AS Citadele banka

Risk management and capital adequacy report (pillar 3 disclosures)

For the twelve months ended
31 December 2021

More opportunities

Citadele

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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. These reports are available at www.cblgroup.com.

Refer to the separate report on remuneration policy for disclosures on remuneration prepared in accordance with the requirements of Articles 74(3) and 75(2) of Directive 2013/36/EU and Article 450 of Regulation (EU) No 575/2013, guidelines of European Banking Authority (including EBA/GL/2021/04), regulations of FCMC and other relent rules.

AS Citadele banka has subsidiaries, which are financial institutions, thus it needs to comply with the capital adequacy, liquidity coverage ratio (LCR), Net stable funding ratio (NSFR), 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.

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 (liquidated in 2021)	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 (liquidated in 2021)	Full consolidation	Full consolidation	Support services
SIA Hortus Residential	Full consolidation	Full consolidation	Support services
SIA CL Insurance Broker	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	371,025	371,025	371,025	-	-	-	-
Loans to credit institutions	58,742	55,541	55,541	-	-	-	-
Debt securities	1,801,720	1,753,276	1,753,276	-	-	-	-
Loans to public	2,701,509	2,701,509	2,701,509	-	-	7,259	-
Equity instruments	1,279	1,279	1,279	-	-	-	-
Other financial instruments	42,032	7,400	7,400	-	-	-	-
Derivatives	4,303	4,303	-	4,303	-	4,303	-
Investments in subsidiaries	279	4,548	4,548	-	-	-	-
Tangible assets	20,444	20,444	20,444	-	-	-	-
Intangible assets	8,562	8,556	4,242	-	-	-	4,314
Current income tax assets	1,927	1,927	1,927	-	-	-	-
Deferred income tax assets	2,676	2,676	-	-	-	-	2,676
Non-current assets held for sale	946	946	946	-	-	-	-
Other assets	39,117	38,524	38,524	-	-	-	-
Total assets	**5,054,561**	**4,971,954**	**4,960,661**	**4,303**	**-**	**11,562**	**6,990**
Liabilities							
Deposits from credit institutions and central banks	479,235	479,235	-	-	-	-	479,235
Deposits and borrowings from customers	3,813,863	3,777,860	-	-	-	-	3,777,860
Debt securities issued	258,895	258,895	-	-	-	-	258,895
Derivatives	739	739	-	739	-	739	-
Provisions	3,934	3,934	3,934	-	-	-	-
Current income tax liabilities	197	197	-	-	-	-	197
Deferred income tax liabilities	376	376	-	-	-	-	376
Other liabilities	100,247	56,097	-	-	-	-	56,097
Total liabilities	**4,657,486**	**4,577,333**	**3,934**	**739**	**-**	**739**	**4,572,660**
Equity							
Share capital	156,888	156,888	-	-	-	-	156,888
Reserves and other capital components	7,320	6,946	-	-	-	-	6,946
Retained earnings	232,867	230,786	-	-	-	-	230,786
Total equity	**397,075**	**394,620**	**-**	**-**	**-**	**-**	**394,620**
Total liabilities and equity	**5,054,561**	**4,971,953**	**3,934**	**739**	**-**	**739**	**4,967,280**

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)**	**4,971,954**	**4,960,661**	**4,303**	**-**	**11,562**
2	Liabilities carrying value amount under the regulatory scope of consolidation (as per template EU LI1)	(4,573)	(3,834)	(739)	-	(739)
3	**Total net amount under the regulatory scope of consolidation**	**4,967,381**	**4,956,827**	**3,564**	**-**	**10,823**
4	Off-balance-sheet amounts	422,208	422,208	-	-	-
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	-	-	-	-	-
8	Differences due to prudential filters	-	-	-	-	-
9	Differences due to credit conversion factors	(282,684)	(283,423)	-	-	-
11a	IFRS 9 transitional provisions and similar	2,847	2,847	-	-	-
11b	Original exposure method (for derivatives)	18,925	-	18,925	-	-
11c	Other	(49)	(49)	-	-	-
10	**Exposure amounts considered for regulatory purposes**	**5,128,628**	**5,098,410**	**22,489**	**-**	**10,823**

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 believes that it pursues prudent risk management policies that are aligned with its business and which aim 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 key 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;
- The 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, successful development, long-term financial stability and to protect the Group from unidentified risks. 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 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 supervisory authority. The 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 supervisory authority. 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 56.25% 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). From 1 March 2022 an updated pillar 2 capital requirement of 2.5% applies.

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 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 31 December 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 audited 12m 2021 profits)

	EUR thousands	
	31/12/2021 Group	31/12/2020 Group
Common Equity Tier 1 capital		
Paid up capital instruments	157,127	156,556
Retained earnings	230,786	176,651
Regulatory deductions	(8,255)	(5,599)
Other capital components and transitional adjustments, net	9,634	13,405
Tier 2 capital		
Eligible part of subordinated liabilities	60,000	60,000
Total own funds	**449,292**	**401,013**

Risk weighted exposure amounts for credit risk, counterparty credit risk and dilution risk	2,164,268	1,340,639
Total exposure amounts for position, foreign currency open position and commodities risk	10,916	13,690
Total exposure amounts for operational risk	206,624	187,358
Total exposure amounts for credit valuation adjustment	4,592	933
Total risk exposure amount	**2,386,400**	**1,542,620**
Total Capital adequacy ratio	**18.8%**	**26.0%**
Common Equity Tier 1 capital ratio	**16.3%**	**22.1%**

Transitional adjustments applied as of 31 December 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	
	31/12/2021 Group	**31/12/2020 Group**
Common Equity Tier 1 capital, fully loaded	386,366	336,917
Tier 2 capital	60,000	60,000
Total own funds, fully loaded	**446,366**	**396,917**
Total risk exposure amount, fully loaded	**2,383,981**	**1,539,013**
Total Capital adequacy ratio, fully loaded	**18.7%**	**25.8%**
Common Equity Tier 1 capital ratio, fully loaded	**16.2%**	**21.9%**

