



## PILLAR 3 DISCLOSURES 31/12/2023

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### General provisions

Disclosure reference date:

01/10/2024

Reference period:

31/12/2023

Reporting currency:

EUR

Disclosing institution:

VAN DE PUT & CO Private Bankers

LEI: 54930084TZJBK6D1AY92

Accounting standard used:

BGAAP

Scope of consolidation:

Individual

**Template EU KM1 - Key metrics template**

	31/12/2023	30/09/2023	30/06/2023	31/03/2023	31/12/2022
<b>Available own funds (amounts)</b>					
Common Equity Tier 1 (CET1) capital	19.777.146	15.807.114	15.794.510	18.629.824	18.617.220
Tier 1 capital	19.777.146	15.807.114	15.794.510	18.629.824	18.617.220
Total capital	19.777.146	15.807.114	15.794.510	18.629.824	18.617.220
<b>Risk-weighted exposure amounts</b>					
Total risk exposure amount	54.855.712	56.030.313	57.157.978	60.313.325	61.572.718
<b>Capital ratios (as a percentage of risk-weighted exposure amount)</b>					
Common Equity Tier 1 ratio (%)	36,05%	28,21%	27,63%	30,89%	30,24%
Tier 1 ratio (%)	36,05%	28,21%	27,63%	30,89%	30,24%
Total capital ratio (%)	36,05%	28,21%	27,63%	30,89%	30,24%
<b>Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)</b>					
Additional own funds requirements to address risks other than the risk of excessive leverage (%)	2,53%	2,53%	2,53%	2,53%	2,53%
of which: to be made up of CET1 capital (percentage points)	1,42%	1,42%	1,42%	1,42%	1,42%
of which: to be made up of Tier 1 capital (percentage points)	1,90%	1,90%	1,90%	1,90%	1,90%
Total SREP own funds requirements (%)	10,53%	10,53%	10,53%	10,53%	10,53%
<b>Combined buffer and overall capital requirement (as a percentage of risk-weighted exposure amount)</b>					
Capital conservation buffer (%)	2,50%	2,50%	2,50%	2,50%	2,50%
Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	0,00%	0,00%	0,00%	0,00%	0,00%
Institution specific countercyclical capital buffer (%)	0,46%	0,42%	0,44%	0,20%	0,10%
Systemic risk buffer (%)	0,00%	0,00%	0,00%	0,00%	0,00%
Global Systemically Important Institution buffer (%)	0,00%	0,00%	0,00%	0,00%	0,00%
Other Systemically Important Institution buffer (%)	0,00%	0,00%	0,00%	0,00%	0,00%
Combined buffer requirement (%)	2,96%	2,92%	2,94%	2,70%	2,60%
Overall capital requirements (%)	3,42%	3,35%	3,38%	2,90%	2,70%
CET1 available after meeting the total SREP own funds requirements (%)	25,52%	17,68%	17,10%	20,36%	19,71%
<b>Leverage ratio</b>					
Total exposure measure	174.931.643	176.146.004	173.701.565	178.716.782	186.807.568
Leverage ratio (%)	11,31%	8,97%	9,09%	10,42%	9,97%
<b>Additional own funds requirements to address the risk of excessive leverage (as a percentage of total exposure measure)</b>					
Additional own funds requirements to address the risk of excessive leverage (%)	0,00%	0,00%	0,00%	0,00%	0,00%
of which: to be made up of CET1 capital (percentage points)	0,00%	0,00%	0,00%	0,00%	0,00%
Total SREP leverage ratio requirements (%)	0,00%	0,00%	0,00%	0,00%	0,00%
<b>Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)</b>					
Leverage ratio buffer requirement (%)	0,00%	0,00%	0,00%	0,00%	0,00%
Overall leverage ratio requirement (%)	3,00%	3,00%	3,00%	3,00%	3,00%
<b>Liquidity Coverage Ratio</b>					
Total high-quality liquid assets (HQLA) (Weighted value -average)	140.782.307	139.772.360	137.331.538	129.997.520	129.976.062
Cash outflows - Total weighted value	16.471.440	16.316.877	16.948.123	17.850.666	19.421.591
Cash inflows - Total weighted value	8.839.292	7.817.230	7.214.402	18.959.943	26.901.345
Total net cash outflows (adjusted value)	7.632.147	8.499.647	9.733.722	4.462.666	4.855.398
Liquidity coverage ratio (%)	1844,60%	1644,45%	1410,88%	2913,00%	2676,94%
<b>Net Stable Funding Ratio</b>					
Total available stable funding	160.293.221	158.175.982	155.523.732	160.499.990	169.377.311
Total required stable funding	27.695.188	29.945.709	30.010.175	37.353.527	40.724.804
NSFR ratio (%)	578,78%	528,21%	518,24%	429,68%	415,91%



