

PILLAR 3 DISCLOSURES 31/12/2024

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General provisions

Disclosure reference date:

25/11/2025

Reference period:

31/12/2024

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

| | 31/12/2024 | 30/09/2024 | 30/06/2024 | 31/03/2024 | 31/12/2023 |
|--|-------------|-------------|-------------|-------------|-------------|
| Available own funds (amounts) | | | | | |
| Common Equity Tier 1 (CET1) capital | 18.541.395 | 18.528.792 | 19.802.354 | 19.789.750 | 19.777.146 |
| Tier 1 capital | 18.541.395 | 18.528.792 | 19.802.354 | 19.789.750 | 19.777.146 |
| Total capital | 18.541.395 | 18.528.792 | 19.802.354 | 19.789.750 | 19.777.146 |
| Risk-weighted exposure amounts | | | | | |
| Total risk exposure amount | 49.536.841 | 50.215.547 | 50.566.538 | 53.019.881 | 54.855.712 |
| Capital ratios (as a percentage of risk-weighted exposure amount) | | | | | |
| Common Equity Tier 1 ratio (%) | 37,43% | 36,90% | 39,16% | 37,33% | 36,05% |
| Tier 1 ratio (%) | 37,43% | 36,90% | 39,16% | 37,33% | 36,05% |
| Total capital ratio (%) | 37,43% | 36,90% | 39,16% | 37,33% | 36,05% |
| Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount) | | | | | |
| Additional own funds requirements to address risks other than the risk of excessive leverage (%) | 2,45% | 2,45% | 2,45% | 2,45% | 2,53% |
| of which: to be made up of CET1 capital (percentage points) | 1,38% | 1,38% | 1,38% | 1,38% | 1,42% |
| of which: to be made up of Tier 1 capital (percentage points) | 1,84% | 1,84% | 1,84% | 1,84% | 1,90% |
| Total SREP own funds requirements (%) | 10,45% | 10,45% | 10,45% | 10,45% | 10,53% |
| Combined buffer and overall capital requirement (as a percentage of risk-weighted exposure amount) | | | | | |
| 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 (%) | 0,97% | 0,78% | 0,80% | 0,55% | 0,46% |
| 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 (%) | 3,47% | 3,28% | 3,30% | 3,05% | 2,96% |
| Overall capital requirements (%) | 4,44% | 4,05% | 4,09% | 3,60% | 3,42% |
| CET1 available after meeting the total SREP own funds requirements (%) | 26,98% | 26,45% | 28,71% | 26,88% | 25,52% |
| Leverage ratio | | | | | |
| Total exposure measure | 156.520.374 | 166.405.716 | 160.341.512 | 145.585.880 | 174.931.643 |
| Leverage ratio (%) | 11,85% | 11,13% | 12,35% | 13,59% | 11,31% |
| Additional own funds requirements to address the risk of excessive leverage (as a percentage of total exposure measure) | | | | | |
| 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% |
| Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure) | | | | | |
| 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% |
| Liquidity Coverage Ratio | | | | | |
| Total high-quality liquid assets (HQLA) (Weighted value -average) | 130.716.794 | 136.960.231 | 132.208.299 | 115.906.358 | 140.782.307 |
| Cash outflows - Total weighted value | 14.095.039 | 17.497.699 | 16.371.559 | 13.932.232 | 16.471.440 |
| Cash inflows - Total weighted value | 6.245.750 | 8.274.458 | 5.908.478 | 6.113.283 | 8.839.292 |
| Total net cash outflows (adjusted value) | 7.849.289 | 9.223.240 | 10.463.082 | 7.818.949 | 7.632.147 |
| Liquidity coverage ratio (%) | 1665,33% | 1484,95% | 1263,57% | 1482,38% | 1844,60% |
| Net Stable Funding Ratio | | | | | |
| Total available stable funding | 140.229.826 | 146.666.066 | 143.177.108 | 132.203.052 | 160.293.221 |
| Total required stable funding | 22.064.454 | 24.453.110 | 23.397.938 | 24.958.998 | 27.695.188 |
| NSFR ratio (%) | 635,55% | 599,78% | 611,92% | 529,68% | 578,78% |



