AS Citadele banka

Risk management and capital adequacy report (pillar 3 disclosures)

For the six months ended
30 June 2023

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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
SIA Citadele Leasing	Full consolidation	Full consolidation	Leasing
Kaleido Privatbank AG (Discontinued operations held for sale)	Full consolidation	Full consolidation	Banking
SIA Citadele Factoring	Full consolidation	Full consolidation	Leasing and factoring
IPAS CBL Asset Management	Full consolidation	Full consolidation	Investment management company
UAB Citadele Factoring	Full consolidation	Full consolidation	Leasing and factoring
SIA Hortus Residential	Full consolidation	Full consolidation	Support services
AS CBL Atklātais Pensiju Fonds	Full consolidation	Full consolidation	Pension fund
OU Citadele Factoring	Full consolidation	Full consolidation	Leasing and factoring
SIA Mobilly (Investments in associates accounted for using the equity method)	Equity method	Equity method	Electronic money institution
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 "Policy on the Assessment of the Suitability of Members of the Supervisory Board, 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 the risk committees represent various operations of the Group in order to balance business and risk within the respective risk committees. Annually Group defines its Risk Appetite Framework which sets acceptable risk-taking limits across all relevant risk types, considering business goals, macroeconomic environment and regulatory setting. Risk appetite limits are cascaded to all risk management strategies and implemented operationally through detailed internal regulations.

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 Management 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).

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), as of period end must also comply with the O-SII capital buffer requirement set by the supervisory authority at 1.75%.

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%. Since then, some countries have announced planed future increases in countercyclical capital buffer levels which, after prespecified delay, one-by-one start to become effective.

The Pillar 2 Guidance (P2G) is a bank-specific recommendation that indicates the level of capital that the supervisory authority 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.

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 2023

	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	1.75%	1.75%	1.75%
Systemic risk buffer	0.06%	0.06%	0.06%
Countercyclical capital buffer	0.17%	0.17%	0.17%
Capital requirement	**10.39%**	**12.36%**	**14.98%**
Pillar 2 Guidance (P2G)	1.50%	1.50%	1.50%
Non-legally binding capital requirement with Pillar 2 Guidance	**11.89%**	**13.86%**	**16.48%**

Capital adequacy ratio (excluding net result since latest annual audit)

	EUR thousands	
	30/06/2023 Group	**31/12/2022 Group**
Common equity Tier 1 capital		
Paid up capital instruments and share premium	157,698	157,702
Retained earnings	253,096	273,080
Proposed dividends	-	(20,000)
Regulatory deductions	(23,678)	(26,588)
Other capital components and transitional adjustments, net	4,019	4,364
Tier 2 capital		
Eligible part of subordinated liabilities	57,612	59,595
Total own funds	**448,747**	**448,153**
Risk weighted exposure amounts for credit risk, counterparty credit risk and dilution risk	2,013,086	2,080,113
Total exposure amounts for position, foreign currency open position and commodities risk	8,571	9,944
Total exposure amounts for operational risk	237,799	237,799
Total exposure amounts for credit valuation adjustment	1,786	1,570
Total risk exposure amount	**2,261,242**	**2,329,426**
Common equity Tier 1 capital ratio	**17.3%**	**16.7%**
Total capital adequacy ratio	**19.8%**	**19.2%**

Transitional adjustments applied

As of 30 June 2023, no transitional provisions were applied in capital adequacy calculation. Fully loaded capital adequacy ratio equals transitional capital adequacy ratio as of the period end.

As of 31 December 2022, the transitional provisions that the Group and the Bank applied for the period end capital adequacy calculations were: 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.

Fully loaded capital adequacy ratio (i.e. excluding transitional adjustments, excluding net result since latest annual audit)

	EUR thousands	
	30/06/2023 Group	**31/12/2022 Group**
Common Equity Tier 1 capital, fully loaded	391,135	387,095
Tier 2 capital	57,612	59,595
Total own funds, fully loaded	**448,747**	**446,690**
Total risk exposure amount, fully loaded	**2,261,242**	**2,328,275**
Common equity Tier 1 capital ratio, fully loaded	**17.3%**	**16.6%**
Total capital adequacy ratio, fully loaded	**19.8%**	**19.2%**

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	157,794	Line E01 in template EU CC2
	of which: Instrument type 1	*157,794*	Line E01 in template EU CC2
2	Retained earnings	253,096	Part of line E03 in template EU CC2
3	Accumulated other comprehensive income (and other reserves)	(4,948)	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**	**405,942**	
Common Equity Tier 1 (CET1) capital: regulatory adjustments			
7	Additional value adjustments (negative amount)	(189)	
8	Intangible assets (net of related tax liability) (negative amount)	(2,793)	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)	(604)	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)	(95)	
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	(9,760)	
EU-20b	of which: qualifying holdings outside the financial sector (negative amount)	-	
EU-20c	of which: securitisation positions (negative amount)	(9,760)	
EU-20d	of which: free deliveries (negative amount)	-	
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in Article 38 (3) are met) (negative amount)	-	
22	Amount exceeding the 17,65% threshold (negative amount)	-	
23	of which: direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities	-	
24	Empty set in the EU		
25	of which: deferred tax assets arising from temporary differences	-	
EU-25a	Losses for the current financial year (negative amount)	-	
EU-25b	Foreseeable tax charges relating to CET1 items except where the institution suitably adjusts the amount of CET1 items insofar as such tax charges reduce the amount up to which those items may be used to cover risks or losses (negative amount)	-	
26	Empty set in the EU		
27	Qualifying AT1 deductions that exceed the AT1 items of the institution (negative amount)	-	
27a	Other regulatory adjustments *(including IFRS 9 transitional adjustments when relevant)*	(1,366)	
28	**Total regulatory adjustments to Common Equity Tier 1 (CET1)**	**(5,048)**	
29	**Common Equity Tier 1 (CET1) capital**	**391,135**	
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)**	**391,135**	
Tier 2 (T2) capital: instruments			
46	Capital instruments and the related share premium accounts	57,612	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**	57,612	
Tier 2 (T2) capital: regulatory adjustments			
52	Direct and indirect holdings by an institution of own T2 instruments and subordinated loans (negative amount)	-	
53	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-	
54	Direct and indirect holdings of the T2 instruments and subordinated loans of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	
54a	Empty set in the EU		
55	Direct and indirect holdings by the institution of the T2 instruments and subordinated loans of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	-	
56	Empty set in the EU		
EU-56a	Qualifying eligible liabilities deductions that exceed the eligible liabilities items of the institution (negative amount)	-	
56b	Other regulatory adjusments to T2 capital		
57	**Total regulatory adjustments to Tier 2 (T2) capital**	**-**	
58	**Tier 2 (T2) capital**	**57,612**	
59	**Total capital (TC = T1 + T2)**	**448,747**	
60	**Total risk exposure amount**	**448,747**	
Capital ratios and buffers			
61	Common Equity Tier 1 (as a percentage of total risk exposure amount)	17.3%	
62	Tier 1 (as a percentage of total risk exposure amount)	17.3%	
63	Total capital (as a percentage of total risk exposure amount)	19.8%	
64	Institution CET1 overall capital requirement (CET1 requirement in accordance with Article 92 (1) CRR, plus additional CET1 requirement which the institution is required to hold in accordance with point (a) of Article 104(1) CRD, plus combined buffer requirement in accordance with Article 128(6) CRD) expressed as a percentage of risk exposure amount)	10.4%	
65	of which: capital conservation buffer requirement	2.5%	
66	of which: countercyclical buffer requirement	0.2%	
67	of which: systemic risk buffer requirement	0.1%	
EU-67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer	1.7%	
68	**Common Equity Tier 1 available to meet buffer (as a percentage of risk exposure amount)**	**9.3%**	
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)	203
73	Direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 17.65% thresholds and net of eligible short positions)	4,269
74	Empty set in the EU	-
75	Deferred tax assets arising from temporary differences (amount below 17.65% threshold, net of related tax liability where the conditions in Article 38 (3) are met)	-
Applicable caps on the inclusion of provisions in Tier 2		
76	Credit risk adjustments included in T2 in respect of exposures subject to standardised approach (prior to the application of the cap)	-
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach	315
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 30/06/2023	**Under regulatory scope of consolidation 30/06/2023**	**Reference**
	Assets			
A01	Cash and cash balances at central banks	353,473	353,473	
A02	Loans to credit institutions	35,976	34,562	
A03	Debt securities	1,310,755	1,270,770	
A04	Loans to public	2,927,203	2,927,203	
A05	Equity instruments	1,148	1148	
A06	Other financial instruments	27,335	1,157	
A07	Derivatives	1,495	1,495	
A08	Investments in subsidiaries	203	4,471	
A09	Tangible assets	13,129	13,129	
A10	Intangible assets	8,193	8,120	Partially line 8 in template EU CC1
A11	Current income tax assets	2,416	2,416	
A12	Deferred income tax assets	1,096	1,096	Line 10 in template EU CC1
A13	Non-current assets held for sale	163,476	162,353	
A14	Other assets	37,664	38,660	
AA	**Total assets**	**4,883,562**	**4,820,053**	
	Liabilities			
L01	Deposits from credit institutions and central banks	48,559	48,559	
L02	Deposits and borrowings from customers	3,871,788	3,817,479	
L03	Debt securities issued	260,995	260,995	Partially line 46 in template EU CC1
L04	Derivatives	693	693	
L05	Provisions	4,559	4,559	
L06	Current income tax liabilities	1,805	1,805	
L07	Deferred income tax liabilities	1,000	1,000	
L08	Discontinued operations	151,057	151,057	
L09	Other liabilities	78,595	67,989	
LL	**Total liabilities**	**4,419,051**	**4,354,136**	
	Shareholders' Equity			
E01	Share capital	157,256	157,256	Line 1 in template EU CC1
E02	Reserves and other capital components	(6,941)	(4,506)	Partially line 3 in template EU CC1
E03	Retained earnings	314,196	313,167	Partially line 2 in template EU CC1
EE	**Total equity**	**464,511**	**465,917**	

EU KM1 - Key metrics template (excluding unaudited profits)

		a	b	c	d	e
		30/06/2023	**31/03/2023**	**31/12/2022**	**30/09/2022**	**30/06/2022**
	Available own funds (amounts)					
1	Common Equity Tier 1 (CET1) capital	391,134	390,168	388,558	372,603	377,920
2	Tier 1 capital	391,134	390,168	388,558	372,603	377,920
3	Total capital	448,747	448,777	448,153	432,603	437,920
	Risk-weighted exposure amounts					
4	Total risk-weighted exposure amount	2,261,242	2,283,398	2,329,426	2,559,276	2,544,564
	Capital ratios (as a percentage of risk-weighted exposure amount)					
5	Common Equity Tier 1 ratio (%)	17.3%	17.1%	16.7%	14.6%	14.9%
6	Tier 1 ratio (%)	17.3%	17.1%	16.7%	14.6%	14.9%
7	Total capital ratio (%)	19.8%	19.7%	19.2%	16.9%	17.2%
	Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)					
EU 7a	Additional own funds requirements to address risks other than the risk of excessive leverage (%)	2.5%	2.5%	2.5%	2.5%	2.5%
EU 7b	of which: to be made up of CET1 capital (percentage points)	1.4%	1.4%	1.4%	1.4%	1.4%
EU 7c	of which: to be made up of Tier 1 capital (percentage points)	1.9%	1.9%	1.9%	1.9%	1.9%
EU 7d	Total SREP own funds requirements (%)	10.5%	10.5%	10.5%	10.5%	10.5%
	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 (%)	0.2%	0.2%	0.2%	0.0%	0.0%
EU 9a	Systemic risk buffer (%)	0.1%	0.1%	0.1%	-	-
10	Global Systemically Important Institution buffer (%)	-	-	-	-	-
EU 10a	Other Systemically Important Institution buffer	1.7%	1.8%	1.5%	1.5%	1.5%
11	Combined buffer requirement (%)	4.5%	4.5%	4.2%	4%	4%
EU 11a	Overall capital requirements (%)	15.0%	15.0%	14.7%	14.5%	14.5%
12	CET1 available after meeting the total SREP own funds requirements (%)	9.3%	9.2%	8.7%	6.4%	6.7%
	Leverage ratio					
13	Total exposure measure	4,921,629	5,199,255	5,435,700	5,203,988	5,129,303
14	Leverage ratio (%)	7.9%	7.5%	7.1%	7.2%	7.4%
	Additional own funds requirements to address the risk of excessive leverage (as a percentage of total exposure measure)					
EU 14a	Additional own funds requirements to address the risk of excessive leverage (%)	0.0%	0.0%	0.0%	0.0%	0.0%
EU 14b	of which: to be made up of CET1 capital (percentage points)	0.0%	0.0%	0.0%	0.0%	0.0%
EU 14c	Total SREP leverage ratio requirements (%)	3.0%	3.0%	3.0%	3.0%	3.0%
	Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)					
EU 14d	Leverage ratio buffer requirement (%)	0.0%	0.0%	0.0%	0.0%	0.0%
EU 14e	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)	1,168,256	1,132,958	1,104,523	1,135,324	1,169,319
EU 16a	Cash outflows - Total weighted value	728,859	727,296	656,268	654,770	665,604
EU 16b	Cash inflows - Total weighted value	105,667	73,862	45,945	52,268	59,611
16	Total net cash outflows (adjusted value)	623,192	653,434	610,323	602,502	605,993
17	Liquidity coverage ratio (%)	187%	173%	181%	188%	193%
	Net Stable Funding Ratio					
18	Total available stable funding	3,720,938	3,790,678	3,763,818	3,835,856	3,781,872
19	Total required stable funding	2,608,601	2,692,252	2,844,055	2,909,299	2,826,367
20	NSFR ratio (%)	143%	141%	132%	132%	134%

