

AS Citadele banka

Risk management and capital adequacy report (pillar 3 disclosures)

For the six months ended
30 June 2022

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opportunities**

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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 issued by the supervisory authorities and other relevant 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 position 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 Atklātāis Pensiju Fonds	Full consolidation	Full consolidation	Pension fund
SIA Mobilly	Equity method	Equity method	Electronic money institution
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 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.

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 supervisory authorities. 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.

For full list of directorships held by the members of Supervisory Board and Management Board please refer to the "Committees" subsection of the "Governance" section of www.cblgroup.com.

RISK MANAGEMENT

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

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

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

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

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

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

assumed and trends thereof to the Group's management bodies, as well as other information necessary for decision making, risk management policy and control procedures, including procedures for control of compliance with the restrictions and limits set, segregation of duties, approval rights and responsibilities.

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

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

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

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

CAPITAL ADEQUACY CALCULATION

Capital adequacy is calculated in accordance with the current global standards of the bank capital adequacy (the Basel III international regulatory framework) as implemented by the European Union via a regulation (EU) 575/2013 and a directive 2013/36/EU, rules and recommendations issued by supervisory authorities 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 assessment of the supervisory authority an additional 2.50% own funds requirement is determined to cover Pillar 2 risks. Thus, as of the period end Citadele shall at all times meet, on a consolidated basis, a total SREP capital requirement (TSCR) of 10.5% (which includes a Pillar 2 additional own funds requirement of 2.5% to be held in the form of 56.25% of Common Equity Tier 1 (CET1) capital and 75% of Tier 1 capital, as a minimum).

The Pillar 2 Guidance (P2G) is a bank-specific recommendation that indicates the level of capital that the ECB expects banks to maintain in addition to their binding capital requirements. It serves as a buffer for banks to withstand stress. The Pillar 2 Guidance is determined as part of the Supervisory Review and Evaluation Process (SREP) and for Citadele as of period end is set at 1.5%. Unlike the Pillar 2 Requirement, the Pillar 2 Guidance is not legally binding.

On top of the minimum capital adequacy ratios and the Pillar 2 additional 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 supervisory authority 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 had decreased to almost 0%. Since then, some countries have announced planned future increases in countercyclical capital buffer levels which, after prespecified delay, one-by-one will start to become effective later in 2022.

The Group and the Bank applies requirements of minimum loss coverage for non-performing exposures in line with regulation (EU) 2019/630. 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 capital adequacy requirements. The long-term regulatory capital position of the Group and the Bank is planned and managed in line with these and other expected upcoming regulatory requirements.

Regulatory capital requirements of the Group on 30 June 2022

	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%
Pillar 2 additional own funds requirement (individually determined by the supervisory authority in the SREP, P2R)	1.41%	1.88%	2.50%
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	9.91%	11.88%	14.50%
Pillar 2 Guidance (P2G)	1.50%	1.50%	1.50%
Non-legally binding capital requirement with Pillar 2 Guidance	11.41%	13.38%	16.00%

Capital adequacy ratio (excluding unaudited net profit for the period)

	EUR thousands	
	30/06/2022 Group	31/12/2021 Group
Common equity Tier 1 capital		
Paid up capital instruments and share premium	157,127	157,127
Retained earnings	230,953	230,786
Regulatory deductions	(14,418)	(8,255)
Other capital components and transitional adjustments, net	4,258	9,634
Tier 2 capital		
Eligible part of subordinated liabilities	60,000	60,000
Total own funds	437,920	449,292
Risk weighted exposure amounts for credit risk, counterparty credit risk and dilution risk	2,324,503	2,164,268
Total exposure amounts for position, foreign currency open position and commodities risk	1,879	10,916
Total exposure amounts for operational risk	206,624	206,624
Total exposure amounts for credit valuation adjustment	3,802	4,592
Total risk exposure amount	2,536,808	2,386,400
Common equity Tier 1 capital ratio	14.9%	16.3%
Total capital adequacy ratio	17.3%	18.8%

Transitional adjustments applied as of 30 June 2022

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 at the end of 2022.

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, excluding unaudited net profit for the period)

	EUR thousands	
	30/06/2022 Group	31/12/2021 Group
Common equity Tier 1 capital, fully loaded	376,457	386,366
Tier 2 capital	60,000	60,000
Total own funds, fully loaded	436,457	446,366
Total risk exposure amount, fully loaded	2,535,642	2,383,981
Common equity Tier 1 capital ratio, fully loaded	14.8%	16.2%
Total capital adequacy ratio, fully loaded	17.2%	18.7%