Template EU OV1 – Overview of total risk exposure amounts

| | Total risk exposure amounts (TREA) | | Total own funds requirements |
|--|---------------------------------------|-------------------|---------------------------------|
| | 31/12/2024 | 31/12/2023 | 31/12/2024 |
| Credit risk (excluding CCR) | 27.122.761 | 34.209.699 | 2.169.821 |
| Of which the standardised approach | 27.122.761 | 34.209.699 | 2.169.821 |
| 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 | - |
| 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) | 1.481.638 | 1.239.351 | 118.531 |
| Of which the standardised approach | 1.481.638 | 1.239.351 | 118.531 |
| Of which IMA | | | |
| Large exposures | | | |
| Operational risk | 20.932.442 | 19.380.785 | 1.674.595 |
| Of which basic indicator approach | 20.932.442 | 19.380.785 | 1.674.595 |
| 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 | | | |
| Total | 49.536.841 | 54.855.712 | 3.962.947 |

Table EU OVB - Disclosure on governance arrangements

The management body of Van de Put & Co Privaatbankiers consists of eight members, each holding one directorship within the institution. The selection and appointment of board members follow a rigorous recruitment policy based on "Fit & Proper" principles, which consider age, experience, professional background, and complementarity. Candidates must demonstrate relevant expertise in the banking sector, preferably in private banking, and comply with all legal requirements for reliability and competence. The board maintains a skills matrix and conducts annual evaluations to ensure that its collective knowledge and expertise remain appropriate and diverse.

Diversity is a key consideration in the composition of the management body. The institution aims for at least 25% representation of each gender and seeks a balanced mix of professional backgrounds and ages. The diversity policy is reviewed annually, with progress documented and reported to the supervisory authority.

Regarding risk oversight, the institution has established a combined Risk and Audit Committee, composed of non-executive directors, with at least half being independent. This committee meets at least quarterly and additionally as needed to address risk management and audit matters. The flow of risk information to the management body is structured and transparent: the risk management function provides comprehensive reports on significant and potential risks, and the board reviews the risk strategy and tolerance at least annually. Internal control and compliance functions have direct access to both the board and the Risk and Audit Committee, ensuring timely and effective communication of risk-related issues.

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 |
|---|-------------------|--|
| Common Equity Tier 1 (CET1) capital: instruments and reserves | | |
| 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) | 15.507.828 | 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 | | |
| Common Equity Tier 1 (CET1) capital before regulatory adjustments | 18.607.828 | |
| Common Equity Tier 1 (CET1) capital: regulatory adjustments | | |
| Additional value adjustments (negative amount) | | |
| Intangible assets (net of related tax liability) (negative amount) | - 66.433 | 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 | | |
| Total regulatory adjustments to Common Equity Tier 1 (CET1) | - 66.433 | |
| Common Equity Tier 1 (CET1) capital | 18.541.395 | |

