AS Citadele banka

Risk management and capital adequacy report (pillar 3 disclosures)

For the six months ended
30 June 2021

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CONTENTS

INTRODUCTION

This report provides interim update on the qualitative and quantitative disclosures on the major risks of operations of AS Citadele banka and its risk management objectives, policies and information on capital adequacy as required by part eight of the Regulation (EU) No 575/2013 "On prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012", requirements of the Financial and Capital Market Commission (FCMC) and other relevant regulations.

This report should be read in conjunction with the latest annual report, the relevant quarterly financial statements, the report on remuneration policy and the statement on corporate governance as certain important information is disclosed in these reports and is not repeated in this report. The mentioned reports are available at www.cblgroup.com.

Refer to the separate report on remuneration policy for disclosures on remuneration in accordance with the requirements of:

- Guidelines EBA/GL/2015/22 of the European Banking Authority "On sound remuneration policies under Articles 74(3) and 75(2) of Directive 2013/36/EU and disclosures under Article 450 of Regulation (EU) No 575/2013",
- Article 34.5. of the regulation No.86 of the FCMC "Rules on disclosure of the information in accordance with the part eight of the Regulation (EU) 575/2013 about materiality of the information, protected and confidential information and frequency of the disclosure of the information", and
- Regulation No.207 of the FCMC "Regulation on remuneration policy principles".

AS Citadele banka has subsidiaries, which are financial institutions, thus it needs to comply with the capital adequacy, liquidity coverage ratio (LCR), leverage ratio (LR) and other regulatory requirements both at the Bank's standalone level and at the Group's consolidated level. However, in line with the pillar 3 disclosure requirements information in the Risk report is disclosed only at the Group's consolidated level. For key information on the Bank standalone refer to the latest annual report and the relevant quarterly financial statements.

All monetary figures in this report are presented in thousands of Euros (EUR 000's). If not specified otherwise, all figures represent amounts as of period end, if not indicated otherwise.

CONSOLIDATION GROUP

AS Citadele banka (thereon – the Bank), registration number 40103303559, is the parent company of the Group. In the consolidation group for regulatory purposes (thereon – the Group) companies are included as per requirements of Regulation (EU) No 575/2013, while in the consolidation group for the accounting purposes companies are included in accordance with International Financial Reporting Standards (IFRS) as adopted in the European Union.

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

a	b	c-g	h
Name of the entity	**Method of accounting consolidation**	**Method of regulatory consolidation**	**Description of the entity**
AS Citadele banka	Full consolidation	Full consolidation	Banking
Kaleido Privatbank AG	Full consolidation	Full consolidation	Banking
SIA Citadele Leasing	Full consolidation	Full consolidation	Leasing
SIA Citadele Factoring	Full consolidation	Full consolidation	Leasing and factoring
OU Citadele Factoring	Full consolidation	Full consolidation	Leasing and factoring
UAB Citadele Factoring	Full consolidation	Full consolidation	Leasing and factoring
IPAS CBL Asset Management	Full consolidation	Full consolidation	Investment management company
AS CBL Atklātais Pensiju Fonds	Full consolidation	Full consolidation	Pension fund
SIA Mobilly	Equity method	Equity method	Electronic money institution
Calenia Investments Limited (in liquidation)	Full consolidation	Full consolidation	Support services
OOO Mizush Asset Management Ukraina (in liquidation)	Full consolidation	Full consolidation	Investment management company
SIA Citadeles moduļi	Full consolidation	Full consolidation	Support services
SIA Hortus Land	Full consolidation	Full consolidation	Support services
SIA Hortus Residential	Full consolidation	Full consolidation	Support services
AAS CBL Life	Full consolidation	Deducted	Life insurance

There are no immediate or foreseeable legal obstacles for capital element transferability or liability repayment between the Group's parent company and its subsidiaries.

In certain jurisdictions all profits may not be paid out in dividends. In other jurisdictions specific part from accumulated profits has to be set aside for reserves. These reserves are freely available to the respective company for unlimited and immediate use to cover risks or losses, when such are incurred. For certain Group's earnings tax on capital distribution applies. For more details refer to the latest annual report.

EU LIA – Explanations of differences between accounting and regulatory exposure amounts

Legal basis	Row number	Qualitative information
Article 436(b) CRR		The consolidation Group for regulatory purposes is different from the consolidation Group for the accounting purposes. As per regulatory requirements AAS CBL Life, a licensed insurer, is not included in the consolidation Group for capital adequacy purposes. Consequently, it is excluded from own funds calculation and individual assets of AAS CBL Life are not included as risk exposures in the Group's capital adequacy calculation. Instead, the carrying value of the Group's investment in AAS CBL Life constitutes a risk exposure in the Group's capital adequacy ratio calculation.
Article 436(b) CRR	(a)	The differences between the amounts in columns (a) and (b) in EU LI1 proceed from different consolidation rules in the regulatory and accounting consolidations with regard to AAS CBL Life.
Article 436(d) CRR	(b)	Carrying values under the regulatory scope of consolidation are different to accounting consolidation for items subject to market risk and other specific risks due to differences in regulatory requirements.

EU LI1 – Differences between the accounting scope and the scope of prudential consolidation and mapping of financial statement categories with regulatory risk categories

	a	b	c	d	e	f	g
			Carrying values of items				
	Carrying values as reported in published financial statements	**Carrying values under scope of prudential consoli-dation**	**Subject to the credit risk framework**	**Subject to the CCR framework**	**Subject to the securitisa-tion framework**	**Subject to the market risk framework**	**Not subject to capital requirements or subject to deduction from own funds**
Assets							
Cash and cash balances at central banks	486,072	486,072	486,072	-	-	-	-
Loans to credit institutions	60,020	55,941	55,941	-	-	-	-
Debt securities	1,684,213	1,645,985	1,645,985	-	-	10,591	-
Loans to public	2,456,803	2,456,803	2,456,803	-	-	-	-
Equity instruments	1,311	1,311	1,311	-	-	-	-
Other financial instruments	39,633	7,574	7,574	-	-	-	-
Derivatives	3,889	3,889	-	3,889	-	3,889	-
Investments in subsidiaries	274	4,542	4,542	-	-	-	-
Tangible assets	23,770	23,770	23,770	-	-	-	-
Intangible assets	8,212	8,193	4,322	-	-	-	3,871
Current income tax assets	2,359	2,359	2,359	-	-	-	-
Deferred income tax assets	2,981	2,981	-	-	-	-	2,981
Non-current assets held for sale	946	946	946	-	-	-	-
Other assets	35,447	34,892	34,892	-	-	-	-
Total assets	**4,805,930**	**4,735,258**	**4,724,517**	**3,889**	**-**	**14,480**	**6,852**
Liabilities							
Deposits from credit institutions and central banks	478,047	478,047	-	-	-	-	478,047
Deposits and borrowings from customers	3,797,982	3,765,165	-	-	-	-	3,765,165
Debt securities issued	60,088	60,088	-	-	-	-	60,088
Derivatives	1,120	1,120	1,120	-	-	1,120	-
Provisions	1,757	1,757	1,757	-	-	-	-
Current income tax liabilities	299	299	-	-	-	-	299
Deferred income tax liabilities	507	507	-	-	-	-	507
Other liabilities	90,860	55,112	-	-	-	-	55,112
Total liabilities	**4,430,660**	**4,362,095**	**2,877**	**-**	**-**	**1,120**	**4,359,218**
Equity							
Share capital	156,556	156,556	-	-	-	-	156,556
Reserves and other capital components	8,354	7,520	-	-	-	-	7,520
Retained earnings	210,360	209,087	-	-	-	-	209,087
Total equity	**375,270**	**373,163**	**-**	**-**	**-**	**-**	**373,163**
Total liabilities and equity	**4,805,930**	**4,735,258**	**2,877**	**-**	**-**	**1,120**	**4,732,381**

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

		a	b	c	d	e
			Items subject to			
		Total	Credit risk framework	CCR framework	Securitisation framework	Market risk framework
1	**Assets carrying value amount under the scope of regulatory consolidation (as per template EU LI1)**	**4,735,258**	**4,724,517**	**3,889**	**-**	**14,480**
2	Liabilities carrying value amount under the regulatory scope of consolidation (as per template EU LI1)	(1,120)	-	-	-	(1,120)
3	**Total net amount under the regulatory scope of consolidation**	**4,734,138**	**4,724,517**	**3,889**	**-**	**13,360**
4	Off-balance-sheet amounts	313,553	313,553	-	-	-
5	Differences in valuations	-	-	-	-	-
6	Differences due to different netting rules, other than those already included in row 2	-	-	-	-	-
7	Differences due to consideration of provisions	(1,657)	(1,657)	-	-	-
8	Differences due to prudential filters	-	-	-	-	-
9	Differences due to credit conversion factors	(216,686)	(216,686)	-	-	-
11a	IFRS 9 transitional provisions and similar	2,926	2,926	-	-	-
11b	Original exposure method (for derivatives)	18,831	-	18,831	-	-
11c	Other	(52)	(52)	-	-	-
10	**Exposure amounts considered for regulatory purposes**	**4,851,053**	**4,822,601**	**22,720**	**-**	**13,360**

GOVERNANCE

In order to ensure that the Bank's Supervisory Board and Management Board members and key function holders are suitable for their position and represent diversity, the Bank has developed internal regulation "AS Citadele banka's policy on the assessment of the suitability of members of the Supervisory Board and Management Board and key function holders".

The policy has been developed in accordance with the Credit Institution Law of the Republic of Latvia and the recommendations of the FCMC. The policy is reviewed and if necessary updated regularly.

The policy prescribes the procedure and the frequency of the assessment of the suitability of members of the Bank's Supervisory Board and Management Board and key function holders, as well as procedure for decision making on the suitability.

The initial suitability assessment is performed when a new member is nominated to the Bank's Supervisory Board or Management Board prior to his/her election or prior to the date of commencement of his/her duties, but not later than within 6 weeks after the election of the member of the Supervisory Board or the Management Board.

The reassessment of suitability is performed in the following cases:

- During the annual assessment of the suitability of a member of the Supervisory Board or the Management Board,
- If a member of the Supervisory Board or the Management Board is re-elected to his/her position,
- If changes are made to the responsibilities of a member of the Supervisory Board or the Management Board or in the competences required to carry out such responsibilities,
- If there is a doubt about the reliability, competence or reputation of a member of the Supervisory Board or the Management Board.

The suitability assessment is performed considering the overall composition of the Supervisory Board and the Management Board, as well as the knowledge and competence collectively necessary for the Supervisory Board and the Management Board, awareness and personal qualities in order to properly carry out the duties assigned to the members of the Supervisory Board in relation to the supervision of the Management Board activities and to the Management Board in relation to the Group's operational management.

The suitability assessment of the members of the Supervisory Board and the Management Board is performed by the Remuneration and Nomination Committee. The Supervisory Board approves the composition and also regulations of this committee. The suitability assessment of key function holders is performed by a special committee. The Management Board approves the composition and also regulations of this committee.

Each member of the Management Board is responsible for a specific scope of the Group operations. The suitability assessment process ensures that members of the Management Board have adequate level of necessary knowledge and competence in relation to specific scope of operations of the Group under responsibility of each member of the Management Board, as well adequate necessary collective knowledge and competence.

RISK MANAGEMENT

The Group considers risk management to be an essential component of its management process. The Group pursues prudent risk management that is aligned with its business ambitions and aims to achieve effective risk mitigation. In order to assess and monitor complex risk exposures, the Group applies a wide range of risk management tools in conjunction with risk committees. Members of risk committees represent various operations of the Group in order to balance business and risk orientation within respective risk committees. The Group's risk management principles are set out in its Risk Management Policy. The Group adheres to the following key risk management principles:

- The Group aims to ensure that it maintains low overall risk exposure, diversified asset portfolio, limited risks in financial markets and low levels of operational risk;

- The Group aims to ensure an acceptable risk level in all operations. Risks are always assessed in relation to their expected return. Risk exposures that are not acceptable are avoided, limited or hedged;
- The Group does not assume high or uncontrollable risks irrespective of the return they provide and assumes risks only in economic fields and geographical regions in relation to which it believes it has sufficient knowledge and expertise;
- Risk management is based on each Group's employee's responsibility for the transactions carried out by him/her and awareness of the related risks;
- Risk limit system and strict controls are essential risk management elements. Control over risk levels and compliance with the imposed limits is achieved by the existence of structured risk limit systems for all material risks.

The aim of the risk management in the Group is to facilitate the achievement of the Group's goals, sustainable growth, long-term financial stability and to protect the Group from unidentified risks. The Bank has appointed a Risk Director (CRO) who is a member of the Bank's Management Board and whose responsibilities do not include the duties related to the activities under control. The CRO has a direct access to the Bank's Supervisory Board. The Risk Committee, which is subordinated to the Bank's Supervisory Board, has been established in the Bank. The main task of the Risk Committee is to provide support to the Bank's Supervisory Board in relation to the monitoring of the Group's risk management system. The Risk Committee established by the Bank's Supervisory Board provides recommendations to the Bank's Management Board regarding improvements of the risk management system. Risk management within the Group is controlled by an independent unit – the Risk Sector.