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)	-	LV0000880102	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 156.8 million	EUR 40.0 million	EUR 20.0 million
9	Nominal amount of instrument	EUR 156.8 million	EUR 40.0 million	EUR 20.0 million
EU-9a	Issue price	EUR 156.8 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	13/12/2021	24/11/2017
12	Perpetual or dated	Perpetual	Dated	Dated
13	Original maturity date	No Maturity	13/12/2031	24/11/2027
14	Issuer call subject to prior supervisory approval	Yes	Yes	Yes

15	Optional call date, contingent call dates and redemption amount	-	Optional redemption after five years from issuance	Optional redemption after five years from issuance
16	Subsequent call dates, if applicable	-	-	-
	Coupons / dividends			
17	Fixed or floating dividend/coupon	-	Fixed	Fixed
18	Coupon rate and any related index	-	5.00%	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	157,127	Line E01 in template EU CC2
	of which: Instrument type 1	*157,127*	Line E01 in template EU CC2
2	Retained earnings	176,983	Part of line E03 in template EU CC2
3	Accumulated other comprehensive income (and other reserves)	6,707	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	53,803	
6	**Common Equity Tier 1 (CET1) capital before regulatory adjustments**	**394,621**	
Common Equity Tier 1 (CET1) capital: regulatory adjustments			
7	Additional value adjustments (negative amount)	(306)	
8	Intangible assets (net of related tax liability) (negative amount)	(4,314)	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)	(2,676)	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)*	1,967	
28	**Total regulatory adjustments to Common Equity Tier 1 (CET1)**	**(5,329)**	
29	**Common Equity Tier 1 (CET1) capital**	**389,292**	
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)**	**389,292**	
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)**	**449,292**
60	**Total risk exposure amount**	**2,386,400**
Capital ratios and buffers		
61	Common Equity Tier 1 (as a percentage of total risk exposure amount)	16.3%
62	Tier 1 (as a percentage of total risk exposure amount)	16.3%
63	Total capital (as a percentage of total risk exposure amount)	18.8%
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)	9.8%
65	of which: capital conservation buffer requirement	2.5%
66	of which: countercyclical buffer requirement	0.0%
67	of which: systemic risk buffer requirement	0.0%
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)**	0.0%
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)	274
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 31/12/2021	**Under regulatory scope of consolidation 31/12/2021**	**Reference**
	Assets			
A01	Cash and cash balances at central banks	371,025	371,025	
A02	Loans to credit institutions	58,742	55,541	
A03	Debt securities	1,801,720	1,753,276	
A04	Loans to public	2,701,509	2,701,509	
A05	Equity instruments	1,279	1,279	
A06	Other financial instruments	42,032	7,400	
A07	Derivatives	4,303	4,303	
A08	Investments in subsidiaries	279	4548	
A09	Tangible assets	20,444	20,444	
A10	Intangible assets	8,562	8,556	Partially line 8 in template EU CC1
A11	Current income tax assets	1927	1927	
A12	Deferred income tax assets	2,676	2,676	Line 10 in template EU CC1
A13	Non-current assets held for sale	946	946	
A14	Other assets	39,117	38,524	
AA	**Total assets**	**5,054,561**	**4,971,954**	
	Liabilities			
L01	Deposits from credit institutions and central banks	479,235	479,235	
L02	Deposits and borrowings from customers	3,813,863	3,777,860	
L03	Debt securities issued	258,895	258,895	Partially line 46 in template EU CC1
L04	Derivatives	739	739	
L05	Provisions	3,934	3,934	
L06	Current income tax liabilities	197	197	
L07	Deferred income tax liabilities	376	376	
L08	Other liabilities	100,247	56,097	
LL	**Total liabilities**	**4,657,486**	**4,577,333**	
	Shareholders' Equity			
E01	Share capital	156,888	156,888	Line 1 in template EU CC1
E02	Reserves and other capital components	7,320	6,946	Partially line 3 in template EU CC1
E03	Retained earnings	232,867	230,786	Partially line 2 in template EU CC1
EE	**Total equity**	**397,075**	**394,620**	

EU KM1 - Key metrics template

		a	b	c	d	e
		31/12/2021	**30/09/2021**	**30/06/2021**	**31/03/2021**	**31/12/2020**
	Available own funds (amounts)					
1	Common Equity Tier 1 (CET1) capital	389,292	368,162	336,056	337,283	341,013
2	Tier 1 capital	389,292	368,162	336,056	337,283	341,013
3	Total capital	449,292	428,162	396,056	397,283	401,013
	Risk-weighted exposure amounts					
4	Total risk-weighted exposure amount	2,386,400	2,315,769	2,206,291	2,261,962	1,542,620
	Capital ratios (as a percentage of risk-weighted exposure amount)					
5	Common Equity Tier 1 ratio (%)	16.3%	15.9%	15.2%	14.9%	22.1%
6	Tier 1 ratio (%)	16.3%	15.9%	15.2%	14.9%	22.1%
7	Total capital ratio (%)	18.8%	18.5%	18.0%	17.6%	26.0%
	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%	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 (%)	6.0%	5.6%	4.9%	4.6%	11.8%
	Leverage ratio					
13	Leverage ratio total exposure measure	5,129,628	4,975,079	4,854,261	4,733,548	4,621,881
14	Leverage ratio	7.6%	7.4%	6.9%	7.1%	7.4%
	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 (%)	3.0%	3.0%	3.0%	3.0%	3.0%
EU 14b	Additional AT1 leverage ratio requirements (%)	3.0%	3.0%	3.0%	3.0%	3.0%
EU 14c	Additional T2 leverage ratio requirements (%)	n/a	n/a	n/a	n/a	n/a
EU 14d	Total SREP leverage ratio requirements (%)	3.0%	3.0%	3.0%	3.0%	3.0%
EU 14e	Applicable leverage buffer	0.0%	0.0%	0.0%	0.0%	0.0%
EU 14f	Overall leverage ratio requirements (%)	3.0%	3.0%	3.0%	3.0%	3.0%
	Liquidity Coverage Ratio					
15	Total high-quality liquid assets (HQLA) (Weighted value - average)	1,255,477	1,217,737	1,283,317	1,215,071	2,061,640
EU 16a	Cash outflows - Total weighted value	675,383	492,146	724,200	638,161	625,221
EU 16b	Cash inflows - Total weighted value	48,374	72,948	47,275	70,740	46,298
16	Total net cash outflows (adjusted value)	635,011	626,184	68,769	567,421	578,923
17	Liquidity coverage ratio (%)	198%	194%	187%	214%	356%
	Net Stable Funding Ratio					
18	Total available stable funding	3,872,201	3,838,052	3,818,011	-	-
19	Total required stable funding	2,849,583	2,804,776	1,938,354	-	-
20	NSFR ratio (%)	136%	137%	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

