated scenario analysis.

Stress testing and scenario analyses are conducted on a regular basis and the results, trend information and supporting analysis are reported to the Authorized Management. In particular, the scenarios are defined and based upon historical events or on forward-looking, hypothetical plausible events that could impact the Bank's positions in terms of capital, liquidity, or profitability. The scenarios are reviewed and updated as markets and business strategies of the Bank evolve.

4.8. Recovery Plan

In the context of the implementation of the BRRD, the Bank has developed and implemented a Recovery Plan whose procedures are owned, understood, and fully supported by the Authorised Management of the Bank, following the mandate of the Board of Directors.

The Recovery Plan outlines the actions which the Bank will follow to react in case of stressed conditions. The actions are deemed as credible and executable to meet challenges which might arise, which will be able to restore the Bank's financial position after a significant deterioration of its financial standing.

As the Recovery Plan is part of the internal risk review process of the Bank, a continuous evaluation of the risk profile is carried on a periodic basis. The Plan is therefore periodically reassessed and adapted to meet the changing conditions coming from the Bank's risk profile or business activities.

4.9. Declaration on the adequacy of Risk Management arrangements

In accordance with article 435 (e) of the EU Regulation 575/2013, the Authorised Management and the Board of Directors considers that the risk management policies, procedures, monitoring thresholds, and IT systems in place, which are described in the present document, are adequate given the risk profile and strategy of the Bank.

The Authorised Management and the Board of Directors ensure that the ongoing risk monitoring and assessments maintain the risks management arrangements up to date and appropriate to the strategy and activities of the Bank.

5. CAPITAL MANAGEMENT AND OWN FUNDS

5.1. Solvency

Article 56 of the law of April 5, 1993, related to the Financial Sector gives the CSSF the ability to determine the coefficients to be applied according to the international conventions as well as the European Directives that needs to be respected by the credit institutions under their supervision.

The methods to calculate the solvency ratio are described in CSSF's Circular 06/273 as amended, concerning the definition of Capital and Solvency Ratios.

In such Circular, the following concepts to be applied to Credit Institutions are defined:

- The levels of own funds to be respected.
- The terms of a notification system and the limits of large exposure.
- The capital requirements related to credit risk as well as dilution risk of all activities.
- Capital requirements to cover operational risks associated with the activities it develops.
- Capital requirements for currency risk hedging.
- Capital requirements to cover the risk of price changes in commodities.
- A simplified capital ratio relating to the risk weighting.

The solvency ratio can give a clear outlook of the importance of own funds of the institution, as related to credit, currency and operational risks associated to the Bank's activities. In accordance with Circular 06/273, the Bank's own funds must be at least equal to the overall capital requirements.

5.1.1. Regulatory Own Funds

Due to the absence of market activity, the Bank was exempted from calculating an integrated ratio in accordance with EU Regulation No 575/2013.

The Bank has obtained a waiver in order to calculate a simplified ratio during the reporting period in accordance with CSSF's Circular 06/273, Section V, Chapter 2, part 9 as amended, as the Bank has no trading portfolio.

The calculation of the Own Funds of the Bank consists of the sum of Tier 1 Capital (*Common Equity Tier 1 (CET1)*) + Additional Tier 1 Capital + Tier 2 Capital.

As of the end of 2024, the Bank's Own Funds are composed solely by Tier 1 Capital, and no additional capital (Tier 2 components).

In Annex I, there is a description of the Structure of Own Funds, as of December 31st, 2024.

Own Funds disclosure

	31/12/2024	31/12/2023
COMMON EQUITY TIER 1 CAPITAL	65,428,290	59,410,830
Paid up capital	27,500,000	27,500,000
Accumulated other comprehensive income	-1,318,865	-3,883,718
Retained earnings and Reserves	39,313,423	35,885,719
<i>Profit or loss eligible</i>	-	-
Additional Tier 1 (T1) capital	-	-
CET1 capital deductions	- 66,268	- 91,169
Deferred tax assets	-	-
Other intangible assets	-	-
Total Tier 1 (T1) capital	65,428,290	59,410,830
Tier 2 (T2) capital	-	-
Total Capital	65,428,290	59,410,830

Annex II of this disclosure, unfolds the nature and amounts of specific items on own funds as per Article 4 of the EU Commission implementing regulation (EU) 1423/2013.

Transitional Own Funds disclosure

Annex III discloses the nature of specific items on own funds during the transitional period as per Article 5 of the EU Commission implementing regulation (EU) 1423/2013.

Full Reconciliation of own funds items to audited financial statements

	31/12/2024
Paid up capital	27,500,000
Reserves	29,996,668
Other reserves	9,316,755
Profit	3,019,195
Equity (Annual report)	68,513,754
Profit not eligible	3,019,195
Other intangible assets	-
Deferred tax assets	-
Other deductions	- 66,268
OWN FUNDS	65,428,290

5.1.2. Capital Ratios

As per the framework of part III of Regulation (EU) No. 575/2013, the Bank must calculate its minimum regulatory capital requirements to cover Credit, Market and Operational Risks.

As of the close of 2024, the Bank reported a Capital Adequacy ratio of 36.34%.

<i>In Euros</i>	31.12.2024	31.12.2023
Own Funds		
Common Equity Tier 1 (CET1)	65,428,290	59,410,830
Tier 1 (T1) capital	65,428,290	59,410,830
Tier 2 (T2) capital		
Total Consolidated Capital (CET1+T1+T2)	65,428,290	59,410,830

Risk-weighted Assets		
Credit Risk	132,400,972	112,283,193
Market Risk	-	-
Operational Risk	47,524,150	39,165,362
Total Risk-weighted assets	179,925,123	151,448,555

CAPITAL RATIOS (*)	31.12.2024	31.12.2023
Common Equity Tier 1 ratio	36.36%	39.23%
Tier 1 ratio	36.36%	39.23%
Total Capital ratio	36.36%	39.23%

(*) As a percentage of total risk exposure amount

The calculation of the capital requirement is detailed below:

<i>In Euros</i>	RWAs		Minimum Capital Requirements	
	31.12.2024	31.12.2023	31.12.2024	31.12.2023
Credit risk (excluding CCR)	132,400,972	112,283,193	9,589,168	8,982,655
Of which the standardised approach	132,400,972	112,286,193	9,589,168	8,982,655
Of which the foundation IRB (FIRB) approach	-	-	-	-
Of which the advanced IRB (AIRB) approach	-	-	-	-
Of which equity IRB under the simple risk-weighted approach or the IMA	-	-	-	-
CCR	-	-	-	-
Of which mark to market	-	-	-	-
Of which original exposure	-	-	-	-
Of which the standardised approach	-	-	-	-
Of which internal model method (IMM)	-	-	-	-
Of which risk exposure amount for contributions to the default fund of a CCP	-	-	-	-
Of which CVA	-	-	-	-
Settlement risk	-	-	-	-

Securitisation exposures in the banking book (after the cap)	-	-	-	-
Of which IRB approach	-	-	-	-
Of which IRB supervisory formula approach (SFA)	-	-	-	-
Of which internal assessment approach (IAA)	-	-	-	-
Of which standardised approach	-	-	-	-
Market risk	-	-	-	-
Of which the standardised approach	-	-	-	-
Of which IMA	-	-	-	-
Large exposures	-	-	-	-
Operational risk	47,524,150	39,165,362	3,801,932	3,133,229
Of which basic indicator approach	47,524,150	39,165,362	3,801,932	3,133,229
Of which standardised approach	-	-	-	-
Of which advanced measurement approach	-	-	-	-
Amounts below the thresholds for deduction (subject to 250% risk weight)	-	-	-	-
Floor adjustment	-	-	-	-
TOTAL	179,925,123	151,448,555	13,391,100	12,115,884

5.1.3. Leverage Ratio

The CRR framework requires the disclosure of information related to the Bank's leverage ratio. The EU Commission implementing regulation (EU) 2016/200 which sets down the implementing technical standards for the disclosure of the leverage ratio according to regulation (EU) 575/2013 specifies uniform templates for the purpose of these disclosures, which are detailed in this section.

The leverage ratio is a non-risk-based measure with the objective to limit an excessive build-up of leverage on a credit institution's balance sheet with the objective to contain the cyclicity of lending.

Although the CRR does not impose a minimum ratio, the Basel Committee on Banking Supervision has suggested a minimum ratio of 3%.

In this regard, the Bank has established specific monitoring procedures which ensure the proper monitoring, identification and management of risks associated with excessive leverage. The Bank has established an internal threshold limited at 6.66%, which is embedded in the risk appetite statement. The Bank monitors the leverage ratio on a quarterly basis, and it is reported to the Authorised Management and the Board of Directors. Results of the quarterly monitoring are used to calibrate the threshold on an ongoing basis.

As of December 31st, 2024, the Bank reported a leverage ratio equal to 7.46%.

Leverage Ratio breakdown

<i>In Euros</i>		31.12.2024	31.12.2023
On-balance sheet exposures			
1	On-balance sheet exposures (excluding derivatives and securities financing transactions (SFTs), but including collateral)	833,500,608	692,576,008
3	(Asset amounts deducted in determining Basel III Tier 1 capital)	-66,268	-91,169
7	Total on-balance sheet exposures (excluding derivatives and SFTs)	833,434,340	692,484,419
Derivative exposures			
8	Replacement cost associated with SA-CCR derivatives transactions (ie net of eligible cash variation margin)	-	-
9	Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions	-	-
EU-9b	Exposure determined under Original Exposure Method	76,412,405	57,567,297
10	(Exempted CCP leg of client-cleared trade exposures) (SA-CCR)	-	-
11	Adjusted effective notional amount of written credit derivatives	-	-
12	(Adjusted effective notional offsets and add-on deductions for written credit derivatives)	-	-
13	Total derivative exposures	76,412,405	57,567,297
Securities financing transaction exposures			
14	Gross SFT assets (with no recognition of netting), after adjusting for sale accounting transactions	-	-
15	(Netted amounts of cash payables and cash receivables of gross SFT assets)	-	-
16	CCR exposure for SFT assets	-	-
17	Agent transaction exposures	-	-
18	Total securities financing transaction exposures (sum of rows 12 to 15)	-	-
Off-balance sheet exposures			
19	Off-balance sheet exposure at gross notional amount	43,162,062	44,375,562
20	(Adjustments for conversion to credit equivalent amounts)	-	-
21	(General provisions deducted in determining Tier 1 capital and specific provisions associated with off-balance sheet exposures)	-	-
22	Off-balance sheet items	43,162,062	44,375,562
Tier 1 capital			
23	Tier 1 capital	65,428,290	59,410,830
24	Total exposures	876,596,402	794,427,697
Leverage ratio			
25	Leverage ratio	7.46%	7.48%
26	Regulatory minimum leverage ratio requirement (%)	3%	3%

Split-up of On Balance Sheet exposures (excluding derivatives, SFTs and exempted exposures)

		Leverage Ratio Exposure Value
EU-1	Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:	833,500,608
EU-2	Trading book exposures	-
EU-3	Banking book exposures, of which:	-
EU-4	Covered bonds	-
EU-5	Exposures treated as sovereigns	447,833,418
EU-6	Exposures to regional governments, MDB, international organizations and PSE NOT treated as sovereigns	
EU-7	Institutions	200,655,945
EU-8	Secured by mortgages of immovable properties	
EU-9	Retail exposures	1,559,807
EU-10	Corporate	171,594,093
EU-11	Exposures in default	
EU-12	Other exposures (e.g. equity, securitisations, and other non-credit obligation assets)	11,857,345

Leverage ratio reconciliation against published financial statements

1	Total assets as per published financial statements	799,130,277
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of regulatory consolidation	
3	(Adjustment for fiduciary assets recognized on the balance sheet pursuant to the applicable accounting framework but excluded from the leverage ratio exposure measure in accordance with Article 429(13) of Regulation (EU) No 575/2013 "CRR")	
8	Adjustments for derivative financial instruments	76,412,405
9	Adjustments for securities financing transactions "SFTs"	
10	Adjustment for off-balance sheet items (i.e. conversion to credit equivalent amounts of off-balance sheet exposures)	43,162,062
12	Other adjustments	-
13	TOTAL LEVERAGE RATIO EXPOSURE	876,596,402

5.1.4. Capital Buffers

As per requirements of CRR, Article 440, the Bank shall disclose information related to its compliance with the requirement for a countercyclical buffer referred to in Title VII, Chapter 4 of Directive 2013/36/EU.