The main risks to which the Group is exposed are: credit risk, market risk, interest rate risk, liquidity risk, currency risk and operational risk. For each of these risks the Group has approved risk management policies and other internal regulations defining key risk management principles and processes, functions and responsibilities of units, risk concentration limits, as well as control and reporting system. The Bank's Supervisory Board approves risk management policies and ensures the control of efficiency of the risk management system. The Bank's Management Board and CRO ensure implementation of the risk management policies and development of internal regulations for the management of each material risk within the Group. In order to assess and monitor material and complex risk exposures, the Bank's Management Board establishes risk committees. Members of risk committees represent various units of the Group in order to ensure the balance between the units responsible for risk monitoring and control and the units with business orientation.

The Group continuously assesses and controls risks – both on an individual basis by type of risk and by performing a comprehensive assessment within the internal capital adequacy assessment process (ICAAP). Each member of the Group is responsible for risk control and management. Each employee of the Group is responsible for the compliance with the principles set out in the Group's internal regulations.

Risk management process includes the following elements: risk identification, risk assessment and decision making, risk management and control, risk monitoring and reporting. The Group regularly, at least once a year, identifies and describes the types of material risks inherent in its operations by assessing what types of risks may have a negative impact on achieving its performance targets and projected financial results. In order to identify the types of material risks, quantitative and qualitative criteria are used and the results of the process are documented. For all types of identified material risks the aims of risk management are defined and risk appetite is determined. In addition, the development of internal regulations in relation to risk management of those risks is ensured, including risk identification and assessment methods, adequate risk restriction and control procedures, such as quantitative restrictions and limits, or control measures that reduce unquantifiable risks, risk appetite, procedures for reporting the information on risks, risk levels assumed and trends thereof to the Group's management bodies, as well as other information necessary for decision making, risk management policy and control procedures, including procedures for control of compliance with the restrictions and limits set, segregation of duties, approval rights and responsibilities.

Risk assessment and decision making include selection, approval and documentation of risk assessment methodology, regular risk assessment, establishment of the risk restriction and controlling system and setting the acceptable level of risks within this system, decision making on assuming the risks. Risk assessment includes the determination of qualitative and quantitative impact of the source of each identified risk using generally accepted methodology, which is adequately documented. The Group makes a decision in relation to each identified and assessed risk, whether the Group accepts such risk or takes the necessary measures for its mitigation, or ceases activities related to this risk. The Group does not assume risks with the impact exceeding the risk appetite determined for each respective type of risk regardless of the economic benefits that might result from assuming such risk.

Risk management and control include the compliance with the level of risk acceptable for the Group including the compliance with the limits restricting the amount of risk. Monitoring and reporting includes regular assessment of the existing level of risk against the desirable level of risk, trend analysis, regular reporting to the relevant unit heads, the Bank's Management Board and the Supervisory Board.

The integral part of the risk management is risk stress testing. Stress testing process ensures regular identification and assessment of risks inherent to the Group's current and future operations, as well as assessment of the impact of different extraordinary and adverse events on the Group's operations, in order to provide support to responsible employees of the Group in management decision-making process at different levels of management (e.g. strategic planning, determination and correction of the risk appetite, capital planning, liquidity management).

The Group's Internal Audit Division regularly monitors the implementation of risk management policies and other internal regulations, as well as provides recommendations regarding improvements of the risk management system.

CAPITAL ADEQUACY CALCULATION

Capital adequacy is calculated in accordance with the current global standards of the bank capital adequacy (the Basel III international regulatory framework) as implemented by the European Union via a regulation (EU) 575/2013 and a directive 2013/36/EU, the Financial and Capital Markets Commission's (FCMC) rules and other relevant regulations.

Capital adequacy is a measure of sufficiency of the Group's eligible capital resources to cover credit risks, market risks, operational risk and other specific risks arising predominantly from asset and off-balance sheet exposures of the Group. The regulations require credit institutions to maintain a Total Capital adequacy ratio of 8.0% of the total risk weighted exposure amounts. The rules also require 4.5% minimum Common Equity Tier 1 capital ratio and 6.0% minimum Tier 1 capital ratio.

Total SREP capital requirement (TSCR) requires capital to cover risks in addition to these covered by the regulation (EU) 575/2013. TSCR is established in a supervisory review and evaluation process (SREP) carried out by the national supervisory authority. The national supervisory authority determines TSCR on a risk-by-risk basis, using supervisory judgement, the outcome of supervisory benchmarking, ICAAP calculations and other relevant inputs. The additional pillar 2 capital requirement is re-assessed annually by the FCMC. As of the period end based on the FCMC's assessment an additional 2.30% capital requirement (TSCR) for the Group and the Bank is determined to cover pillar 2 risks. As of the period end the Bank and the Group is required to cover 56% of the TSCR with Common Equity Tier 1 capital (1.29% capital requirement), 75% with Tier 1 capital (1.73% capital requirement) and 100% with Total Capital (2.30% capital requirement).

On top of the minimum capital adequacy ratios and the pillar 2 capital requirements (TSCR), the Group and the Bank must comply with the capital buffer requirements. The buffer requirements must be reached by Common Equity Tier 1 capital. The capital conservation buffer both for the Group and the Bank is set at 2.50%, limiting dividend pay-out and certain other Tier 1 equity instrument buybacks, if the buffer threshold is not exceeded.

Citadele, being identified as "other systemically important institution" (O-SII), must also comply with the O-SII capital buffer requirement set by the FCMC at 1.50%.

Countercyclical capital buffer norms at each balance sheet date are calculated based on the actual risk exposure geographical distribution and the countercyclical buffer rates applicable for each geographical location. In the reporting period in reaction to the Covid-19 events most European countercyclical capital buffer requirements were decreased to 0%. Therefore, based on the regional distribution of the Group's exposures the effective countercyclical capital buffer requirement of the Group has decreased to almost 0%.

The Group and the Bank applies requirements of minimum loss coverage for non-performing exposures in line with FCMC regulations for the exposures originated until 25 April 2019, and in line with a regulation (EU) 2019/630 for exposures originated starting from 26 April 2019. The minimum loss coverage calculation is mathematically simplistic "calendar based" calculation for non-performing exposures, which is constructed on the principle - the longer an exposure has been non-performing, the lower the probability for the recovery of its value. Therefore, the portion of the exposure that should be covered by provisions, impairments, other adjustments or deductions should increase with time, following a pre-defined calendar. Insufficient coverage for non-performing exposures is deductible from the regulatory capital. Due to the Group's provisioning policy and portfolio structure, the regulation of minimum loss coverage for non-performing exposures has had minor impact on the Group's capital adequacy position.
The Bank has to comply with the regulatory requirements both at the Bank's standalone level and at the Group's consolidated level. As of the period end both the Bank and the Group have sufficient capital to comply with the FCMC's capital adequacy requirements. The long-term regulatory capital position of the Group and the Bank is planned and managed in line with these and other expected upcoming regulatory requirements.

Regulatory capital requirements of the Group on 30 June 2021

	Common Equity Tier 1 capital ratio	Tier 1 capital ratio	Total Capital adequacy ratio
Common equity Tier 1 ratio	4.50%	4.50%	4.50%
Additional Tier 1 ratio	-	1.50%	1.50%
Additional total capital ratio	-	-	2.00%
Individual TSCR, as determined by the FCMC (pillar 2 capital requirement)	1.29%	1.73%	2.30%
Capital buffer requirements:			
Capital conservation buffer	2.50%	2.50%	2.50%
O-SII capital buffer	1.50%	1.50%	1.50%
Countercyclical capital buffer	0.00%	0.00%	0.00%
Capital requirement	**9.79%**	**11.73%**	**14.30%**

Capital adequacy ratio (including net result for the period)

	EUR thousands	
	30/06/2021 Group	31/12/2020 Group
Common Equity Tier 1 capital		
Paid up capital instruments	156,556	156,556
Retained earnings	209,087	176,651
Regulatory deductions	(7,879)	(5,599)
Other capital components and transitional adjustments, net	10,445	13,405
Tier 2 capital		
Eligible part of subordinated liabilities	60,000	60,000
Total own funds	**428,209**	**401,013**
Risk weighted exposure amounts for credit risk, counterparty credit risk and dilution risk	2,010,325	1,340,639
Total exposure amounts for position, foreign currency open position and commodities risk	4,146	13,690
Total exposure amounts for operational risk	187,358	187,358
Total exposure amounts for credit valuation adjustment	4,462	933
Total risk exposure amount	**2,206,291**	**1,542,620**
Total Capital adequacy ratio	**19.4%**	**26.0%**
Common Equity Tier 1 capital ratio	**16.7%**	**22.1%**

Transitional adjustments applied as of 30 June 2021

Capital adequacy calculation in accordance with the EU and the FCMC regulations permits transitional adjustments. The regulatory compliance is measured based on the transitional capital adequacy ratio. For transparency purposes the fully loaded capital adequacy ratio (i.e., excluding transitional adjustments) is also disclosed. The expectation is that in the medium term the transitional capital adequacy ratio will converge with the fully loaded capital adequacy ratio, as the transitional provisions expire.

Most of the transitional provisions, if applied, allow for a favourable treatment of specific capital components or risk exposure items, resulting in a marginal improvement in the capital adequacy ratios. Application of the transitional provisions is mostly discretionary. An application decision is evaluated in the context of estimated positive impact on the capital adequacy ratio versus the resources required to develop the systems and the processes to implement each transitional provision.

The transitional provisions that the Group and the Bank has applied for the period end capital adequacy calculations:

The regulation (EU) 2017/2395 which permits specific proportion of the IFRS 9 implementation impact to be amortised over a five-year period (starting from 2018) for capital adequacy calculation purposes.

All other transitional provisions for which the Group and the Bank is eligible are not applied as of the period end and are still in the assessment phase, implementation phase or have been decided not to be implemented.

Fully loaded capital adequacy ratio (i.e. excluding transitional adjustments, including net result for the period)

	EUR thousands	
	30/06/2021 Group	**31/12/2020 Group**
Common Equity Tier 1 capital, fully loaded	365,283	336,917
Tier 2 capital	60,000	60,000
Total own funds, fully loaded	**425,283**	**396,917**
Total risk exposure amount, fully loaded	**2,203,802**	**1,539,013**
Total Capital adequacy ratio, fully loaded	**19.3%**	**25.8%**
Common Equity Tier 1 capital ratio, fully loaded	**16.6%**	**21.9%**

Fully loaded and transitional capital adequacy ratio excluding net result for the period

The transitional capital adequacy ratio, if the net result for the period is not included, for the Group is 18.0% and for the Bank is 17.3%; the transitional Tier 1 capital ratio for the Group is 15.2% and for the Bank is 14.5%. The fully loaded capital adequacy ratio, if the net result for the period is not included, for the Group is 17.8% and for the Bank is 17.2%; the fully loaded Tier 1 capital ratio for the Group is 15.1% and for the Bank is 14.4%.

OWN FUNDS

The capital of AS Citadele banka consists of two types of instruments – ordinary shares and subordinated debt securities issued. For more information on the bondholders and shareholders of the Bank refer to the latest annual report.

