



AS Citadele banka

Risk management and capital adequacy report (Pillar 3 disclosures)

For the three months ended
31 March 2026



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REGULATORY SCOPE

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Consolidation Group	CRR Article 436
EU LI3 – Outline of the differences in the scopes of consolidation (entity by entity)	CRR Article 436(b)
Governance	CRR Article 435(2)(a)
Risk Management	CRR Article 435(1)(a-f), 435(2)(d-e)
Main Regulatory Ratios with Inclusion of the full period Profits	
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Own Funds	CRR Article 437(1)(a-d)
EU KM1 – Key metrics template	CRR Article 447(a-g), 438(b)
EU OV1 – Overview of total risk exposure amounts	CRR Article 438(d)
Credit Risk and credit risk mitigation (CRM)	CRR Article 453 (a-g), 438(1) (c-f), 440(1)(a), 442 (a-d,g-h), 444
Counterparty credit risk	CRR Article 439
Leverage Ratio	CRR Article 451
Market risk	CRR Article 445, 447, 448
Liquidity risk	CRR Article 451a
EU LIQ1 – Quantitative information of LCR	CRR Article 451a(2)
EU LIQB on qualitative information on LCR, which complements template EU LIQ1	CRR Article 451a(2)
Operational risk	CRR Article 446

INTRODUCTION

This report provides an 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” and other relevant regulations and laws.

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.

If not specified otherwise, 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
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 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. All 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. 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 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, identified material risk drives 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 and adequate control framework;
- 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 Chief Risk Officer (CRO) who serves as a member of the Management Board. Importantly, the CRO's role is distinct and independent from operational activities to ensure unbiased risk oversight. To facilitate effective governance, the CRO maintains 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 function within the Group is controlled by an independent unit – the Risk Division.

The main risks to which the Group is exposed are credit risk, market risk (including interest rate risk), liquidity risk, currency risk, operational risk (including ICT and fraud), ML/TF/PF risks and Sanctions risk, compliance risk and environmental and climate-related 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 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 oversight 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. 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. A robust risk management system has a profound impact on entire operations, empowering the Group to make informed decisions regarding risk, return, and market conditions.

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 on 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 include 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. An integral part of 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.

MAIN REGULATORY RATIOS WITH INCLUSION OF THE INTERIM PROFITS

Throughout the report figures as of 31 March 2026 are presented excluding interim profits for the period. Interim profits become eligible for inclusion in the regulatory capital after auditor's review of interim profits and a permission from the competent authority is received.

Per regulations, Bank may include interim or year-end profits in capital before taking a formal decision confirming the final audited profit for the year only with a prior permission of the competent authority. Any foreseeable charges or dividends must be deducted from those profits. Submission of documents for permission takes time and such permission is requested only after the publishing of the financial report for the respective period and completion of the audit verification. Such permission of the competent authority for inclusion of the interim profits, which have been decreased by foreseeable charges and dividends, has not been received for the three months period end 31 March 2026.

The consolidated Group for regulatory purposes is different from the consolidated Group for accounting purposes. As per regulatory requirements AAS CBL Life, a licensed insurer, is not included in the consolidated Group for capital adequacy purposes. Thus, net profit for the regulatory Group excludes net result of AAS CBL Life versus net result for the accounting Group. Consequently, net result of AAS CBL Life is excluded from own funds calculation and individual assets of AAS CBL Life are not included as risk exposures in the Group's capital adequacy calculation. Instead, the carrying value of the Group's investment in AAS CBL Life constitutes a risk exposure in the Group's capital adequacy ratio calculation.

Key regulatory ratios scenario (including net result for the period, which is decreased in line with the dividend policy)

	EUR thousands	
	31/03/2026	31/12/2025
	Group	Group
Common equity Tier 1 capital	494,356	544,583
Total own funds	604,356	604,583
Total risk exposure amount	2,743,289	2,716,369
Common equity Tier 1 capital ratio	18.0%	18.2%
Total capital adequacy ratio	19.8%	22.3%
Leverage Ratio – fully phased-in definition of Tier 1 capital	10.0%	10.0%
Total available stable funding	4,145,588	4,153,057
Total required stable funding	2,957,363	2,940,393
Net stable funding ratio	140%	141%

CAPITAL ADEQUACY CALCULATION

Capital adequacy is calculated in accordance with the current global standards of the bank capital adequacy 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 and amendments. 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. For credit risk Citadele applies standardised approach.