Annex IV presents a breakdown of the geographical distribution of its credit exposures relevant for the calculation of its countercyclical capital buffer, as well as the amount of the institution's specific countercyclical capital buffer.

6. PILLAR 1 RISK CATEGORIES

6.1. Credit and Counterparty risk

Credit and counterparty risk arise from the potential failure of the Bank's borrowers or counterparties to fulfil their obligations. This risk is the most significant risk faced by the Bank in terms of regulatory capital requirements that arise from its lending activities.

Credit risk represents the Bank's largest regulatory capital requirement, although not one of the core business activities. The Risk is controlled through specific procedures, which provide the Bank with qualitative and quantitative tools which allow monitoring and limiting the credit risk according to the established risk appetite. The Bank's main credit risk comes from customer lending business, whereas counterparty risk is originated from its interbank activity.

Credit lending business is focused as part of global services offered to private clients and well-recognized corporates and funds, and fully collateralized by cash deposits or asset portfolios mainly in custody of the Bank. Specifically, any credit facility granted must be guaranteed by financial collateral, cash, or bank guarantees.

An internal procedure is in place which encompasses a setup of specific review and authorization steps for credit proposals. The procedure involves individual evaluation of the credit risk and approval by the Credit Committee of the Bank.

The collateral arrangements are periodically monitored by the Risk Management Department. The Bank has a very strict collateral policy related to credit lending and always requires a high level of collateralization when granting a loan. The credit risk is determined by the standardized approach as defined by CSSF's Circular 06/273.

As for counterparty risk, the Bank aims to have diversification of the risk between banking counterparties. The Bank has established a "credit rating" based methodology which is shared with the Parent Company. Depending on the obtained rating, and the overall risk appetite established by counterparty, a specific limit will be granted at local level.

The following tables give details on the requirements of regulatory capital by type of exposure as of the end of 2024:

<i>In Euros</i>	Exposures before CCF and CRM		Exposures post CCF and CRM		RWAs and RWA density		Own Funds
	On-balance sheet amount	Off-balance sheet amount	On-balance sheet amount	Off-balance sheet amount	RWAs	RWA density	TOTAL
Central governments or central banks	447,833,418	-	641,128,966	-	641,128,966	0%	-
Regional government or local authority	-	-	-	-	-	-	-
Public sector entities	-	-	-	-	-	-	-
Multilateral development banks	-	-	-	-	-	-	-
International organisations	-	-	-	-	-	-	-
Institutions	200,655,945	-	65,316,938	-	65,316,938	8%	12,536,372

Corporates	171,594,093	40,499,172	117,615,653	36,521,070	154,136,724	8%	106,877,162
Retail	1,559,807	2,662,890	1,559,807	2,662,890	4,222,697	8%	2,956,012
Secured by mortgages on immovable property	-	-	-	-	-	-	-
Exposures in default	-	-	-	-	-	-	-
Exposures associated with particularly high risk	-	-	-	-	-	-	-
Covered bonds	-	-	-	-	-	-	-
Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-
Collective investment undertakings	-	-	-	-	-	-	-
Equity	-	-	-	-	-	-	-
Other items	11,857,345	-	10,093,874	-	10,093,874	8%	10,031,426
Total	833,500,608	43,162,062	835,715,238	39,183,960	874,899,199	8%	132,400,972

During 2024, the Bank did not transfer any credit or counterparty risk by using securitization vehicles.

Credit risk exposure by exposure class

<i>In Euros</i>	ADJUSTED EXPOSURE	CAPITAL REQUIREMENT	% OF TOTAL CAPITAL REQUIREMENTS
Central governments or central banks	641,128,966	-	0%
Institutions	65,316,938	12,536,372	9.49%
Corporates	154,136,724	106,877,162	80.72%
Retail Customers	4,222,697	2,956,012	2.23%
Other	10,093,874	10,031,426	7.58%
TOTAL	874,899,199	132,400,972	100%

* 874,899,199: Exposure Net of Value adjustments and Provisions

* -1,763,470.55: Value adjustments and provisions associated with the original exposure

Credit risk exposure by geographic distribution

<i>In Euros</i>	LUXEMBOURG	EUROPEAN UNION	OTHER	TOTAL
Central governments or central banks	253,001,689	128,563,581	66,268,148	447,833,418
Institutions	30,555,136	10,875,519	159,225,290	200,655,945
Corporates	170,354,974	1,010,109	40,728,182	212,093,265
Retail Customers	1,656,095	2,507,890	58,712	4,222,697
Other	11,857,345	-	-	11,857,345

TOTAL	467,425,239	142,957,099	266,280,332	876,662,670
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The total amount of “Other” geographies in the table above are mainly composed by:

- Exposure related to “Institutions” mainly by 59% located in Andorra and 14% in United States of America.
- Exposure related to “Central governments or Central Banks” in the United States of America, representing 20% of the total amount.

Remaining exposures are located in countries not part of the European Union as well as countries located in America, Australia, Africa and Asia.

6.1.1. Non-Performing and Forborne Exposures

Performing and nonperforming exposures

<i>In Euros</i>	Gross carrying value of performing and non-performing exposures					
		Of which performing but past due > 30 days and <= 90 days	Of which performing forborne	Of which non-performing		
				Of which defaulted	Of which impaired	Of which forborne
Debt securities	194,915,190	-	-	-	-	-
Loans and advances	244,784,038	57,450.61	-	-	130,231	-
Off balance sheet exposures	43,162,062	-	-	-	-	-

The Bank held the following general impairment position:

<i>In Euros</i>	31.12.2024	31.12.2023
Impairments to Financial Institutions	-	22
Impairments to loans and advances	-94,083	539,886
Impairments to securities	-84,137	-83,364
TOTAL	-178,219	675,377

6.1.2. Changes in the stock of specific credit risk adjustments

In the application of Article 442 (i) in the CRR, the following table identifies the changes in the Bank’s stock of specific credit risk adjustments held against loans and debt securities that are defaulted or impaired.

Table EU CR2-A – Changes in the stock of general and specific credit risk adjustments

<i>In Euros</i>	Accumulated specific credit risk adjustment	Accumulated general credit risk adjustment
Opening balance	-539,886	-
Increases due to amounts set aside for estimated loan losses during the period	-	-
Decreases due to amounts reversed for estimated loan losses during the period	-	-
Decreases due to amounts taken against accumulated credit risk adjustments	-	-
Transfers between credit risk adjustments	-	-
Impact of exchange rate differences	-	-
Business combinations, including acquisitions and disposals of subsidiaries	-	-
Other adjustments	445,803	-
Closing balance	-94,083	-
Recoveries on credit risk adjustments recorded directly to the statement of profit or loss	-	-
Specific credit risk adjustments recorded directly to the statement of profit or loss	-	-

6.1.3. Changes in the stock of defaulted and impaired loans and debt securities

In the application of Article 442 (i) of the CRR, the following table identifies the changes in the Bank's stock of defaulted and impaired loans and debt securities for the year 2024.

<i>In Euros</i>	Gross carrying value defaulted exposures
Opening balance	241,567,631
Loans and debt securities that have defaulted or impaired since the last reporting period	130,231
Returned to non-defaulted status	-
Amounts written of	-
Other changes	-
At 31 December 2024 (closing balance)	241,696,862

6.1.4. Credit Risk Mitigation

Even though the core business of the Bank is not in pure lending activities, credit risk exposure is one of the most significant risks faced in terms of regulatory capital requirements.

The exposure is originated by its lending business (i.e., credit lines, loans, guarantees and Lombard loans) and counterparty risk from interbank cash deposits and settlement of obligations.

Therefore, to maintain proper control of its credit exposure, the Bank has established procedures for the evaluation, acceptance and monitoring of loans and advances to customers, as well as for the monitoring of exposure to counterparty risk.

At the same time, the Bank has established specific controls to ensure proper identification and mitigation of concentration risk. Either by client or volume, the Bank has established controls to ensure that regulatory requirements are properly identified and mitigated before the approval of any credit risk intake activity.

Customer Lending Business

On customer loans business, the Bank reviews and approves each proposal based on the rule of full collateralization, to mitigate its credit risk exposure. Collateralization is usually in the form of:

- Pledge of assets, either cash or eligible assets (with specific haircut applied), deposited in the client's accounts in the Bank, and pledged accordingly.
- First demand Bank Guarantees (mainly from the Parent Company) for the full amount of the loan granted.

Collateral accepted is formed mainly by cash deposits in major currencies (EUR, USD, or GBP) or assets which are considered as liquid (traded in major organized markets).

For those assets or currencies which doesn't fulfil these conditions, a specific haircut is determined and applied according to the Group's methodologies.

When assessing pledged assets, the Bank evaluates the pledged collateral, on an individual portfolio basis, and its ability to hold liquidity until the maturity of the lending facility it is related to. For this purpose, the Loan-to-Value (LTV) measurement is used as the basis for such evaluation.

As previously mentioned, the Bank has a very strict collateral policy related to lending and always requires a high level of collateralization when granting a loan. Assets pledged as collateral are evaluated individually and a haircut is applied individually according to the evaluation procedures of CAFG and applied automatically in the banking core system.

The value after haircut of each asset pledged will finally determine the overall value of the collateral and its effect in the LTV. The weighting therefore is not solely dependent on external credit ratings (provided by approved ECAs), but on a series of factors which will ensure convertibility throughout the life of the loan.

Also, the Bank considers that the rules applied for collateral weighting purposes are stringent in terms of final value assigned for collateralization of each asset. This allows that in case of stressed conditions of the market, which would result in a drop of value in any pledged asset, the movement in the LTV will not be proportional to the actual value of the pledged asset.