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

		30/06/2023	31/03/2023	31/12/2022	30/09/2022	30/06/2022
	Available capital (amounts)					
1	Common Equity Tier 1 (CET1) capital	391,135	390,168	388,558	372,603	377,920
2	Common Equity Tier 1 (CET1) capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	391,135	390,168	387,095	371,140	376,457
3	Tier 1 capital	391,135	390,168	388,558	372,603	377,920
4	Tier 1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	391,135	390,168	387,095	371,140	376,457
5	Total capital	448,747	448,777	448,153	432,603	437,920
6	Total capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	448,747	448,777	446,690	431,140	436,457
	Risk-weighted assets (amounts)					
7	Total risk-weighted assets	2,261,242	2,283,398	2,329,426	2,559,276	2,536,808
8	Total risk-weighted assets as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	2,261,242	2,283,398	2,328,275	2,558,108	2,535,642
	Capital ratios					
9	Common Equity Tier 1 (as a percentage of risk exposure amount)	17.3%	17.1%	16.7%	14.6%	14.9%
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	17.3%	17.1%	16.6%	14.5%	14.8%
11	Tier 1 (as a percentage of risk exposure amount)	17.3%	17.1%	16.7%	14.6%	14.9%
12	Tier 1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	17.3%	17.1%	16.6%	14.5%	14.8%
13	Total capital (as a percentage of risk exposure amount)	19.8%	19.7%	19.2%	16.9%	17.3%
14	Total capital (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	19.8%	19.7%	19.2%	16.9%	17.2%
	Leverage ratio					
15	Leverage ratio total exposure measure	4,921,629	5,199,255	5,435,700	5,203,988	5,129,303
16	Leverage ratio	7.9%	7.5%	7.1%	7.2%	7.4%
17	Leverage ratio as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	7.9%	7.5%	7.1%	7.1%	7.3%

EU OV1 – Overview of total risk exposure amounts

		RWAs		Minimum capital requirements
		30/06/2023	31/12/2022	30/06/2023
1	Credit risk (excluding CCR)	2,006,560	2,074,211	160,524
2	*Of which the standardised approach*	*2,006,560*	*2,074,211*	*160,524*
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	*8,312*	*7,472*	*665*
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*	*1,786*	*1,570*	*143*
9	*Of which other CCR*	*6,526*	*5,902*	*522*
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)	*8,571*	9,944	*686*
21	*Of which the standardised approach*	*8,571*	*9,944*	*686*
22	*Of which IMA*	-	-	-
EU 22a	Large exposures	-	-	-
23	Operational risk	237,799	237,799	19,024
EU 23a	*Of which basic indicator approach*	-	-	-
EU 23b	*Of which standardised approach*	*237,799*	*237,799*	*19,024*
EU 23c	*Of which advanced measurement approach*	-	-	-
24	**Amounts below the thresholds for deduction (subject to 250% risk weight)**	-	-	-
29	**Total**	**2,261,242**	**2,329,426**	**180,899**

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 the credit risk management is to ensure a sound, sustainable and diversified loan and securities portfolios, which generates returns that correspond to the assumed level of risk and are characterized by high resilience against external shocks.

Credit risk management is based on an adequate assessment of a credit risk and a proper decision-making in relation to such risk. The lending decision is based on repayment capacity of the borrower and an additional alternative recovery option in case of default or material deterioration of the borrower's risk profile.

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 risk identification, PD calculation, an assessment of customer's creditworthiness and collateral quality and liquidity. The analysis of a legal entity's creditworthiness includes risk identification and an assessment of the shareholder structure and management, industry and peers, business model and project financed as well as an analysis of its credit history and current and forecasted financial situation and its sensitivity to key risk drivers and analysis of ESG factors. The assessment of a private individual's creditworthiness consists of the credit history and affordability analysis. For significant exposures decision on loan origination is 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 or performs internal counterparty financial analysis, if external rating is not assigned, 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, the client's financial position, early warning indicators, payment discipline and client's ability to meet contractual obligations are being regularly evaluated and monitored to timely identify credit quality deterioration and apply appropriate classification.

The Group monitors its loan portfolio and securities portfolio and regularly assesses its structure, quality, concentration levels, portfolio performance trends and overall 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, control of compliance with credit risk concentration limits. Credit risk identification, monitoring and reporting is the responsibility of the Risk Management 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 foreign exchange risk. Risk appetite for the open foreign exchange position is low, and the Group executes counterparty risk assessment and accepts only counterparties which are within its risk appetite limits.

EU CQ4: Quality of non-performing exposures by geography

		a	b	c	d	e	f	g
		Gross carrying / Nominal amount				Accumulated impairment	Provisions on off-balance sheet commitments and financial guarantee given	Accumulated negative changes in fair value due to credit risk on non-performing exposures
			of which: non-performing		of which: subject to impairment			
				of which: defaulted				
010	***On balance sheet exposures***	**4,322,974**	**71,397**	**71,392**	**4,322,974**	**(101,899)**	**n/a**	**-**
020	*Latvia*	1,728,034	28,058	28,058	1,728,034	(39,823)	n/a	-
030	*Lithuania*	1,503,430	22,973	22,968	1,503,430	(28,280)	n/a	-
040	*Estonia*	625,683	8,157	8,157	625,683	(11,342)	n/a	-
050	*United States*	92,786	1	1	92,786	(11)	n/a	-
060	*Germany*	89,196	-	-	68,401	(16)	n/a	-
070	*Other countries*	283,845	12,208	12,208	304,640	(22,427)	n/a	-
080	***Off balance sheet exposures***	**382,743**	**393**	**393**	**n/a**	**n/a**	**(4,459)**	**n/a**
090	*Latvia*	210,177	219	219	n/a	n/a	(3,184)	n/a
100	*Lithuania*	140,189	169	169	n/a	n/a	(1,137)	n/a
110	*Estonia*	7,755	5	5	n/a	n/a	(130)	n/a
120	*Cyprus*	5,668	-	-	n/a	n/a	-	n/a
130	*Switzerland*	2,664	-	-	n/a	n/a	-	n/a
140	*Other countries*	16,290	-	-	n/a	n/a	(8)	n/a
150	***Total***	**4,705,717**	**71,790**	**71,785**	**4,322,974**	**(101,899)**	**(4,459)**	**-**

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

		a	b	c	d	e	f
		Gross carrying amount				**Accumulated impairment**	**Accumulated negative changes in fair value due to credit risk on non-performing exposures**
			of which: non-performing		**of which: loans and advances subject to impairment**		
				of which: defaulted			
010	Agriculture, forestry and fishing	178,036	2,824	2,824	178,036	(5,071)	-
020	Mining and quarrying	5,960	135	135	5,960	(140)	-
030	Manufacturing	167,011	16,615	16,615	167,011	(11,170)	-
040	Electricity, gas, steam and air conditioning supply	76,301	1,851	1,851	76,301	(670)	-
050	Water supply	14,658	20	20	14,658	(236)	-
060	Construction	117,974	3,987	3,987	117,974	(3,544)	-
070	Wholesale and retail trade	194,096	2,388	2,388	194,096	(4,792)	-
080	Transport and storage	226,063	16,155	16,155	226,063	(9,812)	-
090	Accommodation and food service activities	27,958	2,112	2,112	27,958	(809)	-
100	Information and communication	18,643	562	562	18,643	(600)	-
110	Real estate activities	390,014	523	523	390,014	(6,211)	-
120	Financial and insurance activities	4	-	-	4	-	-
130	Professional, scientific and technical activities	49,508	153	153	49,508	(1,762)	-
140	Administrative and support service activities	116,507	588	588	116,507	(2,091)	-
150	Public administration and defence, compulsory social security	200	-	-	200	(9)	-
160	Education	5,209	12	12	5,209	(171)	-
170	Human health services and social work activities	14,166	161	161	14,166	(302)	-
180	Arts, entertainment and recreation	9,090	16	16	9,090	(181)	-
190	Other services	4,661	145	145	4,661	(139)	-
200	**Total**	**1,616,059**	**48,247**	**48,247**	**1,616,059**	**(47,710)**	**-**

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**							**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**			**Accumulated partial write-off**	**On performing exposures**	**On non-performing exposures**
			of which: stage 1	**of which: stage 2**		**of which: stage 2**	**of which: stage 3**		**of which: stage 1**	**of which: stage 2**		**of which: stage 2**	**of which: stage 3**			
005	**Cash balances at central banks and other demand deposits**	**318,302**	**318,302**	**-**	**-**	**-**	**-**	**(2)**	**(2)**	**-**	**-**	**-**	**-**		**-**	**-**
010	**Loans and advances**	**2,980,194**	**2,773,981**	**199,933**	**71,397**	**5**	**66,132**	**(68,422)**	**(52,941)**	**(15,467)**	**(32,864)**	**-**	**(32,137)**	**(4,132)**	**2,520,138**	**37,158**
020	*Central banks*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
030	*General governments*	*25,642*	*23,191*	*2,452*	-	-	-	*(427)*	*(406)*	*(21)*	-	-	-	-	*7,672*	-
040	*Credit institutions*	*23,103*	*23,103*	-	-	-	-	*(1)*	*(1)*	-	-	-	-	-	*92*	-
050	*Other financial corporations*	*41,264*	*40,924*	*341*	*13*	-	*13*	*(1,273)*	*(1,267)*	*(7)*	*(10)*	-	*(10)*	-	*29,793*	-
060	*Non-financial corporations*	*1,567,813*	*1,408,697*	*153,008*	*48,247*	-	*43,411*	*(33,158)*	*(22,003)*	*(11,146)*	*(14,552)*	-	*(13,950)*	*(4,132)*	*1,363,381*	*32,981*
070	*Of which: SMEs*	*1,319,548*	*1,186,035*	*127,721*	*26,757*	-	*23,447*	*(26,034)*	*(19,963)*	*(6,062)*	*(6,672)*	-	*(6,363)*	-	*1,192,433*	*19,371*
080	*Households*	*1,322,372*	*1,278,066*	*44,132*	*23,137*	*5*	*22,708*	*(33,563)*	*(29,264)*	*(4,293)*	*(18,302)*	-	*(18,177)*	-	*1,119,200*	*4,177*
090	**Debt Securities**	**1,271,383**	**1,271,383**	**-**	**-**	**-**	**-**	**(613)**	**(613)**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
100	*Central banks*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
110	*General governments*	*990,267*	*990,267*	-	-	-	-	*(409)*	*(409)*	-	-	-	-	-	-	-
120	*Credit institutions*	*130,055*	*130,055*	-	-	-	-	*(21)*	*(21)*	-	-	-	-	-	-	-
130	*Other financial corporations*	*29,929*	*29,929*	-	-	-	-	*(36)*	*(36)*	-	-	-	-	-	-	-
140	*Non-financial corporations*	*121,132*	*121,132*	-	-	-	-	*(147)*	*(147)*	-	-	-	-	-	-	-
150	**Off-balance sheet exposures**	**382,351**	**376,794**	**5,557**	**393**	**-**	**393**	**4,384**	**4,284**	**100**	**76**	**-**	**76**		**134,239**	**37**
160	*Central banks*	-	-	-	-	-	-	-	-	-	-	-	-		-	-
170	*General governments*	*2,804*	*2,804*	-	-	-	-	*1*	*1*	-	-	-	-		-	-
180	*Credit institutions*	*2,638*	*2,638*	-	-	-	-	*13*	*13*	-	-	-	-		*2,288*	-
190	*Other financial corporations*	*10,811*	*10,811*	-	-	-	-	*220*	*220*	-	-	-	-		*9,265*	-
200	*Non-financial corporations*	*232,947*	*228,424*	*4,523*	*294*	-	*294*	*2,099*	*2,054*	*45*	*46*	-	*46*		*118,231*	*37*
210	*Households*	*133,151*	*132,117*	*1,034*	*99*	-	*99*	*2,051*	*1,996*	*55*	*30*	-	*30*		*4,455*	-
220	***Total***	**4,952,230**	**4,740,460**	**205,490**	**71,790**	**5**	**66,525**	**(64,653)**	**(49,272)**	**(15,367)**	**(32,788)**	**-**	**(32,061)**	**(4,132)**	**2,654,377**	**37,195**

EU CR1-A: Maturity of exposures

		a	b	c	d	e	f
		Net exposure value					
		On demand	<= 1 year	> 1 year <= 5 years	> 5 years	No stated maturity	Total
1	Loans and advances	8,159	793,645	1,510,163	638,339	-	**2,950,306**
2	Debt securities	-	210,937	690,440	369,393	-	**1,270,770**
3	***Total***	**8,159**	**1,004,582**	**2,200,603**	**1,007,732**	**-**	**4,221,076**

Loans and advances also include off balance sheet commitments.