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

		Ordinary shares	Subordinated liabilities: Publicly listed unsecured bonds	Subordinated liabilities: Publicly listed unsecured bonds
1	Issuer	AS Citadele banka	AS Citadele banka	AS Citadele banka
2	Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)	-	LV0000802221	LV0000880011
2a	Public or private placement	Private placement	Public placement	Public placement
3	Governing law(s) of the instrument	Latvia	Latvia	Latvia
3a	Contractual recognition of write down and conversion powers of resolution authorities	According to law	Yes	Yes
	Regulatory treatment			
4	Current treatment taking into account, where applicable, transitional CRR rules	Common Equity Tier 1	Tier 2	Tier 2
5	Post-transitional CRR rules	Common Equity Tier 1	Tier 2	Tier 2
6	Eligible at solo/(sub-)consolidated/ solo & (sub-)consolidated	Solo & consolidated	Solo & consolidated	Solo & consolidated
7	Instrument type (types to be specified by each jurisdiction)	Ordinary shares	Subordinated liabilities	Subordinated liabilities
8	Amount recognised in regulatory capital (currency in million, as of most recent reporting date)	EUR 156.6 million	EUR 40.0 million	EUR 20.0 million
9	Nominal amount of instrument	EUR 156.6 million	EUR 40.0 million	EUR 20.0 million
EU-9a	Issue price	EUR 156.6 million	EUR 40.0 million	EUR 20.0 million
EU-9b	Redemption price	-	EUR 40.0 million	EUR 20.0 million
10	Accounting classification	Shareholders' Equity	Liabilities at amortised cost	Liabilities at amortised cost
11	Original date of issuance	Various	06/12/2016	24/11/2017
12	Perpetual or dated	Perpetual	Dated	Dated
13	Original maturity date	No Maturity	06/12/2026	24/11/2027
14	Issuer call subject to prior supervisory approval	Yes	Yes	Yes
15	Optional call date, contingent call dates and redemption amount	-	-	-
16	Subsequent call dates, if applicable	-	-	-
	Coupons / dividends			
17	Fixed or floating dividend/coupon	-	Fixed	Fixed
18	Coupon rate and any related index	-	6.25%	5.50%
19	Existence of a dividend stopper	-	-	-
EU-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Discretionary	Fixed	Fixed

EU-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Discretionary	Fixed	Fixed
21	Existence of step up or other incentive to redeem	-	-	-
22	Noncumulative or cumulative	Non-cumulative	Non-cumulative	Non-cumulative
23	Convertible or non-convertible	Non-Convertible	Non-convertible	Non-convertible
24	If convertible, conversion trigger(s)	-	-	-
25	If convertible, fully or partially	-	-	-
26	If convertible, conversion rate	-	-	-
27	If convertible, mandatory or optional conversion	-	-	-
28	If convertible, specify instrument type convertible into	-	-	-
29	If convertible, specify issuer of instrument it converts into	-	-	-
30	Write-down features	No	No	No
31	If write-down, write-down trigger(s)	-	-	-
32	If write-down, full or partial	-	-	-
33	If write-down, permanent or temporary	-	-	-
34	If temporary write-down, description of write-up mechanism	-	-	-
34a	Type of subordination (only for eligible liabilities)	Settlement after all subordinated and unsubordinated claims	Settlement after unsubordinated claims, but before claims of shareholders	Settlement after unsubordinated claims, but before claims of shareholders
EU-34b	Ranking of the instrument in normal insolvency proceedings	Settlement after all subordinated and unsubordinated claims	Settlement after unsubordinated claims, but before claims of shareholders	Settlement after unsubordinated claims, but before claims of shareholders
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Settlement after all subordinated and unsubordinated claims	Settlement after unsubordinated claims, but before claims of shareholders	Settlement after unsubordinated claims, but before claims of shareholders
36	Non-compliant transitioned features	No	No	No
37	If yes, specify non-compliant features	-	-	-
37a	Link to the full term and conditions of the instrument (signposting)	-	Refer to “Bonds” section at www.cblgroup.com	Refer to “Bonds” section at www.cblgroup.com

EU CC1 - Composition of regulatory own funds

		(a) Amounts	(b) Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
Common Equity Tier 1 (CET1) capital: instruments and reserves			
1	Capital instruments and the related share premium accounts	156,556.00	Line E01 in template EU CC2
	of which: Instrument type 1	*156,556.00*	Line E01 in template EU CC2
2	Retained earnings	176,934	Part of line E03 in template EU CC2
3	Accumulated other comprehensive income (and other reserves)	7,520	Part of line E02 in template EU CC2
EU-3a	Funds for general banking risk	-	
4	Amount of qualifying items referred to in Article 484 (3) and the related share premium accounts subject to phase out from CET1	-	
5	Minority interests (amount allowed in consolidated CET1)	-	
EU-5a	Independently reviewed interim profits net of any foreseeable charge or dividend	-	
6	**Common Equity Tier 1 (CET1) capital before regulatory adjustments**	**338,893**	
Common Equity Tier 1 (CET1) capital: regulatory adjustments			
7	Additional value adjustments (negative amount)	(291)	
8	Intangible assets (net of related tax liability) (negative amount)	(3,871)	Part of line A10 in template EU CC2
9	Empty set in the EU		
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Article 38 (3) are met) (negative amount)	(2,981)	Line A12 in template EU CC2
11	Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value	-	
12	Negative amounts resulting from the calculation of expected loss amounts	-	
13	Any increase in equity that results from securitised assets (negative amount)	-	
14	Gains or losses on liabilities valued at fair value resulting from changes in own credit standing	-	
15	Defined-benefit pension fund assets (negative amount)	-	
16	Direct and indirect holdings by an institution of own CET1 instruments (negative amount)	-	
17	Direct, indirect and synthetic holdings of the CET 1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-	
18	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	
19	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	
20	Empty set in the EU		

EU-20a	Exposure amount of the following items which qualify for a RW of 1250%, where the institution opts for the deduction alternative	-	
EU-20b	of which: qualifying holdings outside the financial sector (negative amount)	-	
EU-20c	of which: securitisation positions (negative amount)	-	
EU-20d	of which: free deliveries (negative amount)	-	
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in Article 38 (3) are met) (negative amount)	-	
22	Amount exceeding the 17,65% threshold (negative amount)	-	
23	of which: direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities	-	
24	Empty set in the EU		
25	of which: deferred tax assets arising from temporary differences	-	
EU-25a	Losses for the current financial year (negative amount)	-	
EU-25b	Foreseeable tax charges relating to CET1 items except where the institution suitably adjusts the amount of CET1 items insofar as such tax charges reduce the amount up to which those items may be used to cover risks or losses (negative amount)	-	
26	Empty set in the EU		
27	Qualifying AT1 deductions that exceed the AT1 items of the institution (negative amount)	-	
27a	Other regulatory adjustments *(including IFRS 9 transitional adjustments when relevant)*	2,190	
28	**Total regulatory adjustments to Common Equity Tier 1 (CET1)**	**(4,953)**	
29	**Common Equity Tier 1 (CET1) capital**	**336,056**	
Additional Tier 1 (AT1) capital: instruments			
30	Capital instruments and the related share premium accounts	-	
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 as described in Article 486(3) of CRR	-	
EU-33a	Amount of qualifying items referred to in Article 494a(1) subject to phase out from AT1	-	
EU-33b	Amount of qualifying items referred to in Article 494b(1) subject to phase out from AT1	-	
34	Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties	-	
35	of which: instruments issued by subsidiaries subject to phase out	-	
36	**Additional Tier 1 (AT1) capital before regulatory adjustments**	**-**	
Additional Tier 1 (AT1) capital: regulatory adjustments			
37	Direct and indirect holdings by an institution of own AT1 instruments (negative amount)	-	
38	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-	
39	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	
40	Direct, indirect and synthetic holdings by the institution of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	-	
41	Empty set in the EU		
42	Qualifying T2 deductions that exceed the T2 items of the institution (negative amount)	-	
42a	Other regulatory adjustments to AT1 capital	-	
43	**Total regulatory adjustments to Additional Tier 1 (AT1) capital**	**-**	
44	**Additional Tier 1 (AT1) capital**	**-**	
45	**Tier 1 capital (T1 = CET1 + AT1)**	**336,056**	
Tier 2 (T2) capital: instruments			
46	Capital instruments and the related share premium accounts	60,000	Part of line L03 in template EU CC2
47	Amount of qualifying items referred to in Article 484 (5) and the related share premium accounts subject to phase out from T2 as described in Article 486 (4) CRR	-	
EU-47a	Amount of qualifying items referred to in Article 494a (2) subject to phase out from T2	-	
EU-47b	Amount of qualifying items referred to in Article 494b (2) subject to phase out from T2	-	
48	Qualifying own funds instruments included in consolidated T2 capital (including minority interests and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties	-	
49	of which: instruments issued by subsidiaries subject to phase out	-	
50	Credit risk adjustments	-	
51	**Tier 2 (T2) capital before regulatory adjustments**	**60,000**	
Tier 2 (T2) capital: regulatory adjustments			
52	Direct and indirect holdings by an institution of own T2 instruments and subordinated loans (negative amount)	-	
53	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-	

54	Direct and indirect 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)	-
54a	Empty set in the EU	
55	Direct and indirect holdings by the institution of the T2 instruments and subordinated loans of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	-
56	Empty set in the EU	
EU-56a	Qualifying eligible liabilities deductions that exceed the eligible liabilities items of the institution (negative amount)	-
56b	Other regulatory adjusments to T2 capital	
57	**Total regulatory adjustments to Tier 2 (T2) capital**	**-**
58	**Tier 2 (T2) capital**	**60,000**
59	**Total capital (TC = T1 + T2)**	**396,056**
60	**Total risk exposure amount**	**2,206,291**
Capital ratios and buffers		
61	Common Equity Tier 1 (as a percentage of total risk exposure amount)	15.23%
62	Tier 1 (as a percentage of total risk exposure amount)	15.23%
63	Total capital (as a percentage of total risk exposure amount)	17.95%
64	Institution CET1 overall capital requirement (CET1 requirement in accordance with Article 92 (1) CRR, plus additional CET1 requirement which the institution is required to hold in accordance with point (a) of Article 104(1) CRD, plus combined buffer requirement in accordance with Article 128(6) CRD) expressed as a percentage of risk exposure amount)	9.79%
65	of which: capital conservation buffer requirement	2.5%
66	of which: countercyclical buffer requirement	0.00%
67	of which: systemic risk buffer requirement	0.00%
EU-67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer	1.5%
68	**Common Equity Tier 1 available to meet buffer (as a percentage of risk exposure amount)**	0.00%
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 own funds and eligible liabilities of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions)	468
73	Direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 17.65% thresholds and net of eligible short positions)	4,269
74	Empty set in the EU	-
75	Deferred tax assets arising from temporary differences (amount below 17.65% threshold, net of related tax liability where the conditions in Article 38 (3) are met)	-
Applicable caps on the inclusion of provisions in Tier 2		
76	Credit risk adjustments included in T2 in respect of exposures subject to standardised approach (prior to the application of the cap)	-
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach	-
78	Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)	-
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach	-
Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2014 and 1 Jan 2022)		
80	Current cap on CET1 instruments subject to phase out arrangements	-
81	Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)	-
82	Current cap on AT1 instruments subject to phase out arrangements	-
83	Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)	-
84	Current cap on T2 instruments subject to phase out arrangements	-
85	Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)	-
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach	-
78	Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)	-
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach	-
Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2014 and 1 Jan 2022)		
80	Current cap on CET1 instruments subject to phase out arrangements	-
81	Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)	-
82	Current cap on AT1 instruments subject to phase out arrangements	-
83	Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)	-
84	Current cap on T2 instruments subject to phase out arrangements	-
85	Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)	-

* The national supervisory authority determines TSCR on a risk-by-risk basis, using supervisory judgement, the outcome of supervisory benchmarking, ICAAP calculations and other relevant inputs. The additional pillar 2 capital requirement is re-assessed annually by the FCMC. The Group is required to cover 56% of the TSCR with Common Equity Tier 1 capital, 75% with Tier 1 capital and 100% with Total Capital.

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

		a	b	c
		Balance sheet as in published financial statements 30/06/2021	**Under regulatory scope of consolidation 30/06/2021**	**Reference**
	Assets			
A01	Cash and cash balances at central banks	486,072	486,072	
A02	Loans to credit institutions	60,020	55,941	
A03	Debt securities	1,684,213	1,645,985	
A04	Loans to public	2,456,803	2,456,803	
A05	Equity instruments	1,311	1,311	
A06	Other financial instruments	39,633	7,574	
A07	Derivatives	3,889	3,889	
A08	Investments in subsidiaries	274	4,542	
A09	Tangible assets	23,770	23,770	
A10	Intangible assets	8,212	8,193	Partially line 8 in template EU CC1
A11	Current income tax assets	2,359	2,359	
A12	Deferred income tax assets	2,981	2,981	Line 10 in template EU CC1
A13	Non-current assets held for sale	946	946	
A14	Other assets	35,447	34,892	
AA	**Total assets**	**4,805,930**	**4,735,258**	
	Liabilities			
L01	Deposits from credit institutions and central banks	478,047	478,047	
L02	Deposits and borrowings from customers	3,797,982	3,765,165	
L03	Debt securities issued	60,088	60,088	Partially line 46 in template EU CC1
L04	Derivatives	1,120	1,120	
L05	Provisions	1,757	1,757	
L06	Current income tax liabilities	299	299	
L07	Deferred income tax liabilities	507	507	
L08	Other liabilities	90,860	55,112	
LL	**Total liabilities**	**4,430,660**	**4,362,095**	
	Shareholders' Equity			
E01	Share capital	156,556	156,556	Line 1 in template EU CC1
E02	Reserves and other capital components	8,354	7,520	Partially line 3 in template EU CC1
E03	Retained earnings	210,360	209,087	Partially line 2 in template EU CC1
EE	**Total equity**	**375,270**	**373,163**	