The Bank ensures that in case of stress of the market, there will be enough time to adequate the composition of the collateral portfolio and, in such case, terminate and realize the credit exposure with an expectation of no-loss.

The loans portfolio is monitored on a monthly basis to ensure proper coverage by assessing the collateral in place. The Bank has also established specific procedures to manage in-arrears, forborne and defaulted loans, so escalation is done on a timely manner.

In the case of first demand Bank Guarantees granted by the Parent Company, the Bank requires 100% coverage with European or US government issued bonds, which will be pledged to ensure risk transfer. The value of the bonds is affected by an individual haircut and their value is assessed daily.

The Bank applies general provisions to its lending portfolio as per the requirements of the IFRS9 impairment model, which considers the Expected Credit Losses (ECL) model. Under this model, the Bank applies a 12-month and a Lifetime ECL to all credits in the portfolio.

Finally, when deemed as necessary, the Bank will also apply specific impairments when: i) the collateral arrangements are insufficient and, ii) when there is specific evidence of events which might have an impact on the estimated future cash flows of the loans.

Counterparty Exposure

The Bank uses a procedure of request and approval of individual exposure limits. Exposure limits are evaluated at CAFG level as an overall exposure strategy by counterparty and by country. Under this procedure, the Bank gets assigned exposure limits which can accommodate its individual business needs. Where needed, the Bank signs specific agreements which allows to mitigate the counterparty risk (ISDA, CSA, GMRA, but not limited to these).

The Bank monitors the usage of the granted limits by individual counterparty daily. The utilization is reported to the relevant departments in the Bank, as well as to the Group, on a daily basis. Where collateral arrangements are in place, the Bank only accepts cash (Euros).

A specific procedure has been established in the Bank to identify and escalate any overdraft in the established limits, where the reasons for the incident as well as the identification of remedial actions are communicated to the relevant departments, as well as to the Authorised Management. The monitoring and controls are done daily, and an activity report is submitted to the BoD on a quarterly basis.

6.1.4.1. Encumbered and Unencumbered Assets

Below is the detail of Encumbered and Unencumbered assets as per the reporting related to EBA GL/2014/03. In this regard, the figures are based on the average value of the 4 quarters of the previous twelve-months.

As per the business model of the Bank, the assets should remain unpledged and therefore can be used for funding purposes. Any changes to this model should be approved by the Management Body.

Assets

		Carrying amount of encumbered assets	Fair value of encumbered assets	Carrying amount of unencumbered assets	Fair value of unencumbered assets
<i>In Euros</i>		010	040	060	090
010	Assets of the reporting institution	-		799,130,277	
020	Loans on demand	-		305,709,174	
030	Equity instruments	-	-	-	-
040	Debt securities	-	-	194,831,729	187,674,613
050	of which: covered bonds	-	-	-	-
060	of which: asset-backed securities	-	-	-	-
070	of which: issued by general governments	-	-	194,831,729	187,674,613

080	of which: issued by financial corporations	-	-	-	-
090	of which: issued by non-financial corporations	-	-	-	-
100	Loans and advances other than loans on demand	-	-	244,689,956	-
110	of which: mortgage loans	-	-	-	-
120	Other assets	-		53,899,419	

Collateral received

		Non-encumbered		
		Fair value of encumbered collateral received, or own debt securities issued	Fair value of collateral received, or own debt securities issued available for encumbrance	Nominal of collateral received or own debt securities issued non available for encumbrance
		010	040	070
In Euros				
130	Collateral received by the reporting institution	-	-	-
140	Loans on demand	-	-	-
150	Equity instruments	-	-	-
160	Debt securities	-	-	-
170	of which: covered bonds	-	-	-
180	of which: asset-backed securities	-	-	-
190	of which: issued by general governments	-	-	-
200	of which: issued by financial corporations	-	-	-
210	of which: issued by non-financial corporations	-	-	-
220	Loans and advances other than loans on demand	-	-	-
230	Other collateral received	-	-	-
240	Own debt securities issued other than own covered bonds or asset-backed securities	-	-	-

Sources of Encumbrance

	Matching liabilities, contingent liabilities or securities lent	Assets, collateral received, and own debt securities issued other than covered bonds and ABSs encumbered
	010	030
In Euros		
Carrying amount of selected financial liabilities	-	-
Derivatives	-	-
Deposits	-	-
Repurchase agreements	-	-
Other sources of encumbrance	-	-
TOTAL SOURCES OF ENCUMBRANCE	-	-

6.2. Market risk

Market risk is the risk of changes in market prices, interest rates, currencies or other economic factors that could cause a reduction in the value of assets or portfolio of assets. Market risk can arise from open market positions (either long or short) or imperfectly hedged positions. The Bank's exposure to market risk is mainly concentrated in foreign exchange rate and interest rate risk.

The Bank does not own a trading portfolio and as such is not subject to capital requirements to cover position risks. However, the bank is exposed to currency risk as it holds cash in different currencies.

The Bank's policy regarding the decisions to take foreign exchange positions is conservative and is to have enough cash to cover small operations from clients. However, an exchange risk on corporate credit lines as well as hedging spot/forward positions initiated by the clients, still exist. To control this market risk, the Risk Management department performs daily checks on the foreign currency exposure in the banking book against a specific currency.

The Bank does however face the potential of market risk in the form of interest rate risk (as a result of fluctuations in interest rates in connection with cash movements or borrowing or currency risk in operating business when recognising net revenues denominated in foreign currencies). In this regard, the business model of the Bank is reviewed in order to ensure that risks are correctly identified and mitigated, either by business line, or by overall Bank's activity.

6.2.1. Interest rate risk

As specified in its dedicated policy, the Bank covers the treasury market risk in operations on behalf of its clients. The Bank's policy normally accepts on exceptional basis commitments which exceed 6 months and requests to cover most of its position when it is for more than 30 days. However, due to the low sensitivity to movements in interest rates, no limits have been defined for this risk.

Stress tests are performed by the Bank, as per CSSF's Circular 08/338 as amended, which are done in a monthly basis. The methodology followed to perform the stress tests is by scenario simulation, taking into account those assets in the balance sheet that are sensitive to changes in interest rate. A calculation of the economic value and impact occur when the interest rates changes are performed, allowing to calculate the financial margin and the impact on the income statement. The stress tests are designed to determine the impact in the Capital position of the Bank, from an upward or downward movement of 200 basis points in the interest rates curves. On the other hand, the Bank has adopted the stress testing of the 6 scenarios as per EBA guidelines GL/2023/04. The results are evaluated internally against specific internal thresholds to ensure integration in the risk control framework.

As of December 31, 2024, the results of the stress test for a variation of +/-200 basis points on the interest rates were as followed:

Sensitivity	Economic Sensitivity Value
+200bp	1.16%
-200bp	-2.66%

Results of the 6 scenarios as per EBA Guidelines GL/2024/04 are the following:

Variation / Ec Val	VAN UP	VAN DOWN	VAN STEEPENER	VAN FLATTENER	VAN SHORTUP	VAN SHORTDOWN
Dec-24	1.16%	-2.66%	-0.32%	-0.30%	0.58%	-1.36%

6.3. Operational risk

Operational risk is defined as the risk of direct or indirect loss resulting from inadequate or failed internal processes, people, and systems or from external events. The objective of the administration structure of the Bank is to ensure the business functions and to have available the necessary support for their operations.

The operational risk capital requirement has been based on the CSSF Circular 06/273 Part XV, as amended. The Bank has elected the Basic Indicator Approach (“BIA”) for operational risk. The gross income indicator has been calculated based on accounting values for the last three years.

The total capital requirement for operational risk amounted, at the end of December 2024, to EUR 3.8 million.

While the Bank currently employs the BIA approach, the Bank bases its operational risk framework on the Principles for a Sound Management of Operational Risk from the Basel Committee in applying the Risk and Control Self-Assessment (“RCSA”) practice to analyse its risk profile as well as the adequacy of its control to cover it.

In this sense, the Bank has in place an operational risk management framework which promotes the need to timely identify and assess the activities, processes, and systems which are a potential source of operational risk related losses. The framework, as a consequence, promotes the self-identification and evaluation across all the processes of the Bank, as well as the implementation of a 4-eyes principle to limit risk as much as possible.

6.3.1. Reporting, measurement, and mitigation

For monitoring purposes, the Bank has set up a database tool developed by the Parent Company whose methodology is known and accepted by the Bank. The purpose of the tool is centralising all reported operational risk incidents in order to ensure the collection of the entire incidents as well as to monitor the operational risk profile of the Bank.

Consequently, all operational incidents (with and without a financial impact) are assessed and logged, in the form of an incident report. The incident report framework eases controlling the deficiencies through all the processes, better adapting risk management processes and refining back testing work.

The monitoring of this database is ensured by the Risk Management Department of the Bank, who ensures the collection and registration of all operational incidents through the database, based on report incidents received by the responsible business lines.

6.4. Liquidity risk

6.4.1. Overview

Liquidity risk is defined as the possibility of incurring losses when there are not enough cash or liquid resources to comply with the obligations assumed. The Bank is exposed to liquidity risk as it may lack enough liquidity to meet its daily payment obligations or incur refinancing costs in the event of liquidity stress.

The management of liquidity risk is detailed by the Bank's liquidity risk management procedure, which sets out the full coverage of the Bank's liquidity standards as required by the Regulator, including stress testing and scenario analysis. The Bank also uses reverse liquidity stress tests to ensure efficient liquidity management during potential market disruptions and idiosyncratic scenarios.

Strategy and Process

The Liquidity risk governance framework is defined by the Board of Directors, which mandates the elaboration of a specific Liquidity Risk Management procedure. The Bank has embedded specific liquidity risk indicators such as the Liquidity Coverage Ratio (LCR) and the Net Stable Funding Ratio (NSFR) in the Risk Appetite Statement. Other metrics have also been developed (i.e., Deposits Fluctuation), which are also part of the liquidity management framework. All the metrics have established internal thresholds which are reviewed, at least, annually.

The Bank takes a conservative approach to liquidity risk management, which requires that the Bank always meets the regulatory requirements on liquidity, as well as its ability to sustain a prolonged period of liquidity stress. In this regard, the Bank ensures that proper metrics and stress methodologies are in place.

Structure and Organization

The Board of Directors delegates the responsibility to manage liquidity risk to the Authorised Management daily.

The Risk Management function oversees the daily monitoring and reporting of liquidity ratios to ensure compliance with the internal and regulatory thresholds. The reports are submitted daily to the Authorised Management and on a quarterly basis to the Board of Directors.

The information reported to the Authorised Management and the Board of Directors serves for the purpose of testing the liquidity resilience of the Bank, and the identification of possible sources of liquidity stress and the effectiveness of the Bank's Recovery Plan, which would be invoked in the event of a liquidity crisis.