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

		Unsecured carrying amount	Secured carrying amount	Of which secured by collateral	Of which secured by financial guarantees	Of which secured by credit derivatives
		a	b	c	d	e
1	Loans and advances	711,310	2,557,296	2,491,280	66,016	-
2	Debt securities	1,271,383	-	-	-	
3	**Total**	**1,982,693**	**2,557,296**	**2,491,280**	**66,016**	**-**
4	*Of which non-performing exposures*	*1,375*	*37,158*	*36,178*	*980*	-
5	*Of which defaulted*	*1,370*	*37,153*	*36,173*	*980*	-

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

		a	b	c	d	e	f
		Exposures before CCF and before CRM		Exposures post CCF and post CRM		RWAs and RWAs density	
	Exposure classes	On-balance sheet exposures	Off-balance sheet exposures	On-balance sheet exposures	Off-balance sheet amount	RWEA	RWEA density (%)
1	Central governments or central banks	1,248,855	-	1,300,626	1,808	13,707	1%
2	Regional government or local authorities	76,255	2,196	78,346	1,273	6,009	8%
3	Public sector entities	7,018	319	7,018	160	2,298	32%
4	Multilateral development banks	22,927	-	377,989	-	-	0%
5	International organisations	-	-	-	-	-	-
6	Institutions	181,236	2,619	181,236	623	44,929	25%
7	Corporates	1,136,451	218,544	1,056,684	65,188	929,931	83%
8	Retail	833,104	131,185	816,858	4,525	543,678	66%
9	Secured by mortgages on immovable property	739,576	2,580	722,594	1,290	300,198	41%
10	Exposures in default	41,932	9,102	37,959	122	40,975	108%
11	Items associated with particularly high risk	36,993	11,391	35,080	5,646	61,089	150%
12	Covered bonds	16,643	-	16,643	-	1,664	10%
13	Claims on institutions and corporates with a short-term credit assessment	-	-	-	-	-	-
14	Collective investments undertakings	1,156	-	1,156	-	1,220	106%
15	Equity exposures	5,619	-	5,619	-	12,021	214%
16	Other exposures	106,550	295	171,568	13,910	48,841	26%
17	**Total**	**4,465,315**	**378,231**	**4,809,376**	**94,545**	**2,006,560**	**41%**

EU CR5 – Standardised approach

		Risk weight																
	Exposure classes	**0%**	**2%**	**4%**	**10%**	**20%**	**35%**	**50%**	**70%**	**75%**	**100%**	**150%**	**250%**	**370%**	**1250%**	**Others**	**Total**	**Of which unrated**
1	Central governments or central banks	1,233,952	-	-	-	68,469	-	-	-	-	13	-	-	-	-	-	1,302,434	-
2	Regional governments or local authorities	49,573	-	-	-	30,046	-	-	-	-	-	-	-	-	-	-	79,619	-
3	Public sector entities	-	-	-	-	4,304	-	2,874	-	-	-	-	-	-	-	-	7,178	-
4	Multilateral development banks	377,989	-	-	-	-	-	-	-	-	-	-	-	-	-	-	377,989	-
5	International organisations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Institutions	239	-	-	-	163,119	-	14,767	-	-	5,218	-	-	-	-	-	183,343	11,805
7	Corporates	-	-	-	-	65,552	-	29,549	-	-	1,033,059	47	-	-	-	-	1,128,207	924,731
8	Retail	-	-	-	-	-	-	-	-	821,383	-	-	-	-	-	-	821,383	821,383
9	Secured by mortgages on immovable property	-	-	-	-	-	631,266	-	-	53,429	39,188	-	-	-	-	-	723,883	723,883
10	Exposures in default	-	-	-	-	-	-	-	-	-	32,294	5,787	-	-	-	-	38,081	38,081
11	Items associated with particularly high risk	-	-	-	-	-	-	-	-	-	-	40,726	-	-	-	-	40,726	40,726
12	Covered bonds	-	-	-	16,643	-	-	-	-	-	-	-	-	-	-	-	16,643	-
13	Claims on institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Collective investments undertakings	46	-	-	-	-	-	158	-	-	574	378	-	-	-	-	1,156	46
15	Equity exposures	-	-	-	-	-	-	-	-	-	1,350	-	4,269	-	-	-	5,619	5,619
16	Other exposures	95,147	-	-	-	51,864	-	-	-	-	38,467	-	-	-	-	-	185,478	185,478
17	**Total**	**1,756,946**	**-**	**-**	**16,643**	**383,354**	**631,266**	**47,348**	**-**	**874,812**	**1,150,163**	**46,938**	**4,269**	**-**	**-**	**-**	**4,911,739**	**2,751,752**

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	1,317,163	-	-	-	-	1,317,163	66,236	-	-	66,236	827,950	42.5%	0.0%
	LITHUANIA	968,717	-	-	-	-	968,717	54,811	-	-	54,811	685,138	35.2%	0.0%
	ESTONIA	466,966	-	-	-	-	466,966	23,907	-	-	23,907	298,838	15.4%	1.0%
	UNITED STATES	40,629	-	-	-	-	40,629	1,156	-	-	1,156	14,450	0.7%	0.0%
	SWITZERLAND	34,775	-	-	-	-	34,775	2,352	-	-	2,352	29,400	1.5%	0.0%
	NETHERLANDS	25,841	-	-	-	-	25,841	849	-	-	849	10,613	0.5%	1.0%
	SEYCHELLES	17,903	-	-	-	-	17,903	1,432	-	-	1,432	17,900	0.9%	0.0%
	CYPRUS	12,552	-	-	-	-	12,552	994	-	-	994	12,425	0.6%	0.0%
	MEXICO	10,968	-	-	-	-	10,968	877	-	-	877	10,963	0.6%	0.0%
	FRANCE	10,206	-	-	-	-	10,206	637	-	-	637	7,963	0.4%	0.5%
	AUSTRIA	8,451	-	-	-	-	8,451	172	-	-	172	2,150	0.1%	0.0%
	CANADA	6,427	-	-	-	-	6,427	129	-	-	129	1,613	0.1%	0.0%
	UNITED KINGDOM	6,228	-	-	-	-	6,228	427	-	-	427	5,338	0.3%	1.0%
	SLOVAKIA	5,741	-	-	-	-	5,741	46	-	-	46	575	0.0%	1.0%
	BELGIUM	5,455	-	-	-	-	5,455	436	-	-	436	5,450	0.3%	0.0%
	SWEDEN	5,436	-	-	-	-	5,436	393	-	-	393	4,913	0.3%	2.0%
	GERMANY	3,549	-	-	-	-	3,549	110	-	-	110	1,375	0.1%	0.8%
	MALAYSIA	3,237	-	-	-	-	3,237	259	-	-	259	3,238	0.2%	0.0%
	RUSSIAN FEDERATION	3,010	-	-	-	-	3,010	181	-	-	181	2,263	0.1%	0.0%
	NORWAY	2,697	-	-	-	-	2,697	44	-	-	44	550	0.0%	2.5%
	FINLAND	2,058	-	-	-	-	2,058	19	-	-	19	238	0.0%	0.0%
	ISRAEL	868	-	-	-	-	868	69	-	-	69	863	0.0%	0.0%
	CHINA	782	-	-	-	-	782	61	-	-	61	763	0.0%	0.0%
	UZBEKISTAN	364	-	-	-	-	364	10	-	-	10	125	0.0%	0.0%
	AUSTRALIA	292	-	-	-	-	292	20	-	-	20	250	0.0%	1.0%
	IRELAND	142	-	-	-	-	142	4	-	-	4	50	0.0%	0.5%
	AZERBAIJAN	119	-	-	-	-	119	3	-	-	3	38	0.0%	0.0%
	UNITED ARAB EMIRATES	109	-	-	-	-	109	3	-	-	3	38	0.0%	0.0%
	BULGARIA	91	-	-	-	-	91	2	-	-	2	25	0.0%	1.5%
	ITALY	78	-	-	-	-	78	5	-	-	5	63	0.0%	0.0%
	CZECH REPUBLIC	68	-	-	-	-	68	2	-	-	2	25	0.0%	2.5%

	UKRAINE	63	-	-	-	-	63	6	-	-	6	75	0.0%	0.0%
	LUXEMBOURG	52	-	-	-	-	52	4	-	-	4	50	0.0%	0.5%
	LIECHTENSTEIN	46	-	-	-	-	46	4	-	-	4	50	0.0%	0.0%
	TURKMENISTAN	32	-	-	-	-	32	1	-	-	1	13	0.0%	0.0%
	VIRGIN ISLANDS, BRITISH	30	-	-	-	-	30	2	-	-	2	25	0.0%	0.0%
	MOLDOVA, REPUBLIC OF	8	-	-	-	-	8	-	-	-	-	-	0.0%	0.0%
	HONG KONG	7	-	-	-	-	7	1	-	-	1	13	0.0%	1.0%
	DENMARK	4	-	-	-	-	4	-	-	-	-	-	0.0%	2.5%
	POLAND	3	-	-	-	-	3	-	-	-	-	-	0.0%	0.0%
	SPAIN	2	-	-	-	-	2	-	-	-	-	-	0.0%	0.0%
	BELARUS	3	-	-	-	-	3	-	-	-	-	-	0.0%	0.0%
	BARBADOS	1	-	-	-	-	1	-	-	-	-	-	0.0%	0.0%
	CAMEROON	1	-	-	-	-	1	-	-	-	-	-	0.0%	0.0%
	KAZAKHSTAN	1	-	-	-	-	1	-	-	-	-	-	0.0%	0.0%
020	**Total**	**2,961,175**	**-**	**-**	**-**	**-**	**2,961,175**	**155,664**	**-**	**-**	**155,664**	**1,945,800**	**100.00%**	

EU CCyB2 - Amount of institution-specific countercyclical capital buffer

		a
1	Total risk exposure amount	2,261,242
2	Institution specific countercyclical capital buffer rate	0.2%
3	Institution specific countercyclical capital buffer requirement	3,858

EU CQ1: Credit quality of forborne exposures

		a	b	c	d	e	f	g	h
		Gross carrying amount/ Nominal amount of exposures with forbearance measures				**Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions**		**Collaterals received and financial guarantees received on forborne exposures**	
		Performing forborne	**Non-performing forborne**			**On performing forborne exposures**	**On non-performing forborne exposures**		**Of which: Collateral and financial guarantees received on non-performing exposures with forbearance measures**
				Of which defaulted	**Of which impaired**				
005	Cash balances at central banks and other demand deposits	-	-	-	-	-	-	-	-
010	Loans and advances	15,778	47,503	47,503	47,503	(637)	(26,336)	34,284	20,764
020	*Central banks*	-	-	-	-	-	-	-	-
030	*General governments*	-	-	-	-	-	-	-	-
040	*Credit institutions*	-	-	-	-	-	-	-	-
050	*Other financial corporations*	-	-	-	-	-	-	-	-
060	*Non-financial corporations*	*10,303*	*30,231*	*30,231*	*30,231*	*(167)*	*(10,500)*	*29,105*	*19,455*
070	*Households*	*5,475*	*17,272*	*17,272*	*17,272*	*(470)*	*(15,836)*	*5,179*	*1,309*
080	Debt Securities	-	-	-	-	-	-	-	-
090	Loan commitments given	-	-	-	-	-	-	-	-
100	***Total***	***15,778***	***47,503***	***47,503***	***47,503***	***(637)***	***(26,336)***	***34,284***	***20,764***

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 Simplified Standardised Approach (Simplified SA CCR) to calculate counterparty credit risk.