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 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 of which: Instrument type 1	157,127 157,127	Line E01 in template EU CC2 Line E01 in template EU CC2
2 Retained earnings	230,953	Part of line E03 in template EU CC2
3 Accumulated other comprehensive income (and other reserves)	(4,604)	Part of line E02 in template EU CC2
EU-3a Funds for general banking risk	-	
4 Amount of qualifying items referred to in Article 484 (3) and the related share premium accounts subject to phase out from CET1	-	
5 Minority interests (amount allowed in consolidated CET1)	-	
EU-5a Independently reviewed interim profits net of any foreseeable charge or dividend	-	
6 Common Equity Tier 1 (CET1) capital before regulatory adjustments	383,476	
Common Equity Tier 1 (CET1) capital: regulatory adjustments		
7 Additional value adjustments (negative amount)	(204)	
8 Intangible assets (net of related tax liability) (negative amount)	(3,330)	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)	(2,548)	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) 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	-	
23	-	
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 (<i>including IFRS 9 transitional adjustments when relevant</i>)	525	
28	Total regulatory adjustments to Common Equity Tier 1 (CET1)	(5,557)	
29	Common Equity Tier 1 (CET1) capital	377,920	
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)	377,920	
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 adjustments 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)	437,920
60	Total risk exposure amount	2,536,808
Capital ratios and buffers		
61	Common Equity Tier 1 (as a percentage of total risk exposure amount)	14.9%
62	Tier 1 (as a percentage of total risk exposure amount)	14.9%
63	Total capital (as a percentage of total risk exposure amount)	17.3%
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)	9.9%
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)	182
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)	-
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	363,203
78	Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)	-
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach	-
Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2014 and 1 Jan 2022)		
80	Current cap on CET1 instruments subject to phase out arrangements	-
81	Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)	-
82	Current cap on AT1 instruments subject to phase out arrangements	-
83	Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)	-
84	Current cap on T2 instruments subject to phase out arrangements	-
85	Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)	-

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

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

	a	b	c	
	Balance sheet as in published financial statements 30/06/2022	Under regulatory scope of consolidation 30/06/2022	Reference	
Assets				
A01	Cash and cash balances at central banks	215,770	215,770	
A02	Loans to credit institutions	42,112	42,023	
A03	Debt securities	1,660,153	1,616,129	
A04	Loans to public	2,895,490	2,895,490	
A05	Equity instruments	1,892	1,892	
A06	Other financial instruments	29,490	1,114	
A07	Derivatives	8,701	8,701	
A08	Investments in subsidiaries	182	4450	
A09	Tangible assets	18,638	18,638	
A10	Intangible assets	7,891	7,831	Partially line 8 in template EU CC1
A11	Current income tax assets	2,142	2142	
A12	Deferred income tax assets	2,548	2,548	Line 10 in template EU CC1
A13	Non-current assets held for sale	137,212	137,212	
A14	Other assets	39,577	38,972	
AA	Total assets	5,061,798	4,992,912	
Liabilities				
L01	Deposits from credit institutions and central banks	479,163	479,163	
L02	Deposits and borrowings from customers	3,682,557	3,658,466	
L03	Debt securities issued	260,662	260,662	Partially line 46 in template EU CC1
L04	Derivatives	2,181	2,181	
L05	Provisions	4,704	4,704	
L06	Current income tax liabilities	3	3	
L07	Deferred income tax liabilities	375	375	
L08	Other liabilities	230,013	185,635	
LL	Total liabilities	4,659,658	4,591,189	
Shareholders' Equity				
E01	Share capital	156,888	156,888	Line 1 in template EU CC1
E02	Reserves and other capital components	(7,368)	(4,365)	Partially line 3 in template EU CC1
E03	Retained earnings	252,620	249,200	Partially line 2 in template EU CC1
EE	Total equity	402,140	401,723	