Template EU OV1 – Overview of total risk exposure amounts

	Total risk exposure amounts (TREA)		Total own funds requirements
	31/12/2023	31/12/2022	31/12/2023
Credit risk (excluding CCR)	34.209.699	41.360.487	2.736.776
Of which the standardised approach	34.209.699	41.360.487	2.736.776
Of which the Foundation IRB (F-IRB) approach			
Of which slotting approach			
Of which equities under the simple riskweighted approach			
Of which the Advanced IRB (A-IRB) approach			
Counterparty credit risk - CCR			
Of which the standardised approach			
Of which internal model method (IMM)			
Of which exposures to a CCP			
Of which credit valuation adjustment - CVA			
Of which other CCR			
Not applicable			
Not applicable			
Not applicable			
Not applicable			
Not applicable			
Settlement risk	25.877		2.070
Securitisation exposures in the non-trading book (after the cap)			
Of which SEC-IRBA approach			
Of which SEC-ERBA (including IAA)			
Of which SEC-SA approach			
Of which 1250% / deduction			
Position, foreign exchange and commodities risks (Market risk)	1.239.351	1.601.347	99.148
Of which the standardised approach	1.239.351	1.601.347	99.148
Of which IMA			
Large exposures			
Operational risk	19.380.785	18.610.884	1.550.463
Of which basic indicator approach	19.380.785	18.610.884	1.550.463
Of which standardised approach			
Of which advanced measurement approach			
Amounts below the thresholds for deduction (subject to 250% risk weight)			
Not applicable			
Not applicable			
Not applicable			
Not applicable			
<b>Total</b>	<b>54.855.712</b>	<b>61.572.718</b>	<b>4.388.457</b>

**Table EU OVB - Disclosure on governance arrangements**

VAN DE PUT & Co gives every employee equal opportunities, with the focus on talent regardless of gender, age, disability, belief, philosophy, marital status, birth, wealth, political opinion, language, health status, gender identity and expression, physical or genetic characteristics, social, cultural or ethnic origin.



Template EU CC1 - Composition of regulatory own funds

	Amounts	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
<b>Common Equity Tier 1 (CET1) capital: instruments and reserves</b>		
Capital instruments and the related share premium accounts	3.100.000	
of which: Instrument type 1	3.100.000	20900
of which: Instrument type 2		
of which: Instrument type 3		
Retained earnings		
Accumulated other comprehensive income (and other reserves)	16.793.994	21200
Funds for general banking risk		
Amount of qualifying items referred to in Article 484 (3) CRR and the related share premium accounts subject to phase out from CET1		
Minority interests (amount allowed in consolidated CET1)		
Independently reviewed interim profits net of any foreseeable charge or dividend		
<b>Common Equity Tier 1 (CET1) capital before regulatory adjustments</b>	<b>19.893.994</b>	
<b>Common Equity Tier 1 (CET1) capital: regulatory adjustments</b>		
Additional value adjustments (negative amount)		
Intangible assets (net of related tax liability) (negative amount)	- 116.848	10800
Not applicable		
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) CRR are met) (negative amount)		
Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value		
Negative amounts resulting from the calculation of expected loss amounts		
Any increase in equity that results from securitised assets (negative amount)		
Gains or losses on liabilities valued at fair value resulting from changes in own credit standing		
Defined-benefit pension fund assets (negative amount)		
Direct, indirect and synthetic holdings by an institution of own CET1 instruments (negative amount)		
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)		
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)		
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)		
Not applicable		
Exposure amount of the following items which qualify for a RW of 1250%, where the institution opts for the deduction alternative		
of which: qualifying holdings outside the financial sector (negative amount)		
of which: securitisation positions (negative amount)		
of which: free deliveries (negative amount)		
Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)		
Amount exceeding the 17,65% threshold (negative amount)		
of which: direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities		
Not applicable		
of which: deferred tax assets arising from temporary differences		
Losses for the current financial year (negative amount)		
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)		
Not applicable		
Qualifying AT1 deductions that exceed the AT1 items of the institution (negative amount)		
Other regulatory adjustments		
<b>Total regulatory adjustments to Common Equity Tier 1 (CET1)</b>	<b>- 116.848</b>	
<b>Common Equity Tier 1 (CET1) capital</b>	<b>19.777.146</b>	