EU KM1 - Key metrics template

		a	b	c	d	e
		30/06/2021	**31/03/2021**	**31/12/2020**	**30/09/2020**	**30/06/2020**
	Available own funds (amounts)					
1	Common Equity Tier 1 (CET1) capital	336,056	337,283	341,013	314,991	306,181
2	Tier 1 capital	336,056	337,283	341,013	314,991	306,181
3	Total capital	396,056	397,283	401,013	374,991	366,181
	Risk-weighted exposure amounts					
4	Total risk-weighted exposure amount	2,206,291	2,261,962	1,542,620	1,687,916	1,740,681
	Capital ratios (as a percentage of risk-weighted exposure amount)					
5	Common Equity Tier 1 ratio (%)	15.2%	14.9%	22.1%	18.7%	17.6%
6	Tier 1 ratio (%)	15.2%	14.9%	22.1%	18.7%	17.6%
7	Total capital ratio (%)	18.0%	17.6%	26.0%	22.2%	21.0%
	Additional own funds requirements based on SREP (as a percentage of risk-weighted exposure amount)					
EU 7a	Additional CET1 SREP requirements (%)	1.3%	1.3%	1.3%	1.3%	1.3%
EU 7b	Additional AT1 SREP requirements (%)	0.4%	0.4%	0.4%	0.4%	0.4%
EU 7c	Additional T2 SREP requirements (%)	0.6%	0.6%	0.6%	0.6%	0.6%
EU 7d	Total SREP own funds requirements (%)	10.3%	10.3%	10.3%	10.3%	10.3%
	Combined buffer requirement (as a percentage of risk-weighted exposure amount)					
8	Capital conservation buffer (%)	2.5%	2.5%	2.5%	2.5%	2.5%
EU 8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	-	-	-	-	-
9	Institution specific countercyclical capital buffer (%)	0.0%	0.0%	0.0%	0.0%	0.0%
EU 9a	Systemic risk buffer (%)	-	-	-	-	-
10	Global Systemically Important Institution buffer (%)	-	-	-	-	-
EU 10a	Other Systemically Important Institution buffer	1.5%	1.5%	1.5%	1.5%	1.5%
11	Combined buffer requirement (%)	4.0%	4.0%	4.0%	4.0%	4.0%
EU 11a	Overall capital requirements (%)	14.3%	14.3%	14.3%	14.3%	14.3%
12	CET1 available after meeting the total SREP own funds requirements (%)	4.9%	4.6%	11.8%	8.4%	7.3%

	Leverage ratio					
13	Leverage ratio total exposure measure	4,854,261	4,733,548	4,621,881	4,453,251	4,687,323
14	Leverage ratio	6.9%	7.1%	7.4%	7.1%	6.5%
	Additional own funds requirements to address risks of excessive leverage (as a percentage of leverage ratio total exposure amount)					
EU 14a	Additional CET1 leverage ratio requirements (%)	-	-	-	-	-
EU 14b	Additional AT1 leverage ratio requirements (%)	-	-	-	-	-
EU 14c	Additional T2 leverage ratio requirements (%)	n/a	n/a	n/a	n/a	n/a
EU 14d	Total SREP leverage ratio requirements (%)	-	-	-	-	-
EU 14e	Applicable leverage buffer	-	-	-	-	-
EU 14f	Overall leverage ratio requirements (%)	-	-	-	-	-
	Liquidity Coverage Ratio					
15	Total high-quality liquid assets (HQLA) (Weighted value - average)	1,283,317	1,215,071	2,061,640	1,697,740	1,932,639
EU 16a	Cash outflows - Total weighted value	724,200	638,161	625,221	565,153	619,404
EU 16b	Cash inflows - Total weighted value	47,275	70,740	46,298	129,784	139,758
16	Total net cash outflows (adjusted value)	68,769	567,421	578,923	435,422	479,647
17	Liquidity coverage ratio (%)	187%	214%	356%	390%	403%
	Net Stable Funding Ratio					
18	Total available stable funding	3,818,011	-	-	-	-
19	Total required stable funding	1,938,354	-	-	-	-
20	NSFR ratio (%)	197%	-	-	-	-

EU 2017/2395, IFRS 9-FL: Comparison of institutions' own funds and capital and leverage ratios with and without the application of transitional arrangements for IFRS 9 or analogous ECLs

		30/06/2021	31/03/2021	31/12/2020	30/09/2020	30/06/2020
	Available capital (amounts)					
1	Common Equity Tier 1 (CET1) capital	336,056	337,283	341,013	314,991	306,181
2	Common Equity Tier 1 (CET1) capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	333,130	334,357	336,917	310,894	302,084
3	Tier 1 capital	336,056	337,283	341,013	314,991	306,181
4	Tier 1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	333,130	334,357	336,917	310,894	302,084
5	Total capital	396,056	397,283	401,013	374,991	366,181
6	Total capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	393,130	394,357	396,917	370,894	362,084
	Risk-weighted assets (amounts)					
7	Total risk-weighted assets	2,206,291	2,261,962	1,542,620	1,687,916	1,740,681
8	Total risk-weighted assets as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	2,203,802	2,259,426	1,539,012	1,684,217	1,737,135
	Capital ratios					
9	Common Equity Tier 1 (as a percentage of risk exposure amount)	15.2%	14.9%	22.1%	18.7%	17.6%
10	Common Equity Tier 1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	15.1%	14.8%	21.9%	18.5%	17.4%
11	Tier 1 (as a percentage of risk exposure amount)	15.2%	14.9%	22.1%	18.7%	17.6%
12	Tier 1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	15.1%	14.8%	21.9%	18.5%	17.4%
13	Total capital (as a percentage of risk exposure amount)	18.0%	17.6%	26.0%	22.2%	21.0%
14	Total capital (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	17.8%	17.5%	25.8%	22.0%	20.8%
	Leverage ratio					
15	Leverage ratio total exposure measure	4,854,261	4,733,548	4,621,881	4,453,251	4,687,323
16	Leverage ratio	6.9%	7.1%	7.4%	7.1%	6.5%
17	Leverage ratio as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	6.9%	7.1%	7.3%	7.0%	6.5%

EU OV1 – Overview of total risk exposure amounts

		RWAs		Minimum capital requirements
		30/06/2021	31/12/2020	30/06/2021
1	Credit risk (excluding CCR)	1,992,773	1,337,282	159,422
2	*Of which the standardised approach*	*1,992,773*	*1,337,282*	*159,422*
3	*Of which the foundation IRB (FIRB) approach*			
4	*Of which: slotting approach*			
EU 4a	*Of which: equities under the simple risk weighted approach*			
5	*Of which the advanced IRB (AIRB) approach*			
6	CCR	22,014	4,290	1,761
7	*Of which the standardised approach*	-	*3,357*	-
8	*Of which internal model method (IMM)*	-	-	-
EU 8a	*Of which exposures to a CCP*	-		
EU 8b	*Of which credit valuation adjustment - CVA*	*4,463*	*933*	*357*
9	*Of which other CCR*	*17,551*	-	*1,404*
15	Settlement risk	-	-	-
16	Securitisation exposures in the non-trading book (after the cap)	-	-	-
17	*Of which SEC-IRBA approach*	-	-	-
18	*Of which SEC-ERBA (including IAA)*	-	-	-
19	*Of which SEC-SA approach*	-	-	-
EU 19a	*Of which 1250%/ deduction*	-	-	-
20	Position, foreign exchange and commodities risks (Market risk)	4,146	13,690	332
21	*Of which the standardised approach*	*4,146*	*13,690*	*332*
22	*Of which IMA*	-	-	-
EU 22a	Large exposures	-	-	-
23	Operational risk	187,358	187,358	14,989
EU 23a	*Of which basic indicator approach*	-	-	-
EU 23b	*Of which standardised approach*	*187,358*	*187,358*	*14,989*
EU 23c	*Of which advanced measurement approach*	-	-	-
24	**Amounts below the thresholds for deduction (subject to 250% risk weight)**	-	-	-
29	**Total**	**2,206,291**	**1,542,620**	**176,503**

CREDIT RISK AND CREDIT RISK MITIGATION (CRM)

Credit risk is the risk that the Group will incur a loss from debtor's non-performance or default. The Group is exposed to credit risk in its lending, investing and transaction activities, as well as in respect of the guarantees issued to or received from third parties and other off-balance sheet commitments to third parties. Credit risk management is performed pursuant to the Credit Risk Management Policy. The goal of credit risk management is to achieve a diversified asset portfolio, which generates profits that correspond to the assumed level of risk.

Credit risk management is based on an adequate assessment of a credit risk and a proper decision-making in relation to such risk. In cases when significant risk is to be undertaken, the credit risk analysis is performed by independent units of the Risk Sector. The credit risk analysis consists of an assessment of customer's creditworthiness and collateral quality and liquidity. The analysis of a legal entity's creditworthiness includes an assessment of the industry in which it operates, as well as an analysis of its credit history and current and forecasted financial situation. The assessment of a private individual's creditworthiness consists of the analysis of its credit history, income and debt-to-income ratio analysis, as well as an analysis of applicable social and demographic factors. In cases of material risks, lending decisions are taken by the Credit Committee and approved by the Bank's Management Board.

In relation to the acquisition of corporate bonds, the Group always analyses the business profile and financial performance of the issuer, taking into consideration the credit ratings assigned to it by international rating agencies, as well as market-based indicators. Sovereign bonds are assessed similarly, but with an emphasis on different fundamental factors, including the country's economic strength, institutional strength, financial strength of the government, political risks and other relevant factors.

After a loan is issued or a fixed income security is acquired, the customer's financial position and the issuers' risk indicators, such as credit rating changes, are monitored on a regular basis in order to timely identify potential credit quality deterioration. The loan monitoring process covers monitoring of financial results, financial position and cash flows of the borrower, loan repayment discipline and assessment of collateral quality.

The Group reviews its loan portfolio and securities portfolio on a regular basis to assess its structure, quality and concentration levels, as well as to evaluate portfolio trends and to control credit risk level. The Group takes measures for limiting credit risk concentration by diversifying the portfolio and setting credit risk concentration limits. To limit its credit risk the Group has set the following concentration limits: individual counterparty and issuer limits, maximum exposure limit linked to a particular risk class of counterparty/issuer, limit for internally risk weighted exposures in a particular country/sector combination, limit for groups of connected customers, limit for large risk exposures, limit for transactions with the Group's related parties, industry limit, limit by customer type, loan product type, collateral type, intra-group transactions. Control of compliance with credit risk concentration limits, credit risk identification, monitoring and reporting is the responsibility of the Risk Sector.

In addition to the credit risk, which is inherent in the Group's loan portfolio and fixed income securities portfolio, the Group is also exposed to credit risk as a result of its banking relationships with multiple credit institutions, which it maintains in order to process customer transactions in a prompt and efficient manner. The Group manages its exposure to commercial banks and brokerage companies by monitoring on a regular basis the credit ratings of such institutions, conducting due diligence of their credit profiles and monitoring the individual exposure limits applicable to counterparties set by the Financial Market and Counterparty Risk Committee (FMCRC). The Group's exposures to derivative counterparties arise from its activities in managing liquidity and credit risks through short term derivatives that do not expose it to material counterparty risk.

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

Qualitative disclosures	
Article 442(a)	The scope and definitions of 'past-due' and 'impaired' exposures used for accounting purposes and the definitions of past due and default for regulatory purposes are as specified by the EBA Guidelines on the application of the definition of default.
Article 442(a)	All exposures past-due more than 90 days are considered past-due exposures and are considered credit impaired for accounting purposes. All financial assets are assessed for expected credit losses.
Article 442(b)	By default all exposures are assessed collectively for expected credit losses, and the corresponding impairment allowances or provisions for off-balance sheet exposures are presented as general credit risk adjustments. For larger loan book exposures, where there are indications of impairment, an individual expected credit loss assessment is carried out and, if based on the assessment, the exposure is impaired the resulting impairments allowance and provisions are presented as specific credit risk adjustment. For large exposures, which have no impairment indicators or where based on the individual assessment are not impaired, expected credit losses are assessed collectively and presented as general credit risk adjustments.
Article 442(a)	The institution is applying definition of a restructured exposure for the implementation of Article 178(3)(d) as specified by the EBA Guidelines on default in the definition of forborne exposure defined in Annex V of the Commission Implementing Regulation (EU) No 680/2014.