EU KM1 - Key metrics template

	a	b	c	d	e	
	30/06/2022	31/03/2022	31/12/2021	30/09/2021	30/06/2021	
Available own funds (amounts)						
1	Common Equity Tier 1 (CET1) capital	377,920	382,189	389,292	368,162	336,056
2	Tier 1 capital	377,920	382,189	389,292	368,162	336,056
3	Total capital	437,920	442,189	449,292	428,162	396,056
Risk-weighted exposure amounts						
4	Total risk-weighted exposure amount	2,536,808	2,423,264	2,386,400	2,315,769	2,206,291
Capital ratios (as a percentage of risk-weighted exposure amount)						
5	Common Equity Tier 1 ratio (%)	14.9%	15.8%	16.3%	15.9%	15.2%
6	Tier 1 ratio (%)	14.9%	15.8%	16.3%	15.9%	15.2%
7	Total capital ratio (%)	17.3%	18.2%	18.8%	18.5%	18.0%
Additional own funds requirements based on SREP (as a percentage of risk-weighted exposure amount)						
EU 7a	Additional CET1 SREP requirements (%)	1.4%	1.4%	1.3%	1.3%	1.3%
EU 7b	Additional AT1 SREP requirements (%)	0.5%	0.5%	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 (%)	10.5%	10.5%	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%	4%	4.0%	4.0%
EU 11a	Overall capital requirements (%)	14.5%	14.5%	14.3%	14.3%	14.3%
12	CET1 available after meeting the total SREP own funds requirements (%)	6.8%	7.7%	8.5%	8.2%	7.5%
Leverage ratio						
13	Leverage ratio total exposure measure	5,129,303	5,140,820	5,129,628	4,975,079	4,854,261
14	Leverage ratio	7.4%	7.4%	7.6%	7.4%	6.9%
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)	1,068,479	1,163,576	1,255,477	1,217,737	1,283,317
EU 16a	Cash outflows - Total weighted value	666,960	619,398	675,383	492,146	724,200
EU 16b	Cash inflows - Total weighted value	44,247	60,969	48,374	72,948	47,275
16	Total net cash outflows (adjusted value)	638,936	568,987	635,011	626,184	68,769
17	Liquidity coverage ratio (%)	167%	205%	198%	194%	187%
Net Stable Funding Ratio						
18	Total available stable funding	3,781,872	3,771,886	3,872,201	3,838,052	3,818,011
19	Total required stable funding	2,826,367	2,123,712	2,849,583	2,804,776	1,938,354
20	NSFR ratio (%)	134%	178%	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

		30/06/2022	31/03/2022	31/12/2021	30/09/2021	30/06/2021
Available capital (amounts)						
1	Common Equity Tier 1 (CET1) capital	377,920	382,189	389,292	368,162	336,056
2	Common Equity Tier 1 (CET1) capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	376,457	380,726	386,366	365,236	333,130
3	Tier 1 capital	377,920	382,189	389,292	368,162	336,056
4	Tier 1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	376,457	380,726	386,366	365,236	333,130
5	Total capital	437,920	442,189	449,292	428,162	396,056
6	Total capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	436,457	440,726	446,366	425,236	393,130
Risk-weighted assets (amounts)						
7	Total risk-weighted assets	2,536,808	2,423,264	2,386,400	2,315,769	2,206,291
8	Total risk-weighted assets as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	2,535,642	2,422,069	2,383,981	2,313,344	2,203,802
Capital ratios						
9	Common Equity Tier 1 (as a percentage of risk exposure amount)	14.9%	15.8%	16.3%	15.9%	15.2%
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	14.8%	15.7%	16.2%	15.8%	15.1%
11	Tier 1 (as a percentage of risk exposure amount)	14.9%	15.8%	16.3%	15.9%	15.2%
12	Tier 1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	14.8%	15.7%	16.2%	15.8%	15.1%
13	Total capital (as a percentage of risk exposure amount)	17.3%	18.2%	18.8%	18.5%	18.0%
14	Total capital (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	17.2%	18.2%	18.7%	18.4%	17.8%
Leverage ratio						
15	Leverage ratio total exposure measure	5,129,303	5,140,820	5,129,628	4,975,079	4,854,261
16	Leverage ratio	7.4%	7.4%	7.6%	7.4%	6.9%
17	Leverage ratio as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	7.3%	7.4%	7.5%	7.3%	6.9%

EU OV1 – Overview of total risk exposure amounts

		RWAs		Minimum capital requirements
		30/06/2022	31/12/2021	30/06/2022
1	Credit risk (excluding CCR)	2,309,827	2,145,262	184,786
2	Of which the standardised approach	2,309,827	2,145,262	184,786
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	18,478	23,598	1,478
7	Of which the standardised approach	-	-	-
8	Of which internal model method (IMM)	-	-	-
EU 8a	Of which exposures to a CCP	-	-	-
EU 8b	Of which credit valuation adjustment - CVA	3,802	4,592	304
9	Of which other CCR	14,676	19,006	1,174
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)	1,879	10,916	150
21	Of which the standardised approach	1,879	10,916	150
22	Of which IMA	-	-	-
EU 22a	Large exposures	-	-	0
23	Operational risk	206,624	206,624	16,530
EU 23a	Of which basic indicator approach	-	-	-
EU 23b	Of which standardised approach	206,624	206,624	16,530
EU 23c	Of which advanced measurement approach	-	-	-
24	Amounts below the thresholds for deduction (subject to 250% risk weight)	-	-	-
29	Total	2,536,808	2,386,400	202,945

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 Division. 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 Division.