Liquidity Risk Management

The Bank, as a result of its usual business activities, acknowledges its exposure to Liquidity Risk when its access to funding markets is compromised either by stressed market movements or by other idiosyncratic events. The Bank considers liquidity risk on both assets and liabilities side, unfolding it into funding risk (liabilities) and market liquidity risk (assets).

Funding Liquidity risk is defined as the risk of not being able to meet efficiently both expected and unexpected current and future cash flow needs without affecting its daily operations. Market Liquidity risk

is defined as the inability to easily offset or eliminate a position at market price because of inadequate market depth or market disruptions.

In general terms and looking to ensure the maintenance of its liquidity risk profile, the Bank has established management strategies and guidelines which allow to mitigate possible shortfalls in liquidity. The Bank therefore manages its liquidity position by carefully forecasting the cash flows, closely monitoring liquidity limits, asset-liability mismatch assessment, and maintaining an adequate liquidity buffer.

The Bank mitigates liquidity risk through the maintenance of a liquidity reserve, formed by high quality, highly marketable assets, which can be converted in a reasonable time frame, or which could be eligible as collateral with no haircut. Cash management funds are also maintained to meet the withdrawals and lending needs of customers. The amount of funds is continually evaluated and adjusted to ensure its effectiveness.

As of December 31, 2024, the schedule of financial assets and liabilities is as follows:

Maturities of financial assets and liabilities (book value)

<i>In Euros</i>					
Instrument Category (Financial Assets)	≤ 3 months	> 3 m < 1 yr	> 1 yr < 5 yr	> 5 yr	Total
Treasury and balances with Central Banks	253,064,137	-	-	-	253,064,137
Financial Assets held for trading	41,103,578	2,568,785	133,182	-	43,805,545
Loans and advances to credit institutions	179,322,049	-	-	-	179,322,049
Loans and advances to customers	94,213,442	17,924,164	443,358	422,085	113,003,049
Investments held to maturity	-	-	194,831,729	-	194,831,729
TOTAL	417,642,950	21,973,434	220,130,621	549,789	784,026,509

<i>In Euros</i>					
Instrument Category (Financial Liabilities)	≤ 3 months	> 3 m < 1 yr	> 1 yr < 5 yr	> 5 yr	Total
Financial liabilities held for trading	41,026,556	2,567,598	133,190	-	43,727,345
Amounts owed to credit institutions	100,234,772	-	-	-	100,234,772
Customer Deposits	550,406,804	5,428,125	-	-	555,834,929
Guarantees	358,502	-	254,000	343,819	956,321
Engagements	-	36,425,250	6,176,065	26,684	42,627,998
Lease Liability	113,620	580,662	3,964,443	2,413,314	7,072,039
TOTAL	576,374,698	57,374,285	596,707	74,515	634,420,205

6.4.2. Reporting, measurement, and mitigation

As explained in the previous section, the Bank employs a range of liquidity risk assessments and stress tests to assess its ability to meet its obligations when they fall due.

The Bank performs daily assessment on the following regulatory ratios:

- **Liquidity Coverage Ratio (“LCR”):** The Liquidity Coverage Ratio requires financial institutions to hold a stock of liquid assets to cover the net cash outflow of the Bank over a period of 30 days. The net cash outflow is defined as the difference between the total cash outflows and the minimum between the total cash inflows and 75% of the total cash outflows.
- **The Net Stable Funding Ratio (“NSFR”):** The purpose of the Net Stable Funding Ratio (“NSFR”) is to ensure that banks hold a minimum amount of stable funding based on the liquidity characteristics of their assets and activities over a one-year horizon. The objective is to reduce maturity mismatches between the asset and liability items on the balance sheet and thereby reduce funding risks.

Additionally, the Bank also analyses metrics regarding depositor concentrations, geographical location, and currencies on top of quarterly stress tests to assess the Bank’s liquidity resilience.

Below is the calculation of the LCR disclosure template, as of December 31, 2024:

<i>In Euros</i>		Total unweighted value	Total weighted value
High-quality liquid assets			
1	Total HQLA		489,110,566
Cash outflows			
2	Retail deposits and deposits from small business customers, of which:	5,745,405	1,149,081
3	Stable deposits	-	-
4	Less stable deposits	5,745,405	1,149,081
5	Unsecured wholesale funding, of which:	554,798,670	535,256,596
6	Operational deposits (all counterparties) and deposits in networks of cooperative banks	20,099,178	5,024,795
7	Non-operational deposits (all counterparties)	534,669,491	530,231,801
8	Unsecured debt	-	-
9	Secured wholesale funding	-	-
10	Additional requirements, of which:	62,555,658	36,504,802
11	Outflows related to derivative exposures and other collateral requirements	20,349,917	20,349,917
12	Outflows related to loss of funding of debt products	-	-
13	Credit and liquidity facilities	42,205,741	16,154,885
14	Other contractual funding obligations	-	-
15	Other contingent funding obligations	956,321	-
16	TOTAL CASH OUTFLOWS		572,910,479
Cash inflows			
17	Secure Lending (e.g. reverse repos)	-	-
18	Inflows from fully performing exposures	-	-
19	Other cash inflows	165,485,956	163,971,348
20	TOTAL CASH INFLOWS	165,485,956	163,971,348

High-quality liquid assets			
			Total adjusted value
21	Total HQLA		489,110,566
22	Total net cash outflows		408,939,131
23	Liquidity coverage ratio (%)		119.61%

NSFR disclosure

Below is the calculation of the NSFR disclosure template, as of December 31, 2024:

		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	-	-	-	65,428,290	65,428,290
2	Own funds	-	-	-	65,428,290	65,428,290
3	Other capital instruments		-	-	-	-
4	Retail deposits		5,745,405	-	-	5,170,865
5	Stable deposits		-	-	-	-
6	Less stable deposits		5,745,405	-	-	5,170,865
7	Wholesale funding:		657,549,198	5,428,125		22,813,241
8	Operational deposits		20,099,178	-	-	10,049,589
9	Other wholesale funding		637,450,020	5,428,125	-	12,763,652
10	Interdependent liabilities		-	-	-	-
11	Other liabilities:	854,615	30,819,480	-	-	-
12	NSFR derivative liabilities	854,615				
13	All other liabilities and capital instruments not included in the above categories		30,819,480	-	-	-
14	Total available stable funding (ASF)					87,085,881
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					-
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool		-	-	-	-
16	Deposits held at other financial institutions for operational purposes		-	-	-	-
17	Performing loans and securities:		290,203,881	6,317,480	938,528	28,911,161

18	<i>Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut</i>		-	-	-	
19	<i>Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions</i>		234,280,492	-	73,084	23,501,134
20	<i>Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:</i>		3,031,321	6,317,480	865,443	5,410,027
21	<i>With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk</i>		-	-	-	-
22	<i>Performing residential mortgages, of which:</i>		-	-	-	-
23	<i>With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk</i>		-	-	-	-
24	<i>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</i>		-	-	-	-
25	Interdependent assets		-	-	-	-
26	Other assets:	27,209,615	-	-	-	3,395,129
27	<i>Physical traded commodities</i>				-	-
28	<i>Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs</i>				-	-
29	<i>NSFR derivative assets</i>				-	-
30	<i>NSFR derivative liabilities before deduction of variation margin posted</i>				17,178,189	858,909
31	<i>All other assets not included in the above categories</i>		10,031,426	-	-	5,015,713
32	Off-balance sheet items		42,205,741	-	-	2,110,287
33	Total RSF					38,896,070
34	Net Stable Funding Ratio (%)					236.03%

6.4.3. Declaration of adequacy

The Management Body consider that the Bank's liquidity risk management framework, controls and systems in place are adequate and satisfactory with regards to the Bank's profile and strategy.

7. REMUNERATION DISCLOSURE

7.1. Context, Objectives and Scope of Application

The Bank has adopted a Remuneration Policy (hereinafter the “Policy”) which defines and describes its remuneration principles and practices in accordance with European and Luxembourg regulatory requirements on remuneration, including but not limited to:

- The Law of 5 April 1993 on the financial sector (“LFS”), as amended;
- Regulations (EU) 2019/2088 and 2019/876 concerning disclosure requirements and Implementing Regulation 2021/637 laying down publication technical standards;
- Commission Delegated Regulation (EU) 2021/923 on qualitative and quantitative criteria to identify categories of staff whose professional activities have a significant impact on the institution’s risk profile;
- CSSF Circulars 22/797, 15/622, 23/841, 12/522 (as amended);
- EBA Guidelines on sound remuneration policies under Directive 2013/36/EU (EBA/GL/2021/04).

In addition, this Policy is aligned with the overarching framework of the Crédit Andorrà Financial Group on remuneration policies and practices.

The general principles of this Policy apply to all employees of the Bank.

7.2. Guiding Principles and Objectives

The Policy aims at promoting sound and effective risk management and discouraging risk-taking behaviors that would exceed the Bank’s risk appetite. It is consistent with the Bank’s and Group’s economic strategy, objectives, values and long-term interests, and includes measures to prevent conflicts of interest.

The Policy is based on five key guiding principles:

- **Sound and Effective Risk Management**

The Policy and associated remuneration practices are intended to protect the long-term interests of the Bank’s clients, employees, shareholders and the Bank’s financial sustainability in the long run.

Variable remuneration is defined so as not to undermine the Bank’s sound capital base.

- **Attractive, Competitive and Merit-Based Remuneration**

In order to ensure client satisfaction and protection remain central to its philosophy, the Bank aims to attract, retain and motivate talented individuals in their respective areas. Remuneration conditions are designed to be market-aligned and attractive.

Fixed remuneration is defined in a non-discretionary way and reflects the employee’s level of professional experience, skills, and responsibilities.

- **Alignment Between Performance, Risks and Variable Remuneration**

Variable remuneration, while an integral part of the Bank's remuneration conditions, is linked to effective performance and subject to strict evaluation rules to avoid behaviors leading to excessive or misaligned risk-taking.

- **Responsible Conduct**

This Policy encourages responsible conduct by all staff, particularly those providing client services, and ensures fair treatment of clients and avoidance of conflicts of interest in client relations. Moreover, the Bank ensures that remuneration and performance evaluations are not designed in a way that would compromise its obligation to act in the best interest of clients.

- **Principle of Neutrality**

To ensure equal treatment and pay for all employees, the Bank considers each employee's skills, qualifications, and experience, and guarantees equal pay for equal work or work of equal value, irrespective of gender or gender identity.

7.3. RISK PROFILE AND MATERIAL RISK TAKERS

7.3.1. Bank Activities

The Bank has been operating in Luxembourg since 2010, employs fewer than 110 staff, and is primarily active in asset servicing, and to a lesser extent, in private banking. The Bank has no subsidiaries, nor branches, does not engage in proprietary trading, and acts solely as an agent for its clients.

The Bank is not active in investment banking and does not issue consumer or mortgage loans, except for personal loans granted to employees under employment contracts.

7.3.2. Identification of Material Risk Takers (MRTs)

Each year, and on a continuous basis as specific events arise (e.g., appointments, new hires, organizational changes, or other relevant developments), the Bank carries out a detailed analysis to identify staff whose professional activities may have a material impact on the Bank's risk profile: these are the Material Risk Takers" (MRTs) or the "Identified Staff".