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 |
|---|-------------------|--|
| Additional Tier 1 (AT1) capital: instruments | | |
| 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 | | |
| Additional Tier 1 (AT1) capital before regulatory adjustments | | |
| Additional Tier 1 (AT1) capital: regulatory adjustments | | |
| 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 | | |
| Total regulatory adjustments to Additional Tier 1 (AT1) capital | | |
| Additional Tier 1 (AT1) capital | | |
| Tier 1 capital (T1 = CET1 + AT1) | 18.541.395 | |
| Tier 2 (T2) capital: instruments | | |
| 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 | | |
| Tier 2 (T2) capital before regulatory adjustments | | |
| Tier 2 (T2) capital: regulatory adjustments | | |
| 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 | | |
| Total regulatory adjustments to Tier 2 (T2) capital | | |
| Tier 2 (T2) capital | | |
| Total capital (TC = T1 + T2) | 18.541.395 | |
| Total Risk exposure amount | 49.536.841 | |
| Capital ratios and requirements including buffers | | |
| Common Equity Tier 1 capital | 37,43% | |
| Tier 1 capital | 37,43% | |
| Total capital | 37,43% | |
| Institution CET1 overall capital requirements | 9,35% | |
| of which: capital conservation buffer requirement | 2,50% | |
| of which: countercyclical capital buffer requirement | 0,97% | |
| 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 | 1,38% | |
| Common Equity Tier 1 capital (as a percentage of risk exposure amount) available after meeting the minimum capital requirements | 28,08% | |
| National minima (if different from Basel III) | | |
| Not applicable | | |
| Not applicable | | |
| Not applicable | | |
| Amounts below the thresholds for deduction (before risk weighting) | | |
| 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) | | |
| Applicable caps on the inclusion of provisions in Tier 2 | | |
| 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 | | |
| Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2014 and 1 Jan 2022) | | |
| 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 |
|--|--|-----------|
| Assets - Breakdown by asset classes according to the balance sheet in the published financial statements | | |
| Kas, tegoeden bij centrale banken, postcheque- en girodiensten - ENGELSE VERTALING (2022) | 110.596.501 | |
| Vorderingen op kredietinstellingen - ... | 5.453.041 | |
| Vorderingen op cliënten | 744.242 | |
| Obligaties en andere vastrentende effecten | 25.727.753 | |
| Aandelen en andere niet-vastrentende effecten | 10.916.149 | |
| Oprichtingskosten en immateriële vaste activa | 66.433 | 3 |
| Materiële vaste activa | 2.359.139 | |
| Overige activa | 303.791 | |
| Overlopende rekeningen | 294.371 | |
| Total assets | 156.461.420 | |
| Liabilities - Breakdown by liability classes according to the balance sheet in the published financial statements | | |
| Schulden bij cliënten | 133.091.447 | |
| Overige schulden | 4.742.374 | |
| Overlopende rekeningen | | |
| Voorzieningen en uitgestelde belastingen | 19.573 | |
| Total liabilities | 137.853.394 | |
| Shareholders' Equity | | |
| Kapitaal | 3.100.000 | 1 |
| Reserves | 15.507.828 | 2 |
| Overgedragen winst | 198 | |
| Total shareholders' equity | 18.608.026 | |

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 | 9.299.525 | | 3.979 | | | 9.303.504 | 743.962 | 318 | | 744.280 | | 36,72% | 1,00% |
| CH | 2.334.572 | | | | | 2.334.572 | 186.766 | | | 186.766 | | 9,21% | |
| DE | 1.048 | | | | | 1.048 | 84 | | | 84 | | 0,00% | 0,75% |
| FR | 5.099.488 | | | | | 5.099.488 | 407.959 | | | 407.959 | | 20,13% | 1,00% |
| GB | 401.065 | | | | | 401.065 | 32.085 | | | 32.085 | | 1,58% | 2,00% |
| IE | 604.185 | | | | | 604.185 | 48.335 | | | 48.335 | | 2,38% | 1,50% |
| IT | 409.407 | | | | | 409.407 | 32.753 | | | 32.753 | | 1,62% | |
| JP | 403.190 | | | | | 403.190 | 32.255 | | | 32.255 | | 1,59% | |
| LU | 405.327 | | | | | 405.327 | 32.426 | | | 32.426 | | 1,60% | 0,50% |
| NL | 1.241.195 | | | | | 1.241.195 | 99.296 | | | 99.296 | | 4,90% | 2,00% |
| SE | 2.913.775 | | | | | 2.913.775 | 233.102 | | | 233.102 | | 11,50% | 2,00% |
| US | 2.221.075 | | | | | 2.221.075 | 177.686 | | | 177.686 | | 8,77% | |
| Total | 25.333.852 | | | | | 25.337.830 | 2.026.708 | | | 2.027.026 | | 100,0% | 0,97% |

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

| | |
|---|------------|
| Total risk exposure amount | 49.536.841 |
| Institution specific countercyclical capital buffer rate | 0,97% |
| Institution specific countercyclical capital buffer requirement | 480.507 |

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

| | Applicable amount |
|--|--------------------|
| Total assets as per published financial statements | 156.461.420 |
| 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 | 58.954 |
| Total exposure measure | 156.520.374 |