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				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: defaulted	of which: subject to impairment						
010	On balance sheet exposures	4,632,523	89,448	89,445	4,632,523	(97,086)	n/a	-		
020	Latvia	1,791,676	28,991	28,991	1,791,676	(36,137)	n/a	-		
030	Lithuania	1,733,949	23,766	23,763	1,733,949	(22,898)	n/a	-		
040	Estonia	556,107	12,319	12,319	556,107	(11,849)	n/a	-		
050	United States	92,405	1	1	92,405	(266)	n/a	-		
060	Poland	85,640	-	3-	49,420	(16)	n/a	-		
070	Other countries	372,746	24,371	24,371	408,966	(25,920)	n/a	-		
080	Off balance sheet exposures	397,170	896	746	n/a	n/a	4,604	n/a		
090	Latvia	243,936	473	323	n/a	n/a	2,960	n/a		
100	Lithuania	122,726	422	422	n/a	n/a	1,483	n/a		
110	Estonia	23,756	-	-	n/a	n/a	132	n/a		
120	Russian Federation	3,673	-	-	n/a	n/a	-	n/a		
130	Switzerland	2,354	-	-	n/a	n/a	22	n/a		
140	Other countries	725	1	1	n/a	n/a	7	n/a		
150	Total	5,029,693	90,344	90,192	4,632,523	(7,086)	4,604	-		

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

	a				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: defaulted	of which: loans and advances subject to impairment				
010	Agriculture, forestry and fishing	164,122	3,341	3,341	164,122	(6,176)	-	
020	Mining and quarrying	6,844	10	10	6,844	(118)	-	
030	Manufacturing	179,086	8,759	8,759	179,086	(5,684)	-	
040	Electricity, gas, steam and air conditioning supply	49,439	2,153	2,153	49,439	(677)	-	
050	Water supply	16,500	16	16	16,500	(295)	-	
060	Construction	139,343	6,620	6,620	139,343	(3,860)	-	
070	Wholesale and retail trade	200,369	2,179	2,177	200,368	(4,930)	-	
080	Transport and storage	200,636	23,657	23,656	200,636	(12,328)	-	
090	Accommodation and food service activities	43,923	11,127	11,127	43,923	(2,289)	-	
100	Information and communication	17,713	26	26	17,713	(452)	-	
110	Real estate activities	381,684	3,519	3,519	381,685	(7,563)	-	
120	Financial and insurance activities	1	-	-	1	-	-	
130	Professional, scientific and technical activities	48,531	206	206	48,531	(1,195)	-	
140	Administrative and support service activities	124,263	2,587	2,587	124,263	(2,511)	-	
150	Public administration and defence, compulsory social security	2,689	-	-	2,689	(121)	-	
160	Education	5,284	107	107	5,284	(204)	-	
170	Human health services and social work activities	14,434	29	29	14,434	(299)	-	
180	Arts, entertainment and recreation	8,061	1,187	1,187	8,061	(285)	-	
190	Other services	4,163	176	176	4,163	(146)	-	
200	Total	1,607,085	65,699	65,696	1,607,085	(49,133)	-	

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	of which: stage 2	of which: stage 3					
005 Cash balances at central banks and other demand deposits	186,308	186,308	-	-	-	-	(3)	(3)	-	-	-	-	-	-	-
010 Loans and advances	2,924,732	2,706,291	211,043	89,448	2	78,440	(60,135)	(50,075)	(10,047)	(34,737)	-	(34,689)	(4,132)	2,322,880	51,763
020 Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
030 General governments	23,741	23,677	64	-	-	-	(345)	(340)	(5)	-	-	-	-	2,783	-
040 Credit institutions	24,069	24,069	-	-	-	-	(251)	(251)	-	-	-	-	-	-	-
050 Other financial corporations	36,844	36,375	469	4	-	2	(928)	(904)	(23)	(2)	-	(2)	-	12,056	2
060 Non-financial corporations	1,541,387	1,361,264	173,053	65,699	2	55,258	(32,743)	(25,195)	(7,542)	(16,390)	-	(16,343)	(4,132)	1,267,935	47,001
070 Of which: SMEs	1,197,406	1,064,492	125,938	53,302	2	43,319	(26,811)	(20,847)	(5,957)	(7,421)	-	(7,374)	-	988,109	43,633
080 Households	1,298,691	1,260,906	37,457	23,744	-	23,179	(25,867)	(23,385)	(2,477)	(18,344)	-	(18,342)	-	1,040,106	4,760
090 Debt Securities	1,618,344	1,618,344	-	-	-	-	(2,216)	(2,216)	-	-	-	-	-	-	-
100 Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
110 General governments	1,290,612	1,290,612	-	-	-	-	(539)	(539)	-	-	-	-	-	-	-
120 Credit institutions	152,347	152,347	-	-	-	-	(6)	(6)	-	-	-	-	-	-	-
130 Other financial corporations	44,848	44,848	-	-	-	-	(1,475)	(1,475)	-	-	-	-	-	-	-
140 Non-financial corporations	130,537	130,537	-	-	-	-	(195)	(195)	-	-	-	-	-	-	-
150 Off-balance sheet exposures	396,274	390,394	5,880	896	-	746	4,445	4,174	270	159	-	158	-	96,500	558
160 Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
170 General governments	2,307	2,307	-	-	-	-	1	1	-	-	-	-	-	2	-
180 Credit institutions	2,406	2,406	-	-	-	-	23	23	-	-	-	-	-	-	-
190 Other financial corporations	6,510	6,477	32	-	-	-	84	83	1	-	-	-	-	5,192	-
200 Non-financial corporations	250,937	247,528	3,408	765	-	616	2,139	1,985	154	127	-	126	-	85,725	557
210 Households	134,115	131,675	2,440	131	-	131	2,199	2,084	115	32	-	32	-	5,582	1
220 Total	4,939,350	4,715,029	216,923	90,344	2	79,186	(57,906)	(48,117)	(9,777)	(34,578)	-	(34,531)	(4,132)	2,419,380	52,321

