

Bank of Ireland Group plc
Year end Pillar 3 Disclosures
December 2023

This document contains forward-looking statements with respect to certain of Bank of Ireland Group plc (the 'Company' or 'BOIG plc') and its subsidiaries' (collectively the 'Group' or 'BOIG plc Group') plans and its current goals and expectations relating to its future financial condition and performance, the markets in which it operates and its future capital requirements. These forward-looking statements often can be identified by the fact that they do not relate only to historical or current facts. Generally, but not always, words such as 'may,' 'could,' 'should,' 'will,' 'expect,' 'intend,' 'estimate,' 'anticipate,' 'assume,' 'believe,' 'plan,' 'seek,' 'continue,' 'target,' 'goal,' 'would,' or their negative variations or similar expressions identify forward-looking statements, but their absence does not mean that a statement is not forward-looking.

Examples of forward-looking statements include, among others: statements regarding the Group's near term and longer term future capital requirements and ratios, loan to deposit ratios, expected impairment charges, the level of the Group's assets, the Group's financial position, future income, business strategy, projected costs, margins, future payments of dividends, future share buybacks, the implementation of changes in respect of certain of the Group's pension schemes, estimates of capital expenditures, discussions with Irish, United Kingdom, European and other regulators, plans and objectives for future operations, and the continued impact of Russia's invasion of Ukraine and the Israeli-Palestinian conflict particularly on certain of the above issues and generally on the global and domestic economies. Such forward-looking statements are inherently subject to risks and uncertainties, and hence actual results may differ materially from those expressed or implied by such forward-looking statements.

Nothing in this document should be considered to be a forecast of future profitability, dividend forecast or financial position of the Group and none of the information in this document is or is intended to be a profit forecast, dividend forecast or profit estimate. Any forward-looking statement speaks only at the date it is made. The Group does not undertake to release publicly any revision to these forward-looking statements to reflect events, circumstances or unanticipated events occurring after the date hereof.

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The purpose of the Pillar 3 disclosures is to disclose information in accordance with the scope of application of CRD IV requirements for the Group, particularly covering capital requirements and resources, credit risk, counterparty credit risk, information on securitisation activity, market risk, operational risk, liquidity risk, encumbered / unencumbered assets, leverage ratio, the Group's remuneration disclosures and ESG risk. CRD IV in the context of this document describes the package CRR as amended, CRD IV as amended and regulatory and technical standards.

These disclosures represent the annual Pillar 3 disclosures of Bank of Ireland Group plc ('the Group') as at 31 December 2023. They have been prepared in accordance with the requirements of the Capital Requirements Directive & Regulation (CRD IV).

It should be noted that while some quantitative information in this document is based on financial data contained in the Group's Annual Report 31 December 2023, the majority of the quantitative data is sourced from the Group regulatory platform and is calculated according to regulatory requirements.

The difference between the accounting data and information sourced from the Group's regulatory reporting platform is most evident for credit risk disclosures where credit exposure under CRD IV unlike financial statement information, includes potential future drawings of committed credit lines as well as other technical differences. Pillar 3 quantitative data is thus not always directly comparable with the quantitative data contained in the Group's Annual Report 31 December 2023.

Some details of the key differences between the Group's accounting and regulatory exposures are set out in Table 1.5.

Article 432(1) of the CRR and the EBA Guidelines on Materiality, Proportionality and Confidentiality and on Disclosure Frequency, allow for the omission of certain elements of information from Pillar 3 disclosure on the basis of materiality. As set out in Appendix II - CRR Roadmap, the Group does not disclose information on the following CRR Articles on the basis of materiality: Article 442(e).

Frequency

Under the updated CRR, the frequency of disclosures is now determined by the size of institution per Article 433. The Group is classified as a listed "large institution" as it meets certain conditions laid out in Article 4. The Group will disclose the requirements as outlined under Article 433a for a listed large institution and at the frequency required.

Verification

Information which is sourced from the Group's Annual Report 31 December 2023 may be subject to audit by the Group's external auditors and is subject to both internal and external review, along with appropriate governance procedures. The Pillar 3 document is subject to a robust governance process including final approval by the Group Audit Committee (GAC).

Media

Copies of the Group's Pillar 3 Disclosures can be obtained from the Group's website at www.bankofireland.com.

Policy

The Group Financial Controller has approved the Group's Pillar Disclosure Policy which sets out how the Group complies with the Pillar 3 disclosure requirements. The policy sets out the overall approach to disclosure including inter alia frequency and method of disclosure, type of information to be disclosed, data sources and verification of disclosures, as well as setting out internal controls and procedures to be followed.

Attestation by Board member

"I confirm that Bank of Ireland Group's Pillar 3 disclosures for 31 December 2023 to the best of my knowledge, comply with Part Eight of the CRR and have been prepared in accordance with the Group's Pillar 3 Disclosure Policy".

Mark Spain

Group Chief Financial Officer

As per Article 447, points (a) to (g) and Article 438, point (b), Table 1.1 provides a summary of the main prudential and regulatory information and ratios covered by the CRR on a transitional basis. It also includes information on Pillar 2 requirements.

Table 1.1 - EU KM1 - Key metrics - Regulatory basis

	a	b	c	d	e	
	December	September	June	March	December	
	2023 ¹	2023	2023 ¹	2023	2022 ¹	
Available own funds (amounts)						
1	Common equity tier 1 (CET1) (€m)	7,636	7,620	7,780	7,223	7,681
2	Tier 1 (€m)	8,611	8,595	8,755	8,198	8,656
3	Total capital (€m)	10,091	10,076	10,238	9,673	10,128
Risk-weighted exposure amounts						
4	Total RWA (€m)	52,556	52,691	52,015	51,284	47,616
Capital ratios (as a percentage of risk-weighted exposure amount)						
5	Common equity tier 1 ratio (%)	14.53%	14.46%	14.96%	14.09%	16.13%
6	Tier 1 ratio (%)	16.38%	16.31%	16.83%	15.99%	18.18%
7	Total capital ratio (%)	19.20%	19.12%	19.68%	18.86%	21.27%
Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)						
EU 7a	Additional own funds requirements to address risks other than the risk of excessive leverage (%)	2.25%	2.25%	2.25%	2.25%	2.25%
	of which:					
EU 7b	to be made up of CET1 capital (percentage points)	1.27%	1.27%	1.27%	1.27%	1.27%
EU 7c	to be made up of Tier 1 capital (percentage points)	1.69%	1.69%	1.69%	1.69%	1.69%
EU 7d	Total SREP own funds requirements (%)	10.25%	10.25%	10.25%	10.25%	10.25%
Combined buffer and overall capital requirement (as a percentage of risk-weighted exposure amount)						
8	Capital conservation buffer (%)	2.50%	2.50%	2.50%	2.50%	2.50%
EU 8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	-	-	-	-	-
9	Institution specific countercyclical capital buffer (%)	1.15%	0.85%	0.60%	0.27%	0.27%
EU 9a	Systemic risk buffer (%)	-	-	-	-	-
10	Global Systemically Important Institution buffer (%)	-	-	-	-	-
EU 10a	Other Systemically Important Institution buffer (%)	1.50%	1.50%	1.50%	1.50%	1.50%
11	Combined buffer requirement (%)	5.15%	4.85%	4.60%	4.27%	4.27%
EU 11a	Overall capital requirements (%)	15.40%	15.10%	14.85%	14.52%	14.52%
12	CET1 available after meeting the total SREP own funds requirements (%)	8.70%	8.62%	9.14%	8.32%	10.37%
Leverage ratio						
13	Total exposure measure	134,192	131,140	133,230	132,896	130,146
14	Leverage ratio (%)	6.42%	6.55%	6.57%	6.17%	6.65%
Additional own funds requirements to address the risk of excessive leverage (as a percentage of total exposure measure)						
EU 14a	Additional own funds requirements to address the risk of excessive leverage (%)	-	-	-	-	-
	of which:					
EU 14b	to be made up of CET1 capital (percentage points)	-	-	-	-	-
EU 14c	Total SREP leverage ratio requirements (%)	3.00%	3.00%	3.00%	3.00%	3.00%
Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)						
EU 14d	Leverage ratio buffer requirement (%)	-	-	-	-	-
EU 14e	Overall leverage ratio requirement (%)	3.00%	3.00%	3.00%	3.00%	3.00%
Liquidity Coverage Ratio						
15	Total high-quality liquid assets (HQLA) (Weighted value -average)	36,561	38,026	39,106	39,145	37,780
EU 16a	Cash outflows - Total weighted value	20,583	20,526	20,228	19,715	18,629
EU 16b	Cash inflows - Total weighted value	1,028	1,063	1,088	977	1,028
16	Total net cash outflows (adjusted value)	19,555	19,463	19,140	18,738	17,601
17	Liquidity coverage ratio (%)	187.44%	196.33%	205.64%	210.30%	214.37%
Net Stable Funding Ratio						
18	Total available stable funding	103,752	101,805	101,983	101,679	99,799
19	Total required stable funding	65,983	66,724	66,566	66,145	61,082
20	NSFR ratio (%)	157.24%	152.6%	153.2%	153.7%	163.4%

¹ The Group capital ratios have been presented including the retained profits in 2023 and 2022, availing of the regulatory profit verification process.

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As per Article 473a and Article 468, Table 1.2 shows key metrics as required by the EBA/GL/2020/12 relating to the impact if the IFRS 9 transitional arrangements had not been applied. BOI elected to take advantage of the static and dynamic elements of the transitional capital rules in respect of expected credit losses introduced in 2018. The effect of this is to mitigate the impact on capital in adverse conditions.

Table 1.2 - IFRS 9-FL: Key metrics - Regulatory basis

	a	b	c	d	e	
	December 2023 ¹	September 2023	June 2023 ¹	March 2023	December 2022 ¹	
Available capital						
1	Common equity tier 1 (CET1) (€m)	7,636	7,620	7,780	7,223	7,681
2	Common equity tier 1 (CET1) capital as if IFRS9 or analogous ECLs transitional arrangements had not been applied (€m)	7,599	7,599	7,764	7,211	7,651
2a	Common equity tier 1 (CET1) capital as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied (€m) ²	7,636	7,620	7,780	7,223	7,681
3	Tier 1 (€m)	8,611	8,595	8,755	8,198	8,656
4	Tier 1 capital as if IFRS9 or analogous ECLs transitional arrangements had not been applied (€m)	8,574	8,574	8,739	8,186	8,626
4a	Tier 1 capital as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied (€m) ²	8,611	8,595	8,755	8,198	8,656
5	Total capital (€m)	10,091	10,076	10,238	9,673	10,128
6	Total capital as if IFRS9 or analogous ECLs transitional arrangements had not been applied (€m)	10,054	10,055	10,223	9,661	10,098
6a	Total capital as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied (€m) ²	10,091	10,076	10,238	9,673	10,128
Risk weighted assets						
7	Total RWA (€m)	52,556	52,691	52,015	51,284	47,616
8	Total risk-weighted assets as if IFRS9 or analogous ECLs transitional arrangements had not been applied (€m)	52,519	52,670	52,000	51,272	47,585
Risk-based capital ratios as a % of RWA						
9	Common equity tier 1 ratio (%)	14.53%	14.46%	14.96%	14.09%	16.13%
10	Common equity tier 1 ratio (%) as if IFRS9 or analogous ECLs transitional arrangements had not been applied	14.47%	14.43%	14.93%	14.06%	16.08%
10a	Common equity tier 1 ratio (%) as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied ²	14.53%	14.46%	14.96%	14.09%	16.13%
11	Tier 1 ratio (%)	16.38%	16.31%	16.83%	15.99%	18.18%
12	Tier 1 ratio (%) as if IFRS9 or analogous ECLs transitional arrangements had not been applied	16.33%	16.28%	16.81%	15.97%	18.13%
12a	Tier 1 ratio (%) as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied ²	16.38%	16.31%	16.83%	15.99%	18.18%
13	Total capital ratio (%)	19.20%	19.12%	19.68%	18.86%	21.27%
14	Total capital ratio (%) as if IFRS9 or analogous ECLs transitional arrangements had not been applied	19.14%	19.09%	19.66%	18.84%	21.22%
14a	Total capital ratio (%) as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied ²	19.20%	19.12%	19.68%	18.86%	21.27%
Leverage ratio						
15	Total Leverage ratio exposure measure (€m)	134,192	131,140	133,230	132,896	130,146
16	Leverage ratio (%)	6.42%	6.55%	6.57%	6.17%	6.65%
17	Leverage ratio (%) as if IFRS9 or analogous ECLs transitional arrangements had not been applied	6.39%	6.54%	6.56%	6.16%	6.63%
17a	Leverage ratio (%) as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied ²	6.42%	6.55%	6.57%	6.17%	6.65%

¹ The Group capital ratios have been presented including the retained profits in 2023 and 2022, availing of the regulatory profit verification process.

² The Group has not availed of the Article 468 temporary treatment of certain unrealised gains and losses.

The Group's Pillar 3 disclosures are published on a consolidated basis for the year ended 31 December 2023.

Not all legal entities are within the scope of regulatory consolidation. A summarised diagrammatical representation (as at 31 December 2023) of the regulatory consolidation group is illustrated below. The disclosures within this document are based on the regulatory consolidated group. Table 1.3 highlights the main differences between the basis of consolidation for accounting purposes and the CRD IV regulatory treatment.

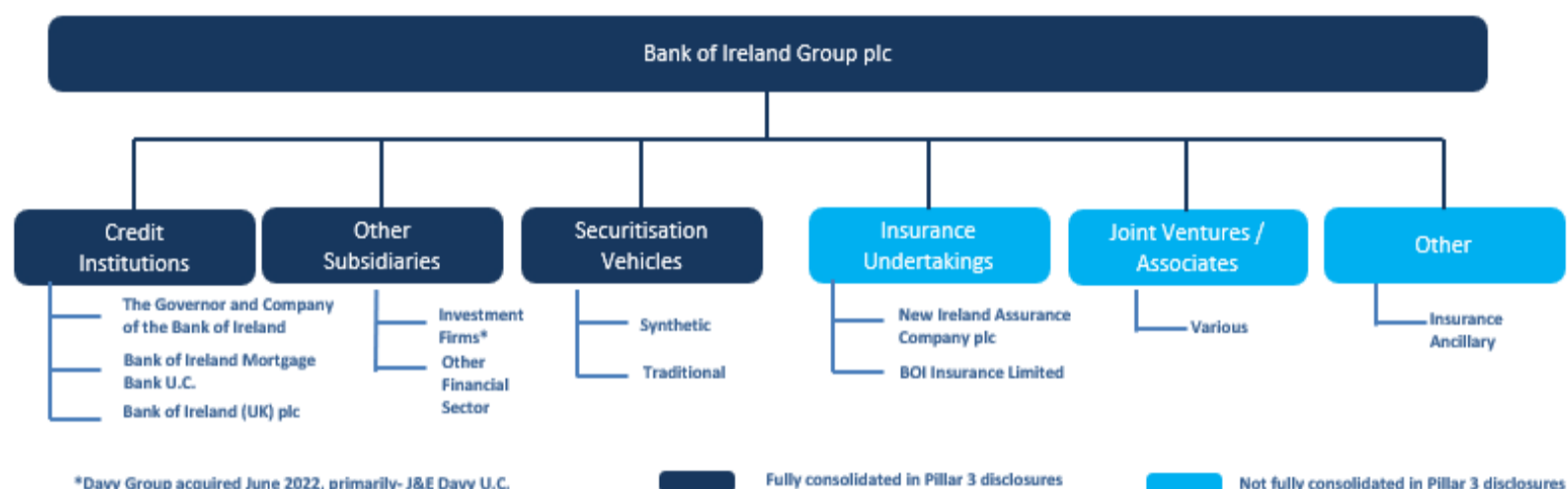


Table 1.3 - Basis of Consolidation

Entity type	Statutory accounting treatment	CRD IV regulatory treatment
Banking entities	Fully consolidated	Fully consolidated
Other Consolidated Subsidiaries	Fully consolidated	Fully consolidated
Securitisation vehicles ¹	Fully consolidated	Fully consolidated (see Securitisations tab for further details)
Insurance undertakings	Fully consolidated	Significant investments in financial sector entities which are not fully consolidated are subject to the 10%/15% threshold which determines the extent to which these investments are deducted from capital or included in RWA.
Joint ventures / associates	Equity method of accounting or fair value through the P&L	The Group's non-qualifying holdings outside the financial sector in joint ventures and associates are included in RWA.
Other Non-consolidated Subsidiaries	Fully consolidated	These investments are an exposure subject to RWA treatment.

Further information relating to differences in scope of consolidation on an entity by entity basis is contained in Appendix III of this document.

¹ Excluding vehicles where the securitisation involves de-recognition of the underlying assets

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As per Article 436 point (d), Table 1.5 below provides information on the main sources of differences between the financial statements' carrying value amounts and the exposure amounts used for credit risk regulatory framework purposes. There are fundamental technical differences in the basis of calculation between financial statement information based on International Financial Reporting Standards (IFRS) accounting standards and regulatory information based on CRD capital adequacy concepts and rules. This is most relevant for credit risk disclosures. Credit exposure at default ("EAD") under the CRD, is defined as the expected amount of EAD and is estimated under specified regulatory rules.

There are two different types of tables included in this document, those compiled based on accounting standards (sourced from the Group's Annual Report 31 December 2023) and those compiled using CRD IV methodologies. Unless specified otherwise, both sets of data reflect the position as at 31 December 2023. The specific methodology used is indicated before each table where applicable.

Many tables throughout the Group's Pillar 3 disclosures are based on net value under the regulatory scope of consolidation. Net value is the gross carrying value of on and off balance sheet exposures, less allowances / impairments.

Table 1.5 - EU LI2 - Reconciliation between regulatory exposure amounts and carrying value in financial statements

	Items subject to					Items subject to				
	a	b	c	d	e	a	b	c	d	e
	Total	Credit risk	CCR	Securitisation	Market Risk	Total	Credit risk	CCR	Securitisation	Market Risk
	€m	€m	€m	€m	€m	€m	€m	€m	€m	€m
2023						2022				
1 Assets carrying value amount under the scope of regulatory consolidation (as per template EU LI1)	134,406	120,618	4,672	7,041	2,075	133,771	119,403	6,255	5,282	2,831
2 Liabilities carrying value amount under the regulatory scope of consolidation (as per template EU LI1)	(6,838)	-	(4,795)	-	(2,043)	(9,859)	-	(6,847)	-	(3,012)
3 Total net amount under the regulatory scope of consolidation	127,568	120,618	(123)	7,041	32	123,912	119,403	(592)	5,282	(181)
4 Off-balance sheet amounts	19,039	19,039	-	-	-	17,906	17,085	-	821	-
5 Differences in valuations	(8)	(8)	-	-	-	(8)	(8)	-	-	-
6 Differences due to different netting rules, other than those already in row 2	919	(658)	1,577	-	-	155	(1,555)	1,710	-	-
7 Differences due to consideration of provisions	939	973	-	(34)	-	1,059	1,091	-	(32)	-
8 Differences due to the use of credit risk mitigation techniques (CRMs)	280	280	-	-	-	211	211	-	-	-
9 Differences due to credit conversion factors	(12,699)	(12,699)	-	-	-	(11,596)	(11,596)	-	-	-
10 Differences due to Securitisation with risk transfer	(837)	-	-	(837)	-	(782)	-	-	(782)	-
11 Other differences	674	(254)	986	(58)	-	(22)	(1,214)	1,175	17	-
12 Exposure amounts considered for regulatory purposes	135,875	127,291	2,440	6,112	32	130,835	123,417	2,293	5,306	(181)

Definition:

The risk that the Group has insufficient capital to support its normal business activities, meet its regulatory capital requirements or absorb losses should unexpected events occur. Capital adequacy risk includes Pension risk and Recovery and Resolution requirements.

Capital management objectives and policies

The objectives of the Group’s capital management policy are to ensure that the Group has sufficient capital to cover the risks of its business and support its strategy and, at all times, to comply with regulatory capital requirements. It seeks to minimise refinancing risk by managing the maturity profile of non-equity capital while the currency mix of capital is managed to ensure that the sensitivity of capital ratios to currency movements is minimised. The capital adequacy requirements set by the regulatory authorities and economic capital based on internal models are used by the Group as the basis for its capital management. The Group seeks to maintain sufficient capital to ensure that these requirements are met.

The current status of capital adequacy risk, including risk dashboards and risk appetite compliance, is reported through the Board Risk Report on a monthly basis. The Group's CET1 capital ratio is 14.53% at 31 December 2023 (31 December 2022: 16.13%) calculated on a regulatory basis.

Financial Conglomerate

BOIG has been identified and classified as a financial conglomerate comprising of the banking regulatory group and insurance companies (see Tab 1.3). In accordance with Article 49 (5) of the CRR, the own funds requirement and capital adequacy ratio of the financial conglomerate calculated on the basis of the Financial Conglomerates Directive are set out below:

Table 1 - EU INS2 - Financial conglomerates information on own funds and capital adequacy ratio

	Dec-23	Dec-22
1 Supplementary own fund requirements of the financial conglomerate (€m)	9,491	8,032
2 Capital adequacy ratio of the financial conglomerate (%)	108.01%	128.08%

Table 2 - EU OVC - ICAAP information

The Internal Capital Adequacy Assessment Process (ICAAP) is carried out by the Group on an annual basis. The ICAAP process facilitates the Board and senior management in adequately identifying, measuring and monitoring the Group’s risk profile to ensure the Group holds sufficient capital to cover these risks and support its strategy. Underpinning the ICAAP process, the Group prepares detailed financial projections. Base case projections are prepared using consensus macroeconomic forecasts together with Group-specific assumptions, and the stress case is prepared based on a severe but plausible stress economic scenario.

The ICAAP process demonstrates that the Group has sufficient capital under both the base and stress case scenarios to support its business and achieve its objectives having regard to Board approved risk appetite and strategy, and to meet its regulatory capital, leverage and liquidity requirements.

The Board approved ICAAP Report and supporting documentation is submitted to the ECB and CBI on an annual basis, and is subject to regulatory review as part of the Supervisory Review and Evaluation Process (SREP).

As per Article 438 point (d), Table 2.1 provides an overview of the total risk exposure amounts (TREA) forming the denominator of the risk based capital requirements calculated in accordance with Article 92 of the CRR. Total own funds requirements are calculated as 8% of TREA.

The increase of €4.9 billion in RWA is primarily due to the acquisition of the KBCI portfolios, loan book movements, an increase in operational risk rwa as a result of higher operating income and other movements.