## Template EU CC1 - Composition of regulatory own funds

	Amounts	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
<b>Additional Tier 1 (AT1) capital: instruments</b>		
Capital instruments and the related share premium accounts		
of which: classified as equity under applicable accounting standards		
of which: classified as liabilities under applicable accounting standards		
Amount of qualifying items referred to in Article 484 (4) CRR and the related share premium accounts subject to phase out from AT1		
Amount of qualifying items referred to in Article 494a(1) CRR subject to phase out from AT1		
Amount of qualifying items referred to in Article 494b(1) CRR subject to phase out from AT1		
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		
of which: instruments issued by subsidiaries subject to phase out		
<b>Additional Tier 1 (AT1) capital before regulatory adjustments</b>		
<b>Additional Tier 1 (AT1) capital: regulatory adjustments</b>		
Direct, indirect and synthetic holdings by an institution of own AT1 instruments (negative amount)		
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)		
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)		
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)		
Not applicable		
Qualifying T2 deductions that exceed the T2 items of the institution (negative amount)		
Other regulatory adjustments to AT1 capital		
<b>Total regulatory adjustments to Additional Tier 1 (AT1) capital</b>		
<b>Additional Tier 1 (AT1) capital</b>		
<b>Tier 1 capital (T1 = CET1 + AT1)</b>	<b>19.777.146</b>	
<b>Tier 2 (T2) capital: instruments</b>		
Capital instruments and the related share premium accounts		
Amount of qualifying items referred to in Article 484(5) CRR and the related share premium accounts subject to phase out from T2 as described in Article 486(4) CRR		
Amount of qualifying items referred to in Article 494a(2) CRR subject to phase out from T2		
Amount of qualifying items referred to in Article 494b(2) CRR subject to phase out from T2		
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		
of which: instruments issued by subsidiaries subject to phase out		
Credit risk adjustments		
<b>Tier 2 (T2) capital before regulatory adjustments</b>		
<b>Tier 2 (T2) capital: regulatory adjustments</b>		
Direct, indirect and synthetic holdings by an institution of own T2 instruments and subordinated loans (negative amount)		
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)		
Direct, indirect and synthetic 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)		
Not applicable		
Direct, indirect and synthetic 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)		
Not applicable		



Template EU CC1 - Composition of regulatory own funds

	Amounts	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
Qualifying eligible liabilities deductions that exceed the eligible liabilities items of the institution (negative amount)		
Other regulatory adjustments to T2 capital		
<b>Total regulatory adjustments to Tier 2 (T2) capital</b>		
<b>Tier 2 (T2) capital</b>		
<b>Total capital (TC = T1 + T2)</b>	<b>19.777.146</b>	
<b>Total Risk exposure amount</b>	<b>54.855.712</b>	
<b>Capital ratios and requirements including buffers</b>		
Common Equity Tier 1 capital	36,05%	
Tier 1 capital	36,05%	
Total capital	36,05%	
Institution CET1 overall capital requirements	8,88%	
of which: capital conservation buffer requirement	2,50%	
of which: countercyclical capital buffer requirement	0,46%	
of which: systemic risk buffer requirement		
of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer requirement		
of which: additional own funds requirements to address the risks other than the risk of excessive leverage	1,42%	
<b>Common Equity Tier 1 capital (as a percentage of risk exposure amount) available after meeting the minimum capital requirements</b>	<b>27,17%</b>	
<b>National minima (if different from Basel III)</b>		
Not applicable		
Not applicable		
Not applicable		
<b>Amounts below the thresholds for deduction (before risk weighting)</b>		
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)		
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)		
Not applicable		
Deferred tax assets arising from temporary differences (amount below 17,65% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met)		
<b>Applicable caps on the inclusion of provisions in Tier 2</b>		
Credit risk adjustments included in T2 in respect of exposures subject to standardised approach (prior to the application of the cap)		
Cap on inclusion of credit risk adjustments in T2 under standardised approach		
Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)		
Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach		
<b>Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2014 and 1 Jan 2022)</b>		
Current cap on CET1 instruments subject to phase out arrangements		
Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)		
Current cap on AT1 instruments subject to phase out arrangements		
Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)		
Current cap on T2 instruments subject to phase out arrangements		
Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)		



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

	Balance sheet as in published financial statements	Reference
<b>Assets - Breakdown by asset classes according to the balance sheet in the published financial statements</b>		
Kas, tegoeden bij centrale banken, postcheque- en girodiensten - ENGELSE VERTALING (2022)	121.747.462	
Vorderingen op kredietinstellingen - ...	8.173.813	
Vorderingen op cliënten	572.849	
Obligaties en andere vastrentende effecten	30.162.962	
Aandelen en andere niet-vastrentende effecten	11.148.493	
Oprichtingskosten en immateriële vaste activa	116.848	3
Materiële vaste activa	2.415.756	
Overige activa	125.500	
Overlopende rekeningen	415.422	
<b>Total assets</b>	<b>174.879.105</b>	
<b>Liabilities - Breakdown by liability classes according to the balance sheet in the published financial statements</b>		
Schulden bij cliënten	153.600.418	
Overige schulden	1.384.693	
Overlopende rekeningen		
<b>Total liabilities</b>	<b>154.985.111</b>	
<b>Shareholders' Equity</b>		
Kapitaal	3.100.000	1
Reserves	16.793.994	2
<b>Total shareholders' equity</b>	<b>19.893.994</b>	