EU CCR1 – Analysis of CCR exposure by approach

		a	b	c	d	e	f	g	h
		Replacement cost (RC)	**Potential future exposure (PFE)**	**EEPE**	**Alpha used for computing regulatory exposure value**	**Exposure value pre-CRM**	**Exposure value post-CRM**	**Exposure value**	**RWEA**
EU1	EU – Original Exposure Method (for derivatives)	-	-	n/a	1.4	-	-	-	-
EU2	EU – Simplified SA CCR (for derivatives)	1,495	4,091	n/a	1.4	7,818	7,818	7,818	6,528
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**	**7,818**	**7,818**	**7,818**	**6,528**

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

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

		a **Exposure value**	b **RWEA**
1	Total transactions subject to the Advanced method	-	-
2	(i) VaR component (including the 3× multiplier)	n/a	-
3	(ii) stressed VaR component (including the 3× multiplier)	n/a	-
4	Transactions subject to the Standardised method	7,516	1,786
EU4	Transactions subject to the Alternative approach (Based on the Original Exposure Method)	-	-
5	**Total transactions subject to own funds requirements for CVA risk**	**7,516**	**1,786**

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

		Risk weight											**Total exposure value**
	Exposure classes	**0%**	**2%**	**4%**	**10%**	**20%**	**50%**	**70%**	**75%**	**100%**	**150%**	**Others**	
1	Central governments or central banks	-	-	-	-	-	-	-	-	-	-	-	-
2	Regional government or local authorities	-	-	-	-	-	-	-	-	-	-	-	-
3	Public sector entities	-	-	-	-	-	-	-	-	-	-	-	-
4	Multilateral development banks	-	-	-	-	-	-	-	-	-	-	-	-
5	International organisations	-	-	-	-	-	-	-	-	-	-	-	-
6	Institutions	-	-	-	-	1,483	-	-	-	-	-	-	1,483
7	Corporates	-	-	-	-	-	-	-	-	6,335	-	-	6,335
8	Retail												
9	Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-
10	Other items	-	-	-	-	-	-	-	-	-	-	-	-
11	**Total exposure value**	**-**	**-**	**-**	**-**	**1,483**	**-**	**-**	**-**	**6,335**	**-**	**-**	**7,818**

SECURITISATION

EU-SEC1 - Securitisation exposures in the non-trading book

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
		Institution acts as originator							**Institution acts as sponsor**				**Institution acts as investor**			
		Traditional				**Synthetic**		**Sub-total**	**Traditional**		**Synthetic**	**Subtotal**	**Traditional**		**Synthetic**	**Subtotal**
		STS		**Non-STS**			**of which SRT**		**STS**	**Non-STS**			**STS**	**Non-STS**		
			of which SRT		**of which SRT**											
1	**Total exposures**	-	-	-	-	9,760	9,760	9,760	-	-	-	-	-	-	-	-
2	Retail (total)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3	residential mortgage	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	credit card	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	other retail exposures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Wholesale (total)	-	-	-	-	9,760	9,760	9,760	-	-	-	-	-	-	-	-
8	loans to corporates	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	commercial mortgage	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	lease and receivables	-	-	-	-	9,760	9,760	9,760	-	-	-	-	-	-	-	-
11	other wholesale	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

EU-SEC3 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as originator or as sponsor

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	EU-p	EU-q
		Exposure values (by RW bands/deductions)					Exposure values (by regulatory approach)				RWEA (by regulatory approach)				Capital charge after cap			
		≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW
1	**Total exposures**	-	-	-	-	9,760	-	-	-	9,760	-	-	-	-	-	-	-	-
2	Traditional transactions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3	Securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	Retail	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Wholesale	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Synthetic transactions	-	-	-	-	9,760	-	-	-	9,760	-	-	-	-	-	-	-	-
10	Securitisation	-	-	-	-	9,760	-	-	-	9,760	-	-	-	-	-	-	-	-
11	Retail underlying	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	Wholesale	-	-	-	-	9,760	-	-	-	9,760	-	-	-	-	-	-	-	-
13	Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

EU-SEC5 - Exposures securitised by the institution - Exposures in default and specific credit risk adjustments

		a	b	c
		Exposures securitised by the institution - Institution acts as originator or as sponsor		
		Total outstanding nominal amount	Of which exposures in default	Total amount of specific credit risk adjustments made during the period
1	**Total exposures**	**350,023**	**644**	-
2	Retail (total)	-	-	-
3	residential mortgage	-	-	-
4	credit card	-	-	-
5	other retail exposures	-	-	-
6	re-securitisation	-	-	-
7	Wholesale (total)	350,023	644	-
8	loans to corporates	-	-	-
9	commercial mortgage	-	-	-
10	lease and receivables	350,023	644	-
11	other wholesale	-	-	-
12	re-securitisation	-	-	-

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	b
		30/06/2023	31/12/2022
On-balance sheet exposures (excluding derivatives and SFTs)			
1	On-balance sheet items (excluding derivatives, SFTs, but including collateral)	4,818,625	5,330,314
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)	(14,807)	(13,603)
7	**Total on-balance sheet exposures (excluding derivatives and SFTs)**	**4,803,818**	**5,316,711**
Derivative exposures			
8	Replacement cost associated with SA-CCR derivatives transactions (i.e. net of eligible cash variation margin)	-	-
EU-8a	Derogation for derivatives: replacement costs contribution under the simplified standardised approach	2,092	1,970
9	Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions	-	-
EU-9a	Derogation for derivatives: Potential future exposure contribution under the simplified standardised approach	5,728	5,381
EU-9b	Exposure determined under Original Exposure Method		
10	(Exempted CCP leg of client-cleared trade exposures) (SA-CCR)	-	-
EU-10a	(Exempted CCP leg of client-cleared trade exposures) (simplified standardised approach)	-	-
EU-10b	(Exempted CCP leg of client-cleared trade exposures) (original exposure method)	-	-
11	Adjusted effective notional amount of written credit derivatives	-	-
12	(Adjusted effective notional offsets and add-on deductions for written credit derivatives)	-	-
13	**Total derivatives exposures**	**7,820**	**7,351**
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	382,743	347,556
20	(Adjustments for conversion to credit equivalent amounts)	272,752	235,918
21	(General provisions associated with off-balance sheet exposures deducted in determining Tier 1 capital)	-	-
22	**Off-balance sheet exposures**	**109,991**	**111,638**
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**	391,134	408,558
24	**Leverage ratio total exposure measure**	**4,921,629**	**5,435,700**
Leverage ratio			
25	Leverage ratio	8.0%	7.5%
EU-25	Leverage ratio (without the adjustment due to excluded exposures of public development banks - Public sector investments) (%)	8.0%	7.5%
25a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves)	8.0%	7.5%
26	Regulatory minimum leverage ratio requirement (%)	3.0%	3.0%
EU-26a	Additional own funds requirements to address the risk of excessive leverage (%)	-	-
EU-26b	of which: to be made up of CET1 capital	-	-
27	Leverage ratio buffer requirement (%)	-	-
EU-27a	Overall leverage ratio requirement (%)	3.0%	3.0%
Choice on transitional arrangements and relevant exposures			
EU-27b	Choice on transitional arrangements for the definition of the capital measure	n/a	n/a

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

		a Applicable amount
1	Total assets as per published financial statements	4,883,562
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of regulatory consolidation	(63,509)
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	6,325
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)	109,992
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	(14,741)
13	**Leverage ratio total exposure measure**	**4,921,629**

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:**	**4,818,625**
EU-2	Trading book exposures	-
EU-3	Banking book exposures, of which:	4,818,625
EU-4	Covered bonds	16,643
EU-5	Exposures treated as sovereigns	1,295,207
EU-6	Exposures to regional governments, MDB, international organisations and PSE **not** treated as sovereigns	71,004
EU-7	Institutions	181,245
EU-8	Secured by mortgages of immovable properties	739,576
EU-9	Retail exposures	833,104
EU-10	Corporate	1,136,472
EU-11	Exposures in default	41,932
EU-12	Other exposures (e.g. equity, securitisations, and other non-credit obligation assets)	503,442

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.

The position risk of financial instruments is managed through diversification by country, sector, industry and elaborate limit control. Issuers are internally risk graded. The exposure level limits, after in depth analysis, are set by the FMCRC, observing concentration risk levels set in the Group's Risk Strategy and other rules set by and specified in the Risk Strategy. The decisions of FMCRC are approved by the Management Board

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)	8,571
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**	**8,571**

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 and limits set in the Group's Risk Appetite Framework and Risk Strategy. FMCRC oversees and assess currency risk level within the Group, monitors compliance and the fulfilment of the limits, and sets limits for individual dealing desks within the overall risk limits. The decisions of the FMCRC are approved by the Bank's Management Board.

Day-to-day currency risk management is the responsibility of the Treasury Division, while risk monitoring and reporting is the responsibility of the Risk Management 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 and sets its internal limits more prudently than the regulatory limits.

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. Acceptable interest rate risk level accompanied with the relevant limits is defined in the Group's Risk appetite framework and Risk strategy, ALCO 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 Division, while the Risk Management 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. Group sets limits for the 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.

EU IRRBB1 - Interest rate risks of non-trading book activities

	Supervisory shock scenarios	a	b	c	d
		Changes of the economic value of equity		**Changes of the net interest income**	
		30/06/2023	**31/12/2022**	**30/06/2023**	**31/12/2022**
1	Parallel up	(49,557)	(13,895)	(3,705)	12,700
2	Parallel down	7,281	731	(16,693)	(32,605)
3	Steepener	4,030	(14,311)	n/a	n/a
4	Flattener	(23,395)	6,052	n/a	n/a
5	Short rates up	(29,935)	4,725	n/a	n/a
6	Short rates down	1,383	(10,501)	n/a	n/a

The calculation of the interest rate risks of non-trading book activities is in accordance with the new IRRBB regulation, thus methodology between 30/06/2023 and 31/12/2022 is not directly comparable.