This process, which is conducted in strict compliance with regulatory requirements and guidelines, is initiated by the Human Resources department, subsequently reviewed by the Risk Management and Compliance departments, the Executive Committee, the Nomination & Remuneration Committee, and ultimately approved by the Bank's Board of Directors.

Retained MRTs are informed of their status at the start of the Performance Year.

In 2024, the list of Material Risk Takers was as follows:

Category	Number of Material Risk Takers
Management Body – Supervisory Function	7
Management Body – Management Function	2
Senior Management and other Material Risk Takers <ul style="list-style-type: none"> - Head of Strategy & Business Development - Head of Depositary Development & Advisory - Head of Wealth Management - Head of Corporate and Fund Services - Head of Depositary and Paying Agent Services - Head of Client & Investor Services - Head of Finance & General Services - Head of IT - Head of Human Resources 	9
Control Functions <ul style="list-style-type: none"> - Chief Internal Auditor - Chief Risk Officer - Chief Compliance Officer 	3
Total	21

7.3.3. Application of the Proportionality Principle

Considering that:

- The Bank’s activities remain limited to the Group’s core businesses of asset servicing, and to a lesser extent, private banking;
- The Bank applies a conservative risk management approach, resulting in limited exposure to risks;
- The Bank is of relatively small size, and has no subsidiaries nor branches;
- The Bank’s internal organization is simple, and decisions are made in a collective and traceable manner;
- The Bank’s asset value has remained below EUR 5 billion for the past four years;

The Bank chose to apply the proportionality principle (art. 94 (3a) CRD, art. 38-6 (2a) LFS), hereby neutralizing for all Material Risk Takers the requirements concerning:

- The payment of at least 50% of variable remuneration in financial instruments (and the related retention obligations);
- The deferral of at least 40% of variable remuneration over 4 to 5 years (and the related ex-post risk adjustments (malus)).

7.4. PERFORMANCE MANAGEMENT

7.4.1. Performance Evaluation System

The Bank conducts an annual performance evaluation for all staff members, at all levels. This evaluation is used both to support career development and to determine eligibility for variable remuneration.

At the beginning of each financial year (or Performance Year), every employee agrees on their objectives with their line manager. These objectives are derived from the Group's and the Bank's mission, guiding principles, and vision, as well as the operational goals of the relevant department. They take into account expected results at three levels: (i) the Bank, (ii) the employee's department, and (iii) the individual employee.

Objectives play a key role in performance management and personal development planning. They are defined, wherever possible, according to the SMART framework (Specific, Measurable, Achievable, Realistic, Time-bound).

Objectives include both quantitative and qualitative components and are weighted as per their relevance.

For certain roles such as Relationship Managers, while quantitative financial targets may be set, these are always balanced with qualitative objectives related to compliance with internal rules, ethics, anti-money laundering procedures, integrity, and teamwork. From a general standpoint, the Bank always ensures appropriate procedures are in place to prevent conflicts of interest for employees who interact with clients, whether directly or indirectly.

Finally, the evaluation criteria of employees in Control Functions (Compliance, Risk Management, Internal Audit) are linked solely to function-related objectives and are consequently completely independent of the performance of the business areas they control.

7.4.2. Link Between Performance and Variable Remuneration

In conjunction with the *top-down* process aiming at defining the available bonus pool at the level of the Bank (described in the next section), the individual performance review results in a mathematical scoring that is directly linked with the determination of the individual variable remuneration amount. This process is performed by the team managers under the guidance and leadership of Human Resources and the Executive Committee.

The Nomination and Remuneration Committee and, ultimately, the Board of Directors oversee the evaluation process and review and validate the variable remuneration of Material Risk Takers.

7.5. BONUS ALLOCATION PROCESS

The process for determining the global bonus pool at the level of the Bank is established as follows:

- The Executive Committee, with the support from the Finance and Risk Management departments, determines the global variable remuneration pool on the basis of *inter alia* historical data, the Bank's financial results for the Performance Year, budget forecasts, and any exceptional factors, and pays specific attention to avoid any negative impact on the Bank's sound capital base in the short, medium, or long term.

- The global bonus pool so defined is then reviewed by the Nomination & Remuneration Committee before being submitted to the Board of Directors for final approval.

As mentioned earlier, variable remuneration is contingent not only on individual performance evaluations but also on the financial situation of the Group, the Bank, and the relevant departments. At all times, the Bank ensures that the payment of variable remuneration does not jeopardize its financial stability. As such, poor financial results may lead to a general reduction or elimination of the bonus pool, regardless of individual performance.

Variable remuneration is never guaranteed, neither in principle nor in amount.

7.6. REMUNERATION STRUCTURE

7.6.1. Structure and Equal Treatment

The Bank offers its employees a remuneration structure based on two components: fixed and variable remuneration. The Bank also ensures gender pay equality for identical positions, while taking into account years of experience and/or seniority.

More broadly, the Bank guarantees that all employees are treated equally, without any form of distinction, exclusion, restriction, or preference, whether direct or indirect, based on age, sex, sexual orientation, marital status, religion, language, ethnic or national origin, physical or mental disability, pregnancy or parental status, personal beliefs, political opinions, or trade union affiliation or activities.

7.6.2. Fixed Remuneration

Fixed remuneration consists of an annual base salary paid monthly and is determined based on the employee's role, responsibilities, competencies, expertise, and experience.

The Bank applies the remuneration conditions defined by the Luxembourg Collective Bargaining Agreement for banking employees, where relevant.

Fixed remuneration also includes certain non-discretionary, non-performance-related fringe benefits (such as supplementary health insurance, disability/death insurance, etc.).

7.6.3. Variable Remuneration

As previously mentioned, variable remuneration is linked to performance evaluation at the individual, departmental, and Bank levels through both quantitative and qualitative criteria, aligning employees' interests with those of the Bank's stakeholders.

Fixed and variable remuneration components are appropriately balanced. Fixed remuneration represents a sufficiently high proportion of total compensation to allow the Bank's full discretion over bonus payments. As such, the Bank reserves the right to reduce or cancel variable remuneration in the event of unsatisfactory performance at the individual, departmental, or institutional level.

The remuneration of employees in Control Functions (Compliance, Risk Management, Internal Audit) is predominantly fixed to reflect the nature of their responsibilities.

Environmental, social, and governance (ESG) risks are also taken into account in assessing both fixed and variable remuneration.

7.6.4. Variable Remuneration Rules and Limits

For all employees, where applicable, variable remuneration is paid between March and May of the year following the Performance Year.

All staff members are required to commit not to use personal hedging strategies or insurance linked to remuneration or liability to undermine the risk alignment embedded in their remuneration terms.

With regard to the variable remuneration of Material Risk Takers, the Bank applies the following limits:

Category	Maximum Variable Remuneration (% of Fixed)	Comments
Management Body – Supervisory Function	N/A	Board Members do not receive variable remuneration
Management Body – Management Function	100%	-
Senior Management and Other Material Risk Takers	100%	-
Control Functions, incl. Head of HR and Finance <ul style="list-style-type: none"> - Chief Internal Auditor - Chief Risk Officer - Chief Compliance Officer - Head of Human Resources - Head of Finance 	30%	-

As of today, no employee has a total remuneration exceeding EUR 1 million.

7.7. Special clauses

7.7.1. Adjustments to Variable Remuneration

The Bank reserves the right to apply a claw back clause to variable remuneration already paid in the event of proven fraud, misconduct, or gross error by the staff member, including breaches of the Code of Conduct or other internal rules.

7.7.2. Guaranteed Variable Remuneration

Guaranteed variable remuneration (e.g. welcome bonus) is exceptional and may only be granted upon recruitment of new staff, and is limited to the first year of employment, provided the institution has a sound and solid capital base.

Guaranteed variable remuneration is not permitted in the context of employment termination. Any severance payments will reflect actual sustained performance and may not reward failure or misconduct.

7.7.3. Long Term Incentive Plan (LTIP)

The Bank has introduced the possibility of offering a Long-Term Incentive Plan (LTIP) to a very limited number of key contributors who play a major role in the Bank's value creation. Eligibility is assessed by the Nomination & Remuneration Committee and submitted to the Board of Directors for approval.

Objectives are evaluated over a 3-year period and based on the Bank's value creation, as well as individual performance and behavior. If conditions are met, eligible participants receive a cash award, 60% of which is deferred pro rata over three years to allow for ex-post risk adjustments such as malus and claw backs.

7.7.4. Discretionary Pension Benefits

The Bank does not offer discretionary pension benefits.

7.8. GOVERNANCE

7.8.1. The Board of Directors

The Board of Directors adopts and periodically reviews the general principles of the Remuneration Policy and is responsible for overseeing its implementation.

The Board ensures that the Policy and remuneration practices align with the institution's overall corporate governance framework, corporate culture, business strategy, risk appetite framework, and long-term interests.

The Board considers input from all relevant functions involved in remuneration, including Control Functions and Human Resources, regarding the design, implementation, and oversight of the Policy.

The Board ensures that the Policy and remuneration practices are reviewed annually by the Internal Audit department to ensure compliance with applicable regulations and effectiveness.

The Board is supported in these responsibilities by the Nomination & Remuneration Committee, which assists particularly with matters relating to the remuneration governance framework, including the oversight of performance assessment and remuneration of Material Risk Takers, and the Heads of Control Functions. The Board is responsible for reviewing and approving the Committee's recommendations on these matters.

In 2024, no significant changes occurred with regards to the Remuneration Policy.

7.8.2. The Nomination & Remuneration Committee

The Nomination & Remuneration Committee assists the Board of Directors in fulfilling its responsibilities under the applicable legal and regulatory framework. More precisely, the Committee plays a central role in nomination and remuneration-related matters by supporting the Board in:

- The selection, appointment, succession planning, and dismissal of members of the Board of Directors, the Authorised Management, Key Function Holders and Material Risk Takers;
- The design, maintenance, and oversight of the Remuneration Policy, ensuring that it is aligned with the institution's risk profile, business strategy, long-term interests, and values;
- The definition and regular review of remuneration packages and, where relevant, incentive structures for members of the Board of Directors, the Authorized Management, Key Function Holders and Material Risk Takers;
- Ensuring that the Policy is gender-neutral, supports equal pay for equal work, and complies with the institution's diversity and inclusion commitments;
- Overseeing the performance evaluation process for Material Risk Takers, including the Heads of Control functions;
- Ensuring the Policy is reviewed at least annually and recommending updates to the Board of Directors as needed;
- Reviewing public disclosures on remuneration;
- Assessing the effectiveness and appropriateness of remuneration structures, including the application of ex-post risk adjustment tools such as malus and claw back.

As of 31 December 2024, the Committee is composed of 3 permanent members selected from the Board of Directors, as follows:

Name	Role	Nature
Jean-Pascal Nepper	Chairman	Independent Director
Xavier Cornella	Deputy Chairman	Group CEO
Geoffroy Bazin	Member	Independent Director

The Committee may involve in its work and invite to its meetings any person whose contribution it deems useful, such as the Head of the Human Resources Department, another Board Member or an independent external expert.