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

Issuer	VAN DE PUT & CO Private Bankers NV
Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	N/A
Public or private placement	Private
Governing law(s) of the instrument	Laws of Belgium
Contractual recognition of write down and conversion powers of resolution authorities	N/A
<i>Regulatory treatment</i>	
Current treatment taking into account, where applicable, transitional CRR rules	Common Equity Tier 1
Post-transitional CRR rules	Common Equity Tier 1
Eligible at solo/(sub-)consolidated/ solo&(sub-)consolidated	Solo
Instrument type (types to be specified by each jurisdiction)	
Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	EUR 19 million
Nominal amount of instrument	EUR 3 million
Issue price	N/A
Redemption price	N/A
Accounting classification	Shareholders' equity
Original date of issuance	N/A
Perpetual or dated	Perpetual
Original maturity date	
Issuer call subject to prior supervisory approval	No
Optional call date, contingent call dates and redemption amount	N/A
Subsequent call dates, if applicable	N/A
<i>Coupons / dividends</i>	
Fixed or floating dividend/coupon	N/A
Coupon rate and any related index	
Existence of a dividend stopper	
Fully discretionary, partially discretionary or mandatory (in terms of timing)	Fully discretionary
Fully discretionary, partially discretionary or mandatory (in terms of amount)	Fully discretionary
Existence of step up or other incentive to redeem	N/A
Noncumulative or cumulative	Noncumulative
Convertible or non-convertible	N/A
If convertible, conversion trigger(s)	N/A
If convertible, fully or partially	N/A
If convertible, conversion rate	N/A
If convertible, mandatory or optional conversion	N/A
If convertible, specify instrument type convertible into	N/A
If convertible, specify issuer of instrument it converts into	N/A
Write-down features	N/A
If write-down, write-down trigger(s)	N/A
If write-down, full or partial	N/A
If write-down, permanent or temporary	N/A
If temporary write-down, description of write-up mechanism	N/A
Type of subordination (only for eligible liabilities)	N/A
Ranking of the instrument in normal insolvency proceedings	N/A
Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	N/A
Non-compliant transitioned features	N/A
If yes, specify non-compliant features	N/A
Link to the full term and conditions of the instrument (signposting)	N/A

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

	General credit exposures		Relevant credit exposures – Market risk		Securitisation exposures Exposure value for non-trading book	Total exposure value	Own fund requirements			Total	Risk-weighted exposure amounts	Own fund requirements weights (%)	Countercyclical buffer rate (%)
	Exposure value under the standardised approach	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			Relevant credit risk exposures - Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book				
BE	10.138.737					10.138.737	811.099			811.099		31,82%	
CH	2.262.671					2.262.671	181.014			181.014		7,10%	
DE	411.386					411.386	32.911			32.911		1,29%	0,75%
DK	384.424					384.424	30.754			30.754		1,21%	2,50%
ES	604.672					604.672	48.374			48.374		1,90%	
FR	6.766.764					6.766.764	541.341			541.341		21,22%	0,50%
GB	805.020					805.020	64.402			64.402		2,53%	2,00%
IE	605.267					605.267	48.421			48.421		1,90%	1,00%
IT	612.484					612.484	48.999			48.999		1,92%	
JE	60.724					60.724	4.858			4.858		0,19%	
JP	402.738					402.738	32.219			32.219		1,26%	
LU	429.925					429.925	34.394			34.394		1,35%	0,50%
NL	1.628.581					1.628.581	130.286			130.286		5,11%	1,00%
SE	2.911.453					2.911.453	232.916			232.916		9,14%	2,00%
US	3.841.942					3.841.942	307.355			307.355		12,06%	
<b>Total</b>	<b>31.866.788</b>					<b>31.866.788</b>	<b>2.549.343</b>			<b>2.549.343</b>		<b>100,0%</b>	<b>0,46%</b>

**Template EU CCyB2 - Amount of institution-specific countercyclical capital buffer**

Total risk exposure amount	54.855.712
Institution specific countercyclical capital buffer rate	0,46%
Institution specific countercyclical capital buffer requirement	252.336