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 Division, 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 Management Division on a monthly basis provides information to the ALCO and the Bank's Management Board and Supervisory 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 and reports non-average end of the month figures may be disclosed. Non-average and end of the month figures will not reconcile.

		a	b	c	d	e	f	g	h
	Scope of consolidation: consolidated	**Total unweighted value (average)**				**Total weighted value (average)**			
EU 1a	Quarter ending on	**30/06/2023**	**31/03/2023**	**31/12/2022**	**30/09/2022**	**30/06/2023**	**31/03/2023**	**31/12/2022**	**30/09/2022**
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	1,168,256	1,132,958	1,104,523	1,135,324
CASH - OUTFLOWS									
2	retail deposits and deposits from small business customers, of which:	2,534,370	2,656,968	2,631,428	2,608,535	185,094	193,461	192,133	193,520
3	*Stable deposits*	1,543,609	1,697,493	1,696,134	1,682,864	77,180	84,875	84,807	84,143
4	*Less stable deposits*	736,375	770,238	766,109	765,244	97,676	98,375	97,723	98,017
5	Unsecured wholesale funding	979,630	1,002,440	909,130	910,598	457,797	464,816	419,672	417,894
6	*Operational deposits (all counterparties) and deposits in networks of cooperative banks*	90,071	95,058	92,176	101,688	22,871	22,640	21,969	24,376
7	*Non-operational deposits (all counterparties)*	889,108	906,891	816,463	808,792	434,475	441,685	397,212	393,400
8	*Unsecured debt*	451	491	491	118	-	-	-	-
9	*Secured wholesale funding*	n/a	n/a	n/a	n/a	-	-	-	-
10	Additional requirements	366,432	357,148	350,656	352,132	73,834	57,283	35,465	35,180
11	*Outflows related to derivative exposures and other collateral requirements*	45,383	29,332	6,454	4,763	45,383	29,332	6,454	4,763
12	*Outflows related to loss of funding on debt products*	-	-	-	-	-	-	-	-
13	*Credit and liquidity facilities*	321,049	327,816	344,202	347,370	28,451	27,951	29,010	30,417
14	Other contractual funding obligations	875	550	458	2,478	875	550	458	2,478
15	Other contingent funding obligations	229,032	226,975	173,821	122,090	11,259	11,186	8,540	5,698
16	TOTAL CASH OUTFLOWS	n/a	n/a	n/a	n/a	728,859	727,296	656,268	654,770
CASH - INFLOWS									
17	Secured lending (e.g. reverse repos)	-	-	-	-	-	-	-	-
18	Inflows from fully performing exposures	72,649	63,827	56,652	62,932	57,092	48,009	41,388	47,881
19	Other cash inflows	48,575	25,853	4,557	4,387	48,575	25,853	4,557	4,387
EU-19a	(Difference between total weighted inflows and total weighted outflows arising from transactions in third countries where there are transfer restrictions or which are denominated in non-convertible currencies)	n/a	n/a	n/a	n/a	-	-	-	-
EU-19b	(Excess inflows from a related specialised credit institution)	n/a	n/a	n/a	n/a	-	-	-	-
20	TOTAL CASH INFLOWS	121,224	89,680	61,210	67,319	105,667	73,862	45,945	52,268
EU-20a	*Fully exempt inflows*	-	-	-	-	-	-	-	-
EU-20b	*Inflows subject to 90% cap*	-	-	-	-	-	-	-	-
EU-20c	*Inflows subject to 75% cap*	121,224	89,680	61,210	67,319	105,667	73,862	45,945	52,268
TOTAL ADJUSTED VALUE									
21	LIQUIDITY BUFFER	n/a	n/a	n/a	n/a	1,168,256	1,132,958	1,104,523	1,135,324
22	TOTAL NET CASH OUTFLOWS	n/a	n/a	n/a	n/a	623,192	653,434	610,323	602,502
23	LIQUIDITY COVERAGE RATIO	n/a	n/a	n/a	n/a	187%	173%	181%	188%

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 the 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 management of the open currency position. Collateral pledged and received can be volatile over time and depends on the underlying risk factor dynamics, mainly FX rates, but for the Group is immaterial in absolute terms due to short maturity and low gross volumes.
(f)	Currency mismatch in the LCR: The Group predominantly operates in EUR currency and has low levels of assets and liabilities in foreign currencies. Low currency mismatch in LCR is observed.
(g)	Other items in the LCR calculation that are not captured in the LCR disclosure template but that the institution considers relevant for its liquidity profile: n/a

EU LIQ2: Net Stable Funding Ratio

		a	b	c	d	e
		Unweighted value by residual maturity				
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	Weighted value
Available stable funding (ASF) Items						
1	Capital items and instruments	391,135	-	-	57,612	448,747
2	*Own funds*	391,135	-	-	57,612	448,747
3	*Other capital instruments*	n/a	-	-	-	-
4	Retail deposits	n/a	2,490,399	102,224	25,147	2,450,503
5	*Stable deposits*	n/a	1,750,972	88,923	24,164	1,772,064
6	*Less stable deposits*	n/a	739,427	13,301	983	678,439
7	Wholesale funding:	n/a	1,302,333	67,398	206,076	821,592
8	*Operational deposits*	n/a	166,250	-	-	-
9	*Other wholesale funding*	n/a	1,136,083	67,398	206,076	821,592
10	Interdependent liabilities	n/a	-	-	-	-
11	Other liabilities:	726	97,639	142	26	96
12	*NSFR derivative liabilities*	726	n/a	n/a	n/a	n/a
13	*All other liabilities and capital instruments not included in the above categories*	n/a	97,639	142	26	96
14	**Total available stable funding (ASF)**	n/a	n/a	n/a	n/a	**3,720,938**

		a	b	c	d	e
		Unweighted value by residual maturity				
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	Weighted value
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)	n/a	n/a	n/a	n/a	65,900
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	523,272	328,710	2,386,793	2,460,107
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	73,307	2,101	20,024	28,405

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	412,030	287,179	1,457,526	2,248,367
21	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*	n/a	3,208	3,080	15,381	327,440
22	*Performing residential mortgages, of which:*	n/a	18,384	16,544	718,720	-
23	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*	n/a	13,228	12,230	463,954	-
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	19,551	22,886	190,523	183,335
25	Interdependent assets	n/a	-	-	-	-
26	Other assets:		308,161	22,219	136,662	65,779
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	1,495	n/a	n/a	1,495
30	*NSFR derivative liabilities before deduction of variation margin posted*	n/a	-	n/a	n/a	-
31	*All other assets not included in the above categories*	n/a	308,161	22,219	135,167	64,284
32	Off-balance sheet items	n/a	201,591	22,206	105,053	16,815
33	**Total RSF**	**n/a**	**n/a**	**n/a**	**n/a**	**2,608,601**
34	**Net Stable Funding Ratio (%)**	**n/a**	**n/a**	**n/a**	**n/a**	**143%**

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 low level of risk while ensuring that any residual risk is economically justified in light of the need to sustain the Group's performance and profit in the long term.

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.

PRUDENTIAL DISCLOSURES ON ESG RISKS

Prudential disclosures on Environmental, Social and Governance (ESG) aspects are prepared in line with the requirements of the Article 449a of the CRR.

EU 2022/2453 Table 1 - Qualitative information on Environmental risk

Row number	Qualitative information - Free format	
	Business strategy and processes	
(a)	Institution's business strategy to integrate environmental factors and risks, taking into account the impact of environmental factors and risks on institution's business environment, business model, strategy and financial planning	As part of the regular business planning process of the Group, Citadele identifies and assesses relevant climate-related and environmental risks expected to affect the Group in short, medium and long term, in addition to the business environment, including macroeconomic variables, competitive landscape, regulatory, societal and geopolitical trends. Current primary climate-related and environmental (C&E) risk focus is on physical risks and transition risk at counterparty industry level.
(b)	Objectives, targets and limits to assess and address environmental risk in short-, medium-, and long-term, and performance assessment against these objectives, targets and limits, including forward-looking information in the design of business strategy and processes	Material climate-related and environmental risks are considered in Risk Appetite and Risk Strategy framework within the prudential risk areas in accordance with the Group's ESG Risk Policy. This process also includes appropriate risk limit setting, including C&E risk limits, the development of Key Risk indicators, and regular monitoring and reporting. In H1 2023 the Group regularly monitored Industry Environmental risk level (internal methodology) which is based on GHG emission intensity of industry. This approach is applied to the lending business and for investments in securities. Citadele is signatory of UNEP FI Principles for Responsible Banking and has set its impact target. Following EU and regional ambition to reach net-zero emissions by 2050, the Group sets target for its own financed portfolio. Net-zero by 2050 sets a measurable target to the Group's ambition on increasing sustainability and strengthening support to clients in transition to green operations.
(c)	Current investment activities and (future) investment targets towards environmental objectives and EU Taxonomy-aligned activities	The Group is committed to financing the transition to low-carbon economy and has set a green lending target of 14% of total new lending in 2023, including financing EU-Taxonomy aligned projects, and projects aligned to EBRD and EIB-specific environmental criteria. The Group has disbursed EUR 20.4 million in new green lending in H1 2023.
(d)	Policies and procedures relating to direct and indirect engagement with new or existing counterparties on their strategies to mitigate and reduce environmental risks	Counterparty C&E risk factor assessment is an integral part of the client's onboarding process and the monitoring process of existing clients. Within the credit risk assessment process, Citadele considers climate-related and environmental risks, both physical and transitional, and including over time horizon (short, medium, and long term). ESG factor assessment is an integral part of the credit decision. Citadele is continuing work on integrating C&E risk factors into lending decision process. Citadele is screening new lending projects for eligibility for EBRD and EIB green financing criteria. Citadele has published a Supplier Code of Conduct setting its expectations toward its suppliers and sharing good practice in environmental issues, social standards and good governance. Citadele is working to further strengthen its capacity to identify, assess and report on green projects with advisory support under the EIB Green Gateway facility through the European Investment Advisory Hub in the form of training, development of tools and manuals and on-the-job-support.
	Governance	
(e)	Responsibilities of the management body for setting the risk framework, supervising and managing the implementation of the objectives, strategy and policies in the context of environmental risk management covering relevant transmission channels	Citadele ESG Policy sets the framework and main principles for managing ESG-related topics within Citadele Group and sets the ESG governance structure. The Supervisory Board of Citadele is responsible for overseeing the formation and implementation of the ESG strategy. ESG risks are considered when developing Citadele's overall business strategy, business objectives, and risk management framework. The Supervisory Board exercises comprehensive oversight of climate-related and environmental risks. The Management Board is responsible for developing ESG strategy and execution of the strategy and ensures comprehensive implementation of the ESG Risk Policy in the Group. The Management Board provides regular reporting to the Supervisory Board of the Group on the ESG risk management aspects in the Group.
(f)	Management body's integration of short-, medium- and long-term effects of environmental factors and risks, organisational structure	Governance of ESG risk management in Citadele Group follows the overarching principle of three lines of defence:

	both within business lines and internal control functions	- The first line of defence comprises business and support functions. It is ultimately accountable for the ESG risk management related to its activities and within its area of responsibility. - The second line of defence is the risk management function, performing independent risk oversight and control. The risk management function facilitates implementation of a sound ESG risk management framework throughout the Group. It has responsibility for further identifying, monitoring, analysing, measuring, managing, and reporting on the ESG risk exposures and forming a holistic view of all risks on the individual and the consolidated basis. In addition, the risk management function challenges and assists in implementation of the ESG risk management requirements by business lines. It also ensures that there are processes and controls in place at the first line of defence and that these are appropriately designed and implemented and operate well. - The third line of defence is Internal Audit Department of the Group – an independent and objective assurance function overseeing implementation of the ESG risk framework and controls in the first and second lines of defence.
(g)	Integration of measures to manage environmental factors and risks in internal governance arrangements, including the role of committees, the allocation of tasks and responsibilities, and the feedback loop from risk management to the management body covering relevant transmission channels	To ensure transparent and efficient driving of the overall ESG agenda, ESG Working Group has been established. The ESG Working Group is composed of dedicated representatives from key functions. The ESG Working Group has a responsibility to ensure that procedures and controls are in place in order to implement and adhere to the ESG objectives, strategy and policies set by the Management Board. The ESG Working Group is led by ESG Officer of the Group. Responsibilities of the ESG Officer of the Group include defining the ESG framework and key goals related to the ESG area in cooperation with heads of the departments affected by the ESG; developing and regularly updating the ESG Policy; training employees in the ESG area; increasing awareness of the ESG matters by ensuring respective external and internal communication; cooperating with the Risk Management Division and heads of units and departments in developing ESG strategic targets and KPIs. Risk Management Division participates in developing, reviewing, and updating ESG Risk Policy; integrates key ESG risk drivers in the Risk Management Framework, Risk Appetite Framework, and relevant Risk Strategies; implements the principles set in the ESG Risk Policy and other regulatory requirements into existing policies, procedures, and processes; cooperates in defining ESG framework, key goals, and critical drivers; and ensures all their employees are familiar with these new processes and adhere to them. All employees of the Group are responsible for ESG risk identification, mitigation, management, and reporting within their area of activity.
(h)	Lines of reporting and frequency of reporting relating to environmental risk	C&E risk, including transition risk, limits are set in the Risk Appetite and Risk Strategy. The limits are monitored with quarterly frequency and included in the CRO report. CRO report is delivered to the Management Board, Risk Committee of the Group and the Supervisory Board. A regular physical risk assessment is performed for the real estate collateralized lending portfolio and monitored semi-annually.
(i)	Alignment of the remuneration policy with institution's environmental risk-related objectives	Allocation of variable remuneration component takes into account all types of current and future risks of the Bank, Group and Group entities respectively, including ESG-related risks. Variable remuneration component is based on a combination of assessment of individual and Company goals. Management scorecard includes ESG-related goals in line with Group's ESG policy. Before paying out the deferred part of any variable remuneration, a reassessment of the long-term performance and, if necessary, risk adjustment (including ESG risks) is applied to align variable remuneration to additional risks that have been identified or may have materialised after the award.
	Risk management	
(j)	Integration of short-, medium- and long-term effects of environmental factors and risks in the risk framework	Transition risk is assessed in short (less than 3 years), medium (3 to 5 years), and long-term (more than 5 years), to account for the changing nature of the ESG risks and their materialization horizon.
(k)	Definitions, methodologies and international standards on which the environmental risk management framework is based	C&E risk management framework of the Group is based on the ECB guide on climate-related and environmental risks, Climate-related financial risks – measurement methodologies and Climate-related risk drivers and their transmission channels - both published by Bank for International Settlements, and EBRD Environmental and Social Risk Management Procedures.
(l)	Processes to identify, measure and monitor activities and exposures (and collateral where applicable) sensitive to environmental risks, covering relevant transmission channels	Transition risk materiality assessments are performed at industry level, based on GHG emission intensity. Industry environmental risk is monitored for legal entity lending portfolio and securities portfolio. A regular Physical risk assessment is performed, covering both quantitative and qualitative assessment of material risks to collateralized real estate. Risk drivers and transmission channels are identified as part of C&E risk materiality assessment and inform risk management practices. Credit risk is the key prudential