		31/12/2021	30/09/2021	30/06/2021	31/03/2021	31/12/2020
	Available capital (amounts)					
1	Common Equity Tier 1 (CET1) capital	389,292	336,056	336,056	337,283	341,013
2	Common Equity Tier 1 (CET1) capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	386,366	333,130	333,130	334,357	336,917
3	Tier 1 capital	389,292	336,056	336,056	337,283	341,013
4	Tier 1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	386,366	333,130	333,130	334,357	336,917
5	Total capital	449,292	396,056	396,056	397,283	401,013
6	Total capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	446,366	393,130	393,130	394,357	396,917
	Risk-weighted assets (amounts)					
7	Total risk-weighted assets	2,386,400	2,206,291	2,206,291	2,261,962	1,542,620
8	Total risk-weighted assets as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	2,383,981	2,203,802	2,203,802	2,259,426	1,539,012
	Capital ratios					
9	Common Equity Tier 1 (as a percentage of risk exposure amount)	16.3%	15.2%	15.2%	14.9%	22.1%
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	16.2%	15.1%	15.1%	14.8%	21.9%
11	Tier 1 (as a percentage of risk exposure amount)	16.3%	15.2%	15.2%	14.9%	22.1%
12	Tier 1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	16.2%	15.1%	15.1%	14.8%	21.9%
13	Total capital (as a percentage of risk exposure amount)	18.8%	18.0%	18.0%	17.6%	26.0%
14	Total capital (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	18.7%	17.8%	17.8%	17.5%	25.8%
	Leverage ratio					
15	Leverage ratio total exposure measure	5,129,628	4,854,261	4,854,261	4,733,548	4,621,881
16	Leverage ratio	7.6%	6.9%	6.9%	7.1%	7.4%
17	Leverage ratio as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	7.5%	6.9%	6.9%	7.1%	7.3%

EU OV1 – Overview of total risk exposure amounts

		RWAs		Minimum capital requirements
		31/12/2021	31/12/2020	31/12/2021
1	Credit risk (excluding CCR)	2,145,262	1,337,282	171,621
2	*Of which the standardised approach*	*2,145,262*	*1,337,282*	*171,621*
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	23,598	4,290	1,888
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*	*4,592*	*933*	*367*
9	*Of which other CCR*	*19,006*	-	*1,520*
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)	10,916	13,690	873
21	*Of which the standardised approach*	*10,916*	*13,690*	*873*
22	*Of which IMA*	-	-	-
EU 22a	Large exposures	-	-	-
23	Operational risk	206,624	187,358	16,530
EU 23a	*Of which basic indicator approach*	-	-	-
EU 23b	*Of which standardised approach*	*206,624*	*187,358*	*16,530*
EU 23c	*Of which advanced measurement approach*	-	-	-
24	**Amounts below the thresholds for deduction (subject to 250% risk weight)**	-	-	-
29	**Total**	**2,386,400**	**1,542,620**	**190,912**

EU INS1 - Insurance participations

		a	b
		Exposure value	Risk exposure amount
1	Own fund instruments held in insurance or re-insurance undertakings or insurance holding company not deducted from own funds	4,269	10,672

EU INS2 - Financial conglomerates information on own funds and capital adequacy ratio

		a
		31/12/2021
1	Supplementary own fund requirements of the financial conglomerate (amount)	279
2	Capital adequacy ratio of the financial conglomerate (%)	279

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 mutually related 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, intragroup 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 CQ4: Quality of non-performing exposures by geography

		a	b	c	d	e	f	g
		Gross carrying / Nominal amount				Accumulated impairment	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: non-performing		of which: subject to impairment			
				of which: defaulted				
010	***On balance sheet exposures***	**4,560,473**	**91,074**	**90,991**	**4,560,473**	**(83,690)**	**n/a**	**-**
020	*Latvia*	1,803,915	32,536	32,536	1,803,915	(31,672)	n/a	-
030	*Lithuania*	1,648,053	18,791	18,791	1,648,053	(19,188)	n/a	-
040	*Estonia*	484,139	17,315	17,233	484,139	(8,880)	n/a	-
050	*United States*	92,071	-	-	92,071	(109	n/a	-
060	*Poland*	72,548	-	-	72,548	(38)	n/a	-
070	*Other countries*	459,747	22,432	22,431	459,747	(23,803)	n/a	-
080	***Off balance sheet exposures***	**422,208**	**436**	**436**	**n/a**	**n/a**	**3,834**	**n/a**
090	*Latvia*	236,512	311	311	n/a	n/a	2,156	n/a
100	*Lithuania*	157,558	88	88	n/a	n/a	1,404	n/a
110	*Estonia*	23,790	37	37	n/a	n/a	200	n/a
120	*Russian Federation*	155	**-**	**-**	n/a	n/a	0	n/a
130	*Switzerland*	3,556	-	-	n/a	n/a	63	n/a
140	*Other countries*	637	-	-	n/a	n/a	11	n/a
150	***Total***	**4,982,681**	**91,510**	**91,427**	**4,560,473**	**(83,690)**	**3,834**	**-**