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

	Applicable amount
Total assets as per published financial statements	174.879.105
Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation	
(Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference)	
(Adjustment for temporary exemption of exposures to central banks (if applicable))	
(Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting framework but excluded from the total exposure measure in accordance with point (i) of Article 429a(1) CRR)	
Adjustment for regular-way purchases and sales of financial assets subject to trade date accounting	
Adjustment for eligible cash pooling transactions	
Adjustment for derivative financial instruments	
Adjustment for securities financing transactions (SFTs)	
Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	
(Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital)	
(Adjustment for exposures excluded from the total exposure measure in accordance with point (c) of Article 429a(1) CRR)	
(Adjustment for exposures excluded from the total exposure measure in accordance with point (j) of Article 429a(1) CRR)	
Other adjustments	52.538
<b>Total exposure measure</b>	<b>174.931.643</b>



Template EU LR2 - LRCOM: Leverage ratio common disclosure

	CRR leverage ratio exposures	
	31/12/2023	31/12/2022
<b>On-balance sheet exposures (excluding derivatives and SFTs)</b>		
On-balance sheet items (excluding derivatives, SFTs, but including collateral)	175.048.491	186.974.832
Gross-up for derivatives collateral provided, where deducted from the balance sheet assets pursuant to the applicable accounting framework		
(Deductions of receivables assets for cash variation margin provided in derivatives transactions)		
(Adjustment for securities received under securities financing transactions that are recognised as an asset)		
(General credit risk adjustments to on-balance sheet items)		
(Asset amounts deducted in determining Tier 1 capital)	- 116.848	- 167.264
Total on-balance sheet exposures (excluding derivatives and SFTs)	174.931.643	186.807.568
<b>Derivative exposures</b>		
Replacement cost associated with SA-CCR derivatives transactions (ie net of eligible cash variation margin)		
Derogation for derivatives: replacement costs contribution under the simplified standardised approach		
Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions		
Derogation for derivatives: Potential future exposure contribution under the simplified standardised approach		
Exposure determined under Original Exposure Method		
(Exempted CCP leg of client-cleared trade exposures) (SA-CCR)		
(Exempted CCP leg of client-cleared trade exposures) (simplified standardised approach)		
(Exempted CCP leg of client-cleared trade exposures) (Original Exposure Method)		
Adjusted effective notional amount of written credit derivatives		
(Adjusted effective notional offsets and add-on deductions for written credit derivatives)		
<b>Total derivatives exposures</b>		
<b>Securities financing transaction (SFT) exposures</b>		
Gross SFT assets (with no recognition of netting), after adjustment for sales accounting transactions		
(Netted amounts of cash payables and cash receivables of gross SFT assets)		
Counterparty credit risk exposure for SFT assets		
Derogation for SFTs: Counterparty credit risk exposure in accordance with Articles 429e(5) and 222 CRR		
Agent transaction exposures		
(Exempted CCP leg of client-cleared SFT exposure)		
<b>Total securities financing transaction exposures</b>		
<b>Other off-balance sheet exposures</b>		
Off-balance sheet exposures at gross notional amount		
(Adjustments for conversion to credit equivalent amounts)		
(General provisions deducted in determining Tier 1 capital and specific provisions associated associated with off-balance sheet exposures)		
<b>Off-balance sheet exposures</b>		
<b>Excluded exposures</b>		
(Exposures excluded from the total exposure measure in accordance with point (c) of Article 429a(1) CRR)		
(Exposures exempted in accordance with point (j) of Article 429a(1) CRR (on and off balance sheet))		
(Excluded exposures of public development banks (or units) - Public sector investments)		
(Excluded exposures of public development banks (or units) - Promotional loans)		
(Excluded passing-through promotional loan exposures by non-public development banks (or units))		
(Excluded guaranteed parts of exposures arising from export credits)		
(Excluded excess collateral deposited at triparty agents)		
(Excluded CSD related services of CSD/institutions in accordance with point (o) of Article 429a(1) CRR)		
(Excluded CSD related services of designated institutions in accordance with point (p) of Article 429a(1) CRR)		
(Reduction of the exposure value of pre-financing or intermediate loans)		
(Total exempted exposures)		
<b>Capital and total exposure measure</b>		
Tier 1 capital	19.777.146	18.617.220
Total exposure measure	174.931.643	186.807.568
<b>Leverage ratio</b>		
Leverage ratio (%)	11,31%	9,97%
Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%)	11,31%	9,97%



Template EU LR2 - LRCom: Leverage ratio common disclosure

	CRR leverage ratio exposures	
	31/12/2023	31/12/2022
Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) (%)	11,31%	9,97%
Regulatory minimum leverage ratio requirement (%)	3,00%	3,00%
Additional own funds requirements to address the risk of excessive leverage (%)		
of which: to be made up of CET1 capital		
Leverage ratio buffer requirement (%)		
Overall leverage ratio requirement (%)		
<b>Choice on transitional arrangements and relevant exposures</b>		
Choice on transitional arrangements for the definition of the capital measure		
<b>Disclosure of mean values</b>		
Mean of daily values of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivable		
Quarter-end value of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables		
Total exposure measure (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)		
Total exposure measure (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)		
Leverage ratio (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)		
Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)		