Table 2.1 - EU OV1 - Overview of risk weighted exposure amounts

	a	b	c
	Dec-23	Dec-22	Dec-23
	Risk weighted exposure amounts (RWEAs)		Total own funds requirements
	€m	€m	€m
1 Credit risk (excluding CCR) of which;	43,921	40,192	3,514
2 the standardised approach	14,788	12,267	1,183
3 the Foundation IRB (F-IRB) approach	16,689	16,873	1,335
4 slotting approach	-	-	-
EU 4a equities under the simple risk weighted approach	-	-	-
5 the Advanced IRB (A-IRB) approach	12,094	10,928	968
6 Counterparty credit risk - CCR of which;	828	752	66
7 the standardised approach	595	561	47
8 internal model method (IMM)	-	-	-
EU 8a exposures to a CCP	28	26	2
EU 8b credit valuation adjustment - CVA	197	164	16
9 other CCR	8	1	1
10 Not applicable	-	-	-
11 Not applicable	-	-	-
12 Not applicable	-	-	-
13 Not applicable	-	-	-
14 Not applicable	-	-	-
15 Settlement risk	-	-	-
16 Securitisation exposures in the non-trading book (after the cap) of which;	1,681	1,421	135
17 SEC-IRBA approach	1,499	1,242	120
18 SEC-ERBA (including IAA)	182	179	15
19 SEC-SA approach	-	-	-
EU 19a 1250% / deduction	-	-	-
20 Position, foreign exchange and commodities risks (Market risk) of which;	230	424	18
21 the standardised approach	230	424	18
22 IMA	-	-	-
EU 22a Large exposures	-	-	-
23 Operational risk of which:	5,896	4,827	472
EU 23a basic indicator approach	-	-	-
EU 23b standardised approach	5,896	4,827	472
EU 23c advanced measurement approach	-	-	-
24 Amounts below the thresholds for deduction (subject to 250% risk weight)	1,722	2,151	138
25 Not applicable	-	-	-
26 Not applicable	-	-	-
27 Not applicable	-	-	-
28 Not applicable	-	-	-
29 Total	52,556	47,616	4,205

As per Article 437, points (a), (d), (e) and (f), Table 2.2 below provides a breakdown of the constituent elements of BOI's transitional own funds. Regulatory adjustments comprise deductions from own funds and prudential filters. It includes a cross reference to the corresponding rows in template EU CC2 (Tab 2.3) to facilitate full reconciliation of accounting and regulatory own funds.

Table 2.2 - EU CC1 - Composition of regulatory own funds

Dec-23	a	b	Dec-22
	Amounts	Source based on reference numbers of the balance sheet under the regulatory scope of consolidation	
	€m		€m
Common equity tier 1 (CET1) capital: Instruments and reserves			
1 Capital instruments and the related share premium accounts	1,505		1,534
of which:			
Ordinary stock	1,048	(a)	1,077
Share premium	457	(b)	457
2 Retained earnings	10,301	(c)	9,710
3 Accumulated other comprehensive income (and other reserves)	(1,506)	(c, d)	(1,092)
3a Funds for general banking risk	-		-
4 Amount of qualifying items per Article 484 (3) and related share premium accounts subject to phase out from CET1	-		-
5 Minority interest (amounts allowed in consolidated CET 1)	-		-
5a Independently reviewed interim profits net of any foreseeable charge or dividend	125	(c)	519
6 Common equity tier 1 (CET 1) capital before regulatory adjustments	10,424		10,671
Common equity tier 1 (CET1) capital regulatory adjustments			
7 Additional value adjustments (negative amount)	(8)		(8)
8 Intangible assets (net of related tax liability) (negative amount)	(971)	(f)	(981)
9 Not applicable	-		-
10 Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)	(818)	(g)	(1,002)
11 Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value	43		31
12 Negative amounts resulting from the calculation of expected loss amounts	(153)		(165)
13 Any increase in equity that results from securitised assets (negative amount)	-		-
14 Gains or losses on liabilities valued at fair value resulting from changes in own credit standing	(16)		(18)
15 Defined-benefit pension fund assets (negative amount)	(583)	(h, i)	(625)
16 Direct, indirect and synthetic holdings by an institution of own CET1 instruments (negative amount)	-		-
17 Direct, indirect and synthetic holdings of the CET 1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-		-
18 Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-		-
19 Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-		(132)
20 Not applicable	-		-
EU-20a Exposure amount of the following items which qualify for a RW of 1250%, where the institution opts for the deduction alternative	(14)		(10)
EU-20b of which: qualifying holdings outside the financial sector (negative amount)	-		-
EU-20c of which: securitisation positions (negative amount)	(14)		(10)
EU-20d of which: free deliveries (negative amount)	-		-
21 Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)	-		-
22 Amount exceeding the 17.65% threshold (negative amount)	-		-
23 of which: direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities	-		-
24 Not applicable	-		-
25 of which: deferred tax assets arising from temporary differences	-		-
EU-25a Losses for the current financial year (negative amount)	-		-
EU-25b Foreseeable tax charges relating to CET1 items except where the institution suitably adjusts the amount of CET1 items insofar as such tax charges reduce the amount up to which those items may be used to cover risks or losses (negative amount)	-		-
26 Not applicable	-		-
27 Qualifying AT1 deductions that exceed the AT1 items of the institution (negative amount)	-		-
27a Other regulatory adjustments	(268)		(80)
28 Total regulatory adjustments to Common Equity Tier 1 (CET1)	(2,789)		(2,990)
29 Common Equity Tier 1 (CET1) capital	7,636		7,681
Additional Tier 1 (AT1) Capital: instruments			
30 Capital instruments and the related share premium accounts	975	(e)	975
31 of which: classified as equity under applicable accounting standards	975	(e)	975
32 of which: classified as liabilities under applicable accounting standards	-		-
33 Amount of qualifying items referred to in Article 484 (4) CRR and the related share premium accounts subject to phase out from AT1	-		-
EU-33a Amount of qualifying items referred to in Article 494a(1) CRR subject to phase out from AT1	-		-
EU-33b Amount of qualifying items referred to in Article 494b(1) CRR subject to phase out from AT1	-		-
34 Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties	-		-
35 of which: instruments issued by subsidiaries subject to phase out	-		-
36 Additional Tier 1 (AT1) capital before regulatory adjustments	975		975
Additional Tier 1 (AT1) Capital: regulatory adjustments			
37 Direct, indirect and synthetic holdings by an institution of own AT1 instruments (negative amount)	-		-
38 Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-		-
39 Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-		-
40 Direct, indirect and synthetic holdings by the institution of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	-		-
41 Not applicable	-		-
42 Qualifying T2 deductions that exceed the T2 items of the institution (negative amount)	-		-
42a Other regulatory adjustments to AT1 capital	-		-
43 Total regulatory adjustments to Additional Tier 1 (AT1) capital	-		-
44 Additional Tier 1 (AT1) capital	975		975
45 Tier 1 capital (T1 = CET1 + AT1)	8,611		8,656
Tier 2 (T2) Capital: instruments and provisions			
46 Capital instruments and the related share premium accounts	1,640	(j)	1,632
47 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	-	(j)	-
EU-47a Amount of qualifying items referred to in Article 494a(2) CRR subject to phase out from T2	-		-
EU-47b Amount of qualifying items referred to in Article 494b(2) CRR subject to phase out from T2	-		-
48 Qualifying own funds instruments included in consolidated T2 capital (including minority interests and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties	-		-
49 of which: instruments issued by subsidiaries subject to phase out	-		-
50 Credit risk adjustments	-		-
51 Tier 2 (T2) capital before regulatory adjustments	1,640		1,632
Tier 2 (T2) capital: regulatory adjustments			
52 Direct, indirect and synthetic holdings by an institution of own T2 instruments and subordinated loans (negative amount)	-		-
53 Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-		-
54 Direct, 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)	-		-
54a Not applicable	-		-
55 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)	(160)		(160)
56 Not applicable	-		-
EU-56a Qualifying eligible liabilities deductions that exceed the eligible liabilities items of the institution (negative amount)	-		-
EU-56b Other regulatory adjustments to T2 capital	-		-
57 Total regulatory adjustments to Tier 2 (T2) capital	(160)		(160)
58 Tier 2 (T2) capital	1,480		1,472
59 Total capital (TC = T1 + T2)	10,091		10,128
60 Total Risk exposure amount	52,556		47,616

Capital ratios and requirements including buffers			
61	Common Equity Tier 1 capital	14.53%	16.13%
62	Tier 1 capital	16.38%	18.18%
63	Total capital	19.20%	21.27%
64	Institution CET1 overall capital requirements	10.91%	10.04%
65	of which: capital conservation buffer requirement	2.50%	2.50%
66	of which: countercyclical capital buffer requirement	1.15%	0.27%
67	of which: systemic risk buffer requirement	0.00%	0.00%
EU-67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer requirement	1.50%	1.50%
EU-67b	of which: additional own funds requirements to address the risks other than the risk of excessive leverage	1.27%	1.27%
68	Common Equity Tier 1 capital (as a percentage of risk exposure amount) available after meeting the minimum capital requirements	8.70%	10.37%
National minima (if different from Basel III)			
69	Not applicable	-	-
70	Not applicable	-	-
71	Not applicable	-	-
Amounts below the threshold for deduction (before risk weighting)			
72	Direct and indirect holdings of own funds and eligible liabilities of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions)	-	-
73	Direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 17.65% thresholds and net of eligible short positions)	601	758
74	Not applicable	-	-
75	Deferred tax assets arising from temporary differences (amount below 17.65% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met)	88	102
Applicable cap on the inclusion of provisions in Tier 2			
76	Credit risk adjustments included in T2 in respect of exposures subject to standardised approach (prior to the application of the cap)	-	-
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach	186	154
78	Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)	-	-
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach	176	170
Capital Instruments subject to phase-out arrangements (only applicable between 1 Jan 2014 and 1 Jan 2022)			
80	Current cap on CET1 instruments subject to phase out arrangements	-	-
81	Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)	-	-
82	Current cap on AT1 instruments subject to phase out arrangements	-	-
83	Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)	-	-
84	Current cap on T2 instruments subject to phase out arrangements	-	-
85	Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)	-	-

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As per Article 437 point (a), Table 2.3 below outlines the differences between the scope of accounting consolidation and the scope of regulatory consolidation, showing the link between BOI's balance sheet in the audited financial statements and the numbers that are used in the composition of own funds disclosure template (EU CC1 - Tab 2.2).

Table 2.3 - EU CC2 - reconciliation of regulatory own funds to balance sheet in the audited financial statements

Balance sheet category	a	b	c	a	b
	Dec-23	Dec-23	Reference	Dec-22	Dec-22
	Balance sheet as in published financial statements	Under regulatory scope of consolidation		Balance sheet as in published financial statements	Under regulatory scope of consolidation
	€m	€m		€m	€m
Assets - Breakdown by asset classes according to the balance sheet in the published financial statements					
1 Cash and balances at central banks	31,843	31,843		36,855	36,855
2 Items in the course of collection from other banks	126	126		140	140
3 Trading securities	72	72		-	-
4 Derivative financial instruments	4,341	4,358		5,138	5,138
5 Fair value changes due to interest rate risk of the hedged items in portfolio hedges	(124)	(124)		(738)	(738)
6 Other financial assets at fair value through profit or loss	20,899	131		18,553	151
7 Loans and advances to banks	1,907	1,805		3,044	2,892
8 Debt securities at amortised cost	5,715	5,715		4,472	4,472
9 Financial assets at fair value through other comprehensive income	3,968	3,968		4,254	4,254
10 Assets classified as held for sale	-	-		2	2
11 Loans and advances to customers	79,729	79,903		71,961	72,167
12 Investments in subsidiaries, joint ventures and associates	187	806	(f)	165	1,160
13 Intangible assets and goodwill	1,408	1,340		1,276	1,207
14 Investment properties	793	-		883	-
15 Property, plant and equipment	800	800		802	783
16 Current tax assets	3	3	(g)	36	31
17 Deferred tax assets	808	807		989	972
18 Other assets	1,127	992	(h)	2,756	643
19 Reinsurance contract assets	1,414	-		-	-
20 Retirement benefit assets	692	688		736	736
21 Total assets	155,708	133,233		151,324	130,865
Equity and liabilities - Breakdown by equity and liability classes according to the balance sheet in the published financial statements					
1 Deposits from banks	3,095	3,095		3,445	3,445
2 Customer accounts	100,183	100,823		99,200	99,637
3 Items in the course of transmission to other banks	322	322		232	232
4 Derivative financial instruments	4,490	4,490		6,526	6,530
5 Fair value changes due to interest rate risk of the hedged items in portfolio hedges	(1,115)	(1,115)		(2,824)	(2,824)
6 Debt securities in issue	8,670	8,670		7,774	7,774
7 Liabilities to customers under investment contracts	7,692	-		5,870	-
8 Insurance contract liabilities	15,113	-		14,280	-
9 Other liabilities	2,480	2,193		2,535	1,844
10 Leasing liabilities	404	404		423	423
11 Current tax liabilities	23	16		8	8
12 Provisions	58	57		79	79
13 Loss allowance provision on loan commitments and financial guarantees	61	61	(i)	55	55
14 Deferred tax liabilities	61	39		97	22
15 Retirement benefit obligations	10	12	(j)	36	36
16 Subordinated liabilities	1,600	1,600		1,656	1,656
17 Total liabilities	143,147	120,667		139,392	118,917
Equity					
1 Capital stock	1,057	1,048	(a)	1,070	1,077
2 Share premium account	456	456	(b)	456	456
3 Retained earnings	10,285	10,522	(c)	9,640	9,392
4 Other reserves	(199)	(429)	(d)	(257)	(10)
5 Own stock held for the benefit of life assurance policyholders	(7)	-		(10)	-
6 Other equity instruments - Additional Tier 1	966	966	(e)	966	966
7 Non-controlling interests	3	3		67	67
8 Total equity	12,561	12,566		11,932	11,948
9 Total equity and liabilities	155,708	133,233		151,324	130,865

As per Article 440(a), Table 2.4 below sets out geographical distribution of credit exposures relevant to the calculation of the countercyclical capital buffer along with the overall additional capital requirement of €604 million at 31 December 2023 (31 December 2022: €130m). The increase in capital requirement is due mainly to the imposition of the buffer in Ireland exposures during the year. CRD IV provides for a countercyclical buffer that could require banks to hold additional CET 1 capital of up to 2.5%. This requirement is expected to be imposed by the designated authority where credit growth is deemed to be excessive and leading to the build-up of system-wide risk. The countercyclical buffer was phased in from 1 January 2016 to 1 January 2019.

Table 2.4a - EU CCyB1 - Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer

	a	b	c			d	e	f	g	h	i	j	k	l	m
	General credit exposures		Relevant credit exposures – Market risk			Own funds requirements									
	Exposure value under the standardised approach	Exposure value under the IRB approach	Sum of long and short position of trading book	Value of trading book exposure for internal models	Securitisation exposures for non-trading book	Total exposure value	Relevant credit risk exposures – Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book	Total	Risk-weighted exposure amounts	Own funds requirement weights (%)	Countercyclical capital buffer rate (%)		
Dec-23 (€m)															
10 Countries with a buffer															
Denmark	-	2	-	-	-	2	-	-	-	-	-	2	0.01%	2.50%	
Norway	-	-	-	-	-	1	-	-	-	-	-	-	0.00%	2.50%	
Czech Republic	-	-	-	-	-	-	-	-	-	-	-	-	0.00%	2.00%	
Sweden	1	8	-	-	-	9	-	-	-	-	-	2	0.01%	2.00%	
Iceland	-	-	-	-	-	-	-	-	-	-	-	-	0.00%	2.00%	
Bulgaria	-	-	-	-	-	-	-	-	-	-	-	-	0.00%	2.00%	
United Kingdom	5,392	20,607	-	-	65	26,064	883	-	6	888	11,103	24.77%	2.00%		
Slovakia	-	-	-	-	-	-	-	-	-	-	-	-	0.00%	1.50%	
Estonia	-	-	-	-	-	-	-	-	-	-	-	-	0.00%	1.50%	
Hong Kong	-	2	-	-	-	2	-	-	-	-	-	1	0.00%	1.00%	
Australia	7	19	-	-	-	26	1	-	-	1	12	0.03%	1.00%		
Netherlands	-	237	-	-	-	237	20	-	-	20	255	0.57%	1.00%		
Romania	-	-	-	-	-	-	-	-	-	-	-	-	0.00%	1.00%	
Croatia	-	-	-	-	-	-	-	-	-	-	-	-	0.00%	1.00%	
Ireland	14,714	38,595	-	-	6,046	59,355	2,116	-	129	2,245	28,064	62.61%	1.00%		
Germany	1	314	-	-	-	315	22	-	-	22	278	0.62%	0.75%		
Luxembourg	111	568	-	-	-	679	52	-	-	52	651	1.45%	0.50%		
France	101	622	-	-	-	723	65	-	-	65	809	1.81%	0.50%		
Total countries with a buffer	20,329	60,975	-	-	6,111	87,415	3,160	-	134	3,294	41,178	91.87%	-		
Countries with a zero rate or no buffer															
Other ¹	148	3,211	-	-	1	3,360	291	-	-	292	3,644	8.13%	2.00%		
Total	148	3,211	-	-	1	3,360	291	-	-	292	3,644	8.13%	-		
20 Overall total	20,477	64,186	-	-	6,112	90,775	3,451	-	134	3,586	44,822	100.00%	-		

As per Article 440 point (b) the following template provides the additional countercyclical capital buffer requirement.

Table 2.4 (b) EU CCyB2 - Amount of institution-specific countercyclical capital buffer

	2023
Total risk exposure amount (€m)	52,556
Institution specific countercyclical buffer rate (%)	1.149%
Institution specific countercyclical buffer requirement (€m)	604

Table 2.4a - EU CCyB1 - Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer

	a	b	c	d	e	f	g	h	i	j	k	l	m	
	General credit exposures		Trading Book exposures			Own funds requirements								
	Exposure value under the standardised approach	Exposure value under the IRB approach	Sum of long and short position of trading book	Value of trading book exposure for internal models	Securitisation exposures for non-trading book	Total exposure value	Relevant credit risk exposures – Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book	Total	Risk-weighted exposure amounts	Own funds requirement weights	Countercyclical capital buffer rate	
Dec-22 (€m)														
10 Countries with a buffer														
Norway	-	-	-	-	-	-	-	-	-	-	-	0.00%	2.00%	
Iceland	-	-	-	-	-	-	-	-	-	-	-	0.00%	2.00%	
Denmark	5	22	-	-	-	27	2	-	-	2	28	0.07%	2.00%	
Czech Republic	-	1	-	-	-	1	-	-	-	-	-	0.00%	1.50%	
Estonia	-	-	-	-	-	-	-	-	-	-	-	0.00%	1.00%	
Hong Kong	-	2	-	-	-	2	-	-	-	-	1	0.00%	1.00%	
Slovakia	-	-	-	-	-	-	-	-	-	-	-	0.00%	1.00%	
Sweden	8	2	-	-	-	10	1	-	-	1	10	0.02%	1.00%	
United Kingdom	5,165	21,159	-	-	71	26,395	856	-	5	861	10,769	26.33%	1.00%	
Bulgaria	-	-	-	-	-	-	-	-	-	-	-	0.00%	1.00%	
Luxembourg	147	626	-	-	-	773	54	-	-	54	679	1.66%	0.50%	
Romania	-	-	-	-	-	-	-	-	-	-	-	0.00%	0.50%	
Total countries with a buffer	5,325	21,812	-	-	71	27,208	913	-	5	918	11,487	28.09%	-	
Countries with a zero rate or no buffer														
Ireland	7,521	36,780	-	-	5,234	49,535	1,876	-	108	1,984	24,799	60.64%	0.00%	
Other ¹	322	4,518	-	-	1	4,841	369	-	-	369	4,611	11.27%	0.00%	
Total	7,843	41,298	-	-	5,235	54,376	2,245	-	108	2,353	29,410	71.91%	-	
20 Overall total	13,168	63,110	-	-	5,280	81,584	3,158	-	113	3,271	40,897	100.00%	-	

Table 2.4 (b) EU CCyB2 - Amount of institution-specific countercyclical capital buffer

	2022
Total risk exposure amount (€m)	47,616
Institution specific countercyclical buffer rate (%)	0.273%
Institution specific countercyclical buffer requirement (€m)	130

¹ The credit exposures amount of individual countries in Other countries are not material (individually less than 5% of total credit exposures).

As per Article 436 point (e), Table 2.5 below provides Prudent valuation adjustments (PVA). The general idea of Prudential Valuations (PV) is for banks to consider an additional valuation adjustment on top of their reported fair values, for prudential purposes. PVA captures valuation uncertainty. The Group uses the simplified approach.

Table 2.5 - EU PV1 - Prudent valuation adjustments (PVA)

Dec-23	a	b	c	d	e	EU e1	EU e2	f	g	h
	Risk category					Category level AVA - Valuation uncertainty		Total category level post-diversification		
	Equity	Interest Rates	Foreign exchange	Credit	Commodities	Unearned credit spreads AVA	Investment and funding costs AVA		of which: Total core approach in the trading book	of which: Total core approach in the banking book
Category level AVA	€m	€m	€m	€m	€m	€m	€m	€m	€m	€m
1 Market price uncertainty	-	-	-	-	-	-	-	-	-	-
2 Not applicable										
3 Close-out cost	-	-	-	-	-	-	-	-	-	-
4 Concentrated positions	-	-	-	-	-	-	-	-	-	-
5 Early termination	-	-	-	-	-	-	-	-	-	-
6 Model risk	-	-	-	-	-	-	-	-	-	-
7 Operational risk	-	-	-	-	-	-	-	-	-	-
8 Not applicable										
9 Not applicable										
10 Future administrative costs	-	-	-	-	-	-	-	-	-	-
11 Not applicable										
12 Total Additional Valuation Adjustments (AVAs)								8	-	-

Dec-22	a	b	c	d	e	EU e1	EU e2	f	g	h
	Risk category					Category level AVA -		Total category level post-diversification		
	Equity	Interest Rates	Foreign exchange	Credit	Commodities	Unearned credit spreads AVA	Investment and funding costs AVA		of which: Total core approach in the trading book	of which: Total core approach in the banking book
Category level AVA	€m	€m	€m	€m	€m	€m	€m	€m	€m	€m
1 Market price uncertainty	-	-	-	-	-	-	-	-	-	-
2 Not applicable										
3 Close-out cost	-	-	-	-	-	-	-	-	-	-
4 Concentrated positions	-	-	-	-	-	-	-	-	-	-
5 Early termination	-	-	-	-	-	-	-	-	-	-
6 Model risk	-	-	-	-	-	-	-	-	-	-
7 Operational risk	-	-	-	-	-	-	-	-	-	-
8 Not applicable										
9 Not applicable										
10 Future administrative costs	-	-	-	-	-	-	-	-	-	-
11 Not applicable										
12 Total Additional Valuation Adjustments (AVAs)								8	-	-

The Risk Management Report within the Group's Annual Report 31 December 2023 contains information on principal risks and uncertainties, the risk management framework and the management of principal risks.

Risk Appetite sets the boundaries the Group, including subsidiaries, is prepared to take in its risk taking and related business activities. The Group's approach to risk management, controls and optimises the risk-return profile of the Group and ensures that the Group's overall business strategy and remuneration practices are aligned with its risk and capital management strategies.

For further information on the Group's Risk Management Framework and management of Principal Risks, please see the following tabs within the disclosures: Risk Management Framework, Business and strategic risk, Capital Adequacy risk, Conduct risk, Credit risk, Funding and liquidity risk, Life insurance risk, Market risk, Operational risk, and Regulatory risk.

For information on related party transactions please see Appendix V of these disclosures.