Template EU LR2 - LRCom: Leverage ratio common disclosure

| | CRR leverage ratio exposures | |
|--|------------------------------|-------------|
| | 31/12/2024 | 31/12/2023 |
| On-balance sheet exposures (excluding derivatives and SFTs) | | |
| On-balance sheet items (excluding derivatives, SFTs, but including collateral) | 156.586.807 | 175.048.491 |
| 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) | - 66.433 | - 116.848 |
| Total on-balance sheet exposures (excluding derivatives and SFTs) | 156.520.374 | 174.931.643 |
| Derivative exposures | | |
| 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) | | |
| Total derivatives exposures | | |
| Securities financing transaction (SFT) exposures | | |
| 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) | | |
| Total securities financing transaction exposures | | |
| Other off-balance sheet exposures | | |
| 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) | | |
| Off-balance sheet exposures | | |
| Excluded exposures | | |
| (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) | | |
| Capital and total exposure measure | | |
| Tier 1 capital | 18.541.395 | 19.777.146 |
| Total exposure measure | 156.520.374 | 174.931.643 |
| Leverage ratio | | |
| Leverage ratio (%) | 11,85% | 11,31% |
| Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%) | 11,85% | 11,31% |



Template EU LR2 - LRCom: Leverage ratio common disclosure

| | CRR leverage ratio exposures | |
|---|------------------------------|------------|
| | 31/12/2024 | 31/12/2023 |
| Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) (%) | 11,85% | 11,31% |
| 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 (%) | | |
| Choice on transitional arrangements and relevant exposures | | |
| Choice on transitional arrangements for the definition of the capital measure | | |
| Disclosure of mean values | | |
| 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 |
|--|------------------------------|
| Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which: | |
| Trading book exposures | |
| Banking book exposures, of which: | 156.520.374 |
| Covered bonds | |
| Exposures treated as sovereigns | 123.601.798 |
| Exposures to regional governments, MDB, international organisations and PSE, not treated as sovereigns | |
| Institutions | 7.700.932 |
| Secured by mortgages of immovable properties | |
| Template EU CCA - Main features of regulatory own funds instruments and eligible liabilities instruments | 154.720 |
| Corporates | 11.682.982 |
| Exposures in default | |
| Other exposures (eg equity, securitisations, and other non-credit obligation assets) | 13.379.942 |

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 risk 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) | | | |
|---|--------------------------------|-------------|-------------|-------------|
| | 31/12/2024 | 30/09/2024 | 30/06/2024 | 31/03/2024 |
| Number of data points used in the calculation of averages | 12 | 12 | 12 | 12 |
| TOTAL ADJUSTED VALUE | | | | |
| LIQUIDITY BUFFER | 128.837.866 | 130.974.982 | 131.699.440 | 133.884.222 |
| TOTAL NET CASH OUTFLOWS | 8.808.102 | 8.848.767 | 8.867.051 | 8.426.484 |
| LIQUIDITY COVERAGE RATIO | 1480% | 1506% | 1517% | 1658% |

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 an increase of the net liquidity outflows. |
| 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 | 18.541.395 | | | | 18.541.395 |
| Own funds | 18.541.395 | | | | 18.541.395 |
| Other capital instruments | | | | | |
| Retail deposits | | 131.960.582 | | | 121.647.919 |
| Stable deposits | | 57.667.918 | | | 54.784.522 |
| Less stable deposits | | 74.292.664 | | | 66.863.397 |
| Wholesale funding: | | 81.023 | | | 40.511 |
| Operational deposits | | 41.997 | | | 20.998 |
| Other wholesale funding | | 39.027 | | | 19.513 |
| Interdependent liabilities | | | | | |
| Other liabilities: | | 2.057.907 | | | - |
| NSFR derivative liabilities | | | | | |
| All other liabilities and capital instruments not included in the above categories | | 2.057.907 | | | - |
| Total available stable funding (ASF) | | | | | 140.229.826 |
| Required stable funding (RSF) Items | | | | | |
| Total high-quality liquid assets (HQLA) | | | | | 7.541.178 |
| 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: | | 1.204.277 | | 9.028.912 | 8.276.714 |
| 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 | | 1.204.277 | | 9.028.912 | 8.276.714 |
| Interdependent assets | | | | | |
| Other assets: | | 9.469.029 | | | 6.246.563 |
| 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 | | 9.469.029 | | | 6.246.563 |
| Off-balance sheet items | | | | | |
| Total RSF | | | | | 22.064.454 |
| Net Stable Funding Ratio (%) | | | | | 635,55% |