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

	CRR leverage ratio exposures
<b>Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:</b>	
Trading book exposures	
Banking book exposures, of which:	174.931.643
Covered bonds	
Exposures treated as sovereigns	133.728.566
Exposures to regional governments, MDB, international organisations and PSE, not treated as sovereigns	
Institutions	10.490.165
Secured by mortgages of immovable properties	
Template EU CCA - Main features of regulatory own funds instruments and eligible liabilities instruments	47.395
Corporates	16.961.599
Exposures in default	
Other exposures (eg equity, securitisations, and other non-credit obligation assets)	13.703.918

**Table EU LRA: Disclosure of LR qualitative information**

Description of the processes used to manage the risk of excessive leverage:	The bank tracks closely its leverage financing. In the RAF, the leverage ratio is one of the indicators that are systematically included in the periodic reports to management. The RAF limits framework provides for a minimum red zone of 4% and a green zone from 11% upwards. The financial department also reports on this ratio and includes it in all internal reports.
Description of the factors that had an impact on the leverage ratio during the period to which the disclosed leverage ratio refers:	The bank's leverage ratio has risen slightly compared with the previous year owing to the decrease in the on-balance sheet exposures and an increase in CET1.





**Table EU LIQA - Liquidity risk management**

Strategies and processes in the management of the liquidity risk, including policies on diversification in the sources and tenor of planned funding.	The bank has no specific strategy to raise funds. The funds owed to the bank are short term deposits from retail clients that they could use for investment opportunities in the securities market.
Structure and organisation of the liquidity risk management function (authority, statute, other arrangements).	The risk management function is responsible for operational (day-to-day) management of liquidity risk and ensuring continued adherence to Risk Appetite and regulatory limits. He is also responsible for the internal reporting to the management bodies. The internal audit, assures an independent review and challenge of the bank's liquidity (risk) management processes.
A description of the degree of centralisation of liquidity management and interaction between the group's units	Not applicable because the bank has no group units.
Scope and nature of liquidity risk reporting and measurement systems.	The bank tracks closely its liquidity risk. In the RAF, the liquidity coverage ratio, the net stable funding ratio and the asset encumbrance ratio are indicators that are systematically included in the periodic reports to management. The financial department also reports on this ratio's and includes it in all internal reports.
Policies for hedging and mitigating the liquidity risk and strategies and processes for monitoring the continuing effectiveness of hedges and mitigants.	The bank does not involve in the mitigation of liquidity risk via hedging instruments.
An outline of the bank's contingency funding plans.	Trough the internal reporting of the indicators included in the RAF and stress testing, the management bodies are fully aware of the evolving situation.
An explanation of how stress testing is used.	Liquidity stress tests are measured regularly on various maturities with the effect on all the liquidity indicators mentioned in the RAF. The availability of a sufficient liquidity buffer is measured daily by the bank.
A declaration approved by the management body on the adequacy of liquidity risk management arrangements of the institution providing assurance that the liquidity risk management systems put in place are adequate with regard to the institution's profile and strategy.	The bank's ILAAP describes the full set of processes, policies and other mechanisms employed to manage, monitor and control liquidity risks. The ILAAP and associated architecture is under continuous review to ensure it remains appropriate for the nature and extent of liquidity risks to which the bank is exposed.
A concise liquidity risk statement approved by the management body succinctly describing the institution's overall liquidity risk profile associated with the business strategy. This statement shall include key ratios and figures (other than those already covered in the EU LIQ1 template under this ITS ) providing external stakeholders with a comprehensive view of the institution's management of liquidity risk, including how the liquidity risk profile of the institution interacts with the risk tolerance set by the management body.	The bank's liquidity risk profile is very risk-adverse and therefore in line with the low liquidity tolerance set by the management body. Almost 80% of deposits owed to the bank are held in Central Bank money and reflects its ability to sustain a major stress.