Key Prudential and Loan book metrics remain within their limits set by the Board in the Risk Appetite Statement. These key ratios and figures associated with the risk profile are included below:

Table 3.1 - Key risk figures and ratios

	2023	2022
Loan book portfolio (on balance sheet - pre impairment loss allowance)	€bn	€bn
Residential mortgages	47.13	38.02
Consumer	5.80	5.35
Non-property SME and corporate	20.45	21.47
Property and construction	7.22	8.20
Risk-based capital ratios as a % of RWA	%	%
Common equity tier 1 ratio (%)	14.53%	16.13%
Tier 1 ratio (%)	16.38%	18.18%
Total capital ratio (%)	19.20%	21.27%
Leverage ratio		
Leverage ratio (%)	6.42%	6.65%
Liquidity coverage ratio (pit)		
LCR ratio (%)	195.52%	221.06%
Net stable funding ratio		
NSFR ratio	157.24%	163.39%

The number of directorships held by members of the Board is listed in the Table 3.2.

Table 3.2 - Number of directorships held by members of the Board

Director	No. of directorships ¹
Giles Andrews	8
Evelyn Bourke	6
Ian Buchanan	4
Eileen Fitzpatrick	8
Richard Goulding	8
Michele Greene	7
Patrick Kennedy	3
Myles O'Grady	2
Stephen Pateman	6
Mark Spain	3
Margaret Sweeney	7

¹ The table above sets out the number of directorships held by each member of the Board whether the directorship is of a group company or not, whether it is an executive or non-executive directorship, and regardless of whether the directorship is with an entity that pursues or does not pursue a commercial objective.

Board composition in 2023

The Board comprises eleven Directors: two Executive Directors, the Chairman, who was independent on appointment, and eight independent NEDs.

The Board considers that a board size of ten to twelve Directors allows for a good balance between having the full range of skills necessary on the Board and to populate its Committees and retaining a sense of accountability by each Director for Board decisions. The Board acknowledges that this number may go below ten or beyond twelve for a short term as may be required to accommodate succession planning activities and to ensure the timely induction and development of new Directors.

The Nomination & Governance (N&G) Committee ensures a formal, rigorous and transparent procedure when considering candidates for appointment to the Board and maintains continuous oversight of the Board's composition to ensure it remains appropriate and has regard for its purpose, culture, major business lines, geographies, risk profile and governance requirements.

Both on an individual and a collective basis, the Directors are considered to have the range of skills, understanding, experience and expertise necessary to ensure the effective leadership of the Group and that high corporate governance standards are maintained. The N&G leads the process for appointments to the Board and ensures plans are in place for orderly succession to both the Board and Executive positions.

The process has regard for the impact of expected retirements of Directors and the Group's desired culture and its strategic direction. As part of the process, the N&G approves a detailed role profile, based on its analysis of the skills and experiences needed and selects, where appropriate, an external search firm to facilitate the process. The N&G ensures that a comprehensive due diligence process is undertaken, which includes the candidate's self-certification of probity and financial soundness, external references and external checks. The due diligence process facilitates the N&G in satisfying itself as to the candidate's independence, fitness and probity, and capacity to devote sufficient time to the role before making a formal recommendation to the Board. Regulatory assessment and formal approval is required and received for all Board appointments.

A Board-approved Policy for the Assessment of Directors, which outlines the Board appointment process, is in place, and is in accordance with applicable joint guidelines issued by ESMA and the EBA.

Diversity

The Board is fully committed to diversity in all forms and truly believes that diversity is an essential ingredient of sound decision-making. The Board's approach to diversity in all its forms is set out in the Board Diversity Policy which has retained the specific gender target of maintaining a minimum of 40% female representation on the Board, with a medium term aspiration of achieving broadly equal gender representation on the Board. The Board values diversity and strives to achieve minority ethnic representation on the Board in the medium-term. Then setting diversity objectives, the Committee will consider diversity benchmarking results published by competent authorities, the European Banking Authority or other relevant international bodies or organisations.

The Board is assisted in its risk governance responsibilities by a Board Risk Committee. The Committee met a total of 13 times on a standalone basis in 2023, driven by oversight of implementation of the Group Risk Management Framework, together with oversight of regulatory requirements. The Committee also met in 4 joint sessions with the Group Audit Committee to discuss impairment, twice with the Group Transformation Oversight Committee to discuss the risk aspects of investment allocation given the Group's investment in digital capabilities, and twice with the Group Sustainability Committee to consider ESG matters.

Board responsibility

The Board is responsible for overseeing the Group's risk management and internal control systems, which are designed to facilitate effective and efficient operations and to ensure the quality of internal and external reporting and compliance with applicable laws and regulations, and to review the effectiveness of same.

In establishing and reviewing the risk management and internal control systems, the Directors carried out a robust assessment of the principal risks facing the Group including those that would threaten its business model, future performance, solvency or liquidity, the likelihood of a risk event occurring and the costs of control. The process for identification, evaluation and management of the principal risks faced by the Group is integrated into the Group's overall framework for risk governance. The Group is forward-looking in its risk identification processes to ensure emerging risks are identified. The risk identification, evaluation and management process also identifies whether the controls in place result in an acceptable level of risk. At Group level, a consolidated risk report and risk appetite dashboard is reviewed and regularly debated by the BRC and the Board to ensure satisfaction with the overall risk profile, risk accountabilities and mitigating actions.

The report and dashboard provide a monthly view of the Group's overall risk profile, key risks and management actions, together with performance against risk appetite and an assessment of emerging risks which could affect the Group's performance over the life of the operating plan.

The Board concluded that the Group's risk management arrangements are adequate to provide assurance that the risk management systems put in place are suitable with regard to the Group's profile and strategy.

Risk Management Framework

2.1 Risk Statement

Risk appetite sets the boundaries the Group, including subsidiaries, is prepared to take in its risk taking and related business activities. The Group's approach to risk management ensures that the Group's overall business strategy and remuneration practices are aligned with its risk and capital management strategies.

The RMF is the foundation stone for how we manage risk in the Group. It sets out the Group-wide approach to risk management and reflects the Group's Risk Culture. At least annually, the RMF is reviewed by the Group CRO and approved by the Board following consideration and recommendation by the BRC. It establishes:

- common principles for the risk management process of identifying, assessing, monitoring, mitigating, and controlling risks to the Group;
- standard definitions of risk terms and classifications to ensure consistent application across the Group;
- clear roles and accountabilities for the management of risk across the Group;
- governance mechanisms by which risk oversight is exercised and risk decisions taken;
- Group standards on risk policies, committee papers and reporting to ensure consistent application across the Group;
- standard methods to identify and classify risks faced by the Group;
- principles for setting risk appetite to articulate tolerances for the adverse outcomes of taking risk, and setting risk exposure limits designed to ensure a low probability of exceeding those tolerances;
- risk policies and procedures as the foundation for risk mitigation in implementing the RMF; and
- a framework for forward looking monitoring and reporting on risk as part of risk management information in the Group.

2.2 Risk Management

Risk management is the set of activities and mechanisms through which we make risk taking decisions and how we control and optimise the risk-return profile of the Group. Good risk management aligns with strategic objectives, code of conduct and stakeholder priorities.

Risk management is central to the financial and operational management of financial service companies and fundamental to the Group's strategic pillars of:

- stronger relationship;
- simple business; and
- sustainable company.

It is a Group-wide process of identifying, assessing, monitoring, and mitigating risks to the Group's earnings, solvency, and franchise and is structured across five activities:

- Risk Identification and Assessment.
- Risk Appetite.
- Risk Policies.
- Stress Testing and Scenario Analysis.
- Risk Monitoring and Reporting.

Within each category the Group maintains risk management standards. Collectively these standards represent the Group's risk management approach.

Risk Identification and Assessment

The Group ensures appropriate identification of risk through both top-down and bottom-up risk identification processes. A standard risk library is used to define all the Group's risk types in a consistent manner.

The Risk Library document outlines the Group's risk classification system. This system provides the structure through which accountability for risk management is assigned, and risk is reported. The Risk Library is used to define risk types and to cover the totality of gross risk types to which the Group is exposed.

Principal risk types are the highest level risk type used to assist with identifying, assessing, monitoring, and mitigating risks to which the Group is exposed. They guide the assignment of risk management resourcing and organisation of the Group Risk division.

The Group maintains and updates the Risk Library in two ways:

- Firstly, during the annual review of its RMF, Group Risk conducts a top-down risk identification process. This establishes risk management's view of the primary categories of types of risk facing the Group. These primary categories of risk are identified as the Group's principal risk types.
- Secondly, a bottom-up risk type assessment process is undertaken to identify the granular level risks that arise from all the activities that the Group engages in.

Financial risks originate in the Group's business and primarily reside in the financial balance sheet. Financial risks are generally identified in the lending and trading processes in the case of credit and market risks, with the risk types defined in the Risk Library and quantified in terms of potential financial impacts. Similarly, for funding and liquidity, capital adequacy, risk assessment processes such as the ICAAP and ILAAP are used to identify, categorise, quantify, and control the risks to the Group.

Operational risks originate in the activities the Group conducts. Once identified, the risk is assessed to determine the level of gross risk exposure and, after consideration of any mitigants, the residual risk exposure can be determined. These measurements (gross risk exposure and residual risk exposure) inform metrics used to monitor and control the Group's risk profile against risk appetite.

The nine principal risk types are outlined below:



ESG factors (including climate-related risks) represent a common risk driver across the Group's principal risk types.

Risk Appetite

The Group's overarching risk strategy is to set and maintain the RMF to ensure that the Group has clearly identified and classified the risks it faces, set its risk appetite through statements of risk tolerance and quantitative limits, and through adherence with risk policy has observed these tolerances and limits as boundaries to its business strategy. This is achieved through appropriate processes, controls, reporting, and governance in place which enable the Group to:

- address its target market with confidence;
- protect its balance sheet; and
- deliver sustainable profitability.

Risk appetite flows from the Group's risk identity. Risk identity is the broad risk profile the Group must necessarily run to successfully pursue the Group's chosen business strategy, within risk capacity. The elements are:

- the National Champion Bank in Ireland focused on having long-term relationships with our retail, commercial and corporate customers;
- our core franchise is in Ireland, with income and risk diversification through a meaningful presence in the UK and selected international activities where we have proven competencies; and
- the Group will pursue an appropriate return for risks taken, and on capital deployed while operating within prudent Board-approved risk appetite parameters to have and maintain a robust, standalone financial position.

Risk capacity defines the externally imposed constraints within which the Group must operate.

The Risk Appetite Statement articulates tolerances for the adverse outcomes of taking risk in order to determine how much exposure the Group can take. It is set in conjunction with the Group's business strategy and sets the outer boundaries of risk the Group, including its subsidiaries, is prepared to take. It flows from the risk identity of the organisation, which is linked to the capital adequacy, desired risk profile, reputation, and strategic business intent of the Group.

For financial risks, tolerances for negative outcomes are set for earnings and capital volatility, and for how long the Group can survive under liquidity stress. For operational risk, tolerances for negative outcomes are set at an overarching operational risk level for financial loss and customer impacts.

At least annually, the Board approves risk appetite limits which are the outer boundaries for the risks that can be taken in the execution of Board approved strategy.

The Group maintains a detailed risk appetite breach escalation process which ensures that breaches of risk appetite are escalated to senior management and the Board in a timely way. This facilitates timely consideration of the breach and any actions that may be required to remedy the breach.

Risk Policies

Risk policies set out detailed risk mitigation standards that are designed to ensure that there is only a low probability of the Group's Board-approved risk appetite being exceeded. These Risk policies are owned by Group Risk. 1LOD functions managing the risk are responsible for ensuring that they have appropriately proceduralised the risk mitigation standards specified for that risk type, and designed and implemented a reliable process incorporating these procedures.

Stress Testing and Scenario Analysis

Where predictable and probable events are factored into business as usual planning and budgeting, risk arises when less predictable or unanticipated events can materialise. These types of events may result in severe impacts to the Group and therefore it is important that they are considered, and that mitigating controls and actions are put in place to ensure that the Group can continue to operate within risk appetite in that event. Stress testing and scenario analysis is the activity that addresses this requirement.

Certain principal risks are measured, managed, and reported using risk models in line with the risk policies and management procedures which are in place for each risk type.

For credit, funding and liquidity, life insurance, market, operational, and pension risks, risk models are used to measure, manage, and report on these respective risk types. Risk limits and diversification, together with regular review processes, are in place to manage potential credit risk and funding and liquidity risk concentrations which in turn could lead to increased volatility in the Group's expected financial outcomes. Additionally, the Group's calculation of economic capital takes into consideration the extent to which credit concentration risk exists in respect of single name, sector, and geography.

At Group level, common measures for risk measurement have been adopted, to inform operational and strategic plans, and ensure the Group is managed within its tolerance for exposure to risk. These include one-year or multi-year forecasting / stress testing and a capital allocation framework which incorporates economic capital modelling and risk adjusted return analysis. The Group uses a suite of risk measurement models and systems to support decision making processes at transaction and portfolio levels, e.g. approving a loan facility to a borrower.

Forecasting and stress testing are risk management tools used by the Group to alert management to potential adverse outcomes related to a variety of risks and inform risk appetite and contingent mitigating action.

Scenario analysis and stress testing, in the context of operational risk, are used to understand the Group's ability to withstand operational disruption and the impact of potential operational risk events on capital.

The Group conducts:

- loan loss forecasting which informs senior management about potential outcomes related to loan loss evolution under chosen macroeconomic scenarios. This information is regularly used as an input into the Group's budget, strategic plan and ICAAP. Additionally, it can be used to forecast future provisioning needs and / or to understand, and therefore anticipate, earnings volatility and future capital utilisation, such as at portfolio / transaction level. Results of forecasting are used by the Group to enhance the understanding of potential vulnerabilities and to make decisions around risk appetite and capital adequacy or to help prepare mitigating actions;
- solvency stress testing to evaluate the Group's financial position under a 'severe but plausible' scenario or shock and provide an indication of how much capital might be needed to absorb losses should such a shock occur. Scenarios for solvency stress testing are approved by ALCO but regulators can also request that a mandated stress scenario be run to assess capital needs across banks in a particular jurisdiction. The approved scenarios are applied to the Group's balance sheet and risks as appropriate, in order to generate stressed loan loss forecasts and potential stressed impacts on the Group's financial and capital ratios. The outputs of the solvency stress testing are reviewed by the Group to inform risk appetite, strategy and capital planning and are an integral component of the Group's ICAAP. They are also used by regulators to assess the Group's ability to continue to meet its capital requirements under severe adverse conditions;
- earnings stress testing in respect of earnings volatility and tolerances in respect of required capital to withstand a severe but plausible stress; and
- reverse stress testing to evaluate the Group's ability to survive an unforeseen severe event or combination of events that would cause the Group's business model to become unviable. Reverse stress testing complements and builds on solvency stress testing by exploring more extreme scenarios / events beyond the likelihood thresholds looked at in solvency stress testing. This is achieved as reverse stress testing is developed in reverse, working back from an outcome of business failure to causal analysis, while the more typical solvency stress testing works towards defining a range of outcomes or probabilities given defined inputs.

A key focus of solvency stress testing activities during 2023 and into 2024 is the impact on the Group's key economies of potential adverse events such as rising geopolitical tensions, further supply chain or energy price induced shocks, or a slowdown in international trade, including how such shocks in aggregate impact the Group's profitability and solvency under different interest rate environments. In parallel the Group continued to develop its capabilities in the climate risk scenario modelling space.

The Group also runs more frequent and / or ad hoc stress tests for general risk management purposes. These cover:

Funding and liquidity risk: The Group stresses its exposure to liquidity risk through liquidity stress testing which provides senior management with the ability to assess the degree to which the Group is vulnerable to extreme but plausible adverse liquidity conditions. It is used to identify the potential impact of a range of adverse shocks, including the impacts of rating downgrades and the reduction / withdrawal of certain funding markets such as customer deposits or wholesale markets on the Group's ability to fund its outflows (asset financing and / or contractual obligations) at the required time and at a reasonable cost.

Life insurance risk: Life insurance regulations require each life company to complete an annual ORSA. The ORSA process is intended to consider severe but plausible risks to the business and the capital or mitigating actions required to withstand those risks within the context of its business plans. This assessment considers a range of sensitivities and scenario tests, including deterioration in the insurance risk experience.

Market risk: The following market risks are subject to stress testing as part of its normal risk measurement and management process:

- market risk, consisting of trading book and banking book interest rate gap risk exposures in Global Markets and Group Treasury;
- structural IRRBB consisting of balance sheet basis risk; and
- structural FX, the sensitivity of Group capital ratios to exchange rate movement.

Interest rate risk and basis risk are stressed using empirically based scenario analyses. In the case of interest rate risk, the stress test results are potential changes in the economic value of positions; in the case of basis risk, the results are potential changes in one year-ahead net interest income.

Operational risk: Potential operational risk stresses (loss impacts) are modelled using a scenario-based approach. Severe, yet plausible operational risk loss scenarios are applied on a Group-basis to assess the impact of the materialisation of key operational risk events at various likelihood and are used to inform the assessment of the Group's economic capital requirement.

Risk Monitoring and Reporting

Reporting of risk exposure is how we ensure management and governance forums can monitor the maintenance of the Group's risk profile within tolerances for exposure to risk.

Furthermore, it is a means for bringing management attention to where significant changes in the risk profile bring into question whether the Group can remain within risk appetite in the future. It enables the Group to respond in an effective and timely manner and to take decisions such as whether to maintain current business activity.

The Group's risk monitoring and reporting process operates within Group Risk:

- it is the responsibility of the 2LOD to take reasonable steps to ensure that the Group does not suffer outcomes outside of risk appetite for each principal risk;
- the Office of the Chief Risk Officer is responsible for reporting on the Group's risk profile at an aggregate level by consolidating reporting from the 2LOD Group Risk Function;
- risk reports are designed to report against principal risks and sub risks in a structured and consistent way so that the usability of reports is consistent across risk types and risk committees;
- reports are designed with reference to regulatory principles for Effective Risk Data Aggregation and Risk Reporting (BCBS 239), addressing report accuracy, comprehensiveness, clarity, usefulness, frequency, and distribution;
- the specific processes for monitoring, reporting, and reviewing risks are set out in the relevant policy and procedural documents consistent with Financial and Regulatory Reporting Risk Policy; and
- at Group level, the risk monitoring, reporting, and review process is overseen by the ERC and its appointed committees. All the key identified risk types are reported monthly, with monthly reporting of risk dashboards including associated risk appetite metrics compliance.

Management and the Board also consider other themes that have an impact on the risk profiles of more than one risk type. The Group currently uses a coordinated approach in relation to risk driven by both ESG factors and Group Transformation related factors.

The Board Risk Report is the report used by the Group to review and monitor the Group's Risk Profile across all Principal Risks and monitor compliance with Risk Appetite and Risk Policies. The Report is subject to review by ERC prior to review by the Group's management body (Board and BRC).

This risk management approach is enabled by an operating model where responsibilities for each activity are clearly assigned and adequately resourced. The design, implementation and performance of this risk management approach is subject to risk governance.

2.3 Risk Roles and Responsibilities

Three lines of Defence

Every colleague has a specific responsibility for ensuring the Group operates within its risk appetite. These responsibilities are defined in terms of the role of colleagues in the 'Three Lines of Defence' as set out below. The role of each of the Three Lines of Defence is:

First Line of Defence (1LOD): Primary responsibility for managing risk within risk appetite and pre-defined triggers.

Second Line of Defence (2LOD): Establishing the policies under which 1LOD activities shall be performed and taking reasonable steps to ensure that the Group does not suffer outcomes outside of risk appetite. This involves:

- setting and owning risk policy, establishing the policies and standards which must be implemented by the 1LOD in relevant activities;
- ensure that standards are reliably adhered to and thereby ensure a high level of confidence that there are unlikely to be outcomes outside of risk appetite;
- establishing limits and triggers, consistent with the risk appetite of the Group;
- establishing tolerances for exposure to risk to minimise the possibility of having an outcome outside risk appetite;
- using standard methods to conduct oversight of the risk types associated with activity and inadequate controls;
- independently review, oversee, and monitor the performance of the financial balance sheet and process universe against pre-defined control tolerances; and
- reporting and escalation obligations are adhered to.

Third Line of Defence (3LOD): Ensuring the 1LOD and 2LOD assess whether all significant risks are identified and appropriately reported by management to the executive and board of management, as well as assessing whether risks are adequately controlled. GIA provides independent, reasonable assurance to key stakeholders on the effectiveness of the Group's risk management and internal control framework. GIA conducts risk based assignments covering Group businesses and functions (including outsourcing providers - subject to the right to audit), with ratings assigned as appropriate. Findings are communicated to senior management and other key stakeholders, with remediation plans monitored for progress against agreed completion dates.

Group Risk Organisational Structure

Group Risk comprises of Group Risk functions and Group Compliance. A 2LOD Risk Officer is assigned for each principal risk type, and for each sub risk type for operational risk. This ensures that there is unambiguous 2LOD oversight responsibility for every principal risk type, and every operational risk sub risk type – with no gaps or duplication. In addition, for colleagues throughout the Group, the Board, and regulators, it is clear who they should approach within Group Risk regarding any given type of risk.

Group Risk is responsible for the Group's overall risk strategy and integrated risk reporting to the Board, the BRC and Group Executive team. The function is led by the Group CRO who is a member of the Group Executive team and reports directly to the Group CEO and may directly influence business decisions. The Group CRO is leaving the Group in 2024, and a recruitment process is underway.

2.4 Risk Culture

The Group Risk Appetite Statement articulates a tolerance for the inevitable outcomes of taking risk. The risk appetite is set in conjunction with the Group's business strategy and sets the risk the Group is prepared to take.

It guides the Group, including its subsidiaries, in its risk taking and related business activities. The culture of the Group reflects the balance between:

- risk management and financial return; and
- risk taking and incentives.

Risk culture within the Group requires all colleagues to have a holistic understanding of the risks posed by the activities they undertake. It is underpinned by the Group's Purpose and Values that should act as a behavioural compass.

The Group's risk culture is a key element of the Group's effective RMF, which enables decisions to be taken in a sound and informed manner.

Standards of behaviour are detailed in the Group Code of Conduct to which all management and staff must adhere and affirm annually. The Speak Up Policy sets out the steps staff can take to raise any concerns they might have of wrongdoing, risk, or malpractice in the Group.

2.5 Recovery and resolution planning

In line with the provisions of the Single Resolution Mechanism Regulation and the Bank Recovery and Resolution Directive (BRRD), the Group maintains a recovery plan which sets out options to restore financial stability and viability of the Group in the event of the relevant circumstances arising. The Group's recovery plan is approved by the Board on the recommendation of BRC and ALCO.

The Group resolution plan is prepared by the Single Resolution Board (the central resolution authority within the Banking Union) in cooperation with the Central Bank of Ireland, rather than by the Group itself.

The plan establishes how the resolution authorities intend to approach the Group's resolution and for the Group the Preferred Resolution Strategy is a single point of entry bail-in at BoIG plc level.

The Group works closely with the resolution authorities to support the preparation of the resolution plan, to identify and address any impediments to the execution of the resolution strategy and to demonstrate that it is resolvable and prepared for crisis management. The resolution authorities also determine the MREL corresponding to the loss absorbing capacity necessary to execute the resolution strategy.