EU CQ4: Quality of non-performing exposures by geography

		a	c	e	f	g
		Gross carrying / Nominal amount			Provisions on off-balance sheet commitments and financial guarantee given	Accumulated negative changes in fair value due to credit risk on non-performing exposures
			of which: defaulted	Accumulated impairment		
010	***On balance sheet exposures***	**4,198,564**	**86,691**	**(74,741)**	**-**	**-**
020	*Latvia*	1,556,092	34,423	(31,230)	-	-
030	*Lithuania*	1,547,852	18,992	(13,700)	-	-
040	*Estonia*	452,308	11,801	(7,784)	-	-
050	*United States*	96,257	-	(63)	-	-
060	*Netherlands*	88,894	-	(20)	-	-
070	*Other countries*	457,161	21,475	(21,944)	-	-
080	***Off balance sheet exposures***	**313,553**	**475**	**-**	**1,657**	**-**
090	*Latvia*	184,364	263	-	1,013	-
100	*Lithuania*	106,695	212	-	505	-
110	*Estonia*	19,677	-	-	138	-
120	*China*	1,708	-	-	1	-
130	*Switzerland*	431	-	-	-	-
140	*Other countries*	678	-	-	-	-
150	***Total***	**4,512,117**	**87,166**	**(74,741)**	**1,657**	**-**

EU CQ5: Credit quality of loans and advances to non-financial corporations by industry

		a	c	e	f
		Gross carrying amount		Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures
			of which: defaulted		
010	Agriculture, forestry and fishing	147,827	6,471	(4,725)	-
020	Mining and quarrying	5,864	257	(192)	-
030	Manufacturing	208,590	10,421	(4,362)	-
040	Electricity, gas, steam and air conditioning supply	41,642	2,580	(289)	-
050	Water supply	12,524	404	(143)	-
060	Construction	122,241	1,661	(2,927)	-
070	Wholesale and retail trade	194,776	3,899	(4,151)	-
080	Transport and storage	215,744	19,715	(12,347)	-
090	Accommodation and food service activities	46,359	6,764	(3,634)	-
100	Information and communication	14,297	130	(210)	-
110	Real estate activities	254,852	724	(4,064)	-
120	Financial and insurance activities	371	-	(5)	-
130	Professional, scientific and technical activities	35,829	700	(750)	-
140	Administrative and support service activities	135,531	6,834	(2,594)	-
150	Public administration and defence, compulsory social security	2,782	-	(34)	-
160	Education	5,628	299	(106)	-
170	Human health services and social work activities	13,523	14	(170)	-
180	Arts, entertainment and recreation	8,708	1,303	(114)	-
190	Other services	4,391	22	(68)	-
200	**Total**	**1,471,479**	**62,198**	**(40,885)**	**-**

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

In template "EU CR1" the disclosed information on Non-performing exposures and Accumulated impairment do not reflect separate allocation of a purchased or originated credit-impaired financial assets' amount. Therefore, total amounts do not reconcile with related subsections.

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
		Gross carrying amount/nominal amount						Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						Accumulated partial write-off	Collaterals and financial guarantees received	
		Performing exposures			Non-performing exposures			Performing exposures - Accumulated impairment and provisions			Non-performing exposures - Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions				On performing exposures	On non-performing exposures
			of which: stage 1	of which: stage 2		of which: stage 2	of which: stage 3		of which: stage 1	of which: stage 2		of which: stage 2	of which: stage 3			
005	**Cash balances at central banks and other demand deposits**	**480,770**	**480,770**	**-**	**-**	**-**	**-**	**(2)**	**(2)**	**-**	**-**	**-**	**-**		**-**	**-**
010	**Loans and advances**	**2,464,709**	**2,331,971**	**127,087**	**86,691**	**-**	**62,108**	**(34,678)**	**(28,347)**	**(6,303)**	**(38,884)**	**-**	**(37,872)**	**(4,132)**	**2,118,672**	**46,380**
020	*Central banks*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
030	*General governments*	*24,150*	*24,001*	*149*	*1*	-	*1*	*(107)*	*(92)*	*(15)*	-	-	-	-	*4,973*	-
040	*Credit institutions*	*21,076*	*21,076*	-	-	-	-	*(43)*	*(43)*	-	-	-	-	-	-	-
050	*Other financial corporations*	*24,319*	*24,287*	*33*	*151*	-	*151*	*(211)*	*(209)*	*(2)*	*(46)*	-	*(46)*	-	*10,073*	*105*
060	*Non-financial corporations*	*1,409,281*	*1,300,853*	*103,196*	*62,198*	-	*38,569*	*(20,401)*	*(15,758)*	*(4,625)*	*(20,484)*	-	*(19,491)*	*(4,132)*	*1,275,169*	*41,027*
070	*Of which: SMEs*	*1,070,839*	*981,215*	*84,864*	*53,102*	-	*31,205*	*(16,606)*	*(12,875)*	*(3,713)*	*(13,003)*	-	*(12,013)*	-	*994,176*	*39,328*
080	*Households*	*985,882*	*961,754*	*23,709*	*24,342*	-	*23,388*	*(13,915)*	*(12,244)*	*(1,661)*	*(18,353)*	-	*(18,335)*	-	*828,457*	*5,248*
090	**Debt Securities**	**1,647,164**	**1,647,164**	**-**	**-**	**-**	**-**	**(1,179)**	**(1,179)**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
100	*Central banks*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
110	*General governments*	*1,236,899*	*1,236,899*	-	-	-	-	*(530)*	*(530)*	-	-	-	-	-	-	-
120	*Credit institutions*	*207,314*	*207,314*	-	-	-	-	*(13)*	*(13)*	-	-	-	-	-	-	-
130	*Other financial corporations*	*45,695*	*45,695*	-	-	-	-	*(526)*	*(526)*	-	-	-	-	-	-	-
140	*Non-financial corporations*	*157,256*	*157,256*	-	-	-	-	*(110)*	*(110)*	-	-	-	-	-	-	-
150	**Off-balance sheet exposures**	**313,078**	**309,273**	**3,258**	**475**	**1**	**474**	**1,541**	**1,499**	**41**	**117**	**-**	**117**		**83,456**	**20**
160	*Central banks*	-	-	-	-	-	-	-	-	-	-	-	-		-	-
170	*General governments*	*4,170*	*4,170*	-	-	-	-	*1*	*1*	-	-	-	-		-	-
180	*Credit institutions*	*1,768*	*1,768*	-	-	-	-	*1*	*1*	-	-	-	-		*60*	-
190	*Other financial corporations*	*7,607*	*7,607*	-	-	-	-	*33*	*33*	-	-	-	-		*4,076*	-
200	*Non-financial corporations*	*173,625*	*170,652*	*2,652*	*259*	*1*	*258*	*686*	*671*	*14*	*58*	-	*58*		*71,744*	*19*
210	*Households*	*125,908*	*125,076*	*606*	*216*	-	*216*	*820*	*793*	*27*	*59*	-	*59*		*7,576*	*1*
220	***Total***	**4,424,951**	**4,288,408**	**130,345**	**87,166**	**1**	**62,582**	**(34,316)**	**(28,027)**	**(6,262)**	**(38,767)**	**-**	**(37,755)**	**(4,132)**	**2,202,128**	**46,400**

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

	a	b	c	d	e	f	g	h	i	j	k	l
	Gross carrying amount / Nominal amount											
	Performing exposures			Non-performing exposures								
		Not past due or Past due < 30 days	Past due > 30 days < 90 days		Unlikely to pay that are not past-due or past-due < = 90 days	Past due > 90 days <= 180 days	Past due > 180 days < =1 year	Past due > 1 year <= 2 years	Past due > 2 year <= 5 years	Past due > 5 year <= 7 years	Past due > 7 years	Of which defaulted
005 Cash balances at central banks and other demand deposits	**480,770**	**480,770**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
010 Loans and advances	**2,464,709**	**2,454,026**	**10,683**	**86,691**	**41,330**	**11,044**	**1,101**	**6,667**	**25,905**	**178**	**466**	**86,691**
020 Central banks	-	-	-	-	-	-	-	-	-	-	-	-
030 General governments	24,150	24,093	57	1	-	-	-	-	-	-	-	1
040 Credit institutions	21,076	21,076	-	-	-	-	-	-	-	-	-	-
050 Other financial corporations	24,319	24,319	-	151	18	-	-	-	132	-	-	151
060 Non-financial corporations	1,409,282	1,401,729	7,554	62,197	35,797	9,402	520	6,060	10,413	8	-	62,197
070 Of which SMEs	*1,070,839*	*1,063,286*	*7,553*	*53,102*	*34,175*	*9,402*	*519*	*6,060*	*2,939*	*8*	-	*53,102*
080 Households	985,882	982,809	3,072	24,342	5,515	1,642	581	607	15,360	170	466	24,342
090 Debt Securities	**1,647,164**	**1,647,164**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
100 Central banks	-	-	-	-	-	-	-	-	-	-	-	-
110 General governments	1,236,899	1,236,899	-	-	-	-	-	-	-	-	-	-
120 Credit institutions	207,314	207,314	-	-	-	-	-	-	-	-	-	-
130 Other financial corporations	45,695	45,695	-	-	-	-	-	-	-	-	-	-
140 Non-financial corporations	157,256	157,256	-	-	-	-	-	-	-	-	-	-
150 Off-balance sheet exposures	**313,078**			**475**								**475**
160 Central banks	-			-								-
170 General governments	4,170			-								-
180 Credit institutions	1,768			-								-
190 Other financial corporations	7,607			-								-
200 Non-financial corporations	173,625			259								259
210 Households	125,908			216								216
220 Total	**4,424,951**	**4,101,190**	**10,683**	**87,166**	**41,330**	**11,044**	**1,101**	**6,667**	**25,905**	**178**	**466**	**87,166**

EU CRC – Qualitative disclosure requirements related to CRM techniques

Article 453 (a) CRR	(a)	Netting is not used as a CRM technique both for on-balance sheet and off-balance sheet exposures.
Article 453 (b) CRR	(b)	The valuation of the government guarantees and cash security deposits is the guaranteed amount as there is no volatility of mark-to-market adjustments to these types of CRM items.
Article 453 (c) CRR	(c)	The only types of collateral considered for CRM are government or state-owned development finance institution guarantees, guarantees provided by institutions and cash security deposits placed with the institution.
Article 453 (d) CRR	(d)	Prudently no credit derivatives are considered for the purposes of reducing capital requirements.
Article 453 (e) CRR	(e)	There is no CRM concentration risk from non-governmental counterparties.

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

		Unsecured carrying amount	Secured carrying amount	Of which secured by collateral	Of which secured by financial guarantees	Of which secured by credit derivatives
		a	b	c	d	e
1	Loans and advances	867,118	2,165,052	2,085,800	79,252	-
2	Debt securities	1,647,164	-	-	-	
3	**Total**	**2,514,282**	**2,165,052**	**2,085,800**	**79,252**	**-**
4	*Of which non-performing exposures*	*40,311*	*46,380*	*40,156*	*6,224*	-

EU CRD – Qualitative disclosure requirements related to standardised approach

Article 444(a)	Credit ratings issued by Moody's, Standard & Poor's, and Fitch Ratings are used by the institution. No ratings issued by other external credit assessment institutions (ECAIs) are used.
Article 444(b)	For all eligible exposure classes eligible ECAI ratings are used.
Article 444(c)	No credit rating issued for one asset is transferred onto comparable assets in the banking book.
Article 444(d)	The alphanumerical scale of each agency is aligned with the credit quality steps prescribed in Part Three, Title II, Chapter 2 of the CRR (as specified by the EBA).

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

		a	b	c	d	e	f
		Exposures before CCF and before CRM		Exposures post CCF and post CRM		RWAs and RWAs density	
	Exposure classes	**On-balance sheet exposures**	**Off-balance sheet exposures**	**On-balance sheet exposures**	**Off-balance sheet amount**	**RWEA**	**RWEA density (%)**
1	Central governments or central banks	1,623,706	200	1,663,080	1,896	15,830	1%
2	Regional government or local authorities	49,104	3,770	49,273	2,133	9,518	19%
3	Public sector entities	4,135	199	4,135	99	937	22%
4	Multilateral development banks	38,680	-	38,680	-	1,977	5%
5	International organisations	-	-	-	-	-	0%
6	Institutions	236,152	1,768	236,152	1,721	55,361	23%
7	Corporates	1,165,541	165,415	1,088,225	48,339	929,482	82%
8	Retail	877,980	135,047	868,533	3,752	565,056	65%
9	Secured by mortgages on immovable property	526,351	3,544	513,247	1,772	246,884	48%
10	Exposures in default	54,205	637	50,676	187	64,467	127%
11	Items associated with particularly high risk	17,295	756	14,084	190	21,410	150%
12	Covered bonds	16,945	-	16,945	-	1,694	10%
13	Claims on institutions and corporates with a short-term credit assessment	-	-	-	-	-	0%
14	Collective investments undertakings	7,574	-	7,574	-	8,147	108%
15	Equity exposures	5,853	-	5,853	-	12,256	209%
16	Other exposures	103,870	621	170,934	35,121	59,754	29%
17	**Total**	**4,727,391**	**311,957**	**4,727,391**	**95,210**	**1,992,773**	**41%**