		risk category through which C&E risk is likely to materialize for the Group, given its business profile and asset composition. Climate risk drivers can impact households, corporates, SMEs, and sovereigns, reducing income or wealth.
(m)	Activities, commitments and exposures contributing to mitigate environmental risks	Setting ESG risk limits in Risk Appetite and establishing long-term portfolio GHG emissions goals serves as a proactive mitigation action for C&E transition risk. Other proactive C&E risk mitigating actions include concentration and geographic risk management, and flood risk insurance requirement for immovable collaterals. Reactive actions taken by the Bank include risk transfer through loan securitisation. While structuring transactions with elevated ESG risk levels and exceeding a predetermined threshold of financed amount, the counterparts ESG action plan is considered. It may affect the length, pricing, or other structuring conditions. The material value of Real estate collateral is adjusted to adequately include physical risk assessment. Other detective mitigation methods are being integrated and used, including regular assessment of the current risk level against the desired risk level, trend analysis, risk indicator monitoring, auditing, etc.
(n)	Implementation of tools for identification, measurement and management of environmental risks	Identification, measurement and management tools for environmental risks: - ESG Risk Policy; - Risk Appetite and Risk Strategy - Environmental risk limits set and monitored in Lending and Securities portfolios; - Climate physical risk materiality assessment for collateralized real estate; - Client Environmental and Climate-related risk assessment; - Environmental and Climate-related risk materiality assessment performed; - Real Estate collateral energy efficiency (EPC) data collection ongoing.
(o)	Results and outcome of the risk tools implemented and the estimated impact of environmental risk on capital and liquidity risk profile	Environmental risk assessment is included in ICAAP under Credit risk. The ESG risk scenario is calculated as the worst-case scenario between the primary Credit risk-adverse scenario and the Credit Risk ESG scenario. For Liquidity risk profile: Climate-related and Environmental risk materiality assessment for consolidated Deposits and Non-Maturity Deposits portfolio is performed.
(p)	Data availability, quality and accuracy, and efforts to improve these aspects	Improvements in the quality of collateral address data have been carried out to standardize data and enable geolocation mapping and connection to external physical risk maps. EPC label data collection has been started as standard practice for new lending, with new data fields introduced in data systems. General availability of EPC data remains the biggest challenge as a relatively low proportion of properties have received EPC labels, and the group with certificates includes a disproportionate number of newly built buildings, thus preventing extrapolation of data for use in estimated energy classes.
(q)	Description of limits to environmental risks (as drivers of prudential risks) that are set, and triggering escalation and exclusion in the case of breaching these limits	Climate-related and environmental Risk appetite limits are set based on the ambition of gradually improving the Group's ESG risks profile year over year. With the implementation of ESG limits, Group determines the current and future relevance of ESG topics for its own business activities. An environmental risk score is based on three factors: GHG emissions, timing (time to maturity), and weight of position in the portfolio.
(r)	Description of the link (transmission channels) between environmental risks with credit risk, liquidity and funding risk, market risk, operational risk and reputational risk in the risk management framework	Credit risk: - Physical and transition risk drivers increase Bank's credit risk through both the income effect and wealth effect. The Bank identifies income effect as a transmission channel of physical risk when physical hazard events have a negative effect on a borrower's ability to repay and service debt via loss or reduction of income from affected real estate or manufacturing equipment. The Bank recognizes the wealth effect as transmission channel via reduced ability to fully recover the value of an exposure in default because of the reduction in the value of the pledged collateral. Requirement of continuous insurance of collateral is a means of mitigating the risk. - Bank assesses that climate risk drivers can impact households, corporates and SMEs, with a lesser degree of impact to sovereigns in the Bank's portfolio. - Climate-related increases in human mortality and declines in labour productivity are projected to be key drivers of long-term transmission channel of climate-risk through reductions in output and resulting economic implications. - In medium to long term increased borrowing costs due to factoring in C&E risks could lead to higher taxes, lower government spending and reduced economic activity, which may indirectly impact Bank's credit risk. Market risk: - Physical and transition risks can alter or reveal new information about future economic conditions or the value of real or financial assets, resulting in downward price shocks and an increase in market volatility in traded assets.

		- Climate risk could also lead to a breakdown in correlations between assets or a change in market liquidity for particular assets, undermining risk management assumptions. - Changes in asset values may be driven by a policy change that affects an individual borrower, or by the effect that policy change may have on the economy more broadly. Liquidity risk: - Climate risk drivers may impact liquidity risk directly by affecting Bank's ability to raise funds or liquidate assets, access to stable sources of funding could be reduced as market conditions change. - Climate risk drivers may cause indirect impact through affected counterparties drawing down deposits and credit lines. Operational risk: - If physical hazards disrupt critical services and telecommunications infrastructure, Bank's operational ability may be impacted. - Increasing legal and regulatory compliance risk associated with climate-sensitive investments and businesses may affect the Bank indirectly or directly. - Increasing direct and indirect (via counterparties) reputational risk based on changing market or consumer sentiment.

EU 2022/2453 Table 2 - Qualitative information on Social risk

Row number	Qualitative information - Free format	
	Business strategy and processes	
(a)	Adjustment of the institution's business strategy to integrate social factors and risks taking into account the impact of social risk on the institution's business environment, business model, strategy and financial planning	Citadele environmental and social risk management is founded on the Banks strategy of developing business with a long-term perspective and in line with social, environmental, and economic goals in the decisions made, products offered, and services provided. This ensures alignment with the commercial strategy and helps embed environmental and social risk management in the organisational structure and culture. Citadele believes that a financial institution's social impact is based on the ability to leverage its expertise, financial products and services to enable people and communities to prosper and grow. Citadele acts based on high ethical and professional standards towards its clients, partners and employees. Being a socially responsible bank, Citadele stands up for: - responsible provision of banking services to promote the Baltic economy; - promoting financial education and literacy in society; - promoting tolerance in society and supporting charity projects for people, animals and nature support; - increasing customer trust in banking and Citadele Group; - making banking services accessible for people at any time and place convenient for them through our digital channel offering; - constantly increase internal ESG competence and promote it in society; - engaging in partnerships with relevant stakeholders to achieve society's goals. Citadele acknowledges its responsibility in contribution to sustainable economic development, which includes responsible, fair, and ethical business practices from its suppliers.
(b)	Objectives, targets and limits to assess and address social risk in short-term, medium-term and long-term, and performance assessment against these objectives, targets and limits, including forward-looking information in the design of business strategy and processes	Citadele is managing the environmental and social risk factors in own operations and business activities. Citadele is performing social risk assessments in accordance with EBRD social risk guidelines of new lending projects above predetermined thresholds. Citadele has been monitoring social risk exposure in line with EBRD expectations since 2010 when EBRD became a stakeholder in the Group. Citadele ensures convenient and secure working conditions to its employees, in line with labour-related standards and requirements, national employment, social insurance, occupational health and safety standards. Citadele supports working environment that is free from any discrimination, prejudice, harassment, abuse of powers and undignified attitude. The Bank is continuously working to make its services accessible.
(c)	Policies and procedures relating to direct and indirect engagement with new or existing counterparties on their strategies to mitigate and reduce socially harmful activities	Citadele has developed and adopted ESG and ESG Risk Management Policies that reflect the Bank's commitment to managing these factors. The ESG Policy outlines Citadele's approach to ESG factors in Group's own operations, while the ESG Risk Policy outlines approach in the Group's business activities.

		The Group maintains good human resources management policies and practices appropriate to the business. Work on building employee capacity and engagement is constantly ongoing, including relevant trainings on ESG. The Bank has adopted systematic Climate-related, Environmental and Social risk management processes for business activities in line with the level of risk associated with the business activities. Social And Environmental Risk Assessment is an integral part of the bank's lending process (described in Procedure: Loan, Credit Line, Overdraft for Legal Persons) and is conducted for all legal person lending transactions in line with instruction on Environmental, Social and Climate-related Risk Assessment. The Environmental And Social Risk Assessment is carried out (i) when evaluating a new lending transaction for legal persons, or in (ii) assessing changes to the terms of the existing corporate lending transactions that require granting of an additional amount. A publicly available Supplier Code Of Conduct has been introduced, summarizing the Bank's requirements in supplier selection, covering environmental practices, labour policies, and good governance, including good practice guidelines for these areas.
	Governance	
(d)	Responsibilities of the management body for setting the risk framework, supervising and managing the implementation of the objectives, strategy and policies in the context of social risk management covering counterparties' approaches to:	Citadele maintains good governance practices, with a clear organisational structure and accountability, defined roles and responsibilities, organisation-wide objectives and progress monitoring, while ensuring adequate resource management. Supervisory Board is responsible for overseeing the Management Board tasked with establishment and implementation of ESG strategy. Chief Executive Officer is governing body member responsible for the execution of the ESG strategy and implementation of the governance structure set by the Management Board. ESG Officer develops a roadmap for achieving the ESG strategy and objectives and ensures its implementation within the Bank. ESG Officer is a central point of contact for overall sustainability project coordination and is responsible for increasing awareness of ESG matters by ensuring respective external and internal communication. ESG Officer leads the ESG Working Group, composed from representatives of all functions involved in ESG risk management integration into Group's operations. Representatives of functions involved in social risk management are all part of the ESG Working Group:
(i)	Activities towards the community and society	(i) Activities towards the community and society are coordinated by Head of Marketing and Communication department;
(ii)	Employee relationships and labour standards	(ii) Employee relationships and labour standards are managed by Head of HR and Legal divisions;
(iii)	Customer protection and product responsibility	(iii) Customer protection and product responsibilities are with the heads of Business lines and Products;
(iv)	Human rights	(iv) Human rights are embedded into core of the Banks operations and all relevant documentation under the responsibility of Head of Legal division.
(e)	Integration of measures to manage social factors and risks in internal governance arrangements, including the role of committees, the allocation of tasks and responsibilities, and the feedback loop from risk management to the management body	Risks associated with social factors in Group's internal operations are monitored continuously and reported to management bodies in monthly CRO report, under Operational risk.
(f)	Lines of reporting and frequency of reporting relating to social risk	Risks associated with social factors are reported on monthly basis.
(g)	Alignment of the remuneration policy in line with institution's social risk-related objectives	The Group's remuneration policy is in line with the Group's business and risk strategy, objectives, culture and values as well as long-term interests of the Group and its stakeholders. Any paying out of the deferred part of any variable remuneration includes reassessment of the long-term performance and, if necessary, risk adjustment to take into account additional risks, including social, identified or materialised after the award.
	Risk management	
(h)	Definitions, methodologies and international standards on which the social risk management framework is based	Social risk management framework in the Group is based on EBRD Environmental and Social Risk Management Manual and procedures recommended by the EBRD, in line with best international practice in the commercial financial sector.