2.6 Risk governance

Risk Governance

The Board has ultimate responsibility for the governance of risk at the Group. Oversight of risk activities is achieved through a risk governance structure designed to facilitate the risk identification, assessment, monitoring, mitigating and ultimate reporting on risk activities and material considerations to the Board.

The Board is assisted in its risk governance responsibilities by the delegated sub-committees of the Board, primarily the BRC and GAC respectively and at executive level by the ERC, ALCO and their supporting appointed executive committees, namely the Group Credit Risk Committee (GCRC), Group Regulatory and Conduct Risk Committee (GRCRC), Group Operational Risk Committee (GORC), Private Equity Risk Committee (PERC), Risk Measurement Committee (RMC), Balance Sheet and Structural Risk Committee, Market Risk Committee, Group Securitisation Committee and Group Liquidity / Capital Committee (if required).

The Board of Directors is ultimately accountable for the effective management of risks and for the system of internal controls in the Group.

The system of internal control is designed to ensure thorough and regular evaluation of the nature and extent of risks and the ability of the Group to react accordingly. The Board is supported by the BRC on risk oversight matters and the GAC in relation to the effectiveness of the system of internal controls.

Each of the Board committees and the executive committees that form part of the risk governance framework operate in accordance with clear terms of reference, approved by the Board or parent executive committee, setting out their respective roles and responsibilities.

The ERC and ALCO are the Group's most senior management risk committees and operate with delegated authority from the GEC, which monitors and oversees the performance of these committees. The BRC also exercises oversight of these committees, as outlined in their respective terms of reference.

The ERC is chaired by the Group CRO and ALCO is chaired by the Group CFO. The membership of these committees comprises members of the Group Executive team and Groupwide divisional and control function executives. The ERC met 24 times and the ALCO met 11 times, during 2023.

The ERC is responsible for the oversight of all material risk types across the Group, with the exception of certain financial risks and outcomes including market risk, funding and liquidity risk, and capital adequacy risk. The ERC and ALCO delegate specific responsibility for oversight of major classes of risk to specific appointed committees and individuals that are accountable to them.

The Board, ERC, ALCO, and their appointed committees are subject to annual effectiveness reviews, which may result in further enhancement.

The relevant ERC appointed committees are set out in the following table.

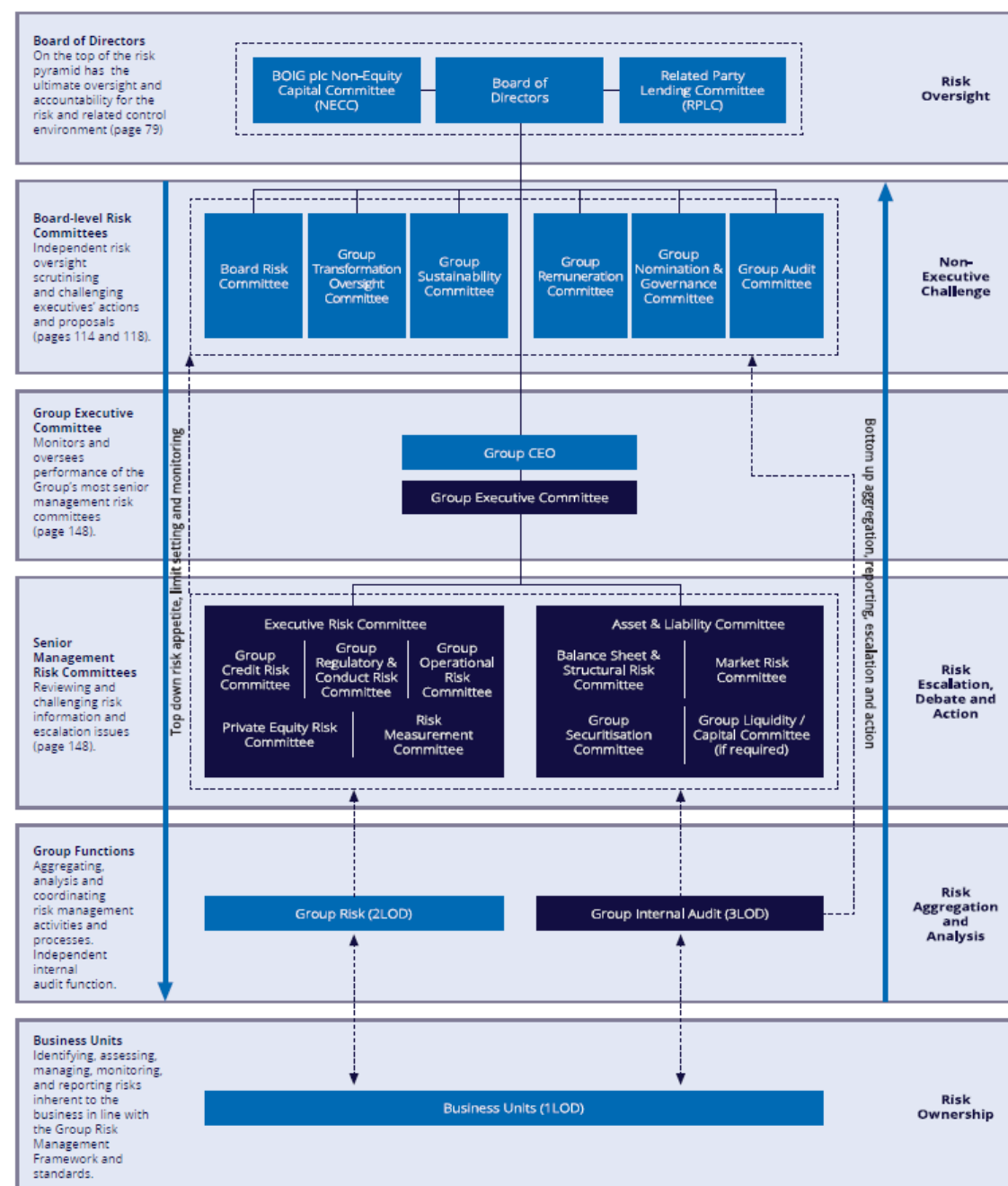
Committee	Delegated responsibility
Group Credit Risk Committee	Oversight of Credit risk.
Group Regulatory and Conduct Risk Committee	Oversight of Conduct and Regulatory risk.
Group Operational Risk Committee	Oversight of Operational risk.
Private Equity Governance Committee	Oversight of Private Equity risk.
Risk Measurement Committee	Oversight of Model risk.

The relevant ALCO appointed committees are set out in the following table.

Committee	Delegated responsibility
Balance Sheet & Structural Risk Committee	Responsible for supporting ALCO in the areas of Funding Transfer Pricing and Structural Risk Management.
Market Risk Committee	Responsible for supporting ALCO in the governance, measurement and control of market risk and oversight of derivative activity.
Group Securitisation Committee	Supports ALCO in providing oversight of collateral management & asset encumbrance.
Group Liquidity / Capital Committee	May be established in line with the escalation process outlined in the Group's Recovery Plan to provide senior management oversight and direction in respect of the Group's liquidity / funding and capital positions during periods of market disruption.

Subsidiary Oversight

The Board has the overall responsibility for ensuring that there is an appropriate governance framework in place for the Group. The Board exercises oversight over Group subsidiaries, while respecting the independent legal and regulatory responsibilities that apply to the boards of such subsidiaries. The Group Subsidiary Governance Policy sets out how the Board exercises oversight of Group subsidiaries and the high-level governance standards that shall be applied across the Group in a proportionate manner.



Business and Strategic Risk**Definition:**

The risk of not achieving agreed strategic and business goals, arising due to inadequate planning or implementation, and / or changes in the external environment or economic factors. This also includes adverse impacts on the franchise value, e.g., by implementing an unsuitable strategy, or maintaining an obsolete business model.

Risk management, measurement and reporting

The Group's risk monitoring and reporting process operates within Group Risk. Business and strategic risk is a principal risk type in the RMF with a dedicated 2LOD owner in Group Risk. It is the responsibility of the Head of Business, Strategic and Sustainability Risk to take reasonable steps to ensure that the Group does not suffer outcomes outside of business and strategic risk appetite.

Divisions and business units are responsible for delivery of their business plans and management of such factors as pricing, sales and loan volumes, operating expenses and other factors that may introduce earnings volatility. Business, divisional and portfolio strategy is developed within the boundaries of the Group's strategy as well as the Group's Risk Appetite Statement.

The current status of business and strategic risk, including risk dashboards and risk appetite compliance is reported through the Board Risk Report on a monthly basis. The key dimensions evaluated within business and strategic risk are:

- the strength of the Group's returns;
- the Group's performance against business plans including strength of returns;
- evaluation and risk assessment of the Group's strategy and implementation of the strategy;
- strength of the Group's competitive position; and
- impact of the economic and geopolitical environment on the Group's strategy.

The Group also reviews business and strategic risk as part of the annual risk identification process.

Risk mitigation

The Group mitigates business risk through business planning methods, such as the diversification of revenue streams, cost base management and oversight of business plans, which are informed by expectations of the external environment and the Group's strategic priorities.

At an operational level, the Group's annual budget process sets expectation at a business unit level for lending volumes, margins, and costs. The tracking of actual and regularly forecasted volumes, margins and costs against budgeted levels is a key financial management process in the mitigation of business risk. In the case of strategic risk, this risk is mitigated through regular updates to the Board on industry developments, the macroeconomic environment and associated trends which may impact the Group's activities, review of the competitive environment and strategies at a divisional and business unit level. On an annual basis, the Board reviews the Group's strategic objectives and key underlying assumptions to confirm that the strategic shape and focus of the Group remains appropriate.

Definition

Conduct risk is the risk of poor outcomes for, or harm to, customers, clients, and markets, arising from the delivery of the Group's products and services.

The Group is exposed to conduct risk as a direct and indirect consequence from all the activities that the Group engages in during its normal conduct of its business. These risks may materialise from failures to comply with regulatory requirements or expectations, as an outcome of risk events in other principal risk categories, from changes in external market expectations or conditions, provision of products and services and the various activities performed by staff, contractors and by third party suppliers.

The key conduct risk exposure areas managed by the Group include the following:

Market Integrity: The risk that the Group fails to ensure that business activities, and those carrying them out, are authorised and comply with regulatory requirements, manage conflicts of interest, observe proper standards of market conduct and enable employees to raise concerns without fear of retaliation.

Customer Protection: The risk that Group sales (including advice), execution and remediation of our products and services fail to meet the expectations of our customers and regulators.

Financial Crime: The risk that the Group's associated persons (employees or third parties) commit or facilitate financial crime, and / or the Group's systems, products and / or services are used by customers, employees or third parties to facilitate or attempt to facilitate financial crime.

Data Privacy: The Group does not comply with relevant data protection and data privacy laws and regulations.

Risk management and measurement

From an ESG perspective, 'Green Washing', or misrepresenting the environmental benefits of green financial products or investments, is an emerging risk within conduct risk. The Group has updated its product approval policy and process to scrutinise green products with this risk in mind.

The Group manages conduct risk under the RMF. The framework establishes the common principles for the risk management process of identifying, assessing, monitoring, and mitigating risks to the Group.

This is implemented by accountable executives and monitored by the GRCRC, the ERC, the BRC and Board in line with the overall Group risk governance structure. The effective management of conduct risk is primarily the responsibility of business management and is supported by Group Compliance. The Group has no tolerance for knowingly causing harm to customers, clients, and markets, arising from the delivery of its products and services. However, we recognise that mistakes and errors of judgement or failures of processes can and do lead to customer harm which we have limited tolerance for. We mitigate this risk through our conduct risk policies.

Risk mitigation

Risk mitigants include the early identification, appropriate assessment, measurement and reporting of risks. The primary risk mitigants for conduct risk are the establishment, through Group conduct policies, of standard mitigating requirements throughout the business. The standards of behaviour are detailed in the Group Code of Conduct Policy to which all management and staff must adhere and affirm annually. The Speak Up Policy sets out the steps staff can take to raise any concerns they might have of wrongdoing, risk, or malpractice in the Group. A training schedule is in place across the Group to support staff and management in this regard.

Risk reporting

The current status of conduct risk, including risk dashboards and risk appetite compliance, is reported through the Board Risk Report on a monthly basis. The Group Chief Compliance Officer reports on the status of conduct risk in the Group, including the status of the top conduct risks, assurance activity, the progress of risk mitigation plans, issues and breaches, and significant regulatory interactions to the ERC and BRC by way of the quarterly Group Chief Compliance Officer report.

Definition *(audited)*

Life insurance risk¹ is the risk of unexpected variation in the amount and timing of claims associated with insurance benefits.

This variation, arising from changing customer mortality, life expectancy, health or behavioural characteristics, may be short or long term in nature.

Risk management *(audited)*

The Group manages life insurance risk under its RMF. Life insurance risk is underwritten and managed by NIAC, a wholly owned subsidiary of the Group. The management of life insurance risk is the responsibility of the NIAC Board which is delegated through internal governance structures. Aggregate life insurance risk exposure and exposure to the subcategories of life insurance risk are monitored through a suite of management reporting metrics.

The risks that arise as a result of writing life insurance business are also managed by a number of governance fora as well as senior management. The minimum standards required when managing these risks are set out in a suite of NIAC Board approved policies.

The Group transfers some life insurance risk to reinsurance companies who then meet an agreed share of the claims that arise on a book of business in return for a premium. This creates a credit exposure to these reinsurance companies which is managed within the NIAC RMF with responsibilities delegated through the Reinsurance Risk Policy. A review of the panel of reinsurers that may be used and the structure of reinsurance arrangements is carried out at least annually. Senior members of the management team with actuarial and underwriting expertise, contribute to the effective oversight of this risk.

Risk measurement *(audited)*

Risk experience is monitored regularly with actual claims experience being compared to the underlying risk assumptions. The results of this analysis are used to inform management of the appropriateness of those assumptions for use in pricing, capital management and new product design.

Exposure to life insurance risk is measured by means of sensitivity and scenario testing. Risk capital is calculated for each individual risk type by stressing the best estimate assumptions of future experience by extreme, but plausible, factors. The stress factors are pre-defined by regulation and are set at a level with an expected frequency of occurrence of one year in every 200. NIAC also carries out an ORSA annually which is overseen by the NIAC Board. Within the ORSA, NIAC's risk profile is considered, both quantitatively and qualitatively, in a holistic manner with potential areas of risk identified along with conclusions in respect of how those risks will be mitigated.

Risk mitigation *(audited)*

The Group mitigates the potential impact of life insurance risk through a number of measures. Capital is held against exposure to life insurance risk. Exposure to this risk is also managed and controlled by the use of medical and financial underwriting, risk mitigating contract design features and reinsurance, as detailed in risk management policies.

Risk reporting *(audited)*

The current status of life insurance risk, including risk dashboards and risk appetite compliance, is reported through the Board Risk Report on a monthly basis. NIAC's ORSA report in respect of the NIAC annual assessment is also presented to the ERC on an annual basis.

1. Whilst insurance undertakings are not fully consolidated in the regulatory consolidation this section is included for completeness as the undertakings impact the regulatory group's capital and capital requirements.

Definition

Regulatory risk is the risk that the Group does not identify legal or regulatory change or appropriately manage its relationships with its regulators.

The Group is exposed to regulatory risk as a direct and indirect consequence from all the activities that the Group engages in during of its normal conduct of its business activities. Regulatory risk may materialise from failure to identify new or existing regulatory and / or legislative requirements or deadlines, ensure appropriate governance is in place to embed regulatory requirements into processes, or the failure to appropriately manage the Group's regulatory relationships. Regulatory risk includes ineffective regulatory change governance and ineffective regulatory engagement.

Ineffective regulatory change governance is the risk that regulatory change is not identified and / or there is an inappropriate approach adopted to implement the regulatory changes required.

Ineffective Regulatory Engagement is the risk of inappropriate or unprofessional interaction with our regulators.

Risk management and measurement

The Group manages regulatory risk under the RMF. The framework establishes the common principles for the risk management process of identifying, assessing, monitoring and mitigating risks to the Group. This is implemented by accountable executives and monitored by the GRCRC, the ERC, the BRC and Board in line with the overall Group risk governance structure.

The effective management of regulatory risk is primarily the responsibility of business management and is supported by Group Compliance. The Group has no tolerance for knowingly failing to meet regulatory expectations. However, we recognise that mistakes and errors of judgement or failures of processes, can and do lead to regulatory failings which we have limited tolerance for.

Risk mitigation

Risk mitigants include the early identification, appropriate assessment and measurement and reporting of risks. The primary risk mitigants for regulatory risk are the existence of appropriate procedures in place throughout the business.

Risk reporting

The current status of regulatory risk, including risk dashboards and risk appetite compliance, is reported through the Board Risk Report on a monthly basis. The Group Chief Compliance Officer reports on the status of regulatory risk in the Group, including the status of the top regulatory risks, assurance activity, the progress of risk mitigation plans, issues and breaches, and significant regulatory interactions to ERC and BRC by way of the quarterly Group Chief Compliance Officer report.

Definition *(audited)*

Credit risk is the risk of loss resulting from a counterparty being unable to meet its contractual obligations to the Group in respect of loans or other financial transactions, or any other deterioration in a counterparty's creditworthiness.

This risk includes debt underwriting risk, loan origination risk, credit concentration risk, cross-border transfer risk, credit quality deterioration risk, default risk, and collateral valuation risk. At portfolio level, credit risk is assessed in relation to the degree of name, product, industry, and geographic concentration to inform the setting of appropriate risk mitigation and transfer mechanisms, and to assess risk capital requirements. Risk appetite measures for credit risk are set by the Board.

Credit risk arises from loans and advances to customers and from certain other financial transactions such as those entered into by the Group with financial institutions, sovereigns and state institutions.

Credit facilities can be largely grouped into the following categories:

- cash advances (e.g. loans, overdrafts, revolving credit facilities (RCFs) and bonds), including associated commitments and letters of offer;
- credit related contingent facilities (issuing of guarantees / performance bonds / letters of credit);
- derivative instruments; and
- settlement / clearing lines.

The manner in which the Group's exposure to credit risk arises, its policies and processes for managing it and the methods used to measure and monitor it are set out below.

Debt underwriting risk

Debt underwriting risk is the risk of loss arising from movements in credit spreads or other changes in market conditions in respect of debt underwriting transactions.

Loan origination risk

Loan origination risk is the risk of loss from originating credit exposures where asset quality is outside risk appetite.

Credit concentration risk

Credit concentration risk is the risk of loss due to excessive exposures to a single entity, or group of entities with similar activities and similar economic characteristics, which would cause their ability to meet contractual obligations to be similarly affected by changes in economic or other conditions.

Cross border transfer risk

Cross-border transfer risk is the risk that sovereign or other counterparties within a country may be unable, unwilling, or precluded from fulfilling their cross-border obligations due to changing political, financial, or economic circumstances such that a loss to the Group may arise.

Credit quality deterioration risk

Credit quality deterioration risk is the risk for potential loss due to a ratings downgrade (e.g. Probability of Default (PD) or IFRS9 staging migration).

Default risk

Default risk is the risk that companies or individuals (counterparties) will be unable to meet the required payment on their debt obligations.

Collateral valuation risk

Collateral valuation risk is the risk of loss arising from a change in the value or enforceability of security held due to errors in the nature, quantity, pricing, or characteristics of security held in respect of a transaction with credit risk.

ESG factors, including climate change represent a common driver across the Group's principal risk types, including credit risk and its sub risks. ESG risk factors are managed as part of credit risk and its sub risks including in policies, risk appetite, risk monitoring and reporting.

Credit risk management *(audited)***Credit risk statement**

The Group actively seeks opportunities to provide credit facilities to borrowers who are assessed as having the capacity to service and discharge their obligations and to allow growth in the volume of loan assets in line with the Group's risk appetite and to provide a solid foundation for sustained growth in earnings and shareholder value.

The Group's credit strategy is to underwrite credit risk within a clearly defined Board-approved risk appetite.

This is done through the extension of credit to customers and financial counterparties in a manner that results in an appropriate return for the risks taken and on the capital deployed, while operating within Board-approved risk parameters.

Credit risk management

Within the Group's lending divisions the approach to the management of credit risk is focused on a detailed credit analysis at origination followed by early intervention and active management of accounts where creditworthiness has deteriorated.

Through its ongoing credit review processes, the Group seeks early identification of deteriorating loans with a view to taking corrective action to prevent a loan becoming credit-impaired.

Typically, loans that are at risk of becoming credit-impaired are managed by dedicated specialist units / debt collection teams focused on working out loans. A separate Customer Loan Solutions function provides experienced and dedicated management of challenged assets. For loans that become credit-impaired, the focus is to minimise the loss that the Group will incur. This may involve implementing forbearance solutions, entering into restructuring arrangements, action to enforce security, asset / portfolio disposals or securitisations.

The Group Credit Risk Function has responsibility for the independent oversight of credit risk and for overall risk reporting to the GCRC, ERC, the BRC and the Board on developments in credit risk and compliance with specific risk limits. It is led by the Chief Credit Officer who reports directly to the Group CRO. The function provides independent oversight of the Group's credit risk strategy, credit risk management information and credit risk underwriting.

Credit policy

The core values and principles governing the provision of credit are contained in the Group Credit Risk Policy which is approved by the Board. The Group Credit Risk Policy is supported by the following additional credit risk related policies; i) Group Impairment Policy; ii) Group Forbearance Policy; iii) Group Property Collateral Valuation Policy; iv) Group Country Risk Policy; v) Group Bank Risk Policy and vi) Group Policy on Definition of Default. Individual business unit loan origination standards set out key loan acceptance criteria at product, sector, or portfolio level. Business unit credit risk procedures are also required for each portfolio or business unit involved in lending and credit related activities. These documents describe the end-to-end credit risk lifecycle. These standards and procedures are aligned with, and have regard to, the Group's Risk Appetite Statement and applicable credit limits, the lessons learned from the Group's loss history, the markets in which the business units operate and the products which they provide.

Lending authorisation

The Group's credit risk management systems operate through a hierarchy of lending authorities which are related to internal loan ratings. All exposures above certain levels require approval by the Group Credit Transactions Committee (GCTC). Other exposures are approved according to a system of tiered individual authorities, which reflect credit competence, proven judgement, and experience.

Material lending proposals are referred to credit underwriting units for independent assessment / approval or formulation of a recommendation for subsequent adjudication by the applicable approval authority. Certain retail loan applications may be approved automatically where they meet both approved policy rules and minimum thresholds for the score produced by internal credit

Controls and limits

The Group imposes credit risk control limits and country risk exposure guide points to mitigate significant concentration risk. These limits and guide points are informed by the Group's Risk Appetite Statement which is approved annually by the Board. It includes specific long-term limits for each category and maximum exposure limits to a customer or a group of connected customers.

The Board approves a framework of country maximum exposure guide points which are used as benchmarks for the setting of country limits, with individual country limits approved by GCRC. A maximum exposure limit framework for exposures to banks is also approved by the GCRC for each rating category. Limits are set and monitored for countries, sovereign obligors, and banks in accordance with these frameworks.

Credit risk measurement *(audited)*

All credit transactions are assessed at origination for credit quality and the borrower is assigned a credit grade based on a predefined credit rating scale. The risk and consequently the credit grade, is reassessed periodically. The use of internal credit rating models and scoring tools, which measure the degree of risk inherent in lending to specific counterparties, is central to the credit risk assessment and ongoing management processes within the Group.