EU CR5 – Standardised approach

		Risk weight																
	Exposure classes	**0%**	**2%**	**4%**	**10%**	**20%**	**35%**	**50%**	**70%**	**75%**	**100%**	**150%**	**250%**	**370%**	**1250%**	**Others**	**Total**	**Of which unrated**
1	Central governments or central banks	1,585,825	-	-	-	79,151	-	-	-	-	-	-	-	-	-	-	1,664,976	1,652,822
2	Regional governments or local authorities	3,817	-	-	-	47,588	-	-	-	-	-	-	-	-	-	-	51,405	30,423
3	Public sector entities	-	-	-	-	3,933	-	301	-	-	-	-	-	-	-	-	4,234	4,234
4	Multilateral development banks	34,726	-	-	-	-	-	3,954	-	-	-	-	-	-	-	-	38,680	35,425
5	International organisations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Institutions	-	-	-	-	225,174	-	14,451	-	-	4,639	-	-	-	-	-	244,264	45,408
7	Corporates	-	-	-	-	73,129	-	56,920	-	-	1,021,663	1,181	-	-	-	-	1,152,893	980,363
8	Retail	-	-	-	-	-	-	-	-	872,286	-	-	-	-	-	-	872,286	871,693
9	Secured by mortgages on immovable property	-	-	-	-	-	377,339	-	-	91,419	46,261	-	-	-	-	-	515,019	514,801
10	Exposures in default	-	-	-	-	-	-	-	-	-	23,656	27,207	-	-	-	-	50,863	49,406
11	Items associated with particularly high risk	-	-	-	-	-	-	-	-	-	-	14,274	-	-	-	-	14,274	14,256
12	Covered bonds	-	-	-	16,945	-	-	-	-	-	-	-	-	-	-	-	16,945	-
13	Claims on institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Collective investments undertakings	479	-	-	-	-	-	-	-	-	4,990	2,105	-	-	-	-	7,574	7,574
15	Equity exposures	-	-	-	-	-	-	-	-	-	1,585	-	4,269	-	-	-	5,854	78,042
16	Other exposures	114,802	-	-	-	39,373	-	-	-	-	51,879	-	-	-	-	-	206,054	206,012
17	**Total**	**1,739,649**	**-**	**-**	**16,945**	**468,348**	**377,339**	**75,626**	**-**	**963,705**	**1,154,673**	**44,767**	**4,269**	**-**	**-**	**-**	**4,845,321**	**4,490,459**

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

		General credit exposures		Relevant credit exposures – Market risk				Own funds requirements						
		Exposure value under the SA	Exposure value under the IRB approach	Sum of long and short positions of trading book exposures for SA	Value of trading book exposures for internal models	Securitisation exposures Exposure value for non-trading book	Total exposure value	Relevant credit risk exposures - Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book	Total	Risk-weighted exposure amounts	Own fund requirements weights (%)	Counter-cyclical buffer rate (%)
010	**Breakdown by country:**													
	Latvia	1,263,747	-	-	-	-	1,263,747	69,331	-	-	69,331	15,796,838	44.97%	0.00%
	Lithuania	1,018,911	-	-	-	-	1,018,911	57,699	-	-	57,699	12,736,388	37.42%	0.00%
	Estonia	373,926	-	-	-	-	373,926	19,637	-	-	19,637	4,674,075	12.74%	0.00%
	United States	48,833	-	-	-	-	48,833	1,438	-	-	1,438	610,413	0.93%	0.00%
	Netherlands	37,769	-	-	-	-	37,769	1,202	-	-	1,202	472,113	0.78%	0.00%
	United Kingdom	7,382	-	-	-	-	7,382	490	-	-	490	92,275	0.32%	0.00%
	Sweden	7,040	-	-	-	-	7,040	383	-	-	383	88,000	0.25%	0.00%
	Other with 0% countercyclical capital buffer	64,767	-	-	-	-	64,767	156,889	-	-	156,889	809,588	1.87%	0.00%
	Other with non 0% countercyclical capital buffer	19,386	-	10,591	-	-	29,977	957	169	-	1,126	374,713	0.73%	0.55%
020	**Total**	**2,841,761**	**-**	**10,591**	**-**	**-**	**2,852,352**	**154,013**	**169**	**-**	**308,195**	**35,654,400**	**100.00%**	

In accordance with the EC 1152/2014 foreign exposures, whose aggregate does not exceed 2% of the aggregate of the general credit, trading book and securitisation exposures of that institution are allocated to an institution's home member state. The Article 140.4 of the 2013/36/EU requires only relevant credit exposures of the institution to be included in the countercyclical capital buffer calculating.

EU CCyB2 - Amount of institution-specific countercyclical capital buffer

		a
1	Total risk exposure amount	2,206,291
2	Institution specific countercyclical capital buffer rate	0.00%
3	Institution specific countercyclical capital buffer requirement	0

In the reporting period in reaction to the Covid-19 events, most European countercyclical capital buffer requirements were decreased to 0%. Therefore, based on the regional distribution of the Group's exposures the effective countercyclical capital buffer requirement of the Group has decreased to almost 0%.

EU CQ1: Credit quality of forborne exposures

		a	b	c	d	e	f	g	h
		Gross carrying amount/ Nominal amount of exposures with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collaterals received and financial guarantees received on forborne exposures	
		Performing forborne	Non-performing forborne			On performing forborne exposures	On non-performing forborne exposures		Of which: Collateral and financial guarantees received on non-performing exposures with forbearance measures
				Of which defaulted	Of which impaired				
005	Cash balances at central banks and other demand deposits	-	-	-	-	-	-	-	-
010	Loans and advances	135,029	57,092	57,091	57,091	(2,384)	(29,515)	150,634	29,216
020	*Central banks*	-	-	-	-	-	-	-	-
030	*General governments*	48	-	-	-	(1)	-	47	-
040	*Credit institutions*	-	-	-	-	-	-	-	-
050	*Other financial corporations*	159	143	143	143	(4)	(38)	248	105
060	*Non-financial corporations*	110,810	39,903	39,902	39,902	(1,774)	(14,422)	128,161	27,254
070	*Households*	24,012	17,046	17,046	17,046	(605)	(15,055)	22,178	1,857
080	Debt Securities	-	-	-	-	-	-	-	-
090	Loan commitments given	601	2	-	-	-	-	-	-
100	***Total***	**135,630**	**57,094**	**57,091**	**57,091**	**(2,384)**	**(29,515)**	**150,634**	**29,216**

COUNTERPARTY CREDIT RISK

Counterparty credit risk is the risk that the counterparty to a transaction could default before the final settlement of the transaction's cash flows. Group's counterparty credit risk arises primarily from currency derivatives transactions. The Group applies mark-to-market method to calculate counterparty credit risk.

EU CCR1 – Analysis of CCR exposure by approach

		a	b	c	d	e	f	g	g
		Replace-ment cost (RC)	Potential future exposure (PFE)	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre-CRM	Exposure value post-CRM	Exposure value	RWEA
EU1	EU – Original Exposure Method (for derivatives)	3,889	12,340	n/a	1.4	22,720	22,720	22,720	17,946
EU2	EU – Simplified SA CCR (for derivatives)	-	-	n/a	1.4	-	-	-	-
1	SA – CCR (for derivatives)	-	-	n/a	1.4	-	-	-	-
2	IMM (for derivatives and SFTs)	n/a	n/a	-	1.2	-	-	-	-
2a	*Of which securities financing transactions netting sets*	n/a	n/a	-	n/a	-	-	-	-
2b	*Of which derivatives and long settlement transactions netting sets*	n/a	n/a	-	n/a	-	-	-	-
2c	*Of which from contractual cross-product netting sets*	n/a	n/a	-	n/a	-	-	-	-
3	Financial collateral simple method (for SFTs)	n/a	n/a	n/a	n/a	-	-	-	-
4	Financial collateral comprehensive method (for SFTs)	n/a	n/a	n/a	n/a	-	-	-	-
5	VaR for SFTs	n/a	n/a	n/a	n/a	-	-	-	-
6	**Total**	**n/a**	**n/a**	**n/a**	**n/a**	**22,720**	**22,720**	**22,720**	**17,946**

Credit Valuation Adjustment is an adjustment to the mid-market valuation of the portfolio of transactions with a counterparty. That adjustment reflects the current market value of the credit risk of the counterparty to the institution in relation to transactions with derivatives.

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

		a Exposure value	b RWEA
1	Total transactions subject to the Advanced method	-	-
2	(i) VaR component (including the 3× multiplier)		-
3	(ii) stressed VaR component (including the 3× multiplier)		-
4	Transactions subject to the Standardised method	14,122	4,462
EU4	Transactions subject to the Alternative approach (Based on the Original Exposure Method)	-	-
5	**Total transactions subject to own funds requirements for CVA risk**	**14,122**	**4,462**

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

		Risk weight											Total exposure value
	Exposure classes	**0%**	**2%**	**4%**	**10%**	**20%**	**50%**	**70%**	**75%**	**100%**	**150%**	**Others**	
1	Central governments or central banks	-	-	-	-	-	-	-	-	-	-	-	-
2	Regional government or local authorities	-	-	-	-	-	-	-	-	-	-	-	-
3	Public sector entities	-	-	-	-	-	-	-	-	-	-	-	-
4	Multilateral development banks	-	-	-	-	-	-	-	-	-	-	-	-
5	International organisations	-	-	-	-	-	-	-	-	-	-	-	-
6	Institutions	-	-	-	-	5,523	867	-	-	-	-		6,390
7	Corporates	-	-	-	-	-	-	-	-	16,175	156		16,330
8	Retail												
9	Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-
10	Other items	-	-	-	-	-	-	-	-	-	-	-	-
11	**Total exposure value**	**-**	**-**	**-**	**-**	**5,523**	**867**	**-**	**-**	**16,175**	**156**	**-**	**22,720**

LEVERAGE RATIO

Leverage ratio is calculated as Tier 1 capital versus the total exposure measure with the minimum requirement of 3%. No buffer requirements for O-SII banks apply under the current regulatory framework. The exposure measure includes both non-risk based on-balance sheet and off-balance sheet items calculated in accordance with the capital requirements regulation. The leverage ratio and the risk-based capital adequacy ratio requirements are complementary, with the leverage ratio defining the minimum capital to total exposure requirement and the risk-based capital adequacy ratios limiting bank risk-taking.

	30/06/2021 **Group**
Leverage Ratio – fully phased-in definition of Tier 1 capital (excluding interim profits)	6.9%
Leverage Ratio - transitional definition of Tier 1 capital (excluding interim profits)	6.9%

EU LR2 - LRCom: Leverage ratio common disclosure

		CRR leverage ratio exposures a 30/06/2021	 b 31/03/2021
On-balance sheet exposures (excluding derivatives and SFTs)			
1	On-balance sheet items (excluding derivatives, SFTs, but including collateral)	4,727,391	4,614,127
2	Gross-up for derivatives collateral provided where deducted from the balance sheet assets pursuant to the applicable accounting framework	-	-
3	(Deductions of receivables assets for cash variation margin provided in derivatives transactions)	-	-
4	(Adjustment for securities received under securities financing transactions that are recognised as an asset)	-	-
5	(General credit risk adjustments to on-balance sheet items)	-	-
6	(Asset amounts deducted in determining Tier 1 capital)	(4,217)	-
7	**Total on-balance sheet exposures (excluding derivatives and SFTs)**	**4,723,174**	**4,614,127**
Derivative exposures			
8	Replacement cost associated with SA-CCR derivatives transactions (i.e. net of eligible cash variation margin)	-	-
EU-8a	Derogation for derivatives: replacement costs contribution under the simplified standardised approach	-	-
9	Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions	-	-
EU-9a	Derogation for derivatives: Potential future exposure contribution under the simplified standardised approach	-	-
EU-9b	Exposure determined under Original Exposure Method	22,720	-
10	(Exempted CCP leg of client-cleared trade exposures) (SA-CCR)	-	-