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 2 | Of which stage 3 | | Of which stage 1 | Of which stage 2 | | Of which stage 2 | Of which stage 3 | | | | | |
| Cash balances at central banks and other demand deposits | 116.084.681 | | | | | | | | | | | | | | | | |
| Loans and advances | 745.950 | | | | | | | | | | | | | | | | |
| <i>Central banks</i> | | | | | | | | | | | | | | | | | |
| <i>General governments</i> | | | | | | | | | | | | | | | | | |
| <i>Credit institutions</i> | 733 | | | | | | | | | | | | | | | | |
| <i>Other financial corporations</i> | 408.285 | | | | | | | | | | | | | | | | |
| <i>Non-financial corporations</i> | | | | | | | | | | | | | | | | | |
| <i>Of which SMEs</i> | | | | | | | | | | | | | | | | | |
| <i>Households</i> | 336.932 | | | | | | | | | | | | | | | | |
| Debt securities | 26.682.676 | | | | | | 798.952 | | | | | | | | | | |
| <i>Central banks</i> | | | | | | | | | | | | | | | | | |
| <i>General governments</i> | 12.709.493 | | | | | | | | | | | | | | | | |
| <i>Credit institutions</i> | | | | | | | | | | | | | | | | | |
| <i>Other financial corporations</i> | 3.648.339 | | | | | | | | | | | | | | | | |
| <i>Non-financial corporations</i> | 10.324.844 | | | | | | 798.952 | | | | | | | | | | |
| 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> | | | | | | | | | | | | | | | | | |
| Total | 798.952 | | | | | | | | | | | | | | | | |

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 | | | - | 400.000 | | |
| Loan commitments given | | | | | | | |
| Total | 400.000 | | | - | 400.000 | | |



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 | 116.084.681 | 116.084.681 | | | | | | | | | |
| Loans and advances | 745.950 | 745.950 | | | | | | | | | |
| <i>Central banks</i> | | | | | | | | | | | |
| <i>General governments</i> | | | | | | | | | | | |
| <i>Credit institutions</i> | 733 | 733 | | | | | | | | | |
| <i>Other financial corporations</i> | 408.285 | 408.285 | | | | | | | | | |
| <i>Non-financial corporations</i> | | | | | | | | | | | |
| <i>Of which SMEs</i> | | | | | | | | | | | |
| <i>Households</i> | 336.932 | 336.932 | | | | | | | | | |
| Debt securities | 26.682.676 | 26.682.676 | | | | | | | | | |
| <i>Central banks</i> | | | | | | | | | | | |
| <i>General governments</i> | 12.709.493 | 12.709.493 | | | | | | | | | |
| <i>Credit institutions</i> | | | | | | | | | | | |
| <i>Other financial corporations</i> | 3.648.339 | 3.648.339 | | | | | | | | | |
| <i>Non-financial corporations</i> | 10.324.844 | 10.324.844 | | | | | | | | | |
| 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> | | | | | | | | | | | |
| Total | 143.513.308 | 143.513.308 | | | | | | | | | |

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 | 123.601.798 | | 123.601.798 | | | 0,00% |
| Regional government or local authorities | | | | | | |
| Public sector entities | | | | | | |
| Multilateral development banks | | | | | | |
| International organisations | | | | | | |
| Institutions | 7.700.932 | | 7.700.932 | | 1.784.931 | 23,18% |
| Corporates | 11.682.982 | | 11.682.982 | | 11.841.865 | 101,36% |
| Retail | 154.720 | | 154.720 | | 116.040 | 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 | 10.916.149 | | 10.916.149 | | 10.916.149 | 100,00% |
| Other items | 2.463.793 | | 2.463.793 | | 2.463.777 | 100,00% |
| TOTAL | 156.520.374 | | 156.520.374 | | 27.122.761 | 17,33% |