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

		a	b	c	d	e	f
		Gross carrying amount				Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures
			of which: non-performing		of which: loans and advances subject to impairment		
				of which: defaulted			
010	Agriculture, forestry and fishing	148,497	4,015	4,015	148,497	(5,184)	-
020	Mining and quarrying	5,463	-	-	5,463	(82)	-
030	Manufacturing	190,160	9,606	9,606	190,160	(5,448)	-
040	Electricity, gas, steam and air conditioning supply	65,337	2,801	2,801	65,337	(893)	-
050	Water supply	13,653	18	18	13,653	(207)	-
060	Construction	136,358	5,121	5,121	136,358	(3,307)	-
070	Wholesale and retail trade	191,533	2,132	2,132	191,533	(4,619)	-
080	Transport and storage	203,594	22,306	22,223	203,594	(11,733)	-
090	Accommodation and food service activities	45,003	11,233	11,233	45,003	(2,062)	-
100	Information and communication	15,863	95	95	15,863	(443)	-
110	Real estate activities	261,626	4,014	4,014	261,626	(4,998)	-
120	Financial and insurance activities	6,334	-	-	6,334	(115)	-
130	Professional, scientific and technical activities	42,640	279	279	42,640	(1,090)	-
140	Administrative and support service activities	123,121	3,278	3,278	123,121	(2,614)	-
150	Public administration and defence, compulsory social security	2,881	-	-	2,881	(58)	-
160	Education	5,087	116	116	5,087	(178)	-
170	Human health services and social work activities	14,195	120	120	14,195	(304)	-
180	Arts, entertainment and recreation	8,091	1,289	1,289	8,091	(250)	-
190	Other services	19,777	143	143	19,777	(446)	-
200	**Total**	**1,499,213**	**66,566**	**66,483**	**1,499,213**	**(44,031)**	**-**

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**	364,628	364,628	-	-	-	-	(3)	(3)	-	-	-	-	-	-	-
010	**Loans and advances**	2,714,138	2,472,585	232,870	91,074	-	76,551	(45,995)	(35,364)	(10,615)	(35,709)	-	(35,532)	(4,132)	2,188,892	53,353
020	*Central banks*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
030	*General governments*	21,065	21,037	28	-	-	-	(155)	(155)	-	-	-	-	-	2,298	-
040	*Credit institutions*	22,089	22,089	-	-	-	-	(90)	(90)	-	-	-	-	-	13	-
050	*Other financial corporations*	19,832	16,416	3,416	141	-	138	(229)	(174	(55)	(42)	-	(42)	-	8,950	99
060	*Non-financial corporations*	1,432,647	1,244,617	179,677	66,566	-	52,763	(26,947)	(20,525)	(6,409)	(17,084)	-	(16,908)	(4,132)	1,175,534	48,294
070	*Of which: SMEs*	1,065,416	923,717	133,965	57,782	-	44,713	(20,606)	(16,179)	(4,414)	(9,148)	-	(8,972)	-	897,790	47,529
080	*Households*	1,218,506	1,168,427	49,751	24,367	-	23,650	(18,575)	(14,420)	(4,151)	(18,584)	-	(18,583)	-	1,002,097	4,960
090	**Debt Securities**	1,755,261	1,755,261	-	-	-	-	(1,985)	(1,985)	-	-	-	-	-	-	-
100	*Central banks*	1,787	1,787	-	-	-	-	-	-	-	-	-	-	-	-	-
110	*General governments*	1,362,911	1,362,911	-	-	-	-	(553)	(553)	-	-	-	-	-	-	-
120	*Credit institutions*	189,111	189,111	-	-	-	-	(48)	(48)	-	-	-	-	-	-	-
130	*Other financial corporations*	40,971	40,971	-	-	-	-	(1,208)	(1,208)	-	-	-	-	-	-	-
140	*Non-financial corporations*	160,481	160,481	-	-	-	-	(176)	(176)	-	-	-	-	-	-	-
150	**Off-balance sheet exposures**	421,772	412,456	9,317	436	-	436	3,736	3,378	358	98	-	98	-	118,674	158
160	*Central banks*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
170	*General governments*	3,241	3,241	-	-	-	-	1	1	-	-	-	-	-	2	-
180	*Credit institutions*	52	52	-	-	-	-	1	1	-	-	-	-	-	-	-
190	*Other financial corporations*	10,247	9,400	847	-	-	-	210	174	36	-	-	-	-	1,435	-
200	*Non-financial corporations*	276,891	271,396	5,495	279	-	279	1,946	1,825	121	61	-	61	-	111,012	158
210	*Households*	131,341	128,367	2,975	156	-	156	1,579	1,377	202	37	-	37	-	6,225	-
220	***Total***	**4,891,171**	**4,640,302**	**242,187**	**91,510**	**-**	**76,987**	**(44,244)**	**(33,971)**	**(10,257)**	**(35,611)**	**-**	**(35,434)**	**(4,132)**	**2,307,566**	**53,511**

EU CR1-A: Maturity of exposures

		a	b	c	d	e	f
		Net exposure value					
		On demand	<= 1 year	> 1 year <= 5 years	> 5 years	No stated maturity	Total
1	Loans and advances	388,295	691,923	1,406,237	637,263	-	3,123,718
2	Debt securities	-	277,935	1,058,133	417,208	-	1,753,276
3	***Total***	**388,295**	**969,858**	**2,464,370**	**1,054,471**	**-**	**4,876,994**

Loans and advances also include off balance sheet commitments.