EU-10a	(Exempted CCP leg of client-cleared trade exposures) (simplified standardised approach)	-	-
EU-10b	(Exempted CCP leg of client-cleared trade exposures) (original exposure method)	-	-
11	Adjusted effective notional amount of written credit derivatives	-	-
12	(Adjusted effective notional offsets and add-on deductions for written credit derivatives)	-	-
	Other		7,817
13	**Total derivatives exposures**	**22,720**	**7,817**
Securities financing transaction (SFT) exposures			
14	Gross SFT assets (with no recognition of netting), after adjustment for sales accounting transactions	-	-
15	(Netted amounts of cash payables and cash receivables of gross SFT assets)	-	-
16	Counterparty credit risk exposure for SFT assets	-	-
EU-16a	Derogation for SFTs: Counterparty credit risk exposure in accordance with Articles 429e(5) and 222 CRR	-	-
17	Agent transaction exposures	-	-
EU-17a	(Exempted CCP leg of client-cleared SFT exposure)	-	-
18	**Total securities financing transaction exposures**	-	-
Other off-balance sheet exposures			
19	Off-balance sheet exposures at gross notional amount	311,957	313,008
20	(Adjustments for conversion to credit equivalent amounts)	311,957	198,483
21	(General provisions associated with off-balance sheet exposures deducted in determining Tier 1 capital)	-	-
22	**Off-balance sheet exposures**	**108,368**	**114,525**
Excluded exposures			
EU-22a	(Exposures excluded from the leverage ratio total exposure measure in accordance with point (c) of Article 429a(1) CRR)	-	-
EU-22b	(Exposures exempted in accordance with point (j) of Article 429a (1) CRR (on and off balance sheet))	-	-
EU-22c	(-) Excluded exposures of public development banks - Public sector investments	-	-
EU-22d	(Excluded promotional loans of public development banks: - Promotional loans granted by a public development credit institution - Promotional loans granted by an entity directly set up by the central government, regional governments or local authorities of a Member State - Promotional loans granted by an entity set up by the central government, regional governments or local authorities of a Member State through an intermediate credit institution)	-	-
EU-22e	(Excluded passing-through promotional loan exposures by non-public development banks (or units): - Promotional loans granted by a public development credit institution - Promotional loans granted by an entity directly set up by the central government, regional governments or local authorities of a Member State - Promotional loans granted by an entity set up by the central government, regional governments or local authorities of a Member State through an intermediate credit institution)	-	-
EU-22f	(Excluded guaranteed parts of exposures arising from export credits)	-	-
EU-22g	(Excluded excess collateral deposited at triparty agents)	-	-
EU-22h	(Excluded CSD related services of CSD/institutions in accordance with point (o) of Article 429a(1) CRR)	-	-
EU-22i	(Excluded CSD related services of designated institutions in accordance with point (p) of Article 429a(1) CRR)	-	-
EU-22j	(Reduction of the exposure value of pre-financing or intermediate loans)	-	-
EU-22k	(Total exempted exposures)	-	-
Capital and total exposure measure			
23	**Tier 1 capital**	336,056	337,283
24	**Leverage ratio total exposure measure**	4,854,262	4,733,548
Leverage ratio			
25	Leverage ratio	6.9%	7.1%
EU-25	Leverage ratio (without the adjustment due to excluded exposures of public development banks - Public sector investments) (%)	6.9%	7.1%
25a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves)	6.9%	7.1%
26	Regulatory minimum leverage ratio requirement (%)	3.0%	3.0%
EU-26	Additional leverage ratio requirements (%)	-	-
27	Required leverage buffer (%)	-	-
Choice on transitional arrangements and relevant exposures			
EU-27	Choice on transitional arrangements for the definition of the capital measure	(4,217)	(2,921)

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

		a Applicable amount
1	Total assets as per published financial statements	4,735,274
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of regulatory consolidation	-
3	(Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference)	-
4	(Adjustment for temporary exemption of exposures to central bank (if applicable))	-
5	(Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting framework but excluded from the leverage ratio total exposure measure in accordance with point (i) of Article 429a(1) CRR)	-
6	Adjustment for regular-way purchases and sales of financial assets subject to trade date accounting	-
7	Adjustment for eligible cash pooling transactions	-
8	Adjustments for derivative financial instruments	-
9	Adjustment for securities financing transactions (SFTs)	-
10	Adjustment for off-balance sheet items (i.e. conversion to credit equivalent amounts of off-balance sheet exposures)	108,368
11	(Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital)	-
EU-11a	(Adjustment for exposures excluded from the leverage ratio total exposure measure in accordance with point (c) of Article 429a(1) CRR)	-
EU-11b	(Adjustment for exposures excluded from the leverage ratio total exposure measure in accordance with point (j) of Article 429a(1) CRR)	-
12	Other adjustments	10,620
13	**Leverage ratio total exposure measure**	**4,854,262**

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

		CRR leverage ratio exposures
EU-1	**Total on-balance sheet exposures (excluding derivatives and SFTs), of which:**	6,681,811
EU-2	Trading book exposures	-
EU-3	Banking book exposures, of which:	6,681,811
EU-4	Covered bonds	18,639
EU-5	Exposures treated as sovereigns	1,678,910
EU-6	Exposures to regional governments, MDB, international organisations and PSE **not** treated as sovereigns	104,155
EU-7	Institutions	291,165
EU-8	Secured by mortgages of immovable properties	758,910
EU-9	Retail exposures	1,431,325
EU-10	Corporate	1,983,981
EU-11	Exposures in default	115,003
EU-12	Other exposures (e.g. equity, securitisations, and other non-credit obligation assets)	299,723

EU LRA: Disclosure of LR qualitative information

1	Description of the processes used to manage the risk of excessive leverage: The Group regularly calculates leverage ratio and monitors changes in it, to manage risk of excessive leverage.
2	Description of the factors that had an impact on the leverage ratio during the period to which the disclosed leverage ratio refers: The major factors affecting the Group's leverage ratio in the reporting period was change in the Tier 1 capital level due to inclusion in own funds of the audited annual net result as well as changes in the Group's total assets which was related to scale of the Group's operations.

MARKET RISK

Market risk is the risk that the Group will incur a loss as a result of the mark-to-market revaluation of balance sheet and off-balance sheet items caused by changes in market values of financial instruments due to changes in foreign exchange rates, interest rates and other factors.

Position risk of financial instruments is assessed and limits are set by the Group's Investment Committee (GIC). The decisions of the GIC are approved by the Bank's Management Board. Market risk is managed by the Group's business units and subsidiaries which can accept market risk in line with the set limits and investment restrictions of the respective portfolio. Market risk is measured, monitored and risk levels are reported by the Risk Sector.

The Group manages market risk by developing investment guidelines for every significant portfolio, which restrict, among other things, the sensitivity against interest rate changes, the duration and credit quality profile of investments, as well as by setting individual limits for issuers and financial instruments, to keep limit volumes closely linked to the results of risk assessments. The Group places significant emphasis on managing concentration risk and applies a framework, under which limits are set on risk adjusted exposures for every country and sector combination that the Group invests in. To assess position risk the Group uses sensitivity and scenario analysis, which identifies and quantifies the negative impact of adverse events on the portfolio of the Group taking into consideration regional, sector profiles of the portfolio and credit rating risk profiles of issuers.

EU MR1 – Market risk under the standardised approach

		a
		RWEAs
	Outright products	
1	Interest rate risk (general and specific)	4,146
2	Equity risk (general and specific)	-
3	Foreign exchange risk	-
4	Commodity risk	-
	Options	
5	Simplified approach	-
6	Delta-plus approach	-
7	Scenario approach	-
8	**Securitisation (specific risk)**	-
9	**Total**	**4,146**

Exposures in equities not included in the trading book

None of the Group's investments in the equity exposures is included in the trading book. Information on the Group's investments in the equities, including carrying value, applied valuation techniques, fair value hierarchy level and estimated fair value, is disclosed at AS Citadele banka latest financial report which is available at www.cblgroup.com.

The prudential consolidation group does not include AAS CBL Life. The Group's investment of EUR 4,269 thousand in the capital of this subsidiary is accounted at cost and is not revalued.

Currency risk

Currency risk is a risk of loss arising from fluctuations in currency exchange rates.

Currency risk management in the Group is carried out in accordance with Currency Risk Management Policy. Currency risk is assessed and decisions are made by the FMCRC. The decisions of the FMCRC are approved by the Bank's Management Board. The FMCRC defines the acceptable currency risk level and the Group's internal limit system, as well as monitors compliance with these limits.

Day-to-day currency risk management is the responsibility of the Treasury Sector, while risk monitoring and reporting is the responsibility of the Risk Sector.

The Group has a low risk appetite for foreign exchange risk. The Group aims to keep exposures at levels that would produce a small net impact even in periods of high volatility. Several well-known methodologies are used to measure and manage foreign exchange risk including a conservative limit for a daily value-at-risk exposure. The Group is in full compliance with the currency position requirements of Latvian legislation.

Interest rate risk

Interest rate risk is related to the possible negative impact of changes in general interest rates on the Group's income and economic value.

Interest rate risk management in the Group is carried out in accordance with Interest Rate Risk Management Policy. Interest rate risk is assessed and decisions are taken by the Assets and Liabilities Management Committee (ALCO). The decisions of the ALCO are approved by the Bank's Management Board. The ALCO sets the acceptable interest rate risk level and the Group's internal limit system, monitors the compliance with the approved limits and use of the instruments for the management of interest rate risk. Interest rate risk measurement, management and reporting are responsibilities of the Treasury Sector, while the Risk Sector ensures proper oversight and prepares analytical reports to the ALCO and the Bank's Management Board.

The Group manages interest rate risk by using repricing gap analysis of the risk sensitive assets and liabilities, duration analysis of assets and liabilities as well as stress testing. The Group sets limits for impact of interest rate shock on economic value, net interest income and revaluation reserve. Based on the market analysis and the Group's financing structure, the ALCO sets the interest rates for customer deposits.

LIQUIDITY RISK

Liquidity risk is the risk that the Group will be unable to meet its legal payment obligations. The purpose of liquidity risk management is to ensure the availability of liquid assets to cover any possible gaps between cash inflows and outflows as well as to secure sufficient funding for lending and investment activities.

The Group manages its liquidity risk in accordance with Liquidity Risk Management Policy. The management and reporting of liquidity risk is coordinated by the Treasury Sector, and the risk is assessed and decisions are taken by the ALCO. The decisions of the ALCO are approved by the Bank's Management Board. The Risk Sector on a monthly basis provides information to the ALCO and the Bank's Management Board about the level of the assumed risk as part of the reporting and supervision process.

Liquidity risk for the Group is assessed in each currency in which the Group has performed a significant amount of transactions. Liquidity risk limits are reviewed at least once a year and also when there are major changes to the Group's operations or external factors affecting its operations. A liquidity crisis management plan has been developed and is updated on a regular basis.

One of the crucial tools used to evaluate liquidity risk is scenario analysis. Several scenarios of different severity and duration are employed by the Group with risk tolerances defined for the outcomes of those scenarios. Furthermore, the Group has developed a system of liquidity risk limits and early warning indicators and systematically prepares cash flow forecasts which incorporate assumptions about the most likely flow of funds over the period of one year. For general assessment of existing gaps between contractual maturities of assets and liabilities without any assumptions on customer behaviour, the Group regularly analyses liquidity term structure and sets corresponding risk tolerances.

The Group's balance sheet structure is planned for at least a one-year period and is aligned with development plans for the current period. The major current and potential funding sources are regularly analysed and controlled across the Group. The Group maintains regular contact with its interbank business partners and creditors with the aim of projecting possible deadlines for repayment or prolongation of funding sources as well as absorption of excess liquidity.

The general principles of the liquidity coverage ratio (LCR) and the net stable funding ratio (NSFR) as measurements of the Bank's and the Group's liquidity position are defined in the Regulation (EC) No 575/2013. The Commission Delegated Regulation (EU) 2015/61 defines general LCR calculation principles in more details. The minimum LCR requirement is 100% and it represents the amount of liquidity available to cover calculated net future liquidity outflows. The Bank and the Group is compliant with LCR requirements.

EU LIQ1 - Quantitative information of LCR

In template "EU LIQ1" the disclosed LCR information is calculated as the simple average of months-end observations over the twelve months preceding the end of each quarter. In other LCR disclosures in this report non-average end of the month figures may be disclosed. Non-average and end of the months figures will not reconcile.

		a	b	c	d	e	f	g	h
	Scope of consolidation: consolidated	**Total unweighted value (average)**				**Total weighted value (average)**			
EU 1a	Quarter ending on	**30/06/2021**	**31/03/2021**	**31/12/2020**	**30/09/2020**	**30/06/2021**	**31/03/2021**	**31/12/2020**	**30/09/2020**
EU 1b	Number of data points used in the calculation of averages	12	12	12	12	12	12	12	12
HIGH-QUALITY LIQUID ASSETS									
1	Total high-quality liquid assets (HQLA), after application of haircuts in line with Article 9 of regulation (EU) 2015/61	n/a	n/a	n/a	n/a	1,533,023	1,701,381	1,831,778	1,672,407
CASH - OUTFLOWS									
2	retail deposits and deposits from small business customers, of which:	2,524,032	2,516,255	2,378,509	2,512,042	199,173	194,747	187,027	190,031
3	*Stable deposits*	1,472,393	1,411,656	1,350,386	1,362,721	73,620	70,583	67,519	68,136
4	*Less stable deposits*	684,101	677,672	670,222	659,471	88,613	88,696	88,409	86,276
5	Unsecured wholesale funding	916,073	891,584	866,682	832,156	380,896	374,059	366,120	350,942
6	*Operational deposits (all counterparties) and deposits in networks of cooperative banks*	151,495	142,674	130,873	131,874	36,771	34,627	31,777	31,990
7	*Non-operational deposits (all counterparties)*	764,578	748,910	735,809	700,282	344,124	339,432	334,343	318,952
8	*Unsecured debt*	-	-	-	-	-	-	-	-
9	*Secured wholesale funding*	n/a	n/a	n/a	n/a	-	-	-	-
10	Additional requirements	260,753	235,847	250,916	231,423	24,992	22,678	26,566	22,657
11	*Outflows related to derivative exposures and other collateral requirements*	1,794	2,013	2,248	2,397	1,794	2,013	2,248	2,397
12	*Outflows related to loss of funding on debt products*	-	-	-	-	-	-	-	-
13	*Credit and liquidity facilities*	258,959	233,834	248,668	229,026	23,198	20,665	24,318	20,260
14	Other contractual funding obligations	13,533	8,157	2,996	2,217	13,533	8,157	2,996	2,217
15	Other contingent funding obligations	29,070	22,945	20,759	20,557	1,496	-	-	-
16	TOTAL CASH OUTFLOWS	n/a	n/a	n/a	n/a	620,090	599,641	582,709	565,846
CASH - INFLOWS									
17	Secured lending (e.g. reverse repos)	-	-	-	-	-	-	-	-
18	Inflows from fully performing exposures	94,965	122,184	137,875	125,111	85,369	112,398	126,118	115,917
19	Other cash inflows	3,776	4,292	4,403	2,591	3,775	4,291	4,402	2,590
EU-19a	(Difference between total weighted inflows and total weighted outflows arising from transactions in third countries where there are transfer restrictions or which are denominated in non-convertible currencies)	n/a	n/a	n/a	n/a	-	-	-	-
EU-19b	(Excess inflows from a related specialised credit institution)	n/a	n/a	n/a	n/a	-	-	-	-
20	TOTAL CASH INFLOWS	98,740	126,476	142,277	127,702	89,145	116,690	130,521	118,508
EU-20a	*Fully exempt inflows*	-	-	-	-	-	-	-	-
EU-20b	*Inflows subject to 90% cap*	-	-	-	-	-	-	-	-
EU-20c	*Inflows subject to 75% cap*	98,740	126,476	142,330	127,702	89,145	116,690	130,521	118,508
TOTAL ADJUSTED VALUE									
21	LIQUIDITY BUFFER	n/a	n/a	n/a	n/a	1,533,023	1,701,381	1,831,778	1,672,407
22	TOTAL NET CASH OUTFLOWS	n/a	n/a	n/a	n/a	530,945	482,952	452,188	447,339
23	LIQUIDITY COVERAGE RATIO	n/a	n/a	n/a	n/a	289%	352%	405%	374%