Loan impairment

Under IFRS 9, essentially all credit risk exposures not measured at fair value through profit or loss (FVTPL) are subject to recognition of an impairment loss allowance for ECL. The Group's impairment modelling methodologies are approved by Model Risk Committee (MRC) and / or RMC and the quantum of the Group's impairment gain or loss, NPEs and impairment loss allowances are reviewed by the GCRC and the ERC in advance of providing a recommendation to the GAC.

The Group's credit risk rating systems and impairment models and methodologies play a key role in quantifying the appropriate level of impairment loss allowance.

Credit risk mitigation *(audited)*

An assessment of the borrower's ability to service and repay the proposed level of debt (principal repayment source) is undertaken for credit requests and is a key element in the Group's approach to mitigating risk.

In addition, the Group mitigates credit risk through the adoption of both proactive preventative measures (e.g. controls and limits) and the development and implementation of strategies to assess and reduce the impact of particular risks should these materialise, including hedging, securitisation, the taking of collateral (which acts as a secondary repayment source) and selective asset / portfolio disposals.

Risk transfer

The objective of risk mitigation / transfer is to limit the risk impact to acceptable levels. At portfolio level, credit risk is assessed in relation to the degree of name, sector, and geographic concentration. Where possible emergence of undue risk concentrations are identified, the risk capital implications are assessed and, where appropriate, risk transfer and mitigation options (e.g. disposals, securitisations, hedging strategies) are explored.

Collateral

Credit risk mitigation includes the requirement to obtain collateral, depending on the nature of the product and local market practice, as set out in the Group's policies and procedures. The Group takes collateral as a secondary repayment source, which can be called upon if the borrower is unable or unwilling to service and repay debt as originally envisaged. Various types of collateral are accepted, including property, securities, cash, guarantees and insurance. The nature and level of collateral required depends on a number of factors including, but not limited to, the amount of the exposure, the type of facility made available, the term of the facility, the amount of the borrower's own cash input and an evaluation of the level of risk or PD. The Group's requirements around completion, valuation and management of collateral are set out in appropriate Group policies, business unit loan origination standards and credit risk procedures.

Counterparty credit risk arising from derivatives

Trading in over-the-counter (OTC) derivatives is governed by the European Market Infrastructure Regulation. The Group has executed standard internationally recognised documents such as International Swaps and Derivatives Association (ISDA) agreements and Credit Support Annexes (CSAs) with all of its derivative financial counterparties.

In addition, the Group has Cleared Derivatives Execution Agreements (CDEAs) with its principal interbank derivative counterparties enabling the Group to clear eligible derivatives through an EU approved and regulated central counterparty. If a derivative contract cannot be cleared through a central counterparty, a CSA serves to limit the potential cost of replacing that contract at market price in the event of a default by the financial counterparty. All of the Group's financial counterparty derivatives are covered by CDEAs or CSAs and are hence collateralised.

Credit risk reporting / monitoring *(audited)*

Credit risk at a Group, divisional and significant operating unit / product type level is reported on a monthly / quarterly basis to senior management. Reporting includes information on loan book composition and asset quality (credit grade, PD profiles, impairment loss allowances and RWAs).

The current status of credit risk, including risk dashboards and risk appetite compliance, is reported through the Board Risk Report on a monthly basis. A report on exceptions to credit policy is reviewed by GCRC members on a quarterly basis.

On a monthly / quarterly basis the GCRC considers credit concentration reports which track changes in portfolio, product / sectoral and single name concentrations measured under agreed parameters. In addition, other reports are submitted to senior management and the Board as required.

The Group maintains an independent Credit Review function which provides ongoing assessment of the Group's credit risk management processes. Using a risk based approach, the Credit Review function carries out periodic reviews of Group lending portfolios, lending units and credit underwriting units. The results of reviews carried out by the Credit Review function are communicated to the Board and senior management.

Management of challenged assets *(audited)*

The Group has in place a range of initiatives to manage challenged and non-performing credit. These include:

- enhanced collections and recoveries processes;
- specialist work-out teams to ensure early intervention for borrowers in or potentially in financial difficulty;
- intensive review cycles for 'at risk' exposures and the management of arrears and excess positions; and
- support from central teams in managing 'at risk' portfolios at a business unit level.

Group forbearance strategies

A forbearance measure is a concession to a borrower for reasons relating to the actual or apparent financial difficulties of that borrower. A concession is any change to the terms and conditions of a credit agreement (e.g. term extension, margin change, release of security, covenant waiver) or a total or partial refinancing of a credit facility. If the concession to a borrower is not granted for reasons relating to the actual or apparent financial difficulty of that borrower, then it does not represent a forbearance measure. The key objective of granting forbearance measures are to; prevent performing borrowers entering arrears, from reaching a non-performing status or to pave the way for non-performing borrowers to return to performing status. Forbearance measures are intended to return the exposure to a sustainable repayment situation.

Forbearance strategies adopted by the Group seek to maximise recoveries and minimise losses arising from nonrepayment of debt, while providing suitable and sustainable restructure options that are supportive of customers in actual or apparent financial difficulties. Such strategies may include, where appropriate, one or a combination of measures such as a temporary reduction in contractual payments, a term extension, capitalisation of arrears, adjustment, or nonenforcement of covenants and / or more permanent restructuring measures. Forbearance requests are assessed on a case by case basis, taking due consideration of the individual circumstances and risk profile of the borrower.

A request for forbearance will always be a trigger event for the Group to undertake an assessment of the customer's financial circumstances and ability to repay prior to any decision to grant a forbearance treatment. This assessment may result in a deterioration in the credit grade assigned to the loan, potentially impacting how frequently the loan must be formally reviewed. This assessment may also result in a loan being considered to have experienced a 'significant increase in credit risk' or becoming classified as credit-impaired.

The Group Forbearance Policy outlines the core principles and parameters underpinning the Group's approach to forbearance with individual business unit procedures defining in greater detail the forbearance strategies appropriate to each unit.

Borrower compliance with revised terms and conditions may not be achieved in all cases. Non-compliance could, for example, arise because the individual circumstances and risk profile of the borrower continue to deteriorate, or fail to show an expected improvement, to the extent that an agreed reduced level of repayment can no longer be met.

In the event of non-compliance, a request for further forbearance may be considered. It is possible that the Group, by virtue of having granted forbearance to a borrower, could suffer a loss that might otherwise have been avoided had enforcement action instead been taken. This could, for example, arise where the value of security held in respect of a loan diminishes over the period of a forbearance arrangement which ultimately proves unsustainable.

It is the Group's policy to measure the effectiveness of forbearance arrangements over the lifetime of those arrangements. A forbearance arrangement is considered to be effective where the risk profile of the affected borrower stabilises or improves over the measured time period, resulting in an improved outcome for the Group and the borrower. The measurement of effectiveness takes account of the nature and intended outcome of the forbearance arrangement and the period over which it applies.

Asset quality - Loans and advances to customers *(audited except where denoted unaudited)***Asset quality methodology**

The Group has allocated financial instruments into one of the following categories at the reporting date:

Stage 1 - 12 month expected credit losses (not credit-impaired)

Financial instruments which have not experienced a significant increase in credit risk since initial recognition and are not credit-impaired. An impairment loss allowance equal to 12-month ECL is recognised, which is the portion of lifetime ECL resulting from default events that are estimated within the next 12 months.

Stage 2 - Lifetime expected credit losses (not credit-impaired)

Financial instruments which have experienced a 'significant increase in credit risk since initial recognition' and are not credit-impaired. An impairment loss allowance equal to lifetime ECL is recognised, being the ECL resulting from all estimated default events over the expected life of the financial instrument. 'Credit risk' in this context refers to the change in the risk of a default occurring over the expected life of the financial instrument.

Stage 3 - Lifetime expected credit losses (credit-impaired)

Credit-impaired financial instruments, other than Purchased or Originated Credit-impaired (POCI) financial assets. An impairment loss allowance equal to lifetime ECL is recognised. The manner in which the Group identifies financial assets as credit-impaired results in the Group's population of credit-impaired financial assets being consistent with its population of defaulted financial assets (in accordance with regulatory guidelines including EBA Guidelines on the application of the definition of default under Article 178 of the Capital Requirements Regulation (CRR)). This encompasses loans where: (i) the borrower is considered unlikely to pay in full without recourse by the Group to actions such as realising security and / or (ii) the borrower is greater than or equal to 90 days past due and the arrears amount is material.

POCI financial assets

Financial assets that were credit-impaired at initial recognition. A POCI is not subject to any initial impairment loss allowance but an impairment loss allowance is subsequently recognised for the cumulative changes in lifetime ECL since initial recognition. A POCI remains classified as such until it is derecognised, even if assessed as no longer credit-impaired at a subsequent reporting date. POCI obligations remain outside of the normal stage allocation process for the lifetime of the obligation.

Further information on the approach to identifying a 'significant increase in credit risk since initial recognition' and in identifying credit-impaired assets is outlined in the following section on 'credit risk methodologies'.

The Group continue to apply the following classifications at the reporting date.

Forborne loans

Loans where a forbearance measure has been granted and where the criteria to exit a forborne classification, in line with EBA guidance, are not yet met. Loans that have never been forborne or loans that are no longer required to be reported as 'forborne' are classified as 'non-forborne'.

Non-performing exposures (NPE)

These are:

- credit-impaired loans which includes loans where the borrower is considered unlikely to pay in full without recourse by the Group to actions such as realising security, and / or loans where the borrower is greater than or equal to 90 days past due and the arrears amount is material; and
- other loans meeting NPE criteria as aligned with regulatory requirements.

Credit risk methodologies (audited)

The Group's credit risk methodologies encompass internal credit rating models and scoring tools and impairment models and are set out below.

Internal credit rating models

The use of internal credit rating models and scoring tools, which measure the degree of risk inherent in lending to specific counterparties, is central to the credit risk assessment and ongoing management processes within the Group.

The primary model measures used are:

- **PD**: the probability of a given counterparty defaulting on any of its borrowings from the Group within the next twelve months;
- **Exposure at Default (EAD)**: the exposure the Group has to a defaulting borrower at the time of default; and
- **LGD**: the loss incurred (after the realisation of any collateral) on a specific transaction should the borrower default, expressed as a percentage of EAD.

These measures are used to calculate regulatory expected loss and are fully embedded in and form an essential component of the Group's operational and strategic credit risk management and credit pricing practices.

The structure of internal rating systems

The Group divides its internal rating systems into non-retail and retail approaches. For the Group's retail consumer and smaller business portfolios, the credit risk assessment is grounded on application and behavioural scoring tools. For larger commercial and corporate customers, the risk assessment is underpinned by statistical risk rating models which incorporate quantitative information from the customer (e.g. financial statements) together with a qualitative assessment of non-financial risk factors such as management quality and market / trading outlook. Lending to financial institutions is assigned an internal rating supported by external ratings of the major rating agencies.

PD calculation

For the purposes of internal credit rating models, the Group produces estimates of PD on either or both (hybrid PD) of the following bases:

- Through-the-Cycle (TtC) estimates are estimates of annual default rate, averaged over an entire economic cycle. These are in effect averaged expectations of PD for a borrower over the economic cycle; and
- Cyclical estimates are estimates of default applicable to the next immediate twelve months. These cyclical estimates partially capture the economic cycle in that they typically rise in an economic downturn and decline in an economic upturn but not necessarily to the same degree as default rates change in the economy.

Non-retail internal rating systems

The Group has adopted the Foundation Internal Ratings Based (FIRB) approach for most of its non-retail portfolios. Under this approach, the Group calculates its own estimates for PD and uses supervisory estimates of LGD and credit conversion factors.

To calculate PD under the FIRB approach, the Group assesses the credit quality of borrowers based on transaction and borrower specific characteristics. Scorecards are developed for each significant portfolio or type of lending, with outputs used to assign a PD grade to each borrower. In the case of financial institutions, external credit agency ratings are used to provide a significant input to the Group's ratings approach. For exposures other than financial institutions, external ratings, when available for borrowers, play a role in the independent validation of internal estimates.

For non-retail exposures, the Group calculates PDs on a TtC or cyclical basis depending on the portfolio. The TtC PD estimates are based on internal default experience, or where default data is limited, statistical model estimates combined with available data to reflect the average annual default rate over the course of an economic cycle. The TtC PDs do not vary with the economic cycle and are used to calculate risk weighted exposure amounts and to determine minimum regulatory capital requirements. The cyclical PD estimates which capture a change in borrower risk over the economic cycle are used for internal credit management purposes. Both measures are estimated from the same borrower risk factors.

Retail internal rating systems

The Group has adopted the Retail Internal Ratings Based (IRB) approach for the majority of its retail exposures. Under this approach, the Group calculates its own estimates for PD, LGD and credit conversion factors. External ratings do not play a role within the Group's retail internal rating systems, however, external credit bureau data can play a role in assessing certain borrowers.

Under the Retail IRB approach, scorecards based on internal behavioural data and, where relevant, transaction-specific characteristics are developed for specific portfolios or product types. The output from the scorecard is used to determine the PD estimate.

The Group calculates retail PDs on a TtC or cyclical basis depending on the portfolio. The TtC estimates are calibrated based on long run average annual default rates over the course of an economic cycle (based on internal default experience) within identified discrete risk pools. The cyclical estimates are calibrated based on a weighted average of the expected long run default rate over the course of an economic cycle and the most recently observed annual default rate. These retail PDs are used for both the calculation of risk weighted exposure amounts and for internal credit management purposes.

LGD estimates are based on historic losses and associated costs for all observed defaults for a defined time period. The time period is set for each model to ensure LGD estimates are representative of economic downturn conditions. Some portfolios have a Best Estimate of Expected Loss (BEEL) LGD modelling component for stock default accounts. Estimates of credit conversion factors (which determine the extent to which a currently undrawn amount is expected to be drawn and outstanding at the point of default) are similarly derived based on historic experience from observed defaults and are calibrated to produce estimates of behaviour characteristic of an economic downturn if those are more conservative than the long run average. The assumption that the time periods and data used for the estimation of LGD and credit conversion factors remain representative of economic downturn conditions is subject to review and

Other uses of internal estimates

Internal estimates play an essential role in risk management and decision making processes as well as the credit approval functions, the internal capital allocation function and the corporate governance functions of the Group. The specific uses of internal estimates differ from portfolio to portfolio, and for retail and non-retail approaches, but typically include:

- credit decisioning / automated credit decisioning and borrower credit approval;
- credit management;
- calculation of RAROC;
- internal reporting; and
- internal capital allocation between businesses of the Group.

For other purposes, the cyclical PD estimates are typically used, both the TtC and cyclical estimates feature within internal management reporting.

Control mechanisms for credit rating and impairment models

The Group Model Risk Policy, as approved by the BRC and ERC, sets out the Group's overall approach to model risk management. Supporting standards set out more detailed requirements with respect to development, monitoring and validation of credit rating and impairment models. These standards are approved by the RMC and / or the MRC. Model development and redevelopments for credit rating and impairment models are approved by the RMC and the results of model performance monitoring are reported to the MRC with onward reporting at the RMC on a regular basis.

The Group mitigates model risk for credit rating and impairment models as follows:

- model development standards: the Group adopts centralised standards and methodologies over the operation and development of models. This ensures a common approach in key areas such as documentation, data quality and management and model testing;
- model governance: the Group adopts a uniform approach to the governance of all risk rating model related activities and impairment model related activities, ensuring the appropriate involvement of relevant stakeholders;
- model performance monitoring: credit risk rating and impairment models are subject to testing on a quarterly basis which is reported to the relevant committees. This includes assessment of model performance against observed outcomes, including:
 - rank order of borrowers;
 - accuracy of parameter estimates;
 - the stability of the rating;
 - the quality of data; and
 - the appropriateness of model use.
- independent validation: all models are subject to in-depth analysis on a periodic basis, which includes an assessment of model performance against observed outcomes, including: rank order of borrowers; accuracy of parameter estimates; the stability of the rating population; the quality of data; and the appropriateness of model use. This analysis is carried out by a dedicated unit the 'Independent Validation Unit' (IVU) which is independent of credit origination and management functions.

When issues are raised on risk rating or impairment models, plans are developed to remediate or replace such models within an agreed timeframe.

In addition, GIA regularly reviews the risk control framework, including policies and standards, to ensure that these are being adhered to, meet industry good practices and are compliant with regulatory requirements.

Methodology for loan loss provisioning under IFRS 9

Approach to measurement of impairment loss allowances

Impairment is measured in a way that reflects: (a) an unbiased and probability-weighted amount that is determined by evaluating a range of possible outcomes; (b) the time value of money; and (c) reasonable and supportable information that is available without undue cost or effort at the reporting date about past events, current conditions, and forecasts of future economic conditions. Impairment is measured through the use of impairment models, individual discounted cash flow (DCF) analysis and modelled loss rates, supplemented where necessary by Group management adjustments.

A loss allowance is recognised for all financial instruments in scope for the impairment requirements of IFRS 9. There have been no significant changes in the quality of collateral or credit enhancements as a result of changes in the Group's collateral policies during the year.

An analysis of the Group's net impairment losses / gains on financial instruments and impairment loss allowance is set out in notes 13, 24 and 25 of the consolidated financial statements.

Impairment models

The Group has in place a suite of IFRS 9 compliant impairment models which are executed on a monthly basis. The ECL framework allocates financial instruments to Stage 1, 2 or 3 and measures the applicable 12 month or lifetime ECL. The characteristics of an exposure determine which impairment model is applied, with influencing factors including product type (e.g. residential mortgage, unsecured personal loan, business loan) and market segment (e.g. owner occupier, Buy to Let (BTL), general corporate lending, general business lending).

ECLs are calculated as the sum of the marginal losses for each time period from the reporting date. The key components of the ECL calculation are PD, EAD and LGD and are described below. Other components include discount rate and maturity. The current contractual interest rate is generally used as the discount rate as it is considered a suitable approximation of the effective interest rate determined at initial recognition. For term lending including committed RCFs, contractual maturity is used in the ECL calculation. For other revolving facilities, behavioural life is generally used.

IFRS 9 Probability of Default

Where available, the ratings or underlying scores from internal credit rating models are used as a starting point for IFRS 9 PD calibration. While calibration techniques are similar to those used for regulatory purposes, the IFRS 9 PD differs from through-the-cycle PDs as it is a point-in-time PD measure based on current conditions adjusted to reflect FLI under a range of scenarios. A current point-in-time IFRS 9 PD is calculated as the expected default rate over the next 12 months. This PD is used in the calculation of 12-month ECL and as a starting point in the calculation of lifetime PD. Future point-in-time IFRS 9 PDs are also calculated, being the expected default rates for each year from the start of year two to maturity of the financial instrument. Transition matrices are used to determine how an exposure moves between different PD bands over time.

Together, the current point-in-time IFRS 9 PD and future point-in-time IFRS 9 PDs are used to calculate an IFRS 9 lifetime PD expectation for each FLI scenario. The scenario-weighted averages are used to generate an overall IFRS 9 lifetime PD expectation. At origination of a new financial instrument, these expectations are stored, together with prepayment estimates where relevant and allow for comparison at future reporting dates as one of the key determinants as to whether a 'significant increase in credit risk' has occurred. As lifetime PD was not calculated historically, the Group used reasonable and supportable information available without undue cost or effort to approximate the residual IFRS 9 lifetime PD expectations at initial recognition for most financial instruments originating prior to the adoption of IFRS 9 on 1 January 2018.

The PD component utilised for certain Corporate and Property impairment models was updated in 2023. The PD calibrations for both Corporate and Property portfolios were enhanced to alleviate excessive sensitivity to a small change in the number of defaults and changes in asset quality ratings. The combined result of both of these changes was a c.€32 million increase in impairment loss allowance noting the management judgement utilised in the PD model calibration process for these portfolios at 30 June 2023 is no longer considered to be required.

The PD component of the model utilised for the Leverage Acquisition Finance segment of the Corporate portfolio was updated in 2023 to address a deterioration in the performance of the macroeconomic relationship in the PD model. The macro-economic model factors were reviewed and updated with UK interest rates now included as a model factor with UK unemployment. The impact of this change was a c.€23 million decrease in impairment loss allowance.

The calibration of the Lifetime PD at initial recognition for Retail Ireland residential mortgage impairment models was refined in 2023. This was required to address an unintended dynamic which resulted in a proportion of newly originated loans migrating to stage 2 due to differences in the PD calibration approach for newly originated loans (<6 months on book) versus seasoned loans (>=6 months on book). This resulted in loans migrating from stage 1 to stage 2 despite analysis demonstrating there was no underlying increase in credit risk. The impact of this change was a decrease in impairment loss allowance of c.€7 million.

Further details are provided in note 2 Critical Accounting Estimates and Judgements of the consolidated financial statements.

IFRS 9 Exposure at Default

Current point-in-time EAD is the expected EAD were the borrower to default within the next 12 months. Future point-in-time EAD also incorporates expected contractual cash flows. IFRS 9 EAD differs from regulatory EAD in that it incorporates expected contractual cash flows and caps the exposure at the contractual limit.

IFRS 9 Loss Given Default

Current point-in-time LGD is the loss that would be incurred should default occur in the next 12 months. To facilitate the calculation of lifetime ECL, future point-in-time LGDs are calculated for each year from the start of year 2 to maturity of the exposure. The starting point for individual components of the calculation is historical data. Cure rate is incorporated as appropriate into the calculation and represents the expected propensity of borrowers to return to the non-defaulted book without a loss having been realised. FLI is also incorporated into LGD as appropriate where RoI or UK property collateral is held. IFRS 9 LGD may differ from regulatory LGD as conservatism and downward assumptions are generally removed.

The ECL model framework was updated in 2023 to reflect an enhanced approach to applying realisation rates and costs calculations within the LGD component of the impairment models for Corporate Banking and Business Banking portfolios. The changes to the LGD component of the Corporate Banking and Business Banking impairment models, resulted in an increase in impairment loss allowance of c.€13 million.

The ECL model framework was also updated in 2023 with model factor updates to reflect recent observed information. This included the application of updated portfolio disposal data within the Retail Ireland residential mortgages LGD model, resulting in an increase in impairment loss allowance of c.€20 million. In addition the Retail Ireland and UK residential mortgage LGD models were updated in the year to reflect an updated approach to estimating cure rates to ensure these are representative of future borrower behaviour. The revised methodology applies a prudent approach to accounts that cured from default while availing of Covid related payment breaks. This change results in an increase in impairment loss allowance of c.€22 million.

An internal model validation review completed in 2022 incorporated observations on the estimation of LGD for a segment of the micro-SME portfolio. A new LGD model has been developed for this segment in 2023. The change has resulted in a reduction in impairment loss allowance of c.€10 million.

Individual Discounted Cash Flow analysis

For credit-impaired financial instruments in Business Banking, Corporate Banking and certain other relationship-managed portfolios, the impairment loss allowance is primarily determined by an individual DCF analysis completed by lenders in business units and subject to review, challenge and, potentially, revision by independent credit professionals in underwriting units. The expected future cash flows are based on an assessment of future recoveries and include forecasted principal and interest payments (not necessarily contractual amounts due) and expected cash flows, if any, from the realisation of collateral / security held, less realisation costs.