In 2024, the services of an external provider, HACA Partners Sàrl, were engaged to support the performance of the annual internal audit of the Remuneration Policy.

In 2024, the Nomination and Remuneration Committee held 8 meetings.

7.8.3. The Executive Committee

Under the supervision of the Board and the Nomination & Remuneration Committee, and supported by Human Resources and the Control Functions, the Executive Committee is responsible for the operational implementation of the Remuneration Policy.

7.8.4. Human Resources & Control Functions

The roles and responsibilities of Human Resources and Control Functions in developing and reviewing the Policy are as follows:

Human Resources

Human Resources contribute actively to defining and maintaining the Policy, including but not limited to, the remuneration structure and levels, the performance management and evaluation process, and the identification of Material Risk Takers.

Compliance

The Compliance Function ensures that the Policy, both in its design and implementation, complies with applicable laws, internal rules, and policies. It reports any compliance risks or breaches to the Board and takes an active part in the identification process of Material Risk Takers.

Risk Management

The Risk Management Function provides the necessary information to define appropriate risk-adjusted performance measures and to assess how the variable remuneration structure impacts the Bank's risk profile and appetite. The Risk Management function also plays an active role in the identification process of Material Risk Takers and in the definition process of the global variable remuneration pool. Finally, the Risk Management Function validates and assesses data related to risk adjustment and is invited to attend meetings of the Nomination and Remuneration Committee on these matters.

Internal Audit

The Internal Audit Function conducts an independent review of the design, implementation, and effects of the Bank's Remuneration Policy on its risk profile, as well as of how these effects are managed, and reports its findings to the Board of Directors.

7.9. Remuneration tables

7.9.1. EU REM1 - Remuneration awarded for the financial year

			a	b	c	d
			MB Supervisory function	MB Management function	Other senior management	Other identified staff
1	Fixed remuneration	Number of identified staff	7	2	9	3
2		Total fixed remuneration	262.800€*	1.109.120€	2.740.204€	550.025€
3		Of which: cash-based	262.880€	910.031€	2.538.287€	474.215€
4		(NA in the EU)				
EU-4a		Of which: shares or equivalent ownership interests				
5		Of which: share-linked instruments or equivalent non-cash instruments				
EU-5x		Of which: other instruments				
6		(NA in the EU)				
7		Of which: other forms		199.089€	201.916€	75.809€
8	(NA in the EU)					
9	Variable remuneration	Number of identified staff		2	9	3
10		Total variable remuneration		136.880€	667.173€	94.287€
11		Of which: cash-based		136.880€	667.173€	94.287€
12		Of which: deferred				
EU-13a		Of which: shares or equivalent ownership interests				
EU-14a		Of which: deferred				
EU-13b		Of which: share-linked instruments or equivalent non-cash instruments				
EU-14b		Of which: deferred				
EU-14x		Of which: other instruments				
EU-14y		Of which: deferred				
15	Of which: other forms					
16	Of which: deferred					
17	Total remuneration (2 + 10)		262.800€	1.246.000€	3.407.377€	644.312€

*As of July 1st, the number of MB Supervisory function was set at four.

7.9.2. EU REM2 - Special payments to staff whose professional activities have a material impact on institutions' risk profile (identified staff)

		a	b	c	d
		MB Supervisory function	MB Management function	Other senior management	Other identified staff
Guaranteed variable remuneration awards					
1	Guaranteed variable remuneration awards - Number of identified staff				
2	Guaranteed variable remuneration awards -Total amount				
3	Of which guaranteed variable remuneration awards paid during the financial year, that are not taken into account in the bonus cap				
Severance payments awarded in previous periods, that have been paid out during the financial year					
4	Severance payments awarded in previous periods, that have been paid out during the financial year - Number of identified staff				
5	Severance payments awarded in previous periods, that have been paid out during the financial year - Total amount				
Severance payments awarded during the financial year					
6	Severance payments awarded during the financial year - Number of identified staff			1	
7	Severance payments awarded during the financial year - Total amount			86.978€	
8	Of which paid during the financial year			86.978€	
9	Of which deferred				
10	Of which severance payments paid during the financial year, that are not taken into account in the bonus cap				
11	Of which highest payment that has been awarded to a single person				

7.9.3. EU REM3 - Deferred remuneration

Not-applicable - The Bank applies the proportionality principle (art. 94 (3a) CRD, art. 38-6 (2a) LFS)

7.9.4. EU REM4 - Remuneration of 1 million EUR or more per year

Not-applicable - No employee has a total remuneration exceeding EUR 1 million.

7.9.5. EU REM5 - Information on remuneration of staff whose professional activities have a material impact on institutions' risk profile (identified staff)

		a	b	c	d	e	f	g	h	i	j
		Management body remuneration			Business areas						
		MB Supervisory function	MB Management function	Total MB	Investment banking	Retail banking	Asset management	Corporate functions	Independent internal control functions	All other	Total
1	Total number of identified staff										21
2	Of which: members of the MB	7	2	9							
3	Of which: other senior management						3		3	3	
4	Of which: other identified staff							3			
5	Total remuneration of identified staff	262.800€	1.246.000€	1.508.800€			2.132.273€	644.312€	645.415€	527.233€	
6	Of which: variable remuneration		136.880€	136.880€			482.840€	94.287€	81.878€	102.455€	
7	Of which: fixed remuneration	262.800€	1.109.120€	1.371.920€			1.649.433€	550.025€	563.537€	629.688€	

ANNEX I

Capital instruments' main features template (1)		
1	Issuer	N/A
2	Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)	N/A
3	Governing law(s) of the instrument	N/A
	<i>Regulatory treatment</i>	N/A
4	Transitional (CRR) rules	N/A
5	Post-transitional (CRR) rules	N/A
6	Eligible at solo/(sub-)consolidated/solo & (sub-)consolidated	N/A
7	Instrument type (types to be specified by each jurisdiction)	N/A
8	Amount recognized in regulatory capital (currency in million, as of most recent reporting date)	N/A
9	Nominal amount of instrument	N/A
9a	Issue price	N/A
9b	Redemption price	N/A
10	Accounting classification	N/A
11	Original date of issuance	N/A
12	Perpetual or dated	N/A
13	Original maturity date	N/A
14	Issuer call subject to prior supervisory approval	N/A
15	Optional call date, contingent call dates and redemption amount	N/A
16	Subsequent call dates, if applicable	N/A
	<i>Coupons / dividends</i>	N/A
17	Fixed or floating dividend / coupon	N/A
18	Coupon rate and any related index	N/A
19	Existence of a dividend stopper	N/A
20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	N/A
20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	N/A
21	Existence of step up or other incentive to redeem	N/A
22	Noncumulative or cumulative	N/A
23	Convertible or non-convertible	N/A
24	If convertible, conversion trigger(s)	N/A
25	If convertible, fully or partially	N/A
26	If convertible, conversion rate	N/A
27	If convertible, mandatory or optional conversion	N/A
28	If convertible, specify instrument type convertible into	N/A
29	If convertible, specify issuer of instrument it converts into	N/A
30	Write-down features	N/A
31	If write-down, write-down trigger(s)	N/A
32	If write-down, full or partial	N/A
33	If write-down, permanent or temporary	N/A
34	If temporary write-down, description of write-up mechanism	N/A
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	N/A
36	Non-compliant transitioned features	N/A
37	If yes, specify non-compliant features	N/A
(1) 'N/A' inserted if the question is not applicable		

ANNEX II

Own funds disclosure

Common Equity Tier 1 capital: instruments and reserves (1)		31/12/2023	(B) REGULATION (EU) No 575/2013 ARTICLE REFERENCE
1	Capital instruments and the related share premium accounts	27,500,000	26 (1), 27, 28, 29
	of which: Instrument type 1		EBA list 26 (3)
	of which: Instrument type 2		EBA list 26 (3)
	of which: Instrument type 3		EBA list 26 (3)
2	Retained earnings	29,996,668	26 (1) (c)
3	Accumulated other comprehensive income (and any other reserves)	7,997,890	26 (1)
3a	Funds for general banking risk		26 (1) (f)
4	Amount of qualifying items referred to in Article 484 (3) and the related share premium accounts subject to phase out from CET1		486 (2)
5	Minority interests (amount allowed in consolidated CET1)		84,
5a	Independently reviewed interim profits net of any foreseeable charge or dividend		26 (2)
6	Common Equity Tier 1 (CET1) capital before regulatory adjustments	65,494,558	sum of rows 1 to 5a
Common Equity Tier 1 (CET1) capital: regulatory adjustments			
7	Additional value adjustments (negative amount)	-66,268	34, 105
8	Intangible assets (net of related tax liability) (negative amount)		36 (1) (b), 37
9	Empty set in the EU		
10	Deferred tax assets that rely on future profitability excluding those arising from temporary difference (net of related tax liability where the conditions in Article 38 (3) are met) (negative amount)	-	36 (1) (c), 38
11	Fair value reserves related to gains or losses on cash flow hedges		33 (a)
12	Negative amounts resulting from the calculation of expected loss amounts		36 (1) (d), 40, 159
13	Any increase in equity that results from securitised assets (negative amount)		32 (1)
14	Gains or losses on liabilities valued at fair value resulting from changes in own credit standing		33 (1) (b)
15	Defined-benefit pension fund assets (negative amount)		36 (1) (e), 41
16	Direct and indirect holdings by an institution of own CET1 instruments (negative amount)		36 (1) (f), 42
17	Direct, indirect and synthetic holdings of the CET1 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)		36 (1) (g), 44
18	Direct, indirect and synthetic holdings 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)		36 (1) (h), 43, 45, 46, 49 (2) (3), 79
19	Direct, indirect and synthetic holdings 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)		36 (1) (i), 43, 45, 47, 48 (1) (b), 49 (1) to (3), 79
20	Empty set in the EU		
20a	Exposure amount of the following items which qualify for a RW of 1250%, where the institution opts for the deduction alternative		36 (1) (k)
20b	of which: qualifying holdings outside the financial sector (negative amount)		36 (1) (k) (i), 89 to 91