EU LIQB on qualitative information on LCR, which complements template EU LIQ1

Qualitative information

(a) Explanations on the main drivers of LCR results and the evolution of the contribution of inputs to the LCR's calculation over time:
The LCR is affected by depositors' activities, that is inflows and outflows of funds for operational or economic reasons, and corresponding changes in the HQLA.

(b) Explanations on the changes in the LCR over time:
LCR dynamics was affected by the acquisition of UniCredit leasing portfolio in January 2021 when the prefunded amount was disbursed to the seller and an organic growth of deposit base.

(c) Explanations on the actual concentration of funding sources:
The Group is primarily deposit funded. Deposits are diversified among Retail and Corporate segments.

(d) High-level description of the composition of the institution`s liquidity buffer:
Mainly comprised of central bank balances and high quality debt securities.

(e) Derivative exposures and potential collateral calls:
Derivatives are mainly used for currency mismatch management. Collateral pledged and received can be volatile over time depending on the underlying risk factor dynamics, mainly FX rates, but is immaterial in absolute terms due to short tenor and low gross volumes.

(f) Currency mismatch in the LCR:
The Group predominantly operates in EUR currency and has low levels of assets and liabilities in foreign currencies. Low currency mismatch in LCR is observed.

(g) Other items in the LCR calculation that are not captured in the LCR disclosure template but that the institution considers relevant for its liquidity profile:
n/a

EU LIQ2: Net Stable Funding Ratio

		a	b	c	d	e
		Unweighted value by residual maturity				
		No maturity	**< 6 months**	**6 months to < 1yr**	**≥ 1yr**	**Weighted value**
	Available stable funding (ASF) Items					
1	Capital items and instruments	336,056	-	-	396,056	396,056
2	*Own funds*	336,056	-	-	60,000	396,056
3	*Other capital instruments*	n/a	-	-	-	-
4	Retail deposits	n/a	2,436,297	75,056	32,052	2,378,920
5	*Stable deposits*	n/a	1,678,911	54,096	29,867	1,676,224
6	*Less stable deposits*	n/a	757,387	20,960	2,185	702,696
7	Wholesale funding:	n/a	1,091,822	49,173	539,437	1,043,035
8	*Operational deposits*	n/a	178,593	-	-	19,979
9	*Other wholesale funding*	n/a	913,228	49,173	539,437	1,023,056
10	Interdependent liabilities	n/a	-	-	-	-
11	Other liabilities:	1,120	36,345	-	-	-
12	*NSFR derivative liabilities*	1,120	-	-	-	-
13	*All other liabilities and capital instruments not included in the above categories*	n/a	36,345	-	-	-
14	**Total available stable funding (ASF)**	n/a	n/a	n/a	n/a	**3,818,011**

		a	b	c	d	e
		Unweighted value by residual maturity				
		No maturity	**< 6 months**	**6 months to < 1yr**	**≥ 1yr**	**Weighted value**
	Required stable funding (RSF) Items					
15	Total high-quality liquid assets (HQLA)	n/a	n/a	n/a	n/a	-
EU-15a	Assets encumbered for more than 12m in cover pool	n/a	-	-	-	-
16	Deposits held at other financial institutions for operational purposes	n/a	-	-	-	-
17	Performing loans and securities:	n/a	448,294	238,751	1,824,248	1,856,945
18	*Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut*	n/a	-	-	-	-
19	*Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions*	n/a	76,261	497	2,488	10,363
20	*Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:*	n/a	352,375	218,411	1,277,955	1,798,871
21	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*	n/a	1,387	1,843	20,282	25,965

22	*Performing residential mortgages, of which:*	n/a	15,351	14,592	493,296	-
23	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*	n/a	1,501	1,328	15,003	-
24	*Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products*	n/a	4,307	5,251	50,508	47,711
25	Interdependent assets	n/a	-	-	-	-
26	Other assets:		254,499	5,282	130,838	85,298
27	*Physical traded commodities*	n/a	n/a	n/a	-	-
28	*Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs*	n/a			-	-
29	*NSFR derivative assets*	n/a			3,889	3,889
30	*NSFR derivative liabilities before deduction of variation margin posted*	n/a			-	-
31	*All other assets not included in the above categories*	n/a	208,595	5,282	126,949	81,409
32	Off-balance sheet items	n/a	45,904	-	-	-
33	**Total RSF**	n/a	n/a	n/a	n/a	**1,942,243**
34	**Net Stable Funding Ratio (%)**	n/a	n/a	n/a	n/a	**197%**

OPERATIONAL RISK

The Group has adopted the Basel Committee on Banking Supervision's definition of operational risk: the probability of incurring losses due to failure or partial failure of internal processes to comply with the requirements of the laws and binding external regulations, as well as the requirements of internal regulations, due to the acts of the Group's employees and operation of systems, irregularities in internal processes, as well as due to the acts of third parties or other external conditions. Operational risk is divided into the following categories: personnel risk, process risk, IT and system risk, external risk.

Operational risk management in the Group is carried out in accordance with Operational Risk Management Policy. Operational risk is managed using an integrated and comprehensive framework of policies, methodologies, procedures and regulations for identification, analysis, mitigation, control and reporting of operational risk. The Group's operational risk management processes are integral to all business activities and are applicable to all employees and members of the Group. The Group's aim is to ensure that each of its employees knows not just how to perform specific transactions, but also understand the key areas where risk can arise and the processes and steps required to prevent, or otherwise mitigate such risk.

The goal of the Group's operational risk management framework is to maintain the lowest possible level of risk while ensuring that any remaining risk is economically justified in light of the need to sustain the Group's performance and profit in the long term. Whether a risk is economically justified depends on an assessment of the potential losses it could cause, the probability of its occurrence, the ability to implement mitigating measures and the cost of such measures, as well as the level of risk that would remain if such mitigating measures were to be put in place.

The Group aims to avoid operational risks with a potential impact which exceeds 10% of its net annual revenue and has a higher probability of occurrence than once per ten years, or risks with unquantifiable impact which are unmanageable, irrespective of the financial gains this could bring. Each accepted risk must be economically justified and, in cases where the assessment of operational risk in monetary terms is possible, the costs of the control measures required must be commensurate with the eventual loss that could be prevented by the existence of the control system.

The Group applies following approaches for operational risk management:

- Assessing operational risk in development projects: new and updated services and products are introduced only after a thorough risk assessment has been carried out;
- Conducting regular operational risk-control self-assessment: the Group identifies and assesses potential operational risk events, assesses control systems and analyses the necessary risk reduction measures;
- Determining operational risk indicators: the Group uses statistical, financial and other indicators which represent the levels of operational risk in its various activities;
- Measuring, analysing, monitoring, reporting and escalating operational risk: the Group registers and analyses operational risk events, including their severity, causes and other important information in an operational risk loss and incident database;
- Conducting scenario analysis and stress-testing;
- Performing business continuity planning: the Group performs regular business impact analysis and has implemented a Disaster Recovery Plan;
- Assigning responsibilities: the operational risk management system includes assignment of responsibilities to certain individuals; and
- Documenting decisions: the Group maintains records in relation to the process undertaken to reach a particular decision or to prevent or mitigate a particular risk.

EXPOSURES, WHICH WERE SUBJECT TO SUPPORT MEASURES IN RESPONSE TO COVID-19

FCMC's regulation No 102 "Reporting and information disclosure about risk exposures, which were subject to support measures as a result of Covid-19 impact" requires specific information disclosure in accordance with the Appendix 3 of the European Banking Authority's guidelines EBA/GL/2020/07 on "Reporting and disclosure of exposures subject to measures applied in response to the Covid-19 crisis". In this section the required information is disclosed.

EBA/GL/2020/07, Template 1: Information on loans and advances subject to legislative and non-legislative moratoria

Exposure amounts disclosed in the Template 1 include only these which are subject to active EBA-compliant moratoria (i.e. expired EBA-compliant moratoria is excluded).

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
		Gross carrying amount							Accumulated impairment, accumulated negative changes in fair value due to credit risk							Gross carrying amount
			Performing			Non-performing				Performing			Non-performing			
				Of which: exposures with forbearance measures	Of which: Instruments with significant increase in credit risk since initial recognition but not credit-impaired (Stage 2)		Of which: exposures with forbearance measures	Of which: Unlikely to pay that are not past-due or past-due <= 90 days			Of which: exposures with forbearance measures	Of which: Instruments with significant increase in credit risk since initial recognition but not credit-impaired (Stage 2)		Of which: exposures with forbearance measures	Of which: Unlikely to pay that are not past-due or past-due <= 90 days	Inflows to non-performing exposures
1	Loans and advances subject to moratorium	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2	of which: Households	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3	*of which: Collateralised by residential immovable property*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	of which: Non-financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	*of which: Small and Medium-sized Enterprises*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	*of which: Collateralised by commercial immovable property*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

EBA/GL/2020/07, Template 2: Breakdown of loans and advances subject to legislative and non-legislative moratoria by residual maturity of moratoria

Exposure amounts disclosed in the Template 2 include not only active EBA-compliant moratoria but also expired EBA-compliant moratoria; that is, the exposure amount of loans and advances for which the EBA-compliant moratoria have expired at the reference date (i.e. the residual maturity of moratoria is equal to zero).

		a	b	c	d	e	f	g	h	i
		Number of obligors	Gross carrying amount							
				Of which: legislative moratoria	Of which: expired	Residual maturity of moratoria				
						<= 3 months	> 3 months <= 6 months	> 6 months <= 9 months	> 9 months <= 12 months	> 1 year
2	Loans and advances subject to moratorium (granted)	320	39,108	-	39,108	-	-	-	-	-
3	of which: Households	n/a	13,279	-	13,279	-	-	-	-	-
4	*of which: Collateralised by residential immovable property*	n/a	13,279	-	13,279	-	-	-	-	-
5	of which: Non-financial corporations	n/a	25,829	-	25,829	-	-	-	-	-
6	*of which: Small and Medium-sized Enterprises*	n/a	25,829	-	25,829	-	-	-	-	-
7	*of which: Collateralised by commercial immovable property*	n/a	21,650	-	21,650	-	-	-	-	-

EBA/GL/2020/07, Template 3: Information on newly originated loans and advances provided under newly applicable public guarantee schemes introduced in response to COVID-19 crisis

Exposure amounts disclosed in the Template 3 include only newly originated loans and advances subject to public guarantee schemes subject to legislative and non-legislative moratoria. Pre-existing exposures, that as a result of Covid-19 were subjected to legislative and non-legislative moratoria, are excluded in the Template 3.

		a	b	c	d
		Gross carrying amount		Maximum amount of the guarantee that can be considered	Gross carrying amount
			of which: forborne	Public guarantees received	Inflows to non-performing exposures
1	Newly originated loans and advances subject to public guarantee schemes	2,072	-	1,658	-
2	of which: Households	-	n/a	n/a	-
3	*of which: Collateralised by residential immovable property*	-	n/a	n/a	-
4	of which: Non-financial corporations	2,072	-	1,658	-
5	*of which: Small and Medium-sized Enterprises*	910	n/a	n/a	-
6	*of which: Collateralised by commercial immovable property*	1,291	n/a	n/a	-