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**	364,628	364,628	-	-	-	-	-	-	-	-	-	-
010	**Loans and advances**	**2,714,138**	**2,698,527**	**15,611**	**91,074**	**53,621**	**3,032**	**4,220**	**1,314**	**28,122**	**345**	**420**	**90,991**
020	*Central banks*	-	-	-	-	-	-	-	-	-	-	-	-
030	*General governments*	21,065	21,065	-	-	-	-	-	-	-	-	-	-
040	*Credit institutions*	22,089	22,089	-	-	-	-	-	-	-	-	-	-
050	*Other financial corporations*	19,832	19,826	6	141	8	-	-	-	133	-	-	141
060	*Non-financial corporations*	1,432,646	1,423,222	9,424	66,566	47,626	2,062	3,628	673	12,547	30	-	66,483
070	*Of which SMEs*	1,065,416	1,055,993	9,424	57,782	46,739	2,062	3,572	673	4,706	30	-	57,782
080	*Households*	1,218,506	1,212,324	6,181	24,367	5,987	970	593	641	15,442	315	420	24,367
090	**Debt Securities**	**1,755,261**	**1,755,261**	-	-	-	-	-	-	-	-	-	-
100	*Central banks*	1,787	1,787	-	-	-	-	-	-	-	-	-	-
110	*General governments*	1,362,911	1,362,911	-	-	-	-	-	-	-	-	-	-
120	*Credit institutions*	189,111	189,111	-	-	-	-	-	-	-	-	-	-
130	*Other financial corporations*	40,971	40,971	-	-	-	-	-	-	-	-	-	-
140	*Non-financial corporations*	160,481	160,481	-	-	-	-	-	-	-	-	-	-
150	**Off-balance sheet exposures**	**421,772**			**436**								**436**
160	*Central banks*	-			-								-
170	*General governments*	3,241			-								-
180	*Credit institutions*	52			-								-
190	*Other financial corporations*	10,247			-								-
200	*Non-financial corporations*	276,891			279								279
210	*Households*	131,341			156								156
220	**Total**	**4,891,171**	**4,453,788**	**15,611**	**91,510**	**53,621**	**3,032**	**4,220**	**1,314**	**28,122**	**345**	**420**	**91,427**

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	927,595	2,242,246	2,212,292	29,954	-
2	Debt securities	1,755,261	-	-	-	
3	**Total**	**2,682,856**	**2,242,246**	**2,212,292**	**29,954**	**-**
4	*Of which non-performing exposures*	*37,721*	*53,353*	*51,226*	*2,127*	-
5	*Of which defaulted*	*37,638*	*53,353*	*51,226*	*2,127*	-

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	1,627,102	201	1,674,699	2,653	15,906	1%
2	Regional government or local authorities	44,022	2,575	44,279	1,537	8,427	18%
3	Public sector entities	606	119	606	60	194	29%
4	Multilateral development banks	44,356	-	44,356	-	1,628	4%
5	International organisations	-	-	-	-	-	-
6	Institutions	219,419	51	225,882	10	59,536	26%
7	Corporates	1,200,959	267,626	1,105,350	103,223	996,208	82%
8	Retail	898,019	141,667	886,881	6,882	585,681	66%
9	Secured by mortgages on immovable property	723,598	3,786	709,954	1893	327,349	46%
10	Exposures in default	60,226	368	53,535	111	60,089	112%
11	Items associated with particularly high risk	10,817	1,375	9,197	332	14,294	150%
12	Covered bonds	16,947	-	16,947	-	1695	10%
13	Claims on institutions and corporates with a short-term credit assessment	-	-	-	-	-	-
14	Collective investments undertakings	7,400	-	7,400	-	8,226	111%
15	Equity exposures	5,826	-	5,826	-	12,229	210%
16	Other exposures	104,163	730	178,548	18,250	53,800	27%
17	**Total**	**4,963,459**	**418,498**	**4,963,459**	**134,951**	**2,145,262**	**42%**

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	1,597,906	-	-	-	79,425	-	-	-	-	21	-	-	-	-	-	1,677,352	1,597,927
2	Regional governments or local authorities	3,682	-	-	-	42,134	-	-	-	-	-	-	-	-	-	-	45,816	19,264
3	Public sector entities	-	-	-	-	464	-	201	-	-	-	-	-	-	-	-	665	665
4	Multilateral development banks	41,100	-	-	-	-	-	3,256	-	-	-	-	-	-	-	-	44,356	41,100
5	International organisations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Institutions	-	-	-	-	199,254	-	20,050	-	-	10,439	-	-	-	-	-	229,743	36,629
7	Corporates	-	-	-	-	76,588	-	52,488	-	-	1,098,127	8	-	-	-	-	1,227,211	1,016,774
8	Retail	-	-	-	-	-	-	-	-	893,763	-	-	-	-	-	-	893,763	893,763
9	Secured by mortgages on immovable property	-	-	-	-	-	556,065	-	-	92,019	63,763	-	-	-	-	-	711,847	711,847
10	Exposures in default	-	-	-	-	-	-	-	-	-	40,761	12,885	-	-	-	-	53,646	53,646
11	Items associated with particularly high risk	-	-	-	-	-	-	-	-	-	-	9,529	-	-	-	-	9,529	9,529
12	Covered bonds	-	-	-	16,947	-	-	-	-	-	-	-	-	-	-	-	16,947	-
13	Claims on institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Collective investments undertakings	276	-	-	-	-	-	76	-	-	4,768	2,280	-	-	-	-	7,400	7,400
15	Equity exposures	-	-	-	-	-	-	-	-	-	1,558	-	4,269	-	-	-	5,827	5,827
16	Other exposures	107,242	-	-	-	44,692	-	-	-	-	44,863	-	-	-	-	-	196,797	196,797
17	**Total**	**1,750,206**	**-**	**-**	**16,947**	**442,557**	**556,065**	**76,071**	**-**	**985,782**	**1,264,300**	**24,702**	**4,269**	**-**	**-**	**-**	**5,120,899**	**4,591,168**