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

	Unsecured carrying amount	Secured carrying amount			
		a	b	Of which secured by collateral c	Of which secured by financial guarantees
					d
1 Loans and advances	730,972	2,374,642	2,358,028	16,614	-
2 Debt securities	1,618,344	-	-	-	-
3 Total	2,349,316	2,374,642	2,358,028	16,614	-
4 <i>Of which non-performing exposures</i>	2,948	51,763	50,738	1,025	-
5 <i>Of which defaulted</i>	2,946	51,763	50,738	1,025	-

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

Exposure classes	a		b		c		d		e		f	
	Exposures before CCF and before CRM		Exposures post CCF and post CRM		RWA's and RWA's density				RWEA density (%)			
	On-balance sheet exposures	Off-balance sheet exposures	On-balance sheet exposures	Off-balance sheet amount	RWEA							
1 Central governments or central banks	1,410,244	1	1,427,938	74	13,883					1%		
2 Regional government or local authorities	65,154	1,611	65,362	1,055	12,590					19%		
3 Public sector entities	1,263	337	1,263	168	374					26%		
4 Multilateral development banks	49,561	-	49,561	-	638					1%		
5 International organisations	-	-	-	-	-					0%		
6 Institutions	214,423	2,383	218,945	1,176	53,338					24%		
7 Corporates	1,268,880	231,152	1,189,441	93,478	1,053,719					82%		
8 Retail	974,161	139,397	963,653	7,434	636,047					65%		
9 Secured by mortgages on immovable property	755,754	3,993	755,051	1,997	332,393					44%		
10 Exposures in default	58,986	734	54,101	177	60,429					111%		
11 Items associated with particularly high risk	44,407	12,659	42,013	6,242	72,382					150%		
12 Covered bonds	16,924	-	16,924	-	1,692					10%		
13 Claims on institutions and corporates with a short-term credit assessment	-	-	-	-	-					0%		
14 Collective investments undertakings	1,114	-	1,114	-	1,248					112%		
15 Equity exposures	6,342	-	6,342	-	12,745					201%		
16 Other exposures	112,517	364	188,022	9,988	58,348					29%		
17 Total	4,979,730	392,631	4,979,730	121,789	2,309,826					45%		



EU CR5 – Standardised approach

Exposure classes	Risk weight															Total	Of which unrated
	0%	2%	4%	10%	20%	35%	50%	70%	75%	100%	150%	250%	370%	1250%	Others		
1 Central governments or central banks	1,358,670	-	-	-	69,323	-	-	-	-	19	-	-	-	-	-	1,428,012	1,358,671
2 Regional governments or local authorities	3,468	-	-	-	62,949	-	-	-	-	-	-	-	-	-	-	66,417	3,468
3 Public sector entities	-	-	-	-	1,139	-	292	-	-	-	-	-	-	-	-	-	1,431
4 Multilateral development banks	46,371	-	-	-	3,190	-	-	-	-	-	-	-	-	-	-	49,561	46,371
5 International organisations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6 Institutions	-	-	-	-	202,241	-	12,576	-	-	6,926	-	-	-	-	-	221,743	-
7 Corporates	-	-	-	-	88,088	-	46,011	-	-	1,157,929	5,563	-	-	-	-	1,297,591	1,070,121
8 Retail	-	-	-	-	-	-	-	-	971,087	-	-	-	-	-	-	971,087	-
9 Secured by mortgages on immovable property	-	-	-	-	-	620,576	-	-	85,068	51,404	-	-	-	-	-	757,048	-
10 Exposures in default	-	-	-	-	-	-	-	-	-	41,976	12,302	-	-	-	-	54,278	348
11 Items associated with particularly high risk	-	-	-	-	-	-	-	-	-	-	48,255	-	-	-	-	48,255	-
12 Covered bonds	-	-	-	16,924	-	-	-	-	-	-	-	-	-	-	-	16,924	-
13 Claims on institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14 Collective investments undertakings	51	-	-	-	-	-	57	-	-	582	425	-	-	-	-	1,115	51
15 Equity exposures	-	-	-	-	-	-	-	-	-	2,074	-	4,268	-	-	-	6,342	-
16 Other exposures	99,661	-	-	-	50,000	-	-	-	-	48,348	-	-	-	-	-	198,009	103,400
17 Total	1,508,221	-	-	16,924	476,930	620,576	58,936	-	1,056,155	1,309,258	66,545	4,268	-	-	-	5,117,813	2,582,430