The regulations require credit institutions to maintain a minimum Total Capital adequacy ratio, minimum Common Equity Tier 1 capital ratio and minimum Tier 1 capital ratio. These include additional pillar 2 capital requirement which is re-assessed annually by the supervisory authority. 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. Pillar 2 additional own funds requirement is to be held in the form of 56.25% of Common Equity Tier 1 (CET1) capital and 75% of Tier 1 capital.

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 met with Common Equity Tier 1 capital. For the Group and the Bank, the capital conservation buffer applies. Citadele is identified as "other systemically important institution" (O-SII), thus the Group must also comply with the O-SII capital buffer requirement set by the supervisory authority. Besides those Countercyclical capital buffer requirements for the Bank and the Group are calculated based on the actual risk exposure geographical distribution and the country specific countercyclical buffer rate. Increases in the countercyclical capital buffer requirement, when announced by the respective countries, become effective with a delay, but decreases take effect immediately.

The Pillar 2 Guidance (P2G) is a Citadele specific regulatory recommendation that indicates the level of capital that the supervisory authority expects banks to maintain in addition to their binding capital requirements and mandatory reserves. The P2G 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).

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 31 March 2026

	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)	1.35%	1.80%	2.40%
Capital buffer requirements:			
Capital conservation buffer	2.50%	2.50%	2.50%
O-SII capital buffer	1.25%	1.25%	1.25%
Systemic risk buffer	0.07%	0.07%	0.07%
Countercyclical capital buffer	1.08%	1.08%	1.08%
Capital requirement	10.75%	12.70%	15.30%
Pillar 2 Guidance (P2G)	1.50%	1.50%	1.50%
Non-legally binding capital requirement with Pillar 2 Guidance	12.25%	14.20%	16.80%

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 KM1 – Key metrics template

	a	b	c	d	e	
	31/03/2026	31/12/2025	30/09/2025	30/06/2025	31/03/2025	
Available own funds (amounts)						
1	Common Equity Tier 1 (CET1) capital	494,356	494,583	533,386	528,793	507,486
2	Tier 1 capital	544,356	544,583	533,386	528,793	507,486
3	Total capital	604,356	604,583	593,386	588,793	567,486
Risk-weighted exposure amounts						
4	Total risk exposure amount	2,743,289	2,716,369	2,641,444	2,608,030	2,568,365
4a	Total risk exposure pre-floor	2,743,289	2,716,369	2,641,444	2,608,030	2,568,365
Capital ratios (as a percentage of risk-weighted exposure amount)						
5	Common Equity Tier 1 ratio (%)	18.0%	18.2%	20.2%	20.3%	19.8%
5a	Not applicable					
5b	Common Equity Tier 1 ratio considering unfloored TREA (%)	18.0%	18.2%	20.2%	20.3%	19.8%
6	Tier 1 ratio (%)	19.8%	20.1%	20.2%	20.3%	19.8%
6a	Not applicable					
6b	Tier 1 ratio considering unfloored TREA (%)	19.8%	20.1%	20.2%	20.3%	19.8%
7	Total capital ratio (%)	22.0%	22.3%	22.5%	22.6%	22.1%
7a	Not applicable					
7b	Total capital ratio considering unfloored TREA (%)	22.0%	22.3%	22.5%	22.6%	22.1%
Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)						
EU 7d	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 7e	of which: to be made up of CET1 capital (percentage points)	1.4%	1.4%	1.4%	1.4%	1.4%
EU 7f	of which: to be made up of Tier 1 capital (percentage points)	1.9%	1.9%	1.9%	1.9%	1.9%
EU 7g	Total SREP own funds requirements (%)	10.5%	10.5%	10.5%	10.5%	10.5%
Combined buffer and overall capital 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 (%)	1.1%	1.1%	1.1%	1.1%	0.8%
EU 9a	Systemic risk buffer (%)	0.1%	0.1%	0.1%	0.1%	0.1%
10	Global Systemically Important Institution buffer (%)	-	-	-	-	-
EU 10a	Other Systemically Important Institution buffer	1.3%	1.3%	1.5%	1.5%	1.5%
11	Combined buffer requirement (%)	4.9%	4.9%	5.2%	5.1%	4.9%
EU 11a	Overall capital requirements (%)	15.4%	15.4%	15.7%	15.6%	15.4%
12	CET1 available after meeting the total SREP own funds requirements (%)	11.6%	11.8%	12.0%	12.1%	11.6%
Leverage ratio						
13	Total exposure measure	5,442,473	5,461,767	5,355,442	5,157,385	5,060,913
14	Leverage ratio (%)	10.0%	10.0%	10.0%	10.3%	10.0%
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 (%)	-	-	-	-	-
EU 14b	of which: to be made up of CET1 capital (percentage points)	-	-	-	-	-
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 (%)	-	-	-	-	-
EU 14e	Overall leverage ratio requirements (%)	3.0%	3.0%	3.0%	3.0%	3.0%
Liquidity Coverage Ratio (average for the year)						
15	Total high-quality liquid assets (HQLA) (Weighted value - average)	1,243,597	1,231,052	1,234,136	1,291,165	1,281,654
EU 16a	Cash outflows - Total weighted value	871,683	885,955	902,926	927,032	906,118