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	1,450,621	-	-	-	-	1,450,621	76,329	-	-	76,329	18,132,763	45.89%	0.00%
	Lithuania	1,088,217	-	-	-	-	1,088,217	61,713	-	-	61,713	13,602,713	37.10%	0.00%
	Estonia	395,532	-	-	-	-	395,532	20,697	-	-	20,697	4,944,150	12.44%	0.00%
	United States	46,920	-	-	-	-	46,920	1,396	-	-	1,396	586,500	0.84%	0.00%
	Netherlands	37,290	-	-	-	-	37,290	1,221	-	-	1,221	466,125	0.73%	0.00%
	United Kingdom	10,652	-	-	-	-	10,652	575	-	-	575	133,150	0.35%	0.00%
	Sweden	6,915	-	-	-	-	6,915	414	-	-	414	86,438	0.25%	0.00%
	Other with 0% countercyclical capital buffer	74,770	-	-	-	-	74,770	3,294	-	-	3,294	934,619	1.98%	0.00%
	Other with non 0% countercyclical capital buffer	12,050	-	7,259	-	-	19,309	585	116	-	701	241,363	0.42%	0.56%
020	**Total**	**3,122,967**	**-**	**7,259**	**-**	**-**	**3,130,226**	**166,224**	**116**	**-**	**166,340**	**39,127,819**	**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	2,386,400
2	Institution specific countercyclical capital buffer rate	0.0%
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	Of which defaulted	Of which impaired	On performing forborne exposures	On non-performing forborne exposures		Of which: Collateral and financial guarantees received on non-performing exposures with forbearance measures
005	Cash balances at central banks and other demand deposits	-	-	-	-	-	-	-	-
010	Loans and advances	124,013	61,844	61,844	51,902	(2,448)	(29,335)	141,457	31,722
020	*Central banks*	-	-	-	-	-	-	-	-
030	*General governments*	-	-	-	-	-	-	-	-
040	*Credit institutions*	-	-	-	-	-	-	-	-
050	*Other financial corporations*	135	128	128	125	(4)	(32)	192	96
060	*Non-financial corporations*	103,312	43,489	43,489	33,789	(1,654)	(13,489)	122,635	29,413
070	*Households*	20,566	18,227	18,227	17,988	(790)	(15,814)	18,630	2,213
080	Debt Securities	-	-	-	-	-	-	-	-
090	Loan commitments given	79	-	-	-	-	-	-	-
100	***Total***	**124,092**	**61,844**	**61,844**	**51,902**	**(2,448)**	**(29,335)**	**141,457**	**31,722**

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	h
		Replacement cost (RC)	Potential future exposure (PFE)	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre-CRM	Exposure value post-CRM	Exposure value	RWEA
EU1	EU – Original Exposure Method (for derivatives)	4,303	11,640	n/a	1.4	22,489	22,489	22,489	19,006
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**	**22,489**	**22,489**	**22,489**	**19,006**

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	14,591	4,592
EU4	Transactions subject to the Alternative approach (Based on the Original Exposure Method)	-	-
5	**Total transactions subject to own funds requirements for CVA risk**	**14,591**	**4,592**

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	-	-	-	-	3,821	30	-	-	-	-	-	3,851
7	Corporates	-	-	-	-	-	-	-	-	18,638	-	-	18,638
8	Retail												
9	Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-
10	Other items	-	-	-	-	-	-	-	-	-	-	-	-
11	**Total exposure value**	**-**	**-**	**-**	**-**	**3,821**	**30**	**-**	**-**	**18,638**	**-**	**-**	**22,489**

ENCUMBERED AND UNENCUMBERED ASSETS

EU AE1 - Encumbered and unencumbered assets

		Carrying amount of encumbered assets		Fair value of encumbered assets		Carrying amount of unencumbered assets		Fair value of unencumbered assets	
			of which notionally eligible EHQLA and HQLA		of which notionally eligible EHQLA and HQLA		of which EHQLA and HQLA		of which EHQLA and HQLA
		010	030	040	050	060	080	090	100
010	**Assets of the disclosing institution**	534,666	-	n/a	n/a	4,437,287	-	n/a	n/a
030	Equity instruments	-	-	-	-	8,679	-	-	-
040	Debt securities	526,755	-	-	-	1,226,521	-	-	-
050	of which: covered bonds	-	-	-	-	-	-	-	-
060	of which: securitisations	-	-	-	-	-	-	-	-
070	of which: issued by general governments	514,663	-	-	-	847,695	-	-	-
080	of which: issued by financial corporations	11,078	-	-	-	217,747	-	-	-
090	of which: issued by non-financial corporations	1,013	-	-	-	159,292	-	-	-
120	Other assets	7,911	-	n/a	n/a	3,202,087	-	n/a	n/a

All pledged amounts consist of placements to secure various Group's transactions in the ordinary course of the business.

EU AE2 - Collateral received and own debt securities issued

		Fair value of encumbered collateral received or own debt securities issued		Unencumbered Fair value of collateral received or own debt securities issued available for encumbrance	
			of which notionally eligible EHQLA and HQLA		of which EHQLA and HQLA
		010	030	040	060
130	**Collateral received by the disclosing institution**	-	-	-	-
140	Loans on demand	-	-	-	-
150	Equity instruments	-	-	-	-
160	Debt securities	-	-	-	-
170	of which: covered bonds	-	-	-	-
180	of which: securitisations	-	-	-	-
190	of which: issued by general governments	-	-	-	-
200	of which: issued by financial corporations	-	-	-	-
210	of which: issued by non-financial corporations	-	-	-	-
220	Loans and advances other than loans on demand	-	-	-	-
230	Other collateral received	-	-	-	-
240	**Own debt securities issued other than own covered bonds or securitisations**	-	-	-	-
241	**Own covered bonds and securitisations issued and not yet pledged**	n/a	n/a	-	-
250	**TOTAL COLLATERAL RECEIVED AND OWN DEBT SECURITIES ISSUED**	**534,666**	-	n/a	n/a

EU AE3 - Sources of encumbrance

		Matching liabilities, contingent liabilities or securities lent	Assets, collateral received and own debt securities issued other than covered bonds and securitisations encumbered
		010	030
010	**Carrying amount of selected financial liabilities**	475,810	526,755

LEVERAGE RATIO

Leverage ratio is calculated as Tier 1 capital versus the total exposure measure. The minimum requirement is 3%. 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.