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	1,510,853	-	-	-	-	1,510,853	78,469	-	-	78,469	18,885,663	43.72%	0.00%
	Lithuania	1,167,206	-	-	-	-	1,167,206	67,776	-	-	67,776	14,590,075	37.76%	0.00%
	Estonia	471,319	-	-	-	-	471,319	24,966	-	-	24,966	5,891,488	13.91%	0.00%
	United States	48,366	-	-	-	-	48,366	1,467	-	-	1,467	604,575	0.82%	0.00%
	Netherlands	33,566	-	-	-	-	33,566	1,084	-	-	1,084	419,575	0.60%	0.00%
	United Kingdom	11,898	-	-	-	-	11,898	695	-	-	695	148,725	0.39%	0.00%
	Sweden	6,897	-	-	-	-	6,897	414	-	-	414	86,213	0.23%	0.00%
	Other with 0% countercyclical capital buffer	<u>89,960</u>	-	-	-	-	89,960	4,102	-	-	4,102	1,124,500	<u>2.29%</u>	0.00%
	Other with non 0% countercyclical capital buffer	<u>10,585</u>	-	-	-	-	10,585	495	-	-	495	132,313	<u>0.28%</u>	<u>0.65%</u>
020	Total	3,350,650	-	-	-	-	3,350,650	179,468	-	-	179,468	41,883,125	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	2,536,808
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		Nominal amount		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	57,459	62,666	62,666	56,007	(1,312)	(29,886)	83,141		31,582
020 Central banks	-	-	-	-	-	-	-	-	-
030 General governments	-	-	-	-	-	-	-	-	-
040 Credit institutions	-	-	-	-	-	-	-	-	-
050 Other financial corporations	-	2	2	-	-	-	2		2
060 Non-financial corporations	47,552	44,115	44,115	37,631	(793)	(13,322)	74,227		29,742
070 Households	9,907	18,549	18,549	18,376	(519)	(16,564)	8,912		1,837
080 Debt Securities	-	-	-	-	-	-	-	-	-
090 Loan commitments given	25	-	-	-	-	-	-	-	-
100 Total	57,484	62,666	62,666	56,007	(1,312)	(29,886)	83,141		31,582

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
	Replace-ment cost (RC)	Potential future exposure (PFE)	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre-CRM	Exposure value post-CRM	Exposure value	RWEA
EU1 EU – Original Exposure Method (for derivatives)	-	-	n/a	1.4	-	-	-	-
EU2 EU – Simplified SA CCR (for derivatives)	8,829	2,810	n/a	1.4	16,294	-	16,294	14,676
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	16,294	-	16,294	14,676

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	b
	Exposure value	RWEA
1 Total transactions subject to the Advanced method	-	-
2 (i) VaR component (including the 3× multiplier)	-	-
3 (ii) stressed VaR component (including the 3× multiplier)	-	-
4 Transactions subject to the Standardised method	15,148	3,802
EU4 Transactions subject to the Alternative approach (Based on the Original Exposure Method)	-	-
5 Total transactions subject to own funds requirements for CVA risk	15,148	3,802

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

Exposure classes	Risk weight											Total exposure value
	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	-	-	-	-	1,621	-	-	-	-	-	-	1,621
7 Corporates	-	-	-	-	-	-	-	-	14,673	-	-	14,673
8 Retail	-	-	-	-	-	-	-	-	-	-	-	-
9 Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-
10 Other items	-	-	-	-	-	-	-	-	-	-	-	-
11 Total exposure value	-	-	-	-	1,621	-	-	-	14,673	-	-	16,294

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 30/06/2022	b 31/12/2021
On-balance sheet exposures (excluding derivatives and SFTs)		
1 On-balance sheet items (excluding derivatives, SFTs, but including collateral)	4,984,212	4,963,459
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)	(5,556)	(4,370)
7 Total on-balance sheet exposures (excluding derivatives and SFTs)	4,978,656	4,959,089
Derivative exposures		
8 Replacement cost associated with SA-CCR derivatives transactions (i.e. net of eligible cash variation margin)	12,360	-
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	3,933	-
EU-9a Derogation for derivatives: Potential future exposure contribution under the simplified standardised approach	-	-
EU-9b Exposure determined under Original Exposure Method	-	22,489
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	16,293	22,489
	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	397,309	422,407
20	(Adjustments for conversion to credit equivalent amounts)	262,956	274,358
21	(General provisions associated with off-balance sheet exposures deducted in determining Tier 1 capital)	-	-
22	Off-balance sheet exposures	134,353	148,049
	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	377,920	389,292
24	Leverage ratio total exposure measure	5,129,303	5,129,627
	Leverage ratio		
25	Leverage ratio	7.4%	7.6%
EU-25	Leverage ratio (without the adjustment due to excluded exposures of public development banks - Public sector investments) (%)	7.4%	7.6%
25a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves)	7.4%	7.6%
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		