EU 16b	Cash inflows - Total weighted value	193,935	204,076	207,481	220,111	205,957
16	Total net cash outflows (adjusted value)	677,747	681,879	695,445	706,921	700,161
17	Liquidity coverage ratio (%)	184%	181%	177%	183%	183%
Net Stable Funding Ratio						
18	Total available stable funding	4,145,588	4,153,057	4,153,716	3,925,651	3,855,362
19	Total required stable funding	2,957,363	2,940,393	2,892,626	2,825,208	2,774,379
20	NSFR ratio (%)	140%	141%	144%	139%	139%

EU OV1 – Overview of total risk exposure amounts

	RWAs		Minimum capital requirements	
	31/03/2026	31/12/2025	31/03/2026	
1	Credit risk (excluding CCR)	2,411,828	2,391,777	192,946
2	Of which the standardised approach	2,411,828	2,391,777	192,946
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	9,922	6,774	794
7	Of which the standardised approach	-	-	-
8	Of which internal model method (IMM)	-	-	-
EU 8a	Of which exposures to a CCP	-	-	-
9	Of which other CCR	9,922	6,774	794
10	Credit valuation adjustments risk - CVA risk	4,488	3,173	359
EU 10a	Of which the standardised approach (SA)	-	-	-
EU 10b	Of which the basic approach (F-BA and R-BA)	4,488	3,173	359
EU 10c	Of which the simplified approach	-	-	-
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)	5,085	2,679	407
21	Of which the Alternative standardised approach (A-SA)	-	-	-
21a	Of which the Simplified standardised approach (S-SA)	5,085	2,679	407
22	Of which Alternative Internal Model Approach (A-IMA)	-	-	-
EU 22a	Large exposures	-	-	-
23	Reclassifications between the trading and non-trading books	-	-	-
24	Operational risk	311,967	311,967	24,957
EU 24a	Exposures to crypto-assets	-	-	-
25	Amounts below the thresholds for deduction (subject to 250% risk weight)	2,492	2,634	199
26	Output floor applied (%)	-	-	-
27	Floor adjustment (before application of transitional cap)	-	-	-
28	Floor adjustment (after application of transitional cap)	-	-	-
29	Total	2,743,289	2,716,369	219,463

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 safeguarded through a comprehensive set of control mechanisms, including well-defined underwriting standards, key risk indicators (KRIs) and limits, and a governance framework that promotes an effective risk culture and sound decision-making. The framework is further reinforced by systematic risk identification and assessment processes, as well as robust data governance and reporting practices.

Lending decisions are grounded in an assessment of the borrower's repayment capacity, supported by the availability of an alternative recovery option in the event of default or a material deterioration in the borrower's risk profile.

When significant credit risk is to be undertaken, the credit risk analysis is carried out by units independent of loan origination. Credit analysis includes comprehensive risk identification, probability-of-default (PD) calculation, and an assessment of the borrower's creditworthiness, collateral quality, and collateral liquidity.

For legal entities, the creditworthiness assessment covers risk identification, an evaluation of the shareholder structure and management, industry and peer analysis, the business model and financed project, as well as an assessment of the entity's credit history, current and projected financial position, sensitivity to key risk drivers, and relevant ESG factors.

For private individuals, the assessment focuses on credit history and affordability analysis.

For significant exposures, loan origination decisions are taken by the Credit Committee and approved by the Bank's Management Board.