Template EU MR1 - Market risk under the standardised approach

| | RWEAs |
|---|-----------|
| Outright products | 1.481.638 |
| Interest rate risk (general and specific) | |
| Equity risk (general and specific) | |
| Foreign exchange risk | 1.481.638 |
| Commodity risk | |
| Options | |
| Simplified approach | |
| Delta-plus approach | |
| Scenario approach | |
| Securitisation (specific risk) | |
| Total | 1.481.638 |

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

| Banking activities | Relevant indicator | | | Own funds requirements | Risk exposure amount |
|--|--------------------|------------|------------|------------------------|----------------------|
| | 31/12/2022 | 31/12/2023 | 31/12/2024 | | |
| Banking activities subject to basic indicator approach (BIA) | 13.105.642 | 9.723.513 | 10.662.753 | 1.674.595 | 20.932.442 |
| 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 | | | | | |

Table EU REMA - Remuneration policy

Institutions shall describe the main elements of their remuneration policies and how they implement these policies. In particular, the following elements, where relevant, shall be described:

Qualitative disclosures
Oversight Bodies and Policy Scope

Remuneration policy is overseen by the Board of Directors (BoD), which acts as the Remuneration Committee. The BoD consists of eight members (three executive, five non-executive, with at least half of non-executives independent). The BoD meets quarterly and annually reviews the remuneration policy. No external consultants were engaged for remuneration matters in the last financial year. The policy applies to all staff, including identified staff, across all business lines and locations; the bank has no subsidiaries or branches in third countries. Identified staff includes directors, the secretary-general, and key control function holders (risk and compliance).

Design and Structure of Remuneration System

Remuneration is primarily fixed, with limited variable components. The BoD proposes remuneration for directors and the secretary-general, subject to shareholder approval. The Executive Committee (EC) determines remuneration for other staff within BoD guidelines. Performance measurement is qualitative, based on individual contribution and overall bank results, with no direct link to commercial targets. Internal control staff (risk and compliance) are remunerated independently of the business units they oversee. No guaranteed variable remuneration or severance payments exceeding legal requirements are awarded.

Risk Considerations in Remuneration

The bank's remuneration system is risk-averse, designed to discourage excessive risk-taking. Variable remuneration is modest and not linked to sales or trading performance. The risk management function is actively involved in policy design and review, ensuring alignment with the bank's risk profile and strategy.

Fixed/Variable Remuneration Ratios

Fixed remuneration constitutes the majority of total pay. Variable remuneration is limited, discretionary, and does not exceed one-third of total annual pay for identified staff, with a cap of €20,000. No remuneration is paid in shares, options, or deferred instruments.

Linking Performance and Remuneration

Performance criteria are qualitative, focusing on individual effort, contribution to bank objectives, and overall results. Variable remuneration, where awarded, is based on discretionary assessment by the EC and is not tied to commercial or risk-taking targets. No instruments (shares, options) are used for variable pay. If performance metrics are weak, variable remuneration is reduced or not awarded.

Long-Term Performance Adjustments

The bank does not apply deferral, retention, or vesting periods for variable remuneration, as variable pay is limited and paid in cash. No malus or clawback provisions are in place, and no shareholding requirements apply to identified staff.

Variable Components and Non-Cash Benefits

Variable remuneration is discretionary and based on qualitative performance indicators. No non-cash instruments (shares, options, etc.) are awarded. Employees receive standard benefits such as pension, insurance, meal vouchers, and company vehicles or bicycles.

Remuneration of Management Body/Senior Management

Upon request, the bank can disclose total remuneration for each member of the BoD and senior management. Remuneration for non-executive directors is fixed and equal, except for the chair, who receives a higher fee. Executive directors are remunerated via the EC.

Derogations under Article 94(3) CRD

The bank does not benefit from derogations under Article 94(3) CRD.

Quantitative Information for Large Institutions

As a small institution, Van de Put & Co Privaatbankiers is not subject to large institution quantitative disclosure requirements under Article 450(2) CRR.

Table EU AE4 - Accompanying narrative information

There are currently no encumbered assets.

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.