**Template EU LIQ1 - Quantitative information of LCR**

Quarter ending on	Total weighted value (average)			
	31/12/2023	30/09/2023	30/06/2023	31/03/2023
Number of data points used in the calculation of averages	12	12	12	12
<b>TOTAL ADJUSTED VALUE</b>				
LIQUIDITY BUFFER	128.205.833	132.132.017	133.429.857	134.400.834
TOTAL NET CASH OUTFLOWS	6.918.134	5.641.749	6.618.842	7.601.020
LIQUIDITY COVERAGE RATIO	2265%	2436%	2193%	1950%

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

Explanations on the main drivers of LCR results and the evolution of the contribution of inputs to the LCR's calculation over time	The main driver of the decrease in the LCR ratio is the decrease of the inflows. This is due to the ALM strategy of the institution. The regulatory required minimum is 100% and the bank's LCR and NSFR are thus well above these minima.
Explanations on the changes in the LCR over time	The LCR is mostly driven by a significantly increase of the net liquidity outflows (+ 57%).
Explanations on the actual concentration of funding sources	The institution is mostly funded by short term deposits from retail clients.
High-level description of the composition of the institution's liquidity buffer.	The liquidity buffer consists of excess monetary reserve element (LCR level 1) and liquid securities (level 2B). The level 1 liquid assets are the most important element of the bank's liquidity buffer.
Derivative exposures and potential collateral calls	Not applicable.
Currency mismatch in the LCR	Most of the activities are denominated in euro. There is a small currency risk, but mostly on closely correlated currencies.
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	Not applicable.



Template EU LIQ2: Net Stable Funding Ratio

	Unweighted value by residual maturity				Weighted value
	No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
Available stable funding (ASF) Items					
Capital items and instruments	19.777.146				19.777.146
Own funds	19.777.146				19.777.146
Other capital instruments					
Retail deposits		152.613.343			140.365.912
Stable deposits		60.278.059			57.264.156
Less stable deposits		92.335.284			83.101.756
Wholesale funding:		300.326			150.163
Operational deposits		273.136			136.568
Other wholesale funding		27.190			13.595
Interdependent liabilities					
Other liabilities:		1.951.830			-
NSFR derivative liabilities					
All other liabilities and capital instruments not included in the above categories		1.951.830			-
Total available stable funding (ASF)					160.293.221
Required stable funding (RSF) Items					
Total high-quality liquid assets (HQLA)					7.645.543
Assets encumbered for a residual maturity of one year or more in a cover pool					
Deposits held at other financial institutions for operational purposes					
Performing loans and securities:		2.071.936		13.410.880	12.435.216
Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut					
Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions					
Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:					
With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk					
Performing residential mortgages, of which:					
With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk					
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		2.071.936		13.410.880	12.435.216
Interdependent assets					
Other assets:		12.155.332			7.645.543
Physical traded commodities					
Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs					
NSFR derivative assets					
NSFR derivative liabilities before deduction of variation margin posted					
All other assets not included in the above categories		12.155.332			7.614.429
Off-balance sheet items					
Total RSF					27.695.188
Net Stable Funding Ratio (%)					578,78%

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

	Gross carrying amount/nominal amount					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions					Accumulated partial write-off	Collateral and financial guarantees received	
	Performing exposures		Non-performing exposures			Performing exposures – accumulated impairment and provisions		Non-performing exposures – accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions				On performing exposures	On non-performing exposures
	Of which stage 1	Of which stage 2	Of which stage 1	Of which stage 2	Of which stage 3	Of which stage 1	Of which stage 2	Of which stage 1	Of which stage 2	Of which stage 3			
Cash balances at central banks and other demand deposits	129.983.757												
Loans and advances	575.020												
Central banks													
General governments													
Credit institutions													
Other financial corporations	16.715												
Non-financial corporations													
Of which SMEs													
Households	52.747												
Debt securities	31.173.501					799.332							
Central banks													
General governments	11.928.321												
Credit institutions													
Other financial corporations	4.037.708												
Non-financial corporations	15.207.472					799.332							
Off-balance-sheet exposures													
Central banks													
General governments													
Credit institutions													
Other financial corporations													
Non-financial corporations													
Households													
Total	799.332												



Template EU CQ1: Credit quality of forborne exposures

	Gross carrying amount/nominal amount of exposures with forbearance measures			Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collateral 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				
Cash balances at central banks and other demand deposits							
Loans and advances							
<i>Central banks</i>							
<i>General governments</i>							
<i>Credit institutions</i>							
<i>Other financial corporations</i>							
<i>Non-financial corporations</i>							
<i>Households</i>							
Debt Securities	400.000			-	399.748		
Loan commitments given							
<b>Total</b>	<b>400.000</b>			<b>-</b>	<b>399.748</b>		