20c	of which: securitisation positions (negative amount)		36 (1) (k) (ii) 243 (1) (b) 244 (1) (b) 258
20d	of which: free deliveries (negative amount)		36 (1) (k) (iii), 379 (3)
21	Deferred tax assets arising from temporary difference (amount above 10 % threshold, net of related tax liability where the conditions in Article 38 (3) are met) (negative amount)		36 (1) (c), 38, 48 (1) (a)
22	Amount exceeding the 15% threshold (negative amount)		48 (1)
23	of which: 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		36 (1) (i), 48 (1) (b)
24	Empty set in the EU		
25	of which: deferred tax assets arising from temporary difference		36 (1) (c), 38, 48 (1) (a)
25a	Losses for the current financial year (negative amount)		36 (1) (a)
25b	Foreseeable tax charges relating to CET1 items (negative amount)		36 (1) (l)
26	Regulatory adjustments applied to Common Equity Tier 1 in respect of amounts subject to pre-CRR treatment		
27	Qualifying AT1 deductions that exceeds the AT1 capital of the institution (negative amount)		36 (1) (j)
28	Total regulatory adjustments to Common Equity Tier 1 (CET1)	-66,268	Sum of rows 7 to 20a,21,22 and 25a to 27
29	Common Equity Tier 1 (CET1) capital	65,428,290	Row 6 minus row 28
Additional Tier 1 (AT1) capital: instruments			
30	Capital instruments and the related share premium accounts		51, 52
31	of which: classified as equity under applicable accounting standards		
32	of which: classified as liabilities under applicable accounting standards		
33	Amount of qualifying items referred to in Article 484 (4) and the related share premium accounts subject to phase out from AT1		486 (3)
34	Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interest not included in row 5) issued by subsidiaries and held by third parties		85, 86
35	of which: instruments issued by subsidiaries subject to phase-out		486 (3)
36	Additional Tier 1 (AT1) capital before regulatory adjustments	-	Sum of rows 30,33 and 34
Additional Tier 1 (AT1) capital: regulatory adjustments			
37	Direct and indirect holdings by an institution of own AT1 instruments (negative amount)		52 (1) (b), 56 (a), 57
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)		56 (b), 58
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)		56 (c), 59, 60, 79, 475 (4)
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)		56 (d), 59, 79
41	Empty set in the EU		
42	Qualifying T2 deductions that exceed the T2 capital of the institution (negative amount)		56 (e)
43	Total regulatory adjustments to Additional Tier 1 (AT1) capital	-	Sum of rows 37 to 42

44	Additional Tier 1 (AT1) capital	-	Row 36 minus row 43
45	Tier 1 capital (T1 = CET1 + AT1)	65,428,290	Sum of row 29 and row 44
Tier 2 (T2) capital: instruments and provisions			
46	Capital instruments and the related share premium accounts		62, 63
47	Amount of qualifying items referred to in Article 484 (5) and the related share premium accounts subject to phase out from T2		486 (4)
48	Qualifying own funds instruments included in consolidated T2 capital (including minority interest and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties		87, 88
49	of which: instruments issued by subsidiaries subject to phase-out		486 (4)
50	Credit risk adjustments		62 (c) & (d)
51	Tier 2 (T2) capital before regulatory adjustment	-	
Tier 2 (T2) capital: regulatory adjustments			
52	Direct and indirect holdings by an institution of own T2 instruments and subordinated loans (negative amount)		63 (b) (i), 66 (a), 67
53	Holdings of the T2 instruments and subordinated loans of financial sector entities where those entities have reciprocal cross holdings with the institutions designed to inflate artificially the own funds of the institution (negative amount)		66 (b), 68
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)		66 (c), 69, 70, 79
55	Direct, indirect and synthetic holdings 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 amounts)		66 (d), 69, 79
56	Empty set in the EU		
57	Total regulatory adjustments to Tier 2 (T2) capital	-	Sum of rows 52 to 56
58	Tier 2 (T2) capital	-	Row 51 minus row 57
59	Total capital (TC = T1 + T2)	65,428,290	Sum of row 45 and row 58
60	Total risk-weighted assets		
Capital ratios and buffers			
61	Common Equity Tier 1 (as a percentage of total risk exposure amount)	36.36%	92 (2) (a)
62	Tier 1 (as a percentage of total risk exposure amount)	36.34%	92 (2) (b)
63	Total capital (as a percentage of total risk exposure amount)	36.34%	92 (2) (c)
64	Institution specific buffer requirement (CET1 requirement in accordance with article 92 (1) (a) plus capital conservation and countercyclical buffer requirements plus a systemic risk buffer, plus systemically important institution buffer expressed as a percentage of total risk exposure amount) ¹⁾	14.07%	CRD 128, 129, 130,131,133
65	of which: capital conservation buffer requirement	2.50%	
66	of which: countercyclical buffer requirement	0.30%	
67	of which: systemic risk buffer requirement	0.0%	
67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer	0.0%	
68	Common Equity Tier 1 available to meet buffers (as a percentage of risk exposure amount) ²⁾	36.34%	CRD 128
69	[non-relevant in EU regulation]		
70	[non-relevant in EU regulation]		
71	[non-relevant in EU regulation]		
Amounts below the thresholds for deduction (before risk-weighting)			

72	Direct and indirect holdings of the capital of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions)		36 (1) (h), 45, 46, 56 (c), 59, 60, 66 (c), 69, 70
73	Direct and indirect holdings of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 10% threshold and net of eligible short positions)		36 (1) (i), 45, 48
74	Empty set in the EU		
75	Deferred tax assets arising from temporary difference (amount below 10 % threshold, net of related tax liability where the conditions in Article 38 (3) are met)		36 (1) (c), 38, 48
Applicable caps on the inclusion of provisions in Tier 2			
76	Credit risk adjustments included in T2 in respect of exposures subject to standardized approach (prior to the application of the cap)		62
77	Cap on inclusion of credit risk adjustments in T2 under standardized approach		62
78	Credit risk adjustments included in T2 in respect of exposures subject to internal rating-based approach (prior to the application of the cap)		62
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach		62
Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2014 and 1 Jan 2023)			
80	- Current cap on CET1 instruments subject to phase-out arrangements		484 (3), 486 (2) & (5)
81	- Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)		484 (3), 486 (2) & (5)
82	- Current cap on AT1 instruments subject to phase-out arrangements		484 (4), 486 (3) & (5)
83	- Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)		484 (4), 486 (3) & (5)
84	- Current cap on T2 instruments subject to phase-out arrangements		484 (5), 486 (4) & (5)
85	- Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)		484 (5), 486 (4) & (5)
(1) 'N/A' inserted if the question is not applicable			

¹⁾ CET1 capital requirement including buffer requirements

²⁾ CET1 capital ratio as reported, less minimum requirement of 4.5% (excluding buffer requirements) and less any CET1 items used to meet the Tier 1 and total capital requirements.

ANNEX III

Transitional own funds disclosure

Common Equity Tier 1 capital: instruments and reserves (1)		31/12/2023	(B) REGULATION (EU) No 575/2013 ARTICLE REFERENCE	(C) AMOUNTS SUBJECT TO PRE-REGULATION (EU) No 575/2013 TREATMENT OR PRESCRIBED RESIDUAL AMOUNT OF REGULATION (EU) 575/2013
1	Capital instruments and the related share premium accounts	27,500,000	26 (1), 27, 28, 29, EBA list 26 (3)	N/A
	of which: Instrument type 1		EBA list 26 (3)	N/A
	of which: Instrument type 2		EBA list 26 (3)	N/A
	of which: Instrument type 3		EBA list 26 (3)	N/A
2	Retained earnings	29,996,668	26 (1) (c)	N/A
3	Accumulated other comprehensive income (and any other reserves)	7,997,890	26 (1)	N/A
3a	Funds for general banking risk		26 (1) (f)	N/A
4	Amount of qualifying items referred to in Article 484 (3) and the related share premium accounts subject to phase out from CET1		486 (2)	N/A
	Public sector capital injections grandfathered until 1 January 2020		483 (2)	N/A
5	Minority interests (amount allowed in consolidated CET1)		84, 479, 480	N/A
5a	Independently reviewed interim profits net of any foreseeable charge or dividend		26 (2)	N/A
6	Common Equity Tier 1 (CET1) capital before regulatory adjustments	65,494,558		N/A
Common Equity Tier 1 (CET1) capital: regulatory adjustments				
7	Additional value adjustments (negative amount)	-66,268	34, 105	N/A
8	Intangible assets (net of related tax liability) (negative amount)		36 (1) (b), 37, 472 (4)	N/A
9	Empty set in the EU			N/A
10	Deferred tax assets that rely on future profitability excluding those arising from temporary difference (net of related tax liability where the conditions in Article 38 (3) are met) (negative amount)	-	36 (1) (c), 38, 472 (5)	N/A
11	Fair value reserves related to gains or losses on cash flow hedges		33 (a)	N/A
12	Negative amounts resulting from the calculation of expected loss amounts		36 (1) (d), 40, 159, 472 (6)	N/A
13	Any increase in equity that results from securitised assets (negative amount)		32 (1)	N/A
14	Gains or losses on liabilities valued at fair value resulting from changes in own credit standing		33 (1) (b) (c)	N/A
15	Defined-benefit pension fund assets (negative amount)		36 (1) (e), 41, 472 (7)	N/A
16	Direct and indirect holdings by an institution of own CET1 instruments (negative amount)		36 (1) (f), 42, 472 (8)	N/A
17	Holdings of the CET1 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)		36 (1) (g), 44, 472 (9)	N/A

18	Direct, indirect and synthetic holdings 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)		36 (1) (h), 43, 45, 46, 49 (2) (3), 79, 472 (10)	N/A
19	Direct, indirect and synthetic holdings 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)		36 (1) (i), 43, 45, 47, 48 (1) (b), 49 (1) to (3), 79, 470, 472 (11)	N/A
20	Empty set in the EU			N/A
20a	Exposure amount of the following items which qualify for a RW of 1250%, where the institution opts for the deduction alternative		36 (1) (k)	N/A
20b	of which: qualifying holdings outside the financial sector (negative amount)		36 (1) (k) (i), 89 to 91	N/A
20c	of which: securitisation positions (negative amount)		36 (1) (k) (ii) 243 (1) (b) 244 (1) (b) 258	N/A
20d	of which: free deliveries (negative amount)		36 (1) (k) (iii), 379 (3)	N/A
21	Deferred tax assets arising from temporary difference (amount above 10 % threshold, net of related tax liability where the conditions in Article 38 (3) are met) (negative amount)		36 (1) (c), 38, 48 (1) (a), 470, 472 (5)	N/A
22	Amount exceeding the 15% threshold (negative amount)		48 (1)	N/A
23	of which: 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		36 (1) (i), 48 (1) (b), 470, 472 (11)	N/A
24	Empty set in the EU			N/A
25	of which: deferred tax assets arising from temporary difference		36 (1) (c), 38, 48 (1) (a), 470, 472 (5)	N/A
25a	Losses for the current financial year (negative amount)		36 (1) (a), 472 (3)	N/A
25b	Foreseeable tax charges relating to CET1 items (negative amount)		36 (1) (l)	N/A
26	Regulatory adjustments applied to Common Equity Tier 1 in respect of amounts subject to pre-CRR treatment			N/A
26a	Regulatory adjustments relating to unrealised gains and losses pursuant to Articles 467 and 468			N/A
26b	Amount to be deducted from or added to Common Equity Tier 1 capital with regard to additional filters and deductions required pre CRR		481	N/A
27	Qualifying AT1 deductions that exceeds the AT1 capital of the institution (negative amount)		36 (1) (j)	N/A
28	Total regulatory adjustments to Common Equity Tier 1 (CET1)	-66,268		N/A
29	Common Equity Tier 1 (CET1) capital	65,428,290		N/A
Additional Tier 1 (AT1) capital: instruments				
30	Capital instruments and the related share premium accounts		51, 52	N/A
31	of which: classified as equity under applicable accounting standards			N/A
32	of which: classified as liabilities under applicable accounting standards			N/A
33	Amount of qualifying items referred to in Article 484 (4) and the related share premium accounts subject to phase out from AT1		486 (3)	N/A
	Public sector capital injections grandfathered until 1 January 2020		483 (3)	N/A
34	Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interest not included in row 5) issued by subsidiaries and held by third parties		85, 86, 480	N/A