For the acquisition of corporate bonds, the Group conducts a thorough assessment of the issuer's business profile and financial performance. This includes consideration of credit ratings assigned by international rating agencies or, where no external rating is available, an internal counterparty financial analysis supported by relevant market-based indicators.

Sovereign bonds are evaluated using a similar approach, with emphasis placed on fundamental country-level factors, including economic strength, institutional quality, government fiscal capacity, political risk, and other material macro-financial indicators.

After loan origination, the borrower's financial position, early-warning indicators, payment discipline, and overall ability to meet contractual obligations are regularly monitored. This ongoing monitoring enables the timely identification of credit quality deterioration and the implementation of appropriate classification measures and action plans, which may include enhanced monitoring, forbearance solutions, and strengthening the Group's creditor position where necessary.

The Group continuously monitors the quality of its loan and securities portfolios, assessing their structure, concentration levels, performance trends, and overall risk profile. To mitigate concentration risk, the Group diversifies its exposures and applies a comprehensive system of credit risk concentration limits. These include individual counterparty and issuer limits, maximum exposure limits based on the counterparty's or issuer's risk class, limits on internally risk-weighted exposures within specific country or sector combinations, limits for groups of connected clients, large exposure limits, related-party transaction limits, and industry-specific limits.

Credit risk management follows the three lines of defence governance model. The first line of defence, comprising business units, is responsible for assuming and managing credit risk in day-to-day operations and for implementing first level controls. The second line of defence is responsible for maintaining and overseeing the risk management framework, including the monitoring, analysis, and reporting of risks, as well as ensuring compliance with internal and regulatory requirements. The third line of defence carried out by Internal audit.

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 and interest rate risk. The Group executes counterparty risk assessment and accepts only counterparties which are within its risk appetite limits.

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 and interest rate derivatives transactions. The Group applies Simplified Standardised Approach (Simplified SA CCR) to calculate counterparty credit risk.

LEVERAGE RATIO

Leverage ratio is calculated as Tier 1 capital versus the total exposure measure. As of period end Citadele is not applying transitional provisions. 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.

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 Bank's Management Board approves the decisions of the FMCRC.

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.

Group Treasury manages market risk applying the measures set by the Group's Risk Strategy, including through interest rate swaps, which are used for risk management purposes only. The Group also applies IFRS 9 hedge accounting to mitigate interest-rate risk and reduce earnings volatility. Hedging relationships are established and maintained under strict eligibility, effectiveness and governance criteria.

Exposures in equities not included in the trading book

None of the Group's investments in equity exposures has trading intent. Information on the Group's investments in the equities, which are not held for trading, 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 Market Risk and Counterparty Credit Risk Management Policy and limits set in the Group's Risk Appetite Framework and Risk Strategy. FMCRC oversees and assesses 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 Bank's Management Board authorizes the decisions of the FMCRC.

Intraday 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 Market Risk and Counterparty Credit 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 market value changes. Based on the market analysis and the Group's financing structure, the ALCO sets the interest rates for customer deposits.

LIQUIDITY RISK

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

The Group manages its liquidity risk in accordance with Liquidity Risk Management Policy and Liquidity Buffer 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 Enterprise Risk Management Department 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 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 contingency 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 two years. 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.