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

	Gross carrying amount/nominal amount											
	Performing exposures				Non-performing exposures							
	Not past due or past due ≤ 30 days	Past due > 30 days ≤ 90 days	Unlikely to pay that are not past due or are past due ≤ 90 days		Past due > 90 days ≤ 180 days	Past due > 180 days ≤ 1 year	Past due > 1 year ≤ 2 years	Past due > 2 years ≤ 5 years	Past due > 5 years ≤ 7 years	Past due > 7 years	Of which defaulted	
Cash balances at central banks and other demand deposits	129.983.757	129.983.757										
Loans and advances	575.020	575.020										
<i>Central banks</i>												
<i>General governments</i>												
<i>Credit institutions</i>												
<i>Other financial corporations</i>	16.715	16.715										
<i>Non-financial corporations</i>												
<i>Of which SMEs</i>												
<i>Households</i>	52.747	52.747										
Debt securities	31.173.501	31.173.501										
<i>Central banks</i>												
<i>General governments</i>	11.928.321	11.928.321										
<i>Credit institutions</i>												
<i>Other financial corporations</i>	4.037.708	4.037.708										
<i>Non-financial corporations</i>	15.207.472	15.207.472										
Off-balance-sheet exposures												
<i>Central banks</i>												
<i>General governments</i>												
<i>Credit institutions</i>												
<i>Other financial corporations</i>												
<i>Non-financial corporations</i>												
<i>Households</i>												
<b>Total</b>	<b>161.732.278</b>	<b>161.732.278</b>										

Template EU CR4 – standardised approach – Credit risk exposure and CRM effects

Exposure classes	Exposures before CCF and before CRM		Exposures post CCF and post CRM		RWAs and RWAs density	
	On-balance-sheet exposures	Off-balance-sheet exposures	On-balance-sheet exposures	Off-balance-sheet exposures	RWAs	RWAs density (%)
Central governments or central banks	133.728.566		133.728.566			0,00%
Regional government or local authorities						
Public sector entities						
Multilateral development banks						
International organisations						
Institutions	10.490.165		10.490.165		2.342.911	22,33%
Corporates	16.961.599		16.961.599		18.127.432	106,87%
Retail	47.395		47.395		35.546	75,00%
Secured by mortgages on immovable property						
Exposures in default						
Exposures associated with particularly high risk						
Covered bonds						
Institutions and corporates with a short-term credit assessment						
Collective investment undertakings						
Equity	11.148.492		11.148.492		11.148.493	100,00%
Other items	2.555.426		2.555.426		2.555.318	100,00%
<b>TOTAL</b>	<b>174.931.643</b>		<b>174.931.643</b>		<b>34.209.700</b>	<b>19,56%</b>



**Template EU MR1 - Market risk under the standardised approach**

	RWEAs
<b>Outright products</b>	1.239.352
Interest rate risk (general and specific)	
Equity risk (general and specific)	
Foreign exchange risk	1.239.352
Commodity risk	
<b>Options</b>	
Simplified approach	
Delta-plus approach	
Scenario approach	
Securitisation (specific risk)	
<b>Total</b>	1.239.352

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

Banking activities	Relevant indicator			Own funds requirements	Risk exposure amount
	31/12/2021	31/12/2022	31/12/2023		
Banking activities subject to basic indicator approach (BIA)	8.180.101	13.105.642	9.723.513	1.550.463	19.380.785
Banking activities subject to standardised (TSA) / alternative standardised (ASA) approaches					
<i>Subject to TSA:</i>					
<i>Subject to ASA:</i>					
Banking activities subject to advanced measurement approaches AMA					

**Template EU AE1 - Encumbered and unencumbered assets**

	Carrying amount of encumbered assets		Fair value of encumbered assets		Carrying amount of unencumbered assets		Fair value of unencumbered assets	
		of which notionally eligible EHQLA and HQLA		of which notionally eligible EHQLA and HQLA		of which EHQLA and HQLA		of which EHQLA and HQLA
<b>Assets of the disclosing institution</b>	<b>189.003</b>				<b>175.086.226</b>	<b>14.033.612</b>		
Equity instruments					11.080.663	10.994.804		
Debt securities					32.001.602	2.975.567	30.871.374	2.856.367
of which: covered bonds								
of which: securitisations								
of which: issued by general governments					11.183.554		11.179.197	
of which: issued by financial corporations					4.596.763		4.226.034	
of which: issued by non-financial corporations					16.220.772	2.973.281	15.453.940	2.814.408
Other assets	189.003				5.354.087			

*The items above are disclosed using median values. Median values are rolling quarterly medians over the previous twelve months and are determined by interpolation.*

**Table EU AE4 - Accompanying narrative information**

The encumbered assets are due to the margin call for LCH.Clearnet and are of very low importance to the institution's business model. This is liquidity held on Eurosystem level and is therefore of very high credit quality.

Most of the equity instruments, debt securities and other assets mentioned in column 060 'Carrying amount of unencumbered assets' in template EU AE1 would not be available for encumbrance in the normal course of its business.

Due to the inexistence of 'collateral received and own debt securities issued' and 'matching liabilities, contingent liabilities or securities lent', templates EU AE2 and EU AE 3 are not disclosed.