EU LR2 - LRCom: Leverage ratio common disclosure

		CRR leverage ratio exposures a 31/12/2021	 b 30/06/2021
On-balance sheet exposures (excluding derivatives and SFTs)			
1	On-balance sheet items (excluding derivatives, SFTs, but including collateral)	4,963,459	4,727,391
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)	(4,370)	(4,217)
7	**Total on-balance sheet exposures (excluding derivatives and SFTs)**	**4,959,089**	**4,723,174**
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	22,489	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	-	-
13	**Total derivatives exposures**	**22,489**	**22,720**
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	422,407	311,957
20	(Adjustments for conversion to credit equivalent amounts)	274,358	311,957
21	(General provisions associated with off-balance sheet exposures deducted in determining Tier 1 capital)	-	-
22	**Off-balance sheet exposures**	**148,049**	**108,368**
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**	389,292	336,056
24	**Leverage ratio total exposure measure**	5,129,627	4,854,262
Leverage ratio			
25	Leverage ratio	7.6%	6.9%
EU-25	Leverage ratio (without the adjustment due to excluded exposures of public development banks - Public sector investments) (%)	7.6%	6.9%
25a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves)	7.6%	6.9%
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	n/a	n/a

Choice on transitional arrangements and relevant exposures		
EU-27b	Choice on transitional arrangements for the definition of the capital measure	
Disclosure of mean values		
28	Mean of daily values of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivable	
29	Quarter-end value of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables	
30	Total exposure measure (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	5,129,628
30a	Total exposure measure (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	5,129,628
31	Leverage ratio (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	7.6%
31a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	7.6%

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

		a **Applicable amount**
1	Total assets as per published financial statements	5,054,561
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of regulatory consolidation	(82,608)
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)	148,049
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	9,625
13	**Leverage ratio total exposure measure**	**5,129,627**

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:**	4,963,459
EU-2	Trading book exposures	-
EU-3	Banking book exposures, of which:	4,963,459
EU-4	Covered bonds	16,947
EU-5	Exposures treated as sovereigns	1,665,300
EU-6	Exposures to regional governments, MDB, international organisations and PSE **not** treated as sovereigns	89,241
EU-7	Institutions	235,280
EU-8	Secured by mortgages of immovable properties	709,954
EU-9	Retail exposures	886,881
EU-10	Corporate	1,105,350
EU-11	Exposures in default	53,535
EU-12	Other exposures (e.g. equity, securitisations, and other non-credit obligation assets)	200,971

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)	10,916
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**	**10,916**

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	**31/12/2021**	**30/09/2021**	**30/06/2021**	**31/03/2021**	**31/12/2021**	**30/09/2021**	**30/06/2021**	**31/03/2021**
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	1,237,033	1,209,409	1,533,023	1,701,381
CASH - OUTFLOWS									
2	retail deposits and deposits from small business customers, of which:	2,546,558	2,544,085	2,524,032	2,516,255	199,896	202,107	199,173	194,747
3	*Stable deposits*	1,584,256	1,603,429	1,472,393	1,411,656	79,213	80,171	73,620	70,583
4	*Less stable deposits*	728,986	740,425	684,101	677,672	94,073	95,312	88,613	88,696
5	Unsecured wholesale funding	989,731	1,029,762	916,073	891,584	425,059	448,668	380,896	374,059
6	*Operational deposits (all counterparties) and deposits in networks of cooperative banks*	151,051	152,193	151,495	142,674	36,660	37,093	36,771	34,627
7	*Non-operational deposits (all counterparties)*	838,680	877,569	764,578	748,910	388,399	411,576	344,124	339,432
8	*Unsecured debt*	-	-	-	-	-	-	-	-
9	*Secured wholesale funding*	n/a	n/a	n/a	n/a	-	-	-	-
10	Additional requirements	287,792	266,096	260,753	235,847	28,799	26,666	24,992	22,678
11	*Outflows related to derivative exposures and other collateral requirements*	1,725	2,120	1,794	2,013	1,725	2,120	1,794	2,013
12	*Outflows related to loss of funding on debt products*	-	-	-	-	-	-	-	-
13	*Credit and liquidity facilities*	286,067	263,976	258,959	233,834	27,074	24,546	23,198	20,665
14	Other contractual funding obligations	20,707	25,214	13,533	8,157	20,707	25,214	13,533	8,157
15	Other contingent funding obligations	39,986	44,884	29,070	22,945	-	-	1,496	-
16	TOTAL CASH OUTFLOWS	n/a	n/a	n/a	n/a	674,461	702,655	620,090	599,641
CASH - INFLOWS									
17	Secured lending (e.g. reverse repos)	-	-	-	-	-	-	-	-
18	Inflows from fully performing exposures	76,804	89,427	94,965	122,184	65,719	78,026	85,369	112,398
19	Other cash inflows	4,714	2,742	3,776	4,292	4,713	2,741	3,775	4,291
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	81,519	92,169	98,740	126,476	70,433	80,767	89,145	116,690
EU-20a	*Fully exempt inflows*	-	-	-	-	-	-	-	-
EU-20b	*Inflows subject to 90% cap*	-	-	-	-	-	-	-	-
EU-20c	*Inflows subject to 75% cap*	81,519	92,169	98,740	126,476	70,433	80,767	89,145	116,690
TOTAL ADJUSTED VALUE									
21	LIQUIDITY BUFFER	n/a	n/a	n/a	n/a	1,237,033	1,209,409	1,533,023	1,701,381
22	TOTAL NET CASH OUTFLOWS	n/a	n/a	n/a	n/a	604,028	621,888	530,945	482,952
23	LIQUIDITY COVERAGE RATIO	n/a	n/a	n/a	n/a	205%	194%	289%	352%