(i)	Processes to identify, measure and monitor activities and exposures (and collateral where applicable) sensitive to social risk, covering relevant transmission channels	All lending transactions for legal entities are screened for social risk according to thresholds and process outlined in the respective lending procedure and Environmental and Social risk assessment instruction. Applications falling within Bank's environmental and social exclusion list, which is based on EBRD guidelines and extended to cover no-go industries in line with the Bank's risk appetite, are rejected. Applications are further reviewed for environmental and social risk factors and social risk level is determined. Applications with particular social risk characteristics are further reviewed by EBRD. Environmental and social risk events for exposures are regularly monitored and reported to EBRD in due course of loan monitoring process, with prescribed remediation actions followed-up. Citadele expects its suppliers to manage sustainability topics within the field of human rights, labour practices, business ethics and the environment. Expectations for supplier ESG risk management are published in Supplier Code of Conduct. Social risk associated with exposures sensitive to social risks, such as clients or counterparties breaching labour law, human rights or other social laws or rights is monitored as part of regular media monitoring.
(j)	Activities, commitments and assets contributing to mitigate social risk	Citadele's success is based on its employees and their well-being. Citadele is committed to ensure supportive work environment that is aligned with today's requirements and standards, with no discrimination, equal opportunities, good working conditions, supporting professional skill and competence development, and employee well-being. Citadele is monitoring employee satisfaction via regular eNPS surveys and Mood Barometer. Citadele is committed to remain among the most desirable employers in the Baltics. The Group's lending exposures are screened and monitored in line with our commitment to EBRD. Citadele is a signatory of UNEP FI Principles for Responsible Banking and is committed to aligning the Bank's strategy and practice with the Sustainable Development Goals. The Bank performed initial Impact Assessment under PRB methodology in 2022 and is committed to increasing its positive impacts and reducing the negative impacts on the areas with highest regional level of need, including Socio-economic and Social needs.
(k)	Implementation of tools for identification and management of social risk	Social risk identification is part of the Group's strategy setting process, and includes analysing changes in consumer behaviour, demographic trends, changes in labour force and technological change.
(l)	Description of setting limits to social risk and cases to trigger escalation and exclusion in the case of breaching these limits	Social risk is monitored under operational risk, and risk limits set within the relevant categories, such as availability and security of Bank's digital services, employee risk, reputational risk. Limit breaches and escalations managed in accordance with procedure for relevant operational risk category.
(m)	Description of the link (transmission channels) between environmental risks with credit risk, liquidity and funding risk, market risk, operational risk and reputational risk in the risk management framework	The Bank has assessed that materialization of social risk within its lending portfolio may manifest in credit risk if social risk events prevent or delay the operation of development projects thus delaying or stopping planned income stream for the repayment of Bank's funds, and / or negatively affecting the value of affected collateral; changes in consumer sentiment following a social risk event may negatively affect demand for a borrower's product or service thus negatively impacting its income and repayment of Bank's funds. Materialization of social risks for Bank's suppliers may cause a disruption in availability of goods or services purchased.

EU 2022/2453 Table 3 - Qualitative information on Governance risk

Row number		Qualitative information - Free format
	Governance	
(a)	Institution's integration in their governance arrangements governance performance of the counterparty, including committees of the highest governance body, committees responsible for decision-making on economic, environmental, and social topics	The Bank's operation is based on transparent and sustainable actions in the financial markets. The Bank has a zero tolerance for corruption, and expects the same from its employees, customers, and business partners. The Bank has developed internal legal framework which sets a clear and transparent corporate governance framework. Citadele is committed to avoid corruption and has no tolerance towards financial crime and non-compliance. For timely identification and understanding of corruption risk in operations of its counterparties, the Bank ensures explicit and unequivocal internal rules for risk screening, identification and continuous monitoring, described in a number of policies and procedures, including Corporate Governance Policy, Code of Ethics, Anti-corruption Policy, Anti-money laundering and counter terrorism and proliferation financing policy, Policy for Conflict of Interest in the Rendering of Investment and Ancillary Investment Services, Procedures for Assessment of Reports on Breaches, Monitoring of Transactions, Procurement and more. All employees are trained in the field of the prevention of corruption risk and fraud risk, as well are attested annually of their compliance with the principles prescribed in Anti-corruption policy.
(b)	Institution's accounting of the counterparty's highest governance body's role in non-financial reporting	Non-financial reports of counterparties are identified in due course of process, either procurement or lending, and further analysed manually, including taking into account the role of the counterparty's highest governance body in non-financial reporting.
(c)	Institution's integration in governance arrangements of the governance performance of their counterparties including: (i) Ethical considerations (ii) Strategy and risk management (iii) Inclusiveness (iv) Transparency (v) Management of conflict of interest (vi) Internal communication on critical concerns	The Bank adheres to strict know-your-customer procedures, which include requirements and good practice expectations for counterparty internal governance processes, including ethical considerations, anti-bribery and anti-corruption measures, internal controls, risk management policies and management of conflicts of interest. Transparency and inclusiveness disclosures are expected to be included in counterparty non-financial reporting in line with the level mandated by regulatory requirements pertinent to the counterparty.
	Risk management	
(d)	Institution's integration in risk management arrangements the governance performance of their counterparties considering: (i) Ethical considerations (ii) Strategy and risk management (iii) Inclusiveness (iv) Transparency (v) Management of conflict of interest (vi) Internal communication on critical concerns	A publicly available Supplier Code of Conduct is binding for any new suppliers. The Supplier Code of Conduct summarizes the Bank's requirements in supplier selection, covering environmental practices, labour policies, and good governance, including good practice guidelines for these areas. Governance areas considered include ethics; no tolerance for bribery and corruption; management of conflict of interest; inclusiveness and transparent governance. The Bank itself adheres to Code of Ethics, based on regulatory requirements and industry good practices. The Code of Ethics includes selection of and cooperation with counterparties, management of conflict of interest and whistleblowing arrangements.

EU 2022/2453 Template 4: Banking book - Climate change transition risk: Exposures to top 20 carbon-intensive firms

	a	b	c	d	e
	Gross carrying amount (aggregate)	Gross carrying amount towards the counterparties compared to total gross carrying amount (aggregate)*	Of which environmentally sustainable (CCM)	Weighted average maturity	Number of top 20 polluting firms included
1	-	-	-	-	-

*For counterparties among the top 20 carbon emitting companies in the world

EU 2022/2453 Template 10 - Other climate change mitigating actions that are not covered in the EU Taxonomy

	a	b	c	d	e	f
	Type of financial instrument	Type of counterparty	Gross carrying amount (million EUR)	Type of risk mitigated (Climate change transition risk)	Type of risk mitigated (Climate change physical risk)	Qualitative information on the nature of the mitigating actions
1	Bonds (e.g. green, sustainable, sustainability-linked under standards other than the EU standards)	Financial corporations	-	-	-	-
2		Non-financial corporations	-	-	-	-
3		*Of which Loans collateralised by commercial immovable property*	-	-	-	-
4		Households	-	-	-	-
5		*Of which Loans collateralised by residential immovable property*	-	-	-	-
6		*Of which building renovation loans*	-	-	-	-
7		Other counterparties	-	-	-	-
8	Loans (e.g. green, sustainable, sustainability-linked under standards other than the EU standards)	Financial corporations	0.2	Transition risk	-	During 2022 and 2023 H1 the following loan categories were classified as Green lending: - Fully electric cars; - Loans classified as green under EIB green or EBRD green frameworks; - LEED Gold or Platinum, BREEAM Excellent certified buildings; - Loans for multi apartment building energy efficiency improvement in Latvia (ALTUM guarantee programme)
9		Non-financial corporations	71.4	Transition risk	-	
10		*Of which Loans collateralised by commercial immovable property*	32.3	Transition risk	-	
11		Households	21.3	Transition risk	-	
12		*Of which Loans collateralised by residential immovable property*	-	-	-	
13		*Of which building renovation loans*	0.4	Transition risk	-	
14		Other counterparties	-	-	-	

EU 2022/2453 Template 1: Banking book- Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity

Columns on "environmentally sustainable (CCM)" and "GHG emissions" exposures are to be reported in the future, but no for the current period. Maturity is reported based on the gross amounts and (as per regulatory requirements) based on the final maturity of the exposure and not the contractual maturity which would be more consistent with the actual expected repayment cash flows.

.		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
	Sector/subsector	Gross carrying amount (Mln EUR)					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (Mln EUR)			GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)		GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting	<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity
			Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation**	Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures		Of which Stage 2 exposures	Of which non-performing exposures		Of which Scope 3 financed emissions						
1	**Exposures towards sectors that highly contribute to climate change***																
2	A - Agriculture, forestry and fishing	178.0	-	n/a	9.4	2.8	(5.1)	(0.5)	(1.9)	n/a	n/a	n/a	150.3	21.0	4.6	2.2	3.5
3	B - Mining and quarrying	6.0	-	n/a	0.6	0.1	(0.1)	(0.0)	(0.0)	n/a	n/a	n/a	5.7	0.3	-	0.0	3.1
4	*B.05 - Mining of coal and lignite*	-	-	n/a	-	-	-	-	-	n/a	n/a	n/a	-	-	-	-	-
5	*B.06 - Extraction of crude petroleum and natural gas*	-	-	n/a	-	-	-	-	-	n/a	n/a	n/a	-	-	-	-	-
6	*B.07 - Mining of metal ores*	-	-	n/a	-	-	-	-	-	n/a	n/a	n/a	-	-	-	-	-
7	*B.08 - Other mining and quarrying*	6.0	-	n/a	0.6	0.1	(0.1)	(0.0)	(0.0)	n/a	n/a	n/a	5.7	0.3	-	0.0	3.1
8	*B.09 - Mining support service activities*	-	-	n/a	-	-	-	-	-	n/a	n/a	n/a	-	-	-	-	-
9	C - Manufacturing	181.0	1.9	n/a	38.8	16.6	(11.2)	(7.4)	(1.6)	n/a	n/a	n/a	175.6	3.9	-	1.6	5.0
10	*C.10 - Manufacture of food products*	26.6	-	n/a	1.9	2.2	(1.4)	(0.0)	(0.8)	n/a	n/a	n/a	24.5	1.7	-	0.4	2.0
11	*C.11 - Manufacture of beverages*	1.6	-	n/a	0.0	0.0	(0.0)	(0.0)	(0.0)	n/a	n/a	n/a	1.6	-	-	-	2.2
12	*C.12 - Manufacture of tobacco products*	-	-	n/a	-	-	-	-	-	n/a	n/a	n/a	-	-	-	-	-
13	*C.13 - Manufacture of textiles*	4.0	-	n/a	0.1	0.0	(0.1)	(0.0)	(0.0)	n/a	n/a	n/a	4.0	-	-	-	3.5
14	*C.14 - Manufacture of wearing apparel*	2.0	-	n/a	0.2	0.1	(0.1)	(0.0)	(0.1)	n/a	n/a	n/a	1.9	-	-	0.1	2.6
15	*C.15 - Manufacture of leather and related products*	0.1	-	n/a	0.1	0.0	(0.0)	(0.0)	(0.0)	n/a	n/a	n/a	0.1	-	-	-	2.7
16	*C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials*	30.0	-	n/a	1.3	0.8	(0.6)	(0.0)	(0.1)	n/a	n/a	n/a	28.7	0.4	-	0.8	2.5
17	*C.17 - Manufacture of pulp, paper and paperboard*	6.1	-	n/a	0.0	0.0	(0.0)	(0.0)	(0.0)	n/a	n/a	n/a	6.1	-	-	0.0	7.5
18	*C.18 - Printing and service activities related to printing*	8.6	-	n/a	1.3	0.3	(0.2)	(0.0)	(0.1)	n/a	n/a	n/a	8.6	0.0	-	-	2.6