Modelled loss rates

For some smaller and / or lower risk portfolios, (primarily UK unsecured consumer lending and RoI asset finance portfolios) impairment loss allowances are measured by applying modelled loss rates to exposure amounts. Modelled loss rates are generally determined on a component basis taking into account factors such as the nature and credit quality of the exposures and past default and recovery experience on the portfolio or on portfolios with similar risk characteristics. Generally, a number of different loss rates will be set for a portfolio to allow differentiation of individual financial instruments within the portfolio based on their credit quality.

Identifying a significant increase in credit risk

The Group's standard criteria to identify financial instruments which have had a 'significant increase in credit risk since initial recognition' are applied to the vast majority of loans and advances to customers. 'Credit risk' in this context refers to the change in the risk of a default occurring over the expected life of the financial instrument. Unless credit-impaired or a POCI, a financial instrument is generally allocated to Stage 2 if any of the following criteria are met at the reporting date:

- remaining lifetime PD is more than double and more than 50 basis points higher than the remaining lifetime PD at the reporting date as estimated based on facts and circumstances at initial recognition (adjusted where relevant for changes in prepayment expectations);
- a contractual payment is greater than 30 days past due;
- the credit management PD risk rating for individually assessed / relationship managed assets is above a defined risk threshold; and
- the exposure is a forbore loan or an NPE.

The above criteria are automatically applied as part of the monthly execution of the Group's impairment models. In addition, the Group considers other reasonable and supportable information that would not otherwise be taken into account that would indicate that a significant increase in credit risk had occurred. In this regard, the Group has assessed the impact of elevated inflation and interest rates on asset quality. Credit risk assessments on the impact of higher inflation and interest rates on debt affordability were completed across the Group's loan portfolios. Where appropriate, outputs have been utilised to identify significant increases in credit risk and the classification of assets in stage 2. These credit risk assessments, which leveraged qualitative information not already captured in impairment models, resulted in a credit management decision to classify €2.8 billion of stage 1 residential mortgage and consumer assets as stage 2 at the reporting date, with an associated €33 million increase in impairment loss allowance.

Where a financial asset has been modified but not derecognised, the quantitative assessment of 'significant increase in credit risk' continues to be based on the remaining lifetime PD at the reporting date as estimated based on facts and circumstances at initial recognition (adjusted where relevant for changes in prepayment expectations).

The Group assesses the effectiveness of its staging criteria semi-annually, taking into account considerations such as the extent to which: (i) exposures have moved directly from Stage 1 to Stage 3; (ii) exposures have moved to Stage 3, having spent only a short period in Stage 2; (iii) exposures have moved frequently between Stages 1 and 2; and (iv) there is potential over-reliance on backstop or qualitative criteria in identifying Stage 2 exposures. The Group applies the low credit risk expedient to all debt securities in scope for the impairment requirements of IFRS 9 (with the exception of a small amount of debt securities associated with corporate banking relationships) and similarly to loans and advances to banks, central banks, and investment firms. 'Low credit risk' encompasses PD grades 1 to 5 on the Group's internal PD rating system, which broadly aligns with ratings of AAA to BBB for the external major rating agencies. Such financial instruments are allocated to Stage 1.

For some smaller and / or low risk portfolios, the Group identifies a 'significant increase in credit risk since initial recognition' solely by reference to whether a contractual payment is greater than 30 days past due.

Identifying defaulted assets and credit-impaired assets

The Group's population of credit-impaired financial assets are consistent with its population of defaulted financial assets and closely aligned with the Group's definition of NPEs. Where default criteria are no longer met, the credit facility (obligor for non-retail exposures) exits credit-impaired (Stage 3), subject to meeting defined probation criteria, in line with regulatory requirements.

Under the definition of default the Group considers certain events as resulting in mandatory default and credit-impaired classification without further assessment. These include:

- greater than or equal to 90 days past due and the past due amount is material;
- more than 3 full monthly payments past due (retail credit facilities only);
- a forbearance arrangement is put in place and that arrangement involves debt forgiveness or reduction in interest rate / margin;
- legal action is underway by the Group to enforce repayment or realise security;
- the Group or a receiver takes security into possession;
- the Group has formally sought an insolvency arrangement in respect of the borrower;
- the exposure is classified as non-performing forbore for supervisory reporting purposes; and
- residential mortgages where default has occurred on another credit facility secured on the same property collateral, or more than 20% of overall balance sheet exposure to the customer in the mortgage portfolio is in default.

Certain other events necessitate a lender assessment and, if the outcome of the lender assessment is that the contractual amount of principal and interest will not be fully repaid in what is assessed to be the most likely cash flow scenario or will be repaid only via recourse by the Group to actions such as realising security, default and credit-impaired classification is mandatory. For larger value commercial lending cases (typically greater than €1 million or £850,000), the lender assessment involves production of an individual discounted cash flow analysis. The events differ by portfolio and include those set out below.

All portfolios:

- a forbearance measure has been requested by a borrower and formally assessed;
- the non-payment of interest (e.g. via interest roll-up, arrears capitalisation etc.) as a result of the terms of modification of loans, including refinancing and renegotiation of facilities where during the renegotiation process, the lender becomes aware that the borrower is under actual or apparent financial distress;
- there are justified concerns about a borrower's future ability to generate stable and sufficient cash flows;
- a borrower's sources of recurring income are no longer available to meet regular loan repayments;
- evidence of fraudulent activity by the borrower or another party connected with the loan;
- the contractual maturity date has passed without repayment in full;
- repayment of a credit obligation is suspended because of a law allowing this option or other legal restrictions; and
- it becomes known that an insolvency arrangement is in force in respect of the borrower or that the borrower has formally sought an insolvency arrangement.

Residential mortgage portfolios:

- offer of voluntary surrender of security or sale of security at a possible shortfall; or
- it becomes known that the borrower has become unemployed with no comparable new employment secured.

Larger Small and Medium Enterprise / corporate and property loans:

- the borrower has breached the covenants of a credit contract with the Group;
- there is a crisis in the sector in which the counterparty operates combined with a weak position of the counterparty in this sector;
- external credit rating has been downgraded below a certain level;
- financial statements or financial assessment indicates inability of the borrower to meet debt service obligations and / or a negative net assets position;
- the borrower has ceased trading;
- a fall in the assessed current value of security such that the LTV ratio is greater than or equal to 120% (Property and construction only);
- a fall in net rent such that it is inadequate to cover interest with little / no other income to support debt service capacity (investment property exposures only);
- a fall in the assessed gross development value such that sale proceeds are no longer expected to fully repay debt (development exposures only); or
- the borrower has been granted multiple forbearance arrangements over a period of 3 years.

Review of credit-impaired loans

It is Group policy to review credit-impaired loans above agreed thresholds semi-annually or on receipt of material new information, with the review including a reassessment of the recovery strategy and the continued appropriateness of a credit-impaired classification.

The minimum requirements for a credit-impaired loan to return to non credit-impaired status are that the borrower must not be greater than 90 days past due on a material amount, the borrower must be considered likely to pay in full without recourse by the Group to actions such as realising security and there must be no forbearance arrangement in place where future reliance on realisation of collateral is expected for repayment in full when this was not originally envisaged. Typically, an updated assessment of the borrower's current financial condition and prospects for repayment is required with the borrower to have satisfactorily met repayments required under the original or modified agreement regularly for a reasonable period of time.

Methodologies for valuation of property collateral

The Group's approach to the determination of the market value of property collateral is set out in the Group Property Collateral Valuation Policy, supported by related Group Property Collateral Valuation Guidelines, and is summarised below. The Group's approach to applying FLI to those values for the purposes of measuring impairment loss allowance for the year ended 31 December 2023 is set out in the Group Impairment Policy and is described below.

Retail Ireland mortgage loan book property values are determined by reference to the original or latest property valuations held indexed to the CSO Residential Property Price Index (RPPI). Retail UK mortgage loan book property values are determined by reference to the original or latest property valuations held indexed to the Nationwide UK house price index.

Commercial property valuations may include formal written valuations from external or internal professionals, or 'internally assessed valuations' completed by business units. Internally assessed valuations are informed by the most appropriate sources available for the assets in question. This may include property specific information / characteristics, local market knowledge, comparable transactions, professional advice (e.g. asset management reports) or a combination thereof, in line with more detailed guidance approved by the GCRC. This guidance is informed by both internal and externally sourced market data / valuation information, including input from the Group's Real Estate Advisory Unit. Internally assessed valuations are subject to review, challenge and, potentially, revision by independent credit professionals in underwriting units and are approved as part of the normal credit process.

Typically, more frequent valuations are required for properties held as security for NPEs with an annual valuation required for NPEs in excess of €300,000 / £250,000.

Credit risk associated with geopolitical risk, inflation and interest rates

In 2023, the Group conducted a number of assessments in relation to credit risk associated with the impact of elevated inflation and interest rates on asset quality.

As outlined previously, credit risk assessments were implemented across the residential mortgage and consumer portfolios and, where appropriate, outputs have been utilised to identify significant increases in credit risk and the classification of stage 1 assets as stage 2. These credit risk assessments, which leveraged qualitative information not already captured in impairment models, resulted in a credit management decision to classify €2.8 billion of stage 1 assets as stage 2 at the reporting date, (2022: €1.9 billion), with a corresponding €33 million increase in impairment loss allowance (2022: €12 million).

The impact of elevated inflation and interest rates have been taken into account within individual credit assessments in the relationship managed commercial portfolios.

All US Commercial Real Estate Office exposures have been downgraded to ensure all performing loans in this portfolio are classified as stage 2 or lower. The estimated impact of this judgement was a c.€10 million increase in impairment loss allowance. In addition to this an Investment Property post model adjustment to the Group's impairment loss allowance of €48 million was recognised to reflect latent risk in the wider Investment Property portfolio including the impact of prevailing interest rates in the commercial property market.

Furthermore, the final set of probability weightings applied FLI scenarios utilised in the Group's impairment models incorporated the application of management judgement to the initial probability weightings to reflect economic uncertainty associated with factors including geopolitical risk; elevated inflation and interest rates in the Group's key economies. The estimated impact of this judgement was a c.€31 million increase in impairment loss allowance (2022: c.€37 million).

Further details on the selected FLI scenarios for the reporting period, Group management adjustments and management judgement incorporated into impairment model parameters are provided in note 2 Critical Accounting Estimates and Judgements.

Forward looking information

Changes in estimates

FLI refers to probability-weighted future macroeconomic scenarios used in the measurement of impairment loss allowances under IFRS 9, and is approved semi-annually by the ERC. The Group has used four RoI FLI scenarios and four UK FLI scenarios at 31 December 2023, comprised of a central scenario, an upside scenario, and two downside scenarios, including one severe downside scenario.

All scenarios extend over a five year forecast period, with reversion to long run averages for property price growth for years beyond this. The Group keeps under review the number of FLI scenarios and the need to produce projections for other jurisdictions.

The central FLI scenario for the year ending 31 December 2023 is based on internal and external information and management judgement and follows the same process as used in prior periods.

In order to incorporate available, reasonable and supportable information and apply meaningful upside and downside FLI scenarios, three alternative scenarios (one upside and two downside) were constructed by the Group's Economic Research Unit (ERU) and the Real Estate Advisory Unit (REAU) along specific scenario narratives to reflect different levels of geopolitical tensions, varying impacts of energy price disruption and inflation; the depth of downturn in the RoI, UK and global economies; and the pace of economic recovery.

The alternative scenarios were assessed relative to the historical distribution of key macroeconomic factors to derive an initial set of relative probabilities. The probability weightings attached to the scenarios are a function of their relative position on the distribution of historical outcomes, with a lower probability weighting attached to the scenarios that were assessed to be more distant from the centre of the distribution. The final weightings were also informed by other qualitative factors and expert judgement.

The overall ECL for an exposure is determined as a probability weighted average of the ECL calculated for each scenario, weighted by the probability of each scenario occurring. Beyond the forecast period, default rates are assumed to revert over time to an observed long run average and the value of property collateral for LGD purposes is assumed to grow at an observed long run rate. Typically, one or two macroeconomic variables are incorporated into each impairment model, being those determined through macro regression techniques to be most relevant to forecasting default of the credit risk exposures flowing through that model.

The lifetime PD expectation for an exposure generated under each of the scenarios, weighted by the probability of each scenario occurring, is used to generate the lifetime PD expectations used for the assessment of 'significant increase in credit risk'. Forecasts of residential and commercial property price growth are incorporated as appropriate into the LGD component of the ECL calculation.

The application of property price growth forecasts for the estimation of stage 3 impairment loss allowances ensures that the property collateral value at the point of liquidation does not incorporate an improvement on the current market condition. FLI is also taken into account in relation to the estimation of impairment loss allowances for relationship managed corporate and business banking portfolios where recovery values are dependent on non-property cash flows and / or collateral.

The development of climate risk modelling capabilities is a key objective of the Group's Climate Risk Action Plan. Methodology development is in the early stages across the industry. Initial implementation has focused on development of scenario analysis capabilities which is expected to be followed by integration into impairment models and internal credit ratings models in the

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Introduction

Under the standardised approach, risk weightings for rated counterparties are determined on the basis of the external credit rating assigned to the counterparty. For non-rated counterparties and certain other types of exposure, regulatory-determined standardised risk weightings are used.

Exposures rated under the standardised approach amount to €63,477 million (2022: €60,291 million). The exposure value is presented before credit risk mitigation (“CRM”) and credit conversion factors (“CCF”) and after credit impairment provisions but excluding counterparty credit risk exposures and securitisations.

Use of external credit ratings

Under CRD IV, institutions are permitted to determine the risk weight of an exposure with reference to the credit assessments of external credit assessment institutions (“ECAIs”).

As per article 444, BOI uses a combination of the credit weightings assigned by the ECAIs and mapping guidelines issued by the Central Bank of Ireland to map the exposures to the appropriate credit quality assessment step. These guidelines are identical to those issued by the European Banking Authority (“EBA”).

Risk weights are set out according to each exposure class. In many classes, risk weights are also determined by the credit quality of the exposure, with reference to the credit assessment of External Credit Assessment Institutions (ECAIs). ECAI are used for the following standardised exposure classes:

- Exposures to central governments or central banks;
- Exposures to regional governments or local authorities;
- Exposures to public sector entities;
- Exposures to multilateral development banks; and
- Exposures to international organisations.

The Group uses external ratings provided by the ECAIs: Fitch Ratings, Moody’s Investors Service and Standard & Poor’s.

ECAI ratings are mapped to risk buckets or ‘credit quality steps’ in accordance with EU commission implementing regulations. Risk weights are set out in CRR tables according to these credit quality steps.

As per Article 453, points (g), (h) and (i) and Article 444 point (e), Table 4.1 below shows credit risk exposures net of specific credit risk adjustments under the standardised approach both before and after credit risk mitigation (CRM) and credit conversion factors (CCF) and the associated RWAs and RWAs density, split by exposure class. The template excludes counterparty credit risk and securitisation exposures.

Table 4.1 - EU CR4 - Standardised approach - Credit risk exposure and CRM effects

Dec-23 Exposure classes	Exposures before CCF and CRM		Exposures post CCF and CRM		RWA and RWA density	
	On-balance-sheet exposures	Off-balance-sheet exposures	On-balance-sheet exposures	Off-balance-sheet exposures	RWA ¹	RWA density
	a €m	b €m	c €m	d €m	e €m	f %
1 Central governments or central banks	37,565	50	37,898	59	221	0.58%
2 Regional governments or local authorities	182	123	182	-	9	4.95%
3 Public sector entities	379	16	437	-	29	6.66%
4 Multilateral development banks	274	4	460	3	-	-
5 International organisations	214	-	214	-	-	-
6 Institutions	56	-	85	-	24	28.70%
7 Corporates	3,997	3,333	3,587	428	3,664	91.26%
8 Retail	5,046	722	4,895	57	3,590	72.51%
9 Secured by mortgages on immovable property ²	6,874	-	6,874	-	2,406	35.00%
10 Exposures in default	303	29	298	1	327	109.16%
11 Items associated with particularly high risk	156	124	156	62	327	150.00%
12 Covered bonds	-	-	-	-	-	-
Claims on institutions and corporates with a short-term credit	-	-	-	-	-	-
13 assessment	-	-	-	-	-	-
14 Collective investment undertakings	9	-	9	-	108	1250.00%
15 Equity exposures	688	-	688	-	1,590	231.05%
16 Other items	3,333	-	3,333	-	2,493	74.79%
17 Total	59,076	4,401	59,116	610	14,788	24.76%

Dec-22 Exposure classes	Exposures before CCF and CRM		Exposures post CCF and CRM		RWA and RWA density	
	On-balance-sheet exposures	Off-balance-sheet exposures	On-balance-sheet exposures	Off-balance-sheet exposures	RWA ¹	RWA density
	a €m	b €m	c €m	d €m	e €m	f %
1 Central governments or central banks	42,349	52	42,699	65	258	0.60%
2 Regional governments or local authorities	108	128	108	-	10	8.92%
3 Public sector entities	304	8	367	-	32	8.65%
4 Multilateral development banks	338	5	525	5	-	-
5 International organisations	159	-	159	-	-	-
6 Institutions	56	-	81	-	22	26.80%
7 Corporates	4,710	2,629	4,267	309	4,165	91.02%
8 Retail	4,583	719	4,389	56	3,278	73.75%
9 Secured by mortgages on immovable property	-	-	-	-	-	-
10 Exposures in default	160	12	159	3	192	118.54%
11 Items associated with particularly high risk	100	157	100	79	268	150.00%
12 Covered bonds	-	-	-	-	-	-
Claims on institutions and corporates with a short-term credit	-	-	-	-	-	-
13 assessment	-	-	-	-	-	-
14 Collective investment undertakings	4	-	4	-	53	1250.00%
15 Equity exposures	896	-	896	-	2,033	226.95%
16 Other items	2,814	-	2,814	-	1,956	69.50%
17 Total	56,581	3,710	56,568	517	12,267	21.49%

1 RWA includes amounts below the thresholds for deduction (subject to 250% risk weight).

2 Amounts in 2023 are due to the acquisition of the KBCI portfolios.

As per Article 444 point (e), Table 4.2 below analyses exposures at default (EAD) under the standardised approach by risk weight, split by exposure class. All amounts presented are post CRM and CCF and net of specific credit risk adjustments but exclude counterparty credit risk and securitisation exposures.

Table 4.2 - EU CR5 - Standardised approach by exposure class

Dec-23 EAD (€m)	Risk weight															Total	of which unrated ¹
	0%	2%	4%	10%	20%	35%	50%	70%	75%	100%	150%	250%	370%	1250%	Others		
	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q
1 Central governments or central banks	37,858	-	-	-	11	-	-	-	-	-	-	88	-	-	-	37,957	34,290
2 Regional governments or local authorities	137	-	-	-	45	-	-	-	-	-	-	-	-	-	-	182	182
3 Public sector entities	379	-	-	-	-	-	58	-	-	-	-	-	-	-	-	437	437
4 Multilateral development banks	463	-	-	-	-	-	-	-	-	-	-	-	-	-	-	463	463
5 International organisations	214	-	-	-	-	-	-	-	-	-	-	-	-	-	-	214	214
6 Institutions	-	-	-	-	60	-	25	-	-	-	-	-	-	-	-	85	85
7 Corporates	-	-	-	-	-	-	-	-	-	4,015	-	-	-	-	-	4,015	4,015
8 Retail	-	-	-	-	-	-	-	-	4,952	-	-	-	-	-	-	4,952	4,952
9 Secured by mortgages on immovable property	-	-	-	-	-	6,874	-	-	-	-	-	-	-	-	-	6,874	6,874
10 Exposures in default	-	-	-	-	-	-	-	-	-	244	55	-	-	-	-	299	299
11 Items associated with particularly high risk	-	-	-	-	-	-	-	-	-	-	218	-	-	-	-	218	218
12 Covered bonds	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13 Claims on institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14 Collective investment undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	9	-	9	9
15 Equity exposures	-	-	-	-	-	-	-	-	-	87	-	601	-	-	-	688	688
16 Other items	300	-	-	-	126	-	267	-	-	2,198	-	-	-	-	442	3,333	3,333
17 Total	39,351	-	-	-	242	6,874	350	-	4,952	6,544	273	689	-	9	442	59,726	56,059

Dec-22 EAD (€m)	Risk Weight															Total	of which unrated ¹
	0%	2%	4%	10%	20%	35%	50%	70%	75%	100%	150%	250%	370%	1250%	Others		
	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q
1 Central governments or central banks	42,651	-	-	-	11	-	-	-	-	-	-	102	-	-	-	42,764	38,680
2 Regional governments or local authorities	60	-	-	-	48	-	-	-	-	-	-	-	-	-	-	108	108
3 Public sector entities	304	-	-	-	-	-	63	-	-	-	-	-	-	-	-	367	367
4 Multilateral development banks	530	-	-	-	-	-	-	-	-	-	-	-	-	-	-	530	530
5 International organisations	159	-	-	-	-	-	-	-	-	-	-	-	-	-	-	159	159
6 Institutions	-	-	-	-	63	-	18	-	-	-	-	-	-	-	-	81	81
7 Corporates	-	-	-	-	-	-	-	-	-	4,576	-	-	-	-	-	4,576	4,576
8 Retail	-	-	-	-	-	-	-	-	4,445	-	-	-	-	-	-	4,445	4,445
9 Secured by mortgages on immovable property	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10 Exposures in default	-	-	-	-	-	-	-	-	-	102	60	-	-	-	-	162	162
11 Items associated with particularly high risk	-	-	-	-	-	-	-	-	-	-	179	-	-	-	-	179	179
12 Covered bonds	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13 Claims on institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14 Collective investment undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	4	-	4	4
15 Equity exposures	-	-	-	-	-	-	-	-	-	138	-	758	-	-	-	896	896
16 Other items	415	-	-	-	140	-	102	-	-	1,751	-	-	-	-	406	2,814	2,814
17 Total	44,119	-	-	-	262	-	183	-	4,445	6,567	239	860	-	4	406	57,085	53,001

¹ Exposures for which a credit assessment by a nominated ECAI is not applied or where a specific risk weight is applied depending on the nature of the exposure.

The Group has adopted the Foundation IRB approach for its non-retail exposures (Probability of Default (PD) models) and the Advanced IRB approach (including EAD, LGD and PD) for the majority of its retail exposures. Exposures for which capital requirements continue to be determined under the Standardised approach include sovereign and multilateral development bank exposures, the Group's land and development exposures, certain asset finance and leasing portfolios, non-credit obligation assets and other corporate exposures for which regulatory approval to use the IRB approach is not held.

Relationship of PD grades with external ratings

The table below illustrates the relationship between PD grade, PD band and S&P type ratings. PD is used in the IRB RWA calculation and can be mapped to Group-level PD grades based on PD bands. These PD grades differ from internal obligor grades which are used in arriving at IFRS classifications, however there is a defined relationship between both sets of grades.

Note the internal ranges do not map directly to the prescribed ranges used in tables 4.3 and 4.4.