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

		^a Applicable amount
1	Total assets as per published financial statements	5,061,799
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of regulatory consolidation	(68,886)
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	7,592
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)	134,353
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	(5,555)
13	Leverage ratio total exposure measure	5,129,303

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:	4,984,212
EU-2	Trading book exposures	-
EU-3	Banking book exposures, of which:	4,984,212
EU-4	Covered bonds	16,924
EU-5	Exposures treated as sovereigns	1,410,234
EU-6	Exposures to regional governments, MDB, international organisations and PSE not treated as sovereigns	115,975
EU-7	Institutions	214,418
EU-8	Secured by mortgages of immovable properties	755,605
EU-9	Retail exposures	973,810
EU-10	Corporate	1,268,512
EU-11	Exposures in default	58,491
EU-12	Other exposures (e.g. equity, securitisations, and other non-credit obligation assets)	170,243

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 Division.

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)	1,879
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	1,879

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 Division.

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 Division 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 Division 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) as measurements of the Bank's and the Group's liquidity position is 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 month figures will not reconcile.

Scope of consolidation: consolidated		a	b	c	d	e	f	g	h
		Total unweighted value (average)				Total weighted value (average)			
EU 1a	Quarter ending on	30/06/2022	31/03/2022	31/12/2021	30/09/2021	30/06/2022	31/03/2022	31/12/2021	30/09/2021
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	1,169,319	1,211,800	1,237,033	1,209,409
CASH - OUTFLOWS									
2	retail deposits and deposits from small business customers, of which:	2,578,177	2,561,797	2,546,558	2,544,085	196,408	196,875	199,896	202,107
3	<i>Stable deposits</i>	1,654,670	1,621,190	1,584,256	1,603,429	82,733	81,059	79,213	80,171
4	<i>Less stable deposits</i>	755,422	739,477	728,986	740,425	97,009	95,216	94,073	95,312
5	Unsecured wholesale funding	938,538	976,740	989,731	1,029,762	423,125	430,786	425,059	448,668
6	<i>Operational deposits (all counterparties) and deposits in networks of cooperative banks</i>	119,653	138,100	151,051	152,193	28,919	33,473	36,660	37,093
7	<i>Non-operational deposits (all counterparties)</i>	818,756	838,640	838,680	877,569	394,077	397,313	388,399	411,576
8	<i>Unsecured debt</i>	129	-	-	-	-	-	-	-
9	<i>Secured wholesale funding</i>	n/a	n/a	n/a	n/a	-	-	-	-
10	Additional requirements	328,575	318,788	287,792	266,096	32,553	31,531	28,799	26,666
11	<i>Outflows related to derivative exposures and other collateral requirements</i>	3,034	2,076	1,725	2,120	3,034	2,076	1,725	2,120
12	<i>Outflows related to loss of funding on debt products</i>	-	-	-	-	-	-	-	-
13	<i>Credit and liquidity facilities</i>	325,541	316,713	286,067	263,976	29,519	29,455	27,074	24,546
14	Other contractual funding obligations	9,440	16,052	20,707	25,214	9,440	16,052	20,707	25,214
15	Other contingent funding obligations	54,434	40,804	39,986	44,884	-	-	-	-
16	TOTAL CASH OUTFLOWS	n/a	n/a	n/a	n/a	661,526	675,244	674,461	702,655
CASH - INFLOWS									
17	Secured lending (e.g. reverse repos)	-	-	-	-	-	-	-	-
18	Inflows from fully performing exposures	69,281	73,179	76,804	89,427	54,997	60,314	65,719	78,026
19	Other cash inflows	4,614	4,415	4,714	2,742	4,613	4,414	4,713	2,741
	(Difference between total weighted inflows and total weighted outflows)	n/a	n/a	n/a	n/a	-	-	-	-
EU-19a	arising from transactions in third countries where there are transfer restrictions or which are denominated in non-convertible currencies)								
EU-19b	(Excess inflows from a related specialised credit institution)	n/a	n/a	n/a	n/a	-	-	-	-
20	TOTAL CASH INFLOWS	73,895	77,594	81,519	92,169	59,611	64,729	70,433	80,767
EU-20a	<i>Fully exempt inflows</i>	-	-	-	-	-	-	-	-
EU-20b	<i>Inflows subject to 90% cap</i>	-	-	-	-	-	-	-	-
EU-20c	<i>Inflows subject to 75% cap</i>	73,895	77,594	81,519	92,169	59,611	64,729	70,433	80,767
TOTAL ADJUSTED VALUE									
21	LIQUIDITY BUFFER	n/a	n/a	n/a	n/a	1,169,319	1,211,800	1,237,033	1,209,409
22	TOTAL NET CASH OUTFLOWS	n/a	n/a	n/a	n/a	601,915	610,515	604,028	621,888
23	LIQUIDITY COVERAGE RATIO	n/a	n/a	n/a	n/a	194%	198%	205%	194%