Scope of consolidation: consolidated		a	b		c	d	e	f		g	h
		Total unweighted value (average)				Total weighted value (average)					
		31/03/2026	31/12/2025	30/09/2025	30/06/2025	31/03/2026	31/12/2025	30/09/2025	30/06/2025		
EU 1a	Quarter ending on										
EU 1b	Number of data points used in the calculation of averages	12	12	12	12	12	12	12	12	12	12
HIGH-QUALITY LIQUID ASSETS											
1	Total high-quality liquid assets (HQLA)	n/a	n/a	n/a	n/a	1,243,597	1,231,052	1,234,136		1,291,165	
CASH - OUTFLOWS											
2	retail deposits and deposits from small business customers, of which:	2,698,019	2,671,302	2,641,555	2,611,009	174,419	173,049	171,427		169,738	
3	<i>Stable deposits</i>	1,700,731	1,662,914	1,624,340	1,584,416	85,037	83,146	81,217		79,221	
4	<i>Less stable deposits</i>	614,632	614,429	606,577	598,597	80,075	80,440	79,534		78,603	
5	Unsecured wholesale funding	980,025	993,572	1,041,390	1,079,553	475,442	487,008	513,729		531,129	
6	<i>Operational deposits (all counterparties) and deposits in networks of cooperative banks</i>	49,032	49,584	49,408	51,050	11,215	11,359	11,334		11,777	
7	<i>Non-operational deposits (all counterparties)</i>	930,272	943,199	991,265	1,027,854	463,506	474,859	501,678		518,703	
8	<i>Unsecured debt</i>	721	789	717	649	721	789	717		649	
9	<i>Secured wholesale funding</i>	n/a	n/a	n/a	n/a	-	-	-		-	
10	Additional requirements	529,034	525,613	515,778	523,909	200,032	203,957	200,408		208,801	
11	<i>Outflows related to derivative exposures and other collateral requirements</i>	165,675	171,464	169,681	177,633	165,675	171,465	169,681		177,633	
12	<i>Outflows related to loss of funding on debt products</i>	-	-	-	-	-	-	-		-	
13	<i>Credit and liquidity facilities</i>	363,359	354,149	346,097	346,276	34,358	32,493	30,727		31,168	
14	Other contractual funding obligations	15,741	15,876	11,530	11,776	15,741	15,876	11,530		11,776	
15	Other contingent funding obligations	120,958	121,286	116,642	111,751	6,048	6,064	5,832		5,588	
16	TOTAL CASH OUTFLOWS	n/a	n/a	n/a	n/a	871,683	885,955	902,926		927,032	
CASH - INFLOWS											
17	Secured lending (e.g. reverse repos)	-	-	-	-	-	-	-		-	
18	Inflows from fully performing exposures	57,825	58,614	61,649	65,172	35,268	37,143	40,714		44,464	
19	Other cash inflows	158,667	166,934	166,767	175,647	158,667	166,934	166,767		175,647	
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	216,492	255,548	228,416	240,819	193,935	204,076	207,481		220,111	
EU-20a	<i>Fully exempt inflows</i>	-	-	-	-	-	-	-		-	
EU-20b	<i>Inflows subject to 90% cap</i>	-	-	-	-	-	-	-		-	
EU-20c	<i>Inflows subject to 75% cap</i>	216,492	255,548	228,416	240,819	193,935	204,076	207,481		220,111	
TOTAL ADJUSTED VALUE											
21	LIQUIDITY BUFFER	n/a	n/a	n/a	n/a	1,243,597	1,231,052	1,234,136		1,291,165	
22	TOTAL NET CASH OUTFLOWS	n/a	n/a	n/a	n/a	677,747	681,879	695,445		706,921	
23	LIQUIDITY COVERAGE RATIO	n/a	n/a	n/a	n/a	184%	181%	177%		183%	

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 with deposits diversified across Retail and Corporate segments. Additional diversification is achieved through the ongoing use of German deposit gathering platforms and issuance of bonds.
- (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:
The Group's exposures to derivative counterparties arise from its activities in managing foreign exchange risk and interest rate risk. Collateral pledged and received can be volatile over time and depends on the underlying risk factor dynamics, but for the Group is not substantial in absolute terms.
- (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

OPERATIONAL RISK

The Group has adopted the Basel Committee on Banking Supervision's definition of operational risk: the probability of incurring losses resulting from inadequate or failed internal processes, people and systems or from external events. 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 maintains a low tolerance for operational risks that may result in actual or forward-looking losses exceeding EUR 0.55 million annually. The Group does not accept operational risks that are unquantifiable or cannot be effectively managed, irrespective of any potential financial benefit. 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;
- Maintaining robust ICT operations by promptly addressing ICT incidents and continuously improving ISs stability and availability;
- 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;
- 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; and
- Establishing a robust Gen AI governance framework that includes policies, procedures, and controls to ensure compliance with the EU AI Act (2024/1689).

ATTESTATION

AS Citadele banka Risk management and capital adequacy report (Pillar 3 disclosures) provides an interim update on the qualitative and quantitative disclosures on the major risks of AS Citadele banka and its risk management objectives, policies and information on capital adequacy as required by the Regulation (EU) No 575/2013 and other relevant regulations and laws. AS Citadele banka has implemented a comprehensive system of internal policies and processes, controls and IT systems to comply with these disclosures requirements.

This report has been authorised by the Management Board of AS Citadele banka.