19	*C.19 - Manufacture of coke oven products*	1.9	1.9	n/a	-	-	(0.0)	-	-	n/a	n/a	n/a	1.9	-	-	0.0	3.6
20	*C.20 - Production of chemicals*	1.1	-	n/a	0.3	0.0	(0.0)	(0.0)	(0.0)	n/a	n/a	n/a	1.1	-	-	-	2.4
21	*C.21 - Manufacture of pharmaceutical preparations*	7.3	-	n/a	-	0.0	(0.0)	-	(0.0)	n/a	n/a	n/a	7.3	-	-	-	2.7
22	*C.22 - Manufacture of rubber products*	2.8	-	n/a	0.1	0.0	(0.1)	(0.0)	(0.0)	n/a	n/a	n/a	2.8	0.0	-	-	2.3
23	*C.23 - Manufacture of other non-metallic mineral products*	2.2	-	n/a	0.3	0.0	(0.1)	(0.0)	(0.0)	n/a	n/a	n/a	2.1	0.1	-	-	2.6
24	*C.24 - Manufacture of basic metals*	0.2	-	n/a	-	0.0	(0.0)	-	(0.0)	n/a	n/a	n/a	0.2	-	-	-	2.6
25	*C.25 - Manufacture of fabricated metal products, except machinery and equipment*	15.3	-	n/a	1.4	0.1	(0.4)	(0.1)	(0.0)	n/a	n/a	n/a	14.6	0.6	-	0.0	2.7
26	*C.26 - Manufacture of computer, electronic and optical products*	2.7	-	n/a	0.0	0.0	(0.0)	(0.0)	(0.0)	n/a	n/a	n/a	2.6	0.1	-	-	5.3
27	*C.27 - Manufacture of electrical equipment*	3.4	-	n/a	0.0	0.0	(0.0)	(0.0)	(0.0)	n/a	n/a	n/a	3.4	-	-	-	3.8
28	*C.28 - Manufacture of machinery and equipment n.e.c.*	2.8	-	n/a	0.1	0.0	(0.1)	(0.0)	(0.0)	n/a	n/a	n/a	2.6	0.2	-	0.0	2.9
29	*C.29 - Manufacture of motor vehicles, trailers and semi-trailers*	1.1	-	n/a	0.5	0.1	(0.1)	(0.0)	(0.1)	n/a	n/a	n/a	1.0	-	-	0.1	3.3
30	*C.30 - Manufacture of other transport equipment*	1.4	-	n/a	0.9	-	(0.0)	(0.0)	-	n/a	n/a	n/a	1.4	-	-	-	3.8
31	*C.31 - Manufacture of furniture*	42.4	-	n/a	20.7	12.9	(5.6)	(5.0)	(0.4)	n/a	n/a	n/a	42.2	0.1	-	0.1	3.7
32	*C.32 - Other manufacturing*	3.2	-	n/a	0.4	0.0	(0.1)	(0.0)	(0.0)	n/a	n/a	n/a	2.9	0.3	-	-	3.6
33	*C.33 - Repair and installation of machinery and equipment*	14.0	-	n/a	10.5	0.0	(2.2)	(2.1)	(0.0)	n/a	n/a	n/a	13.7	0.3	-	0.0	2.1
34	D - Electricity, gas, steam and air conditioning supply	86.6	28.3	n/a	0.3	1.9	(0.7)	(0.0)	(0.1)	n/a	n/a	n/a	61.0	25.5	-	0.0	7.0
35	*D35.1 - Electric power generation, transmission and distribution*	83.3	28.3	n/a	0.1	1.9	(0.6)	(0.0)	(0.1)	n/a	n/a	n/a	58.4	24.9	-	0.0	7.0
36	*D35.11 - Production of electricity*	*28.3*	*28.2*	*n/a*	*0.1*	*1.9*	*(0.5)*	*(0.0)*	*(0.1)*	*n/a*	*n/a*	*n/a*	*28.2*	*0.1*	-	*0.0*	*1.0*
37	*D35.2 - Manufacture of gas; distribution of gaseous fuels through mains*	0.6	-	n/a	0.0	0.0	(0.0)	(0.0)	(0.0)	n/a	n/a	n/a	0.6	-	-	-	4.2
38	*D35.3 - Steam and air conditioning supply*	2.6	-	n/a	0.2	0.0	(0.1)	(0.0)	(0.0)	n/a	n/a	n/a	2.0	0.6	-	-	4.7
39	E - Water supply; sewerage, waste management and remediation activities	14.7	-	n/a	0.7	0.0	(0.2)	(0.0)	(0.0)	n/a	n/a	n/a	9.6	5.0	-	-	4.2
40	F - Construction	118.0	-	n/a	13.0	4.0	(3.5)	(0.5)	(1.3)	n/a	n/a	n/a	113.4	2.2	-	2.4	4.4
41	*F.41 - Construction of buildings*	51.1	-	n/a	5.7	0.7	(1.3)	(0.2)	(0.3)	n/a	n/a	n/a	50.1	0.8	-	0.2	3.1
42	*F.42 - Civil engineering*	24.2	-	n/a	2.6	1.1	(0.8)	(0.1)	(0.3)	n/a	n/a	n/a	22.4	0.3	-	1.6	9.3
43	*F.43 - Specialised construction activities*	42.7	-	n/a	4.7	2.2	(1.4)	(0.2)	(0.7)	n/a	n/a	n/a	40.9	1.1	-	0.6	3.2
44	G - Wholesale and retail trade; repair of motor vehicles and motorcycles	194.1	-	n/a	14.8	2.4	(4.8)	(0.5)	(1.0)	n/a	n/a	n/a	186.3	7.0	-	0.9	2.5
45	H - Transportation and storage	226.1	-	n/a	11.7	16.2	(9.8)	(0.3)	(7.6)	n/a	n/a	n/a	179.6	9.5	30.0	7.0	4.3
46	*H.49 - Land transport and transport via pipelines*	170.4	-	n/a	9.9	4.0	(2.3)	(0.2)	(0.7)	n/a	n/a	n/a	138.3	1.9	30.0	0.2	4.7

47	*H.50 - Water transport*	7.9	-	n/a	-	6.8	(6.8)	-	(6.8)	n/a	n/a	n/a	1.1	-	-	6.8	0.2
48	*H.51 - Air transport*	0.0	-	n/a	-	-	-	-	-	n/a	n/a	n/a	0.0	-	-	-	1.0
49	*H.52 - Warehousing and support activities for transportation*	45.9	-	n/a	1.1	5.3	(0.7)	(0.0)	(0.1)	n/a	n/a	n/a	38.3	7.6	-	0.0	3.6
50	*H.53 - Postal and courier activities*	1.9	-	n/a	0.8	0.0	(0.0)	(0.0)	(0.0)	n/a	n/a	n/a	1.8	0.0	-	0.0	2.6
51	I - Accommodation and food service activities	31.2	-	n/a	0.7	2.1	(0.8)	(0.8)	(0.3)	n/a	n/a	n/a	28.9	2.3	-	0.0	8.6
52	L - Real estate activities	390.0	-	n/a	41.7	0.5	(6.2)	(0.5)	(0.2)	n/a	n/a	n/a	356.0	28.7	5.2	0.1	3.2
53	**Exposures towards sectors other than those that highly contribute to climate change***																
54	K - Financial and insurance activities	9.3	-	n/a	-	-	(0.0)	-	-	n/a	n/a	n/a	9.3	-	-	-	6.0
55	Exposures to other sectors (NACE codes J, M - U)	302.4	-	n/a	24.4	1.6	(5.4)	(1.3)	(0.7)	n/a	n/a	n/a	279.1	19	3.6	0.8	6.1
56	***TOTAL***	1,737.2	30.3	n/a	156.1	48.2	(47.9)	(11.2)	(14.6)	n/a	n/a	n/a	1,554.6	124.4	43.4	15	n/a

* In accordance with the Commission delegated regulation EU) 2020/1818 supplementing regulation (EU) 2016/1011 as regards minimum standards for EU Climate Transition Benchmarks and EU Paris-aligned Benchmarks -Climate Benchmark Standards Regulation - Recital 6: Sectors listed in Sections A to H and Section L of Annex I to Regulation (EC) No 1893/2006

** NACE code based, not considering any mitigating aspects or for example for "D35.11 - Production of electricity" whether electricity is generated with renewables or from fossil sources.

EU 2022/2453 Template 2: Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral

EPC label data collection has been started as standard practice for new lending, with new data fields introduced in data systems. EPC data collection for existing collateral portfolio was previously carried out. Effort included cadastral number data cleaning and linking to external data providers like Land Registrars in Latvia and Estonia, and data collection services in Lithuania. General availability of EPC data remains the biggest challenge as a relatively low proportion of properties have received EPC labels, and the set of properties with certificates includes a disproportionate number of newly built buildings, thus preventing extrapolation of data for use in estimated energy classes. Unbuilt land collateral is estimated at 0 kWh/m² energy efficiency. Properties with expired EPC certificate are excluded form "EPC label of collateral" disclosure, but included in the estimated "EP score in kWh/m²" of collateral based on the expired EPC certificates.

.		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
	Counterparty sector	**Total gross carrying amount (in MEUR)**															
			Level of energy efficiency (EP score in kWh/m² of collateral)						Level of energy efficiency (EPC label of collateral)							Without EPC label of collateral	
			0; <= 100	> 100; <= 200	> 200; <= 300	> 300; <= 400	> 400; <= 500	> 500	A	B	C	D	E	F	G		Of which level of energy efficiency (EP score in kWh/m² of collateral) estimated
1	Total EU area																
2	*Of which Loans collateralised by commercial immovable property*	572	204	25	1	1	1	1	54	32	44	1	22	4	1	415	19%
3	*Of which Loans collateralised by residential immovable property*	774	46	5	1	1	0	0	18	8	3	4	1	1	1	738	3%
4	*Of which Collateral obtained by taking possession: residential and commercial immovable properties*	1	-	-	-	-	-	-	-	-	-	-	-	-	-	1	67%
5	*Of which Level of energy efficiency (EP score in kWh/m² of collateral) estimated*	104	91	1	0	0	-	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a	104	100%
6	Total non-EU area																
7	*Of which Loans collateralised by commercial immovable property*	7	-	-	-	-	-	-	-	-	-	-	-	-	-	7	0%

8	*Of which Loans collateralised by residential immovable property*	4	-	-	-	-	-	-	-	-	-	-	-	-	-	4	0%
9	*Of which Collateral obtained by taking possession: residential and commercial immovable properties*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0%
10	*Of which Level of energy efficiency (EP score in kWh/m² of collateral) estimated*	-	-	-	-	-	-	-	n/a	n/a	n/a	n/a	n/a	n/a	n/a	-	0%

EU 2022/2453 Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk

Citadele's current assessment of climate change physical risk is performed for the real estate collateral pledged as security for loans originated by the Group. Assessment is performed on address level using location-specific risk analysis to quantify physical risks using geospatial mapping and natural hazard maps collated by independent external agencies. Climate-related hazards are divided between acute and chronic risk groups according to the mapping provided in EU Taxonomy Climate Delegated Act Annex A. Main physical risks identified are flooding and draught. No exposures were identified as subject to Extremely high or High-Extremely high risk. Methodology and approach for subsequent assessments is being developed and further enhanced. The current approach is mainly limited by availability of the data for assessment of the climate change physical risk. Collateral location coverage rate reaches 88% (improvement from 72% at 31/12/2022). Medium risk is assigned for the 12% of the collaterals for which coordinates could not be obtained. Future improvements to the methodology are much dependant on collection of additional data types and access to new data sources which would broaden the coverage and provide better perspective on the climate change physical risk for wider range of exposure types. The current approach provides a reasonable proxy indication of the climate change physical risk for exposures collateralised by immovable property, but not for other types of exposures to physical risk such as location of income-generating facilities that are not directly pledged. Thus climate change physical risk is not disclosed by sectors as current data availability does not provide sufficient information on all potential locations of impact. Even for exposures collateralised by immovable property, the current approach might have limitations, by not considering other enhancement factors of the respective exposure other than the pledged collateral, nor does it take into account potential local physical risk mitigation measures at the level of specific property.

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
	Variable: Geographical area subject to climate change physical risk - acute and chronic events	**Gross carrying amount (Mln EUR)**													
			of which exposures sensitive to impact from climate change physical events												
			Breakdown by maturity bucket					of which exposures sensitive to impact from chronic climate change events	of which exposures sensitive to impact from acute climate change events	of which exposures sensitive to impact both from chronic and acute climate change events	Of which Stage 2 exposures	Of which non-performing exposures	Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		
			<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity							of which Stage 2 exposures	Of which non-performing exposures
1	A - Agriculture, forestry and fishing	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
2	B - Mining and quarrying	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
3	C - Manufacturing	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
4	D - Electricity, gas, steam and air conditioning supply	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
5	E - Water supply; sewerage, waste management and remediation activities	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
6	F - Construction	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
7	G - Wholesale and retail trade; repair of motor vehicles and motorcycles	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
8	H - Transportation and storage	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
9	L - Real estate activities	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
10	Loans collateralised by residential immovable property	778	3	12	56	100	21	146	84	59	3	2	(4)	(0)	(1)

11	Loans collateralised by commercial immovable property	580	134	9	0	1	5	133	61	50	2	1	(3)	(0)	(1)
12	Repossessed collaterals	1	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Other relevant sectors (breakdown below where relevant)	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a