PD Grades	PD Scale	S&P type ratings
1-4	0% <= PD < 0.26%	AAA, AA+, AA, AA-, A+, A, A-, BBB+, BBB
5-7	0.26% <= PD < 1.45%	BBB-, BB+, BB, BB-
8-9	1.45% <= PD < 3.60%	B+
10-11	3.60% <= PD < 100%	B, Below B
12	100%	n/a

The internal ratings process by exposure class

Details on how the internal ratings process is applied to each individual IRB exposure class are given below. Departures from Group standards outlined above are not permitted.

Corporates

Corporate entities, including certain SME and specialised lending exposures are rated using a number of models. This suite of models typically incorporates scorecard-based calibrated PD outputs (both TtC and cyclical PD estimates). The Group does not rate purchased corporate receivables under the IRB approach. Information on the Corporates Foundation IRB exposure class is provided in Table 4.3.

Institutions

Institutions are rated by a single dedicated model. This is an internally-built scorecard and the output from this model is a single PD estimate that is fully TtC. Information on the Institutions Foundation IRB exposure class is provided in Table 4.3.

Retail

Retail exposures including Mortgages, Qualifying Revolving Retail Exposures (QRRE) and certain Retail SME and Consumer loans are rated on a number of models based on application and behavioural data which is calibrated to a PD. This PD estimate typically varies with the economic cycle. The Group also generates LGD and CCF estimates for its retail exposures. These estimates are calibrated to produce estimates representative of an economic downturn. Information on the Retail IRB exposure classes is provided in Table 4.4.

Securitisations

Capital requirements for securitisation positions (retained and purchased) are determined under the IRBA and ERBA approaches. These are dealt within the Securitisation section.

As per Article 452, point (g)(i)-(v), Table 4.4 below presents the key parameters used for the calculation of capital requirements for credit risk exposures, under the Advanced IRB approach, split by PD range. Average maturity is not a component of the Advanced IRB RWA formula and is therefore not reported in the tables below. All exposures are presented both pre and post CRM and CCF (EAD). The template excludes counterparty credit risk and securitisations.

Table 4.4 EU CR6 - IRB approach - Credit risk exposures by exposure class and PD range (Advanced IRB)

Dec-23 PD Range a	On-balance sheet exposures €m b	Off-balance sheet exposures pre- CCF €m c	Exposure weighted average CCF % d	EAD post CRM and post CCF €m e	Exposure weighted average PD % f	Number of obligors g	Exposure weighted average LGD % h	Exposure weighted average maturity (years) i	Risk weighted exposure amount after supporting factors €m j	Density of risk weighted exposure amount % k	Expected loss amount €m l	Value adjustments and provisions €m m
Total Advanced IRB												
0.00 to <0.15	41	625	43.65%	315		148,923			13	4.31%	0	-
0.00 to <0.10	6	178	50.52%	96		44,404			2	2.58%	0	-
0.10 to <0.15	35	447	40.91%	219		104,519			11	5.07%	0	0
0.15 to <0.25	13,934	672	38.65%	14,233		219,511			1,310	9.20%	6	(14)
0.25 to <0.50	5,512	743	43.35%	5,856		177,328			735	12.56%	3	(7)
0.50 to <0.75	11,833	1,532	54.59%	12,705		158,359			3,117	24.53%	20	(15)
0.75 to <2.5	6,433	1,886	55.71%	7,502		269,331			3,230	43.05%	30	(24)
0.75 to <1.75	4,573	1,742	55.86%	5,561		198,893			2,136	38.41%	17	(16)
1.75 to <2.5	1,860	144	53.81%	1,941		70,438			1,094	56.36%	13	(8)
2.5 to <10	2,489	137	43.08%	2,540		134,415			2,036	80.13%	53	(37)
2.5 to <5	1,492	92	105.85%	1,524		83,018			1,096	71.91%	24	(15)
5 to <10	997	45	44.62%	1,016		51,397			940	92.46%	29	(22)
10 to <100	745	38	42.49%	765		110,490			1,010	132.09%	66	(42)
10 to <20	294	22	35.17%	303		85,298			371	122.51%	17	(13)
20 to <30	93	7	56.27%	96		9,970			125	129.83%	9	(8)
30 to <100	358	9	48.74%	366		15,222			514	140.62%	40	(21)
100 (Default)	918	36	37.42%	936		51,449			643	68.74%	324	(334)
Total Advanced IRB	41,905	5,669	49.92%	44,852		1,269,806			12,094	26.97%	502	(473)
Secured by real estate property - Non SME												
0.00 to <0.15	-	-	-	-	-	-	-	-	-	-	-	-
0.00 to <0.10	-	-	-	-	-	-	-	-	-	-	-	-
0.10 to <0.15	-	-	-	-	-	-	-	-	-	-	-	-
0.15 to <0.25	13,846	65	53.47%	13,919	0.18%	79,250	20.12%		1,286	9.24%	6	(14)
0.25 to <0.50	5,383	39	65.27%	5,428	0.33%	41,487	16.16%		655	12.07%	3	(5)
0.50 to <0.75	11,736	1,174	58.91%	12,465	0.61%	67,410	24.61%		3,057	24.52%	19	(13)
0.75 to <2.5	5,599	1,420	60.15%	6,478	1.25%	58,910	21.33%		2,585	39.91%	20	(13)
0.75 to <1.75	4,014	1,348	60.01%	4,842	1.03%	40,405	21.18%		1,708	35.28%	12	(9)
1.75 to <2.5	1,585	72	62.70%	1,636	1.91%	18,505	21.75%		877	53.59%	8	(4)
2.5 to <10	1,128	4	84.60%	1,134	5.08%	15,234	21.42%		932	82.19%	13	(11)
2.5 to <5	594	1	82.23%	595	3.71%	10,505	24.13%		421	70.86%	5	(3)
5 to <10	534	3	85.79%	539	6.59%	4,729	18.42%		511	94.67%	8	(8)
10 to <100	549	4	101.94%	556	29.99%	5,363	19.65%		745	134.01%	37	(19)
10 to <20	176	1	102.23%	178	15.24%	1,641	20.22%		234	131.62%	6	(5)
20 to <30	53	2	101.76%	55	24.05%	436	10.46%		66	119.65%	3	(2)
30 to <100	320	1	102.02%	323	39.13%	3,286	20.92%		445	137.80%	28	(12)
100 (Default)	679	2	101.65%	685	100.00%	5,440	25.41%		520	75.95%	166	(157)
Total Secured by real estate property - Non SME	38,920	2,708	59.65%	40,665	2.73%	273,094	21.28%		9,780	24.05%	264	(232)
Qualifying revolving												
0.00 to <0.15	38	545	43.62%	276	0.09%	141,912	65.70%		10	3.75%	0	0
0.00 to <0.10	4	178	50.54%	94	0.05%	44,328	73.53%		2	2.44%	0	0
0.10 to <0.15	34	367	40.27%	182	0.11%	97,584	61.64%		8	4.42%	0	0
0.15 to <0.25	80	524	36.20%	270	0.20%	133,050	56.72%		18	6.52%	0	0
0.25 to <0.50	92	381	37.74%	236	0.36%	109,628	56.02%		25	10.63%	-	-
0.50 to <0.75	63	269	37.22%	163	0.62%	83,736	55.90%		27	16.45%	1	-1
0.75 to <2.5	153	350	38.40%	287	1.36%	142,308	55.90%		85	29.52%	2	(2)
0.75 to <1.75	115	293	37.84%	226	1.14%	112,173	55.51%		58	25.78%	1	(1)
1.75 to <2.5	38	57	41.27%	61	2.18%	30,135	57.31%		27	43.32%	1	(1)
2.5 to <10	75	104	36.46%	113	4.96%	54,765	54.70%		81	71.92%	3	(3)
2.5 to <5	45	70	36.01%	70	3.65%	33,396	54.60%		42	59.57%	1	(1)
5 to <10	30	34	37.40%	43	7.11%	21,369	54.87%		39	92.14%	2	(2)
10 to <100	40	29	31.42%	50	27.19%	87,933	56.80%		79	156.71%	8	(6)
10 to <20	16	18	27.53%	22	13.62%	75,504	56.78%		30	136.02%	2	(1)
20 to <30	8	4	35.37%	9	25.19%	5,156	58.97%		18	184.13%	1	-1
30 to <100	16	7	38.97%	19	44.13%	7,273	55.72%		31	167.14%	5	(4)
100 (Default)	24	29	30.01%	35	100.00%	28,773	78.49%		17	49.44%	27	(34)
Total Qualifying revolving	565	2,231	38.61%	1,430	4.24%	782,105	58.45%		342	23.90%	41	(46)
Retail of which SME												
0.00 to <0.15	1	80	43.83%	37	0.10%	6,929	40.01%		3	8.12%	0	0
0.00 to <0.10	1	-	8.30%	1	0.08%	36	40.32%		-	8.82%	0	0
0.10 to <0.15	-	80	43.87%	36	0.10%	6,893	40.00%		3	8.10%	0	0
0.15 to <0.25	7	83	42.47%	43	0.18%	7,151	40.31%		5	12.85%	0	0
0.25 to <0.50	29	323	47.30%	184	0.33%	21,378	60.69%		52	28.45%	0	(2)
0.50 to <0.75	29	89	50.05%	73	0.65%	6,790	50.16%		30	41.17%	0	(1)
0.75 to <2.5	218	116	53.58%	278	1.59%	18,340	54.86%		159	57.24%	3	(3)
0.75 to <1.75	109	101	52.75%	161	1.24%	12,740	55.34%		88	54.36%	1	(2)
1.75 to <2.5	109	15	59.13%	117	2.08%	5,600	54.21%		71	61.22%	2	(1)
2.5 to <10	962	29	60.77%	972	4.75%	31,923	53.38%		646	66.37%	26	(15)
2.5 to <5	656	21	60.51%	664	3.62%	19,511	51.55%		413	62.13%	13	(7)
5 to <10	306	8	61.52%	308	7.19%	12,412	57.34%		233	75.49%	13	(8)
10 to <100	126	5	58.94%	128	18.51%	12,329	60.44%		134	104.16%	15	(12)
10 to <20	89	3	60.27%	90	13.36%	5,738	61.63%		88	97.58%	8	(6)
20 to <30	23	1	60.22%	23	23.56%	2,944	57.04%		26	114.40%	3	(3)
30 to <100	14	1	55.70%	15	41.35%	3,647	58.52%		20	127.67%	4	(3)
100 (Default)	171	5	53.81%	173	100.00%	10,712	57.88%		63	36.44%	100	(115)
Total Retail of which SME	1,543	730	48.36%	1,888	13.16%	115,552	54.80%		1,092	57.84%	144	(148)
Retail of which other												
0.00 to <0.15	2	-	-	2	0.07%	82	77.28%		0	15.37%	0	0
0.00 to <0.10	1	-	-	1	0.05%	40	78.21%		0	11.23%	0	0
0.10 to <0.15	1	-	-	1	0.12%	42	75.70%		0	22.41%	0	0
0.15 to <0.25	1	-	-	1	0.19%	60	73.88%		1	30.32%	0	0
0.25 to <0.50	8	-	-	8	0.33%	4,835	65.70%		3	39.24%	0	0
0.50 to <0.75	5	-	-	4	0.63%	423	74.87%		3	64.34%	0	0
0.75 to <2.5	463	-	-	459	1.41%	49,773	71.47%		401	87.24%	5	(6)
0.75 to <1.75	335	-	-	332	1.26%	33,575	71.87%		282	84.74%	3	(4)
1.75 to <2.5	128	-	-	127	1.82%	16,198	70.42%		119	93.76%	2	(2)
2.5 to <10	324	-	-	321	4.43%	32,493	76.43%		377	117.39%	11	(8)
2.5 to <5	197	-	-	195	3.17%	19,606	76.00%		220	112.79%	5	(4)
5 to <10	127	-	-	126	6.39%	12,887	77.11%		157	124.50%	6	(4)
10 to <100	30	-	-	31	25.77%	4,865	74.44%		52	174.25%	6	(5)
10 to <20	13	-	-	13	13.35%	2,415	74.50%		19	147.89%	1	(1)
20 to <30	9	-	-	9	22.03%	1,434	71.70%		15	175.95%	2	-2
30 to <100	8	-	-									

Dec-22 PD Range a	On-balance	Off-balance	Exposure	EAD post CRM	Exposure	Number of	Exposure	Exposure	Risk weighted	Density of risk	Expected loss	Value
	sheet exposures	sheet exposures	weighted	and post CCF	weighted		of obligors	weighted				
	€m	pre-CCF	average CCF	€m	average PD	g	average LGD	average maturity	supporting	exposure	€m	provisions
	b	€m	%	e	%		%	(years)	factors	amount %	€m	€m
		c	d		f		h	i	j	k	l	m
Total Advanced IRB												
0.00 to <0.15	1,330	374	35.61%	1,462		71,223			63	4.42%	0	-
0.00 to <0.10	1,299	62	45.12%	1,327		26,709			57	4.34%	0	-
0.10 to <0.15	31	312	33.72%	135		44,514			6	5.25%	0	0
0.15 to <0.25	12,328	605	38.69%	12,588		189,689			1,060	8.41%	5	(6)
0.25 to <0.50	11,052	1,034	43.18%	11,519		307,845			1,640	14.23%	9	(12)
0.50 to <0.75	2,070	403	44.89%	2,266		129,415			477	21.02%	3	(3)
0.75 to <2.5	8,671	2,414	58.96%	10,115		256,893			3,823	37.80%	33	(18)
0.75 to <1.75	7,008	2,296	59.41%	8,390		198,562			2,997	35.72%	23	(10)
1.75 to <2.5	1,663	118	50.22%	1,725		58,331			826	47.89%	10	(8)
2.5 to <10	2,929	147	42.47%	2,989		165,580			2,680	89.65%	65	(44)
2.5 to <5	1,766	99	105.99%	1,805		108,530			1,564	86.64%	32	(20)
5 to <10	1,163	48	42.63%	1,184		57,050			1,116	94.24%	32	(24)
10 to <100	605	85	16.26%	627		68,095			789	125.83%	53	(33)
10 to <20	258	69	9.10%	267		38,694			332	122.97%	15	(14)
20 to <30	115	6	45.34%	121		16,569			152	127.55%	8	(6)
30 to <100	232	10	53.06%	239		12,832			305	128.16%	29	(13)
100 (Default)	722	39	39.84%	742		38,635			398	53.56%	294	(298)
Total Advanced IRB	39,707	5,101	49.20%	42,308		1,227,375			10,930	25.83%	462	(414)
Secured by real estate property - Non SME												
0.00 to <0.15	1,294	17	98.09%	1,310	0.09%	18,681	18.53%		57	4.35%	0	-
0.00 to <0.10	1,294	17	98.09%	1,310	0.09%	18,664	18.53%		57	4.35%	0	-
0.10 to <0.15	-	-	0.00%	-	0.10%	17	100.00%		-	-	-	-
0.15 to <0.25	12,243	58	99.80%	12,327	0.18%	91,958	17.02%		1,040	8.43%	5	(6)
0.25 to <0.50	10,935	42	98.87%	10,994	0.39%	69,241	18.31%		1,546	14.06%	8	(10)
0.50 to <0.75	1,977	24	101.53%	2,017	0.60%	16,239	14.65%		412	20.41%	2	(2)
0.75 to <2.5	8,119	1,954	62.66%	9,366	1.18%	57,846	21.56%		3,366	35.94%	26	(10)
0.75 to <1.75	6,706	1,908	62.68%	7,920	1.05%	45,686	22.33%		2,755	34.79%	20	(6)
1.75 to <2.5	1,413	46	61.55%	1,446	1.85%	12,160	17.34%		611	42.23%	6	(4)
2.5 to <10	1,371	5	102.63%	1,380	5.30%	17,741	21.51%		1,168	84.61%	17	(10)
2.5 to <5	670	3	100.59%	674	3.91%	9,049	25.24%		538	79.89%	7	(2)
5 to <10	701	2	104.62%	706	6.63%	8,692	17.95%		630	89.10%	10	(8)
10 to <100	435	2	104.53%	441	30.08%	3,814	15.53%		535	121.23%	27	(13)
10 to <20	152	-	108.19%	153	15.76%	1,386	19.87%		195	127.03%	5	(4)
20 to <30	90	1	101.99%	92	23.74%	769	14.55%		109	119.46%	4	(3)
30 to <100	193	1	105.06%	196	44.17%	1,659	17.59%		231	117.55%	18	(6)
100 (Default)	468	3	102.67%	472	100.00%	3,497	28.57%		289	61.17%	127	(123)
Total Secured by real estate property - Non SME	36,842	2,105	65.32%	38,307	2.26%	279,017	18.71%		8,413	21.96%	212	(174)
Qualifying revolving												
0.00 to <0.15	33	271	28.82%	111	0.11%	45,065	51.04%		3	3.69%	0	0
0.00 to <0.10	4	45	25.25%	16	0.08%	7,966	51.05%		0	2.98%	0	0
0.10 to <0.15	29	226	29.53%	95	0.11%	37,099	51.03%		3	3.80%	0	0
0.15 to <0.25	77	459	30.12%	215	0.20%	90,110	51.04%		13	6.00%	0	0
0.25 to <0.50	87	670	37.95%	342	0.35%	216,898	60.72%		40	11.75%	1	(1)
0.50 to <0.75	61	286	38.73%	172	0.60%	105,355	57.14%		29	16.80%	1	(1)
0.75 to <2.5	143	352	40.15%	285	1.28%	155,368	56.83%		84	29.49%	2	(2)
0.75 to <1.75	112	299	40.43%	233	1.11%	128,702	57.16%		62	26.83%	1	(1)
1.75 to <2.5	31	53	38.52%	52	2.08%	26,666	55.33%		22	41.47%	1	(1)
2.5 to <10	66	112	35.19%	107	4.83%	56,779	53.60%		75	69.70%	3	(2)
2.5 to <5	40	74	35.40%	67	3.55%	34,649	54.25%		40	58.71%	1	(1)
5 to <10	26	38	34.76%	40	6.98%	22,130	52.52%		35	88.10%	2	(1)
10 to <100	31	77	10.43%	44	25.86%	51,448	55.99%		70	160.55%	7	(4)
10 to <20	13	67	6.65%	20	13.81%	31,052	53.74%		26	133.42%	2	(1)
20 to <30	5	4	31.76%	9	24.35%	14,105	58.41%		17	188.48%	1	-1
30 to <100	13	6	41.05%	15	42.58%	6,291	62.91%		27	179.42%	4	(2)
100 (Default)	15	30	31.06%	29	100.00%	18,630	70.08%		19	66.21%	21	(19)
Total Qualifying revolving	513	2,257	34.54%	1,305	4.00%	739,653	56.44%		333	25.62%	35	(29)
Retail of which SME												
0.00 to <0.15	1	86	44.71%	39	0.10%	7,348	40.00%		3	8.10%	0	0
0.00 to <0.10	-	-	1.50%	-	0.07%	30	40.00%		-	8.19%	0	0
0.10 to <0.15	1	86	44.73%	39	0.10%	7,318	40.00%		3	8.09%	0	0
0.15 to <0.25	6	88	43.33%	44	0.18%	7,496	40.54%		6	12.99%	0	-
0.25 to <0.50	25	322	46.85%	178	0.33%	21,250	61.11%		51	28.58%	0	(1)
0.50 to <0.75	24	93	48.93%	69	0.65%	6,992	58.34%		29	41.80%	0	-
0.75 to <2.5	244	108	53.35%	300	1.67%	18,441	54.72%		176	58.83%	3	(4)
0.75 to <1.75	99	89	53.03%	146	1.24%	12,085	55.20%		79	53.95%	1	(2)
1.75 to <2.5	145	19	54.84%	154	2.08%	6,356	54.27%		97	63.43%	2	(2)
2.5 to <10	920	30	60.02%	933	4.69%	29,362	53.44%		611	65.47%	25	(22)
2.5 to <5	643	22	59.65%	653	3.59%	18,382	51.39%		399	61.06%	12	(12)
5 to <10	277	8	61.08%	280	7.26%	10,980	58.22%		212	75.75%	12	(10)
10 to <100	107	6	57.84%	110	19.09%	8,381	60.85%		115	104.02%	13	(12)
10 to <20	75	2	60.85%	76	13.01%	3,774	61.94%		75	96.32%	6	(7)
20 to <30	16	1	58.38%	16	23.51%	1,225	57.39%		18	114.51%	2	(2)
30 to <100	16	3	54.50%	18	41.62%	3,382	59.25%		22	128.03%	4	(3)
100 (Default)	202	6	52.17%	204	100.00%	11,000	58.32%		73	35.61%	119	(136)
Total Retail of which SME	1,529	739	48.06%	1,877	14.66%	110,270	54.94%		1,064	56.63%	160	(175)
Retail of which other												
0.00 to <0.15	2	-	-	2	0.11%	129	73.00%		0	26.08%	0	0
0.00 to <0.10	1	-	-	1	0.07%	49	73.00%		0	19.74%	0	0
0.10 to <0.15	1	-	-	1	0.12%	80	73.00%		0	29.25%	0	0
0.15 to <0.25	2	-	-	2	0.19%	125	73.00%		1	38.71%	0	0
0.25 to <0.50	5	-	-	5	0.40%	456	73.00%		3	63.11%	0	0
0.50 to <0.75	8	-	-	8	0.63%	829	73.00%		7	81.76%	0	0
0.75 to <2.5	165	-	-	164	1.66%	25,238	73.02%		197	120.07%	2	(2)
0.75 to <1.75	91	-	-	91	1.26%	12,089	73.01%		101	110.74%	1	(1)
1.75 to <2.5	74	-	-	73	2.16%	13,149	73.03%		96	131.68%	1	(1)
2.5 to <10	572	-	-	569	4.22%	61,698	73.00%		826	145.34%	20	(10)
2.5 to <5	413	-	-	411	3.54%	46,450	73.00%		587	142.92%	12	(5)
5 to <10	159	-	-	158	5.99%	15,248	73.00%		239	151.65%	8	(5)
10 to <100	32	-	-	32	22.50%	4,452	73.01%		69	218.31%	6	(4)
10 to <20	18	-	-	18	13.47%	2,482	73.00%		36	188.68%	2	(2)
20 to <30	4	-	-	4	25.06%	470	73.00%		8	243.03%	1	0

As per Article 453 point (j), Table 4.5 below illustrates the effect of credit derivatives on the IRB approach capital requirements calculations. The template excludes counterparty credit risk and securitisations.

Table 4.5 - EU CR7 – IRB approach – Effect on the RWEAs of credit derivatives used as CRM techniques

	Dec-23		Dec-22	
	Pre-credit derivatives risk weighted exposure amount	Actual risk weighted exposure amount	Pre-credit derivatives risk weighted exposure amount	Actual risk weighted exposure amount
	€m a	€m b	€m a	€m b
1 Exposures under F-IRB	16,689	16,689	16,873	16,873
2 Central governments and central banks	-	-	-	-
3 Institutions	609	609	657	657
4 Corporates	16,080	16,080	16,216	16,216
of which				
4.1 Corporates - SMEs	7,198	7,198	7,197	7,197
4.2 Corporates - Specialised lending	502	502	618	618
5 Exposures under A-IRB	12,094	12,094	10,928	10,928
6 Central governments and central banks	-	-	-	-
7 Institutions	-	-	-	-
8 Corporates	-	-	-	-
of which				
8.1 Corporates - SMEs	-	-	-	-
8.2 Corporates - Specialised lending	-	-	-	-
9 Retail	12,094	12,094	10,928	10,928
of which				
9.1 Retail – SMEs - Secured by immovable property collateral	-	-	-	-
9.2 Retail – non-SMEs - Secured by immovable property collateral	9,780	9,780	8,411	8,411
9.3 Retail – Qualifying revolving	342	342	334	334
9.4 Retail – SMEs - Other	1,092	1,092	1,063	1,063
9.5 Retail – Non-SMEs- Other	880	880	1,120	1,120
10 TOTAL (including F-IRB exposures and A-IRB exposures)	28,783	28,783	27,802	27,802

As per Article 453 point (g), Table 4.6 below discloses more granular information on the type of CRM techniques by type and exposure class under the IRB approach.