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 are mainly affected by developments in the deposit base and corresponding actions taken by management to manage liquidity position accordingly.
- (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

	Unweighted value by residual maturity				Weighted value
	a No maturity	b < 6 months	c 6 months to < 1yr	d ≥ 1yr	
Available stable funding (ASF) Items					
1 Capital items and instruments	377,920	-	-	437,920	437,920
2 Own funds	377,920	-	-	60,000	437,920
3 Other capital instruments	n/a	-	-	-	-
4 Retail deposits	n/a	2,580,022	33,282	18,826	2,461,826
5 Stable deposits	n/a	1,788,411	32,099	17,202	1,746,686
6 Less stable deposits	n/a	791,611	1,184	1,624	715,140
7 Wholesale funding:	n/a	992,368	436,235	254,402	882,023
8 Operational deposits	n/a	134,385	-	-	-
9 Other wholesale funding	n/a	857,983	436,235	254,402	882,023
10 Interdependent liabilities	n/a	-	-	-	-
11 Other liabilities:	2,181	77,500	56	75	103
12 NSFR derivative liabilities	2,181	-	-	-	-
13 All other liabilities and capital instruments not included in the above categories	n/a	77,500	56	75	103
14 Total available stable funding (ASF)	n/a	n/a	n/a	n/a	3,781,872

	Unweighted value by residual maturity				Weighted value
	a No maturity	b < 6 months	c 6 months to < 1yr	d ≥ 1yr	
Required stable funding (RSF) Items					
15 Total high-quality liquid assets (HQLA)	n/a	n/a	n/a	n/a	319,200
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	346,807	225,409	2,601,914	2,392,036
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	68,849	417	8,419	15,513

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	239,245	151,405	1,662,268	2,145,070
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk	n/a	930	2,375	19,890	309,808
22	Performing residential mortgages, of which:	n/a	22,066	21,294	712,335	-
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk	n/a	14,746	14,309	431,845	-
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	16,647	52,293	218,892	231,453
25	Interdependent assets	n/a	-	-	-	-
26	Other assets:		331,336	24,116	199,458	115,131
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			8,701	8,701
30	NSFR derivative liabilities before deduction of variation margin posted	n/a			-	-
31	All other assets not included in the above categories	n/a	296,077	24,116	190,757	106,430
32	Off-balance sheet items	n/a	35,259	-	-	-
33	Total RSF	n/a	n/a	n/a	n/a	2,826,367
34	Net Stable Funding Ratio (%)	n/a	n/a	n/a	n/a	134%

OPERATIONAL RISK

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

Operational risk 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.

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.

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	d				e	f	g	h	i	j				k	l	m	n	o	
			Gross carrying amount		Non-performing							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	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	Gross carrying amount						
					Of which: legislative moratoria	Of which: expired	Residual maturity of moratoria				
							<= 3 months	> 3 months <= 6 months	> 6 months <= 9 months	> 9 months <= 12 months	> 1 year
2	Loans and advances subject to moratorium (granted)	312	29,405	29,405	-	-	-	-	-		
3	of which: Households	n/a	11,449	-	11,449	-	-	-	-		
4	of which: <i>Collateralised by residential immovable property</i>	n/a	11,449	-	11,449	-	-	-	-		
5	of which: Non-financial corporations	n/a	17,956	-	17,956	-	-	-	-		
6	of which: <i>Small and Medium-sized Enterprises</i>	n/a	17,956	-	17,956	-	-	-	-		
7	of which: <i>Collateralised by commercial immovable property</i>	n/a	17,895	-	17,895	-	-	-	-		

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	
			Maximum amount of the guarantee that can be considered	Public guarantees received	Gross carrying amount	Inflows to non-performing exposures
1	Newly originated loans and advances subject to public guarantee schemes	720	-	576	-	-
2	of which: Households	-	n/a	n/a	-	-
3	of which: <i>Collateralised by residential immovable property</i>	-	n/a	n/a	-	-
4	of which: Non-financial corporations	720	-	576	-	-
5	of which: <i>Small and Medium-sized Enterprises</i>	220	n/a	n/a	-	-
6	of which: <i>Collateralised by commercial immovable property</i>	180	n/a	n/a	-	-