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	389,292	-	-	449,292	449,292
2	*Own funds*	389,292	-	-	60,000	449,292
3	*Other capital instruments*	n/a	-	-	-	-
4	Retail deposits	n/a	2,565,483	41,385	24,572	2,460,757
5	*Stable deposits*	n/a	1,761,119	38,955	22,901	1,732,972
6	*Less stable deposits*	n/a	804,364	2,429	1,671	727,785
7	Wholesale funding:	n/a	919,715	81,173	490,726	962,053
8	*Operational deposits*	n/a	121,478	-	-	-
9	*Other wholesale funding*	n/a	798,237	81,173	490,726	962,053
10	Interdependent liabilities	n/a	-	-	-	-
11	Other liabilities:	739	72,438	124	37	99
12	*NSFR derivative liabilities*	739	-	-	-	-
13	*All other liabilities and capital instruments not included in the above categories*	n/a	72,438	124	37	99
14	**Total available stable funding (ASF)**	n/a	n/a	n/a	n/a	**3,872,201**

		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	523,736
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	449,685	292,283	2,283,082	2,208,693
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	67,350	1,404	6,189	13,626

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	342,146	252,791	1,318,755	1,938,228
21	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*	n/a	1,469	1,981	17,172	271,136
22	*Performing residential mortgages, of which:*	n/a	21,485	21,096	679,151	-
23	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*	n/a	13,870	13,065	376,588	-
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	18,704	16,992	278,986	256,840
25	Interdependent assets	n/a	-	-	-	-
26	Other assets:		301,858	35,418	230,540	117,154
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			4,303	4,303
30	*NSFR derivative liabilities before deduction of variation margin posted*	n/a			-	-
31	*All other assets not included in the above categories*	n/a	265,760	35,418	226,237	112,851
32	Off-balance sheet items	n/a	36,098	-	-	-
33	**Total RSF**	n/a	n/a	n/a	n/a	**2,849,583**
34	**Net Stable Funding Ratio (%)**	n/a	n/a	n/a	n/a	**135.89%**

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.

Further operational risk is divided into the following categories: personnel risk, process risk, IT and system risk, external risk.

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 1 bp of CET1 capital and has a higher probability of occurrence than once per five 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.

Due to Covid-19 situation previously unseen measures have been undertaken by governments in the jurisdictions the Group operates. Citadele has worked tirelessly to implement the necessary operational and other measures to facilitate smooth and uninterrupted high-quality client services and to organise productive and safe work environment for its employees. As a result, operational risks are at levels comparable to pre Covid-19 levels with no substantial increase in risk events.

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 which are in place, and analyses the necessary risk reduction measures;
- Measuring 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 and sensitivity 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.

Operational risk management in the Group is carried out in accordance with Operational Risk Management Policy.

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

		a	b	c	d	e
		Relevant indicator			**Own funds requirements**	**Risk exposure amount**
Banking activities		**Year-3**	**Year-2**	**Last year**		
1	Banking activities subject to basic indicator approach (BIA)	-	-	-	-	-
2	Banking activities subject to standardised (TSA) / alternative standardised (ASA) approaches	-	-	-	16,530	206,624
3	*Subject to TSA:*	123,572	100,695	161,055	n/a	n/a
4	*Subject to ASA:*	-	-	-	n/a	n/a
5	Banking activities subject to advanced measurement approaches AMA	-	-	-	-	-

INTERNAL CAPITAL ADEQUACY ASSESSMENT PROCESS

The internal capital adequacy assessment process requires estimating individual capital charges for every significant risk type inherent to the Group. The internally developed methodology takes into account greater number of risks compared to what minimum regulatory standards require (e.g. interest rate risk in the banking book, concentration risk, compliance risk etc.). Furthermore, to ensure sustainability even at times of distress, the Group simulates its capital adequacy position under assumptions of an adverse macroeconomic scenario. The following summarises the forward looking assessment of the risk profile for 2021, where assessment is based on likelihoods assigned to different adverse deviations from the baseline scenario in terms of capital impact. The annual internal capital adequacy assessment is conducted for a three-year period, which corresponds to the timeframe used in the annual financial and strategic planning process, thereby promoting consistent integration of financial forecasts into capital adequacy evaluation.

Significant risks based on 2021 ICAAP assessment for which internal capital was allocated

Risk type	Exposure class	Risk assessment for 2021*	Regulatory capital requirement calculation method	Internal assessment method
Credit and concentration risks	Loan portfolio	High	Standardised approach	Scenario sensitivity approach
	Bond portfolio	Low	Standardised approach	Scenario sensitivity approach
	Counterparties	Low	Standardised approach	Scenario sensitivity approach
Market risk	Position risk in non-trading bond portfolio	Low	-	Scenario sensitivity approach
	Currency risk	Low	CRR articles 351-354	Value at risk (VaR)
Operational risk		Low	Standardised approach	Loss distribution approach
General interest rate risk in the banking book		Moderate	-	200bp parallel shift impact on EVE, six scenarios according to the regulatory requirements
Liquidity risk		Moderate	-	Integrated within reputation risk
AML and compliance risk		Low	-	Integrated within operational risk
Reputation risk		Low	-	Scenario sensitivity approach
Business model and strategy risk		Moderate	-	Scenario sensitivity approach

* on a 4-grade scale: low, moderate, elevated, high.

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
			Gross carrying amount							
		Number of obligors		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)	312	32,192		32,192	-	-	-	-	-
3	of which: Households	n/a	12,228	-	12,228	-	-	-	-	-
4	*of which: Collateralised by residential immovable property*	n/a	12,228	-	12,228	-	-	-	-	-
5	of which: Non-financial corporations	n/a	19,964	-	19,964	-	-	-	-	-
6	*of which: Small and Medium-sized Enterprises*	n/a	19,964	-	19,964	-	-	-	-	-
7	*of which: Collateralised by commercial immovable property*	n/a	19,482	-	19,482	-	-	-	-	-

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	880	-	704	-
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	880	-	704	-
5	*of which: Small and Medium-sized Enterprises*	380	n/a	n/a	-
6	*of which: Collateralised by commercial immovable property*	211	n/a	n/a	-