35	of which: instruments issued by subsidiaries subject to phase-out		486 (3)	N/A
36	Additional Tier 1 (AT1) capital before regulatory adjustments	-		N/A
Additional Tier 1 (AT1) capital: regulatory adjustments				
37	Direct and indirect holdings by an institution of own AT1 instruments (negative amount)		52 (1) (b), 56 (a), 57, 475 (2)	N/A
38	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)		56 (b), 58, 475 (3)	N/A
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)		56 (c), 59, 60, 79, 475 (4)	N/A
40	Direct, indirect and synthetic holdings of the AT1 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)		56 (d), 59, 79, 475 (4)	N/A
41	Regulatory adjustments applied to Additional Tier 1 capital in respect of amounts subject to pre-CRR treatment and transitional treatments subject to phase-out as prescribed in Regulation (EU) No 585/2013 (ie. CRR residual amounts)			N/A
41a	Residual amounts deducted from Additional Tier 1 capital with regard to deduction from Common Equity Tier 1 capital during the transitional period pursuant to article 472 of Regulation (EU) No 575/2013		472, 473(3)(a), 472 (4), 472 (6), 472 (8) (a), 472 (9), 472 (10) (a), 472 (11) (a)	N/A
41b	Residual amounts deducted from Additional Tier 1 capital with regard to deduction from Tier 2 capital during the transitional period pursuant to article 475 of Regulation (EU) No 575/2013		477, 477 (3), 477 (4) (a)	N/A
41c	Amounts to be deducted from added to Additional Tier 1 capital with regard to additional filters and deductions required pre- CRR		467, 468, 481	N/A
42	Qualifying T2 deductions that exceed the T2 capital of the institution (negative amount)		56 (e)	N/A
43	Total regulatory adjustments to Additional Tier 1 (AT1) capital	-		N/A
44	Additional Tier 1 (AT1) capital	-		N/A
45	Tier 1 capital (T1 = CET1 + AT1)	65,428,290		N/A
Tier 2 (T2) capital: instruments and provisions				
46	Capital instruments and the related share premium accounts		62, 63	N/A
47	Amount of qualifying items referred to in Article 484 (5) and the related share premium accounts subject to phase out from T2		486 (4)	N/A
	Public sector capital injections grandfathered until 1 January 2020		483 (4)	N/A
48	Qualifying own funds instruments included in consolidated T2 capital (including minority interest and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third party		87, 88, 480	N/A
49	of which: instruments issued by subsidiaries subject to phase-out		486 (4)	N/A
50	Credit risk adjustments		62 (c) & (d)	N/A
51	Tier 2 (T2) capital before regulatory adjustment	-		N/A
Tier 2 (T2) capital: regulatory adjustments				
52	Direct and indirect holdings by an institution of own T2 instruments and subordinated loans (negative amount)		63 (b) (i), 66 (a), 67, 477 (2)	N/A
53	Holdings of the T2 instruments and subordinated loans of financial sector entities where those entities have reciprocal		66 (b), 68, 477 (3)	N/A

	cross holdings with the institutions 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)		66 (c), 69, 70, 79, 477 (4)	N/A
54a	Of which new holdings not subject to transitional arrangements			N/A
54b	Of which holdings existing before 1 January 2013 and subject to transitional arrangements			N/A
55	Direct, indirect and 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 (negative amounts)		66 (d), 69, 79, 477 (4)	N/A
56	Regulatory adjustments applied to tier 2 in respect of amounts subject to pre-CRR treatment and transitional treatments subject to phase out as prescribed in Regulation (EU) No 575/2013 (i.e. CRR residual amounts)			N/A
56a	Residual amounts deducted from Tier 2 capital with regard to deduction from Common Equity Tier 1 capital during the transitional period pursuant to article 472 of Regulation (EU) No 575/2013		472, 472(3)(a), 472 (4), 472 (6), 472 (8), 472 (9), 472 (10) (a), 472 (11) (a)	N/A
56b	Residual amounts deducted from Tier 2 capital with regard to deduction from Additional Tier 1 capital during the transitional period pursuant to article 475 of Regulation (EU) No 575/2013		475, 475 (2) (a), 475 (3), 475 (4) (a)	N/A
56c	Amounts to be deducted from or added to Tier 2 capital with regard to additional filters and deductions required pre-CRR		467, 468, 481	N/A
57	Total regulatory adjustments to Tier 2 (T2) capital		-	N/A
58	Tier 2 (T2) capital		-	N/A
59	Total capital (TC = T1 + T2)	65,428,290		N/A
59a	Risk weighted assets in respect of amounts subject to pre-CRR treatment and transitional treatments subject to phase out as prescribed in Regulation (EU) No 575/2013 (i.e. CRR residual amount)			N/A
	Of which: items not deducted from CET1 (Regulation (EU) No 575/2013 residual amounts) (items to be detailed line by line, e.g. Deferred tax assets that rely on future profitability net of related tax liability, indirect holdings of own CET1, etc)		472, 472 (5), 472 (8) (b), 472 (10) (b), 472 (11) (b)	N/A
	Of which: items not deducted from AT1 items (Regulation (EU) No 575/2013 residual amounts) (items to be detailed line by line, e.g. Reciprocal cross holdings in T2 instruments, direct holdings of non-significant investments in the capital of other financial sector entities, etc.)		475, 475 (2) (b), 475 (2) ©, 475 (4) (b)	N/A
	Items not deducted from T2 items (Regulation (EU) No 575/2013 residual amounts) (items to be detailed line by line, e.g. Indirect holdings of own T2 instruments, indirect holdings of non-significant investments in the capital of other financial sector entities, indirect holdings of significant investments in the capital of other financial sector entities etc)		477, 477 (2) (b), 477 (2) (c), 477 (4) (b)	N/A
60	Total risk-weighted assets			N/A
Capital ratios and buffers				
61	Common Equity Tier 1 (as a percentage of total risk exposure amount)	36.34%	92 (2) (a), 465	N/A
62	Tier 1 (as a percentage of total risk exposure amount)	36.34%	92 (2) (b), 465	N/A
63	Total capital (as a percentage of total risk exposure amount)	36.34%	92 (2) (c)	N/A

64	Institution specific buffer requirement (CET1 requirement in accordance with article 92 (1) (a) plus capital conservation and countercyclical buffer requirements plus a systemic risk buffer, plus systemically important institution buffer expressed as a percentage of total risk exposure amount) ¹⁾	14.07%	CRD 128, 129, 140	N/A
65	of which: capital conservation buffer requirement	2.5%		N/A
66	of which: countercyclical buffer requirement	0.30%		N/A
67	of which: systemic risk buffer requirement	0.0%		N/A
67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer	0.0%	CRD 131	N/A
68	Common Equity Tier 1 available to meet buffers (as a percentage of risk exposure amount) ²⁾	36.34%	CRD 128	N/A
69	[non-relevant in EU regulation]			N/A
70	[non-relevant in EU regulation]			N/A
71	[non-relevant in EU regulation]			N/A
Amounts below the thresholds for deduction (before risk-weighting)				
72	Direct and indirect holdings of the capital of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions)		36 (1) (h), 45, 46, 472 (10) 56 (c), 59, 60, 475 (4), 66 (c), 69, 70, 477 (4)	N/A
73	Direct and indirect holdings of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 10% threshold and net of eligible short positions)		36 (1) (i), 45, 48, 470, 472 (11)	N/A
74	Empty set in the EU			N/A
75	Deferred tax assets arising from temporary difference (amount below 10 % threshold, net of related tax liability where the conditions in Article 38 (3) are met)		36 (1) (c), 38, 48, 470, 472 (5)	N/A
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)		62	N/A
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach		62	N/A
78	Credit risk adjustments included in T2 in respect of exposures subject to internal rating-based approach (prior to the application of the cap)		62	N/A
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach		62	N/A
Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2014 and 1 Jan 2023)				
80	Current cap on CET1 instruments subject to phase-out arrangements		484 (3), 486 (2) & (5)	N/A
81	Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)		484 (3), 486 (2) & (5)	N/A
82	Current cap on AT1 instruments subject to phase-out arrangements		484 (4), 486 (3) & (5)	N/A
83	Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)		484 (4), 486 (3) & (5)	N/A
84	Current cap on T2 instruments subject to phase-out arrangements		484 (5), 486 (4) & (5)	N/A
85	Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)		484 (5), 486 (4) & (5)	N/A
(1) 'N/A' inserted if the question is not applicable				

¹⁾ CET1 capital requirement including buffer requirements

²⁾ CET1 capital ratio as reported, less minimum requirement of 4.5% (excluding buffer requirements) and less any CET1 items used to meet the Tier 1 and total capital requirements.

ANNEX IV

Geographical distribution of credit exposures relevant for the calculation of the countercyclical capital buffer

	General credit exposures		Trading book exposures		Securitisation exposures		Own funds requirements				Own funds requirements weights	Countercyclical capital buffer rate
	Exposure value for SA	Exposure value for IRB	Sum of long and short positions of trading book exposures for SA	Value of trading book exposures for internal models	Exposure value for SA	Exposure value for IRB	of which: General credit exposures	of which: Trading book exposures	of which: Securitisation exposures	Total		
<i>In EUR</i>	010	020	030	040	050	060	070	080	090	100	110	120
Breakdown by country	010	020	030	040	050	060	070	080	090	100	110	120
Luxembourg	133,292,689						7,458,254			7,458,254	77.78%	0.50%
British Virgin Islands	19,251						1,155			1,155	0.01%	0.00%
Cayman Islands	19,021,181						790,152			790,152	8.24%	0.00%
United Kingdom	10,126,994						808,654			808,654	8.43%	2.00%
France	2,247,736						128,045			128,045	1.34%	1.00%
Spain	1,148,121						85,907			85,907	0.90%	0.00%
Panama	147						12			12	0.00%	0.00%
Marshall Islands	3,841,321						307,306			307,306	3.20%	0.00%
Belgium	122,142						7,328			7,328	0.08%	0.00%
Republic of Congo	20,000						1,200			1,200	0.01%	0.00%
OTHER	19,252						1,155			1,155	0.01%	0.00%
TOTAL	169,858,834						9,589,168			9,589,168	100%	

Amount of institution-specific countercyclical capital buffer

<i>In EUR</i>	Countercyclical capital buffer rate
Total risk exposure amount	169,858,834
Institution specific countercyclical capital buffer rate	0.57%
Institution specific countercyclical capital buffer requirement	0.30%