Table 4.6 - EU CR7-A – IRB approach – Disclosure of the extent of the use of CRM techniques

Total exposures	Credit risk Mitigation techniques											Credit risk Mitigation methods in the calculation of RWEAs		
	Funded credit Protection (FCP)										Unfunded credit Protection (UFCP)		RWEA without substitution effects (reduction effects only)	RWEA with substitution effects (both reduction and substitution effects)
	Part of exposures covered by Financial Collaterals	Part of exposures covered by Other eligible collaterals	Part of exposures covered by Immovable property Collaterals (%)	Part of exposures covered by Receivables	Part of exposures covered by Other physical collateral	Part of exposures covered by Other funded credit protection	Part of exposures covered by Cash on deposit	Part of exposures covered by Life insurance policies	Part of exposures covered by Instruments held by a third party	Part of exposures covered by Guarantees	Part of exposures covered by Credit Derivatives			
€m	%	%	%	%	%	%	%	%	%	%	%	€m	€m	
a	b	c	d	e	f	g	h	i	j	k	l	m	n	
Dec-23														
Exposures under A-IRB														
1 Central governments and central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2 Institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3 Corporates	-	-	-	-	-	-	-	-	-	-	-	-	-	-
of which														
3.1 Corporates – SMEs	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3.2 Corporates – Specialised lending	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3.3 Corporates – Other	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4 Retail	44,852	-	89.30%	89.30%	-	-	-	-	-	-	-	-	12,256	12,094
of which														
4.1 Retail – SMEs - Secured by immovable property collateral	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4.2 Retail – non-SMEs - Secured by immovable property collateral	40,665	-	98.49%	98.49%	-	-	-	-	-	-	-	-	9,780	9,780
4.3 Retail – Qualifying revolving	1,430	-	-	-	-	-	-	-	-	-	-	-	342	342
4.4 Retail – SMEs - Other	1,888	-	-	-	-	-	-	-	-	-	-	-	1,254	1,092
4.5 Retail – Non-SMEs- Other	869	-	-	-	-	-	-	-	-	-	-	-	880	880
5 Total Advanced IRB	44,852	-	89.30%	89.30%	-	-	-	-	-	-	-	-	12,256	12,094
Exposures under F-IRB														
1 Central governments and central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2 Institutions	3,860	-	-	-	-	-	-	-	-	-	-	-	609	609
3 Corporates	18,854	0.25%	34.59%	34.48%	-	0.11%	-	-	-	-	0.90%	-	16,456	16,080
of which														
3.1 Corporates – SMEs	9,228	0.02%	64.43%	64.40%	-	0.03%	-	-	-	-	1.78%	-	7,356	7,198
3.2 Corporates – Specialised lending	566	2.05%	-	-	-	-	-	-	-	-	-	-	502	502
3.3 Corporates – Other	9,060	0.38%	6.37%	6.17%	-	0.19%	-	-	-	-	0.06%	-	8,598	8,380
4 Total Foundation IRB	22,714	0.21%	28.71%	28.62%	-	0.09%	-	-	-	-	0.75%	-	17,065	16,689

Total exposures	Credit risk Mitigation techniques											Credit risk Mitigation methods in the calculation of RWEAs		
	Funded credit										Unfunded credit		RWEA without substitution effects (reduction effects only)	RWEA with substitution effects (both reduction and substitution effects)
	Part of exposures covered by Financial Collaterals	Part of exposures covered by Other eligible collaterals	Part of exposures covered by Immovable property Collaterals (%)	Part of exposures covered by Receivables	Part of exposures covered by Other physical collateral	Part of exposures covered by Other funded credit protection	Part of exposures covered by Cash on deposit	Part of exposures covered by Life insurance policies	Part of exposures covered by Instruments held by a third party	Part of exposures covered by Guarantees	Part of exposures covered by Credit Derivatives			
€m	%	%	%	%	%	%	%	%	%	%	%	€m	€m	
a	b	c	d	e	f	g	h	i	j	k	l	m	n	
Dec-22														
Exposures under A-IRB														
1 Central governments and central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2 Institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3 Corporates	-	-	-	-	-	-	-	-	-	-	-	-	-	-
of which														
3.1 Corporates – SMEs	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3.2 Corporates – Specialised lending	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3.3 Corporates – Other	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4 Retail	42,308	-	86.95%	86.95%	-	-	-	-	-	-	-	-	11,085	10,928
of which														
4.1 Retail – SMEs - Secured by immovable property collateral	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4.2 Retail – non-SMEs - Secured by immovable property collateral	38,308	-	96.03%	96.03%	-	-	-	-	-	-	-	-	8,411	8,411
4.3 Retail – Qualifying revolving	1,305	-	-	-	-	-	-	-	-	-	-	-	334	334
4.4 Retail – SMEs - Other	1,878	-	-	-	-	-	-	-	-	-	-	-	1,220	1,063
4.5 Retail – Non-SMEs- Other	817	-	-	-	-	-	-	-	-	-	-	-	1,120	1,120
5 Total Advanced IRB	42,308	-	86.95%	86.95%	-	-	-	-	-	-	-	-	11,085	10,928
Exposures under F-IRB														
1 Central governments and central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2 Institutions	3,631	-	-	-	-	-	-	-	-	-	-	-	657	657
3 Corporates	20,403	0.07%	51.71%	50.32%	-	1.39%	-	-	-	-	-	-	16,543	16,216
of which														
3.1 Corporates – SMEs	10,183	0.02%	92.82%	90.49%	-	2.33%	-	-	-	-	-	-	7,359	7,197
3.2 Corporates – Specialised lending	795	1.50%	-	-	-	-	-	-	-	-	-	-	618	618
3.3 Corporates – Other	9,425	-	11.67%	11.17%	-	0.50%	-	-	-	-	-	-	8,566	8,400
4 Total Foundation IRB	24,034	0.06%	43.90%	42.72%	-	1.18%	-	-	-	-	-	-	17,200	16,873

As per Article 438 point (h), Table 4.7 below analyses the movements in risk weighted exposure amounts under the IRB approach within the period.

Table 4.7 - EU CR8 – RWEA flow statements of credit risk exposures under the IRB approach

	Risk weighted exposure amount €m a
1 Risk weighted exposure amount as at the end of the previous reporting period - September '23	29,534
2 Asset size (+/-) ¹	(1,008)
3 Asset quality (+/-) ²	97
4 Model updates (+/-) ³	342
5 Methodology and policy (+/-) ⁴	-
6 Acquisitions and disposals (+/-) ⁵	(27)
7 Foreign exchange movements (+/-)	(155)
8 Other (+/-) ⁶	-
9 Risk weighted exposure amount as at the end of the reporting period - December '23	28,783

	Risk weighted exposure amount €m a
1 Risk weighted exposure amount as at the end of the previous reporting period - June '23	29,010
2 Asset size (+/-) ¹	706
3 Asset quality (+/-) ²	67
4 Model updates (+/-) ³	(273)
5 Methodology and policy (+/-) ⁴	-
6 Acquisitions and disposals (+/-) ⁵	-
7 Foreign exchange movements (+/-)	27
8 Other (+/-) ⁶	(3)
9 Risk weighted exposure amount as at the end of the reporting period - September '23	29,534

1 Asset size: This represents movements in RWA driven by changes in the composition of the Group's existing portfolios. This includes, but is not limited to: constant currency growth in existing portfolios including new business and repayment of loans, changes in the product mix.

2 Asset quality: This can represent movements in RWA including but not limited to: PD Migration and LGD changes driven by economic conditions, changes in lending practices, demographics and model re-calibrations and re-anchoring.

3 Model updates: This can represent movements in RWA including, but is not limited to: new model approvals, refinements and enhancements to improve model performance.

4 Methodology and policy: Updates to the RWA calculation methodology, communicated by the Regulator.

5 Acquisitions and disposals: This can represent movements in RWA due to changes in book sizes as a result of acquisitions and/or disposals.

6 Other comprises movements in non-credit RWA items and unconsolidated intragroup investments.

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As per Article 452, point (b), Table 4.8 below presents for each exposure class referred to in Article 147, the percentage of the total exposure value subject to the standardised approach (SA) and to the IRB approach, as well as the part of each exposure class subject to a roll-out plan.

Table 4.8 discloses the exposure value of IRB exposures in accordance with Article 166 CRR and, in order to provide an exposure measure valid for both SA exposures and IRB exposures, the aggregate exposure value of IRB and SA exposures uses the leverage ratio exposure methodology.

Table 4.8 - EU CR6-A – Scope of the use of IRB and SA approaches

	Exposure value as defined in Article 166 CRR for exposures subject to IRB approach	Total exposure value for exposures subject to the Standardised approach and to the IRB approach	Percentage of total exposure value subject to the permanent partial use of the SA (%)	Percentage of total exposure value subject to a roll-out plan (%)	Percentage of total exposure value subject to IRB Approach (%)
	€m a	€m b	% c	% d	% e
Dec-23					
1 Central governments or central banks		39,175	97.81%	2.19%	-
of which;					
1.1 Regional governments or local authorities		689	-	100.00%	-
1.2 Public sector entities		874	43.50%	56.50%	-
2 Institutions	3,861	4,528	-	14.74%	85.26%
3 Corporates	19,044	23,527	7.86%	12.34%	79.80%
of which;					
3.1 Corporates - Specialised lending, excluding slotting approach		741	-	-	100.00%
3.2 Corporates - Specialised lending under slotting approach		-	-	-	-
4 Retail	43,344	55,122	9.07%	13.18%	77.75%
of which;					
4.1 Retail – Secured by real estate SMEs		-	-	-	-
4.2 Retail – Secured by real estate non-SMEs		46,362	-	15.14%	84.86%
4.3 Retail – Qualifying revolving		766	-	-	100.00%
4.4 Retail – Other SMEs		3,059	35.49%	0.36%	64.15%
4.5 Retail – Other non-SMEs		4,935	79.33%	4.74%	15.93%
5 Equity		906	19.61%	80.39%	-
6 Other non-credit obligation assets		5,528	20.10%	79.90%	-
7 Total	66,249	128,787	36.07%	13.08%	50.85%

	Exposure value as defined in Article 166 CRR for exposures subject to IRB approach	Total exposure value for exposures subject to the Standardised approach and to the IRB approach	Percentage of total exposure value subject to the permanent partial use of the SA (%)	Percentage of total exposure value subject to a roll-out plan (%)	Percentage of total exposure value subject to IRB Approach (%)
	€m a	€m b	% c	% d	% e
Dec-22					
1 Central governments or central banks		44,016	97.70%	2.30%	-
of which;					
1.1 Regional governments or local authorities		809	14.98%	85.02%	-
1.2 Public sector entities		993	30.67%	69.33%	-
2 Institutions	3,632	4,509	-	19.45%	80.55%
3 Corporates	20,660	25,487	6.79%	14.10%	79.11%
of which;					
3.1 Corporates - Specialised lending, excluding slotting approach		906	-	-	100.00%
3.2 Corporates - Specialised lending under slotting approach		-	-	-	-
4 Retail	41,020	45,523	10.41%	0.04%	89.55%
of which;					
4.1 Retail – Secured by real estate SMEs		-	-	-	-
4.2 Retail – Secured by real estate non-SMEs		37,191	-	-	100.00%
4.3 Retail – Qualifying revolving		723	-	-	100.00%
4.4 Retail – Other SMEs		2,625	26.03%	0.78%	73.19%
4.5 Retail – Other non-SMEs		4,984	81.36%	-	18.64%
5 Equity		1,075	16.84%	83.16%	-
6 Other non-credit obligation assets		5,316	19.84%	80.16%	-
7 Total	65,312	125,926	40.27%	8.46%	51.27%

As per Article 452(i) of the CRR, Table 4.9 below provides back testing data to validate the reliability of PD calculations under the Foundation IRB Approach.

Table 4.9 - EU CR9 - IRB approach - Back-testing of PD by exposure class and PD range (Foundation IRB)

Dec-23 PD Range b	Number of obligors at the end of previous year		Observed average default rate (%) e	Exposures weighted average PD (%) f	Average PD (%) g	Average historical annual default rate (%) h
	c	d of which number of obligors which defaulted in the year				
Total Foundation IRB						
0.00 to <0.15	297	-	0.00%		0.06%	0.20%
0.00 to <0.10	286	-	0.00%		0.05%	0.20%
0.10 to <0.15	11	-	0.00%		0.13%	0.00%
0.15 to <0.25	164	1	0.61%		0.17%	0.28%
0.25 to <0.50	257	-	0.00%		0.35%	0.33%
0.50 to <0.75	333	4	1.20%		0.60%	0.67%
0.75 to <2.5	1,185	10	0.84%		1.47%	0.87%
0.75 to <1.75	1,090	10	0.92%		1.39%	0.89%
1.75 to <2.5	95	-	0.00%		1.92%	0.32%
2.5 to <10	2,475	63	2.55%		3.73%	2.40%
2.5 to <5	2,419	61	2.52%		3.51%	2.34%
5 to <10	56	2	3.57%		7.20%	6.83%
10 to <100	706	71	10.06%		15.60%	9.35%
10 to <20	412	35	8.50%		11.01%	7.73%
20 to <30	110	12	10.91%		20.00%	10.59%
30 to <100	184	24	13.04%		40.00%	16.53%
100 (Default)	452	-	0.00%		100.00%	0.00%
Institutions						
0.00 to <0.15	111	-	0.00%	0.05%	0.05%	0.00%
0.00 to <0.10	101	-	0.00%	0.05%	0.05%	0.00%
0.10 to <0.15	10	-	0.00%	0.13%	0.13%	0.00%
0.15 to <0.25	8	-	0.00%	0.20%	0.20%	0.00%
0.25 to <0.50	5	-	0.00%	0.36%	0.36%	0.00%
0.50 to <0.75	1	-	0.00%	0.59%	0.59%	0.00%
0.75 to <2.5	6	-	0.00%	1.11%	1.20%	0.00%
0.75 to <1.75	4	-	0.00%	1.11%	1.11%	0.00%
1.75 to <2.5	2	-	0.00%	0.00%	2.09%	0.00%
2.5 to <10	-	-	0.00%	0.00%	0.00%	0.00%
2.5 to <5	-	-	0.00%	0.00%	0.00%	0.00%
5 to <10	-	-	0.00%	0.00%	0.00%	0.00%
10 to <100	5	-	0.00%	14.54%	13.89%	0.00%
10 to <20	4	-	0.00%	13.75%	13.75%	0.00%
20 to <30	1	-	0.00%	0.00%	25.42%	0.00%
30 to <100	-	-	0.00%	46.26%	0.00%	0.00%
100 (Default)	-	-	0.00%	0.00%	0.00%	0.00%
Corporates of which SME						
0.00 to <0.15	87	-	0.00%	0.07%	0.07%	0.28%
0.00 to <0.10	87	-	0.00%	0.07%	0.07%	0.28%
0.10 to <0.15	0	-	0.00%	0.11%	0.00%	0.00%
0.15 to <0.25	88	1	1.14%	0.17%	0.17%	0.35%
0.25 to <0.50	133	-	0.00%	0.35%	0.35%	0.40%
0.50 to <0.75	233	2	0.86%	0.60%	0.60%	0.63%
0.75 to <2.5	967	9	0.93%	1.52%	1.46%	0.95%
0.75 to <1.75	949	9	0.95%	1.51%	1.45%	0.96%
1.75 to <2.5	18	-	0.00%	1.91%	1.92%	1.00%
2.5 to <10	2,239	56	2.50%	3.89%	3.65%	2.33%
2.5 to <5	2,204	56	2.54%	3.74%	3.59%	2.31%
5 to <10	35	-	0.00%	8.54%	7.23%	3.62%
10 to <100	654	67	10.24%	17.72%	15.78%	9.44%
10 to <20	374	32	8.56%	10.01%	10.09%	7.75%
20 to <30	103	11	10.68%	20.00%	20.00%	10.65%
30 to <100	177	24	13.56%	40.00%	40.00%	17.32%
100 (Default)	369	-	0.00%	100.00%	100.00%	0.00%
Corporates of which specialised lending						
0.00 to <0.15	-	-	0.00%	0.00%	0.00%	0.00%
0.00 to <0.10	-	-	0.00%	0.00%	0.00%	0.00%
0.10 to <0.15	-	-	0.00%	0.00%	0.00%	0.00%
0.15 to <0.25	5	-	0.00%	0.17%	0.17%	0.00%
0.25 to <0.50	5	-	0.00%	0.35%	0.35%	0.00%
0.50 to <0.75	11	-	0.00%	0.60%	0.60%	0.00%
0.75 to <2.5	24	-	0.00%	1.42%	1.40%	0.00%
0.75 to <1.75	24	-	0.00%	1.42%	1.40%	0.00%
1.75 to <2.5	-	-	0.00%	2.00%	0.00%	0.00%
2.5 to <10	10	-	0.00%	3.42%	3.30%	3.85%
2.5 to <5	10	-	0.00%	3.42%	3.30%	3.85%
5 to <10	-	-	0.00%	0.00%	0.00%	0.00%
10 to <100	1	-	0.00%	10.00%	10.00%	20.00%
10 to <20	1	-	0.00%	10.00%	10.00%	20.00%
20 to <30	-	-	0.00%	0.00%	0.00%	0.00%
30 to <100	-	-	0.00%	0.00%	0.00%	0.00%
100 (Default)	2	0	0.00%	100.00%	100.00%	0.00%
Corporates of which other						
0.00 to <0.15	99	-	0.00%	0.06%	0.06%	0.35%
0.00 to <0.10	98	-	0.00%	0.06%	0.06%	0.35%
0.10 to <0.15	1	-	0.00%	0.14%	0.14%	0.00%
0.15 to <0.25	63	-	0.00%	0.17%	0.17%	0.25%
0.25 to <0.50	114	-	0.00%	0.35%	0.35%	0.30%
0.50 to <0.75	88	2	2.27%	0.62%	0.59%	0.99%
0.75 to <2.5	188	1	0.53%	1.52%	1.50%	0.39%
0.75 to <1.75	113	1	0.88%	1.20%	1.23%	0.47%
1.75 to <2.5	75	-	0.00%	1.92%	1.92%	0.00%
2.5 to <10	226	7	3.10%	3.90%	3.89%	3.12%
2.5 to <5	205	5	2.44%	3.42%	3.37%	2.70%
5 to <10	21	2	9.52%	7.21%	7.20%	13.43%
10 to <100	46	4	8.70%	16.08%	14.83%	8.65%
10 to <20	33	3	9.09%	14.99%	14.29%	7.92%
20 to <30	6	1	16.67%	20.00%	20.00%	10.81%
30 to <100	7	-	0.00%	40.00%	40.00%	6.85%
100 (Default)	81	-	0.00%	100.00%	100.00%	0.00%

	Number of obligors at the end of previous year		Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
	c	d				
Dec-22						
PD Range						
b						
Total Foundation IRB						
0.00 to <0.15	352	-	0.00%		0.06%	0.32%
0.00 to <0.10	346	-	0.00%		0.06%	0.32%
0.10 to <0.15	6	-	0.00%		0.14%	0.00%
0.15 to <0.25	193	1	0.52%		0.17%	0.26%
0.25 to <0.50	266	3	1.13%		0.35%	0.30%
0.50 to <0.75	400	2	0.50%		0.60%	0.49%
0.75 to <2.5	1,385	11	0.79%		1.49%	0.75%
0.75 to <1.75	1,298	11	0.85%		1.41%	0.77%
1.75 to <2.5	87	-	0.00%		1.94%	0.41%
2.5 to <10	2,853	59	2.07%		3.74%	2.31%
2.5 to <5	2,815	53	1.88%		3.56%	2.27%
5 to <10	38	6	15.79%		7.20%	6.52%
10 to <100	887	63	7.10%		17.69%	8.77%
10 to <20	529	18	3.40%		11.45%	7.34%
20 to <30	131	12	9.16%		20.00%	10.48%
30 to <100	227	33	14.54%		40.00%	15.49%
100 (Default)	636	-	0.00%		100.00%	0.00%
Institutions						
0.00 to <0.15	110	-	0.00%	0.05%	0.06%	0.00%
0.00 to <0.10	110	-	0.00%	0.05%	0.06%	0.00%
0.10 to <0.15	-	-	0.00%	0.13%	0.00%	0.00%
0.15 to <0.25	13	-	0.00%	0.20%	0.17%	0.00%
0.25 to <0.50	13	-	0.00%	0.36%	0.35%	0.00%
0.50 to <0.75	-	-	0.00%	0.59%	0.00%	0.00%
0.75 to <2.5	9	-	0.00%	1.20%	1.70%	0.00%
0.75 to <1.75	9	-	0.00%	1.11%	1.70%	0.00%
1.75 to <2.5	-	-	0.00%	2.09%	0.00%	0.00%
2.5 to <10	7	-	0.00%	0.00%	2.70%	0.00%
2.5 to <5	7	-	0.00%	0.00%	2.70%	0.00%
5 to <10	-	-	0.00%	0.00%	0.00%	0.00%
10 to <100	3	-	0.00%	13.89%	11.56%	0.00%
10 to <20	2	-	0.00%	13.75%	10.00%	0.00%
20 to <30	1	-	0.00%	25.42%	20.00%	0.00%
30 to <100	-	-	0.00%	0.00%	0.00%	0.00%
100 (Default)	-	-	0.00%	0.00%	0.00%	0.00%
Corporates of which SME						
0.00 to <0.15	123	-	0.00%	0.07%	0.05%	0.50%
0.00 to <0.10	121	-	0.00%	0.07%	0.05%	0.50%
0.10 to <0.15	2	-	0.00%	0.00%	0.14%	0.00%
0.15 to <0.25	87	-	0.00%	0.17%	0.17%	0.15%
0.25 to <0.50	144	1	0.69%	0.35%	0.35%	0.32%
0.50 to <0.75	316	1	0.32%	0.60%	0.60%	0.51%
0.75 to <2.5	1,185	10	0.84%	1.46%	1.47%	0.82%
0.75 to <1.75	1,163	10	0.86%	1.45%	1.45%	0.83%
1.75 to <2.5	22	-	0.00%	1.92%	2.05%	0.93%
2.5 to <10	2,611	48	1.84%	3.65%	3.70%	2.25%
2.5 to <5	2,593	47	1.81%	3.59%	3.63%	2.23%
5 to <10	18	1	5.56%	7.23%	7.20%	3.68%
10 to <100	824	57	6.92%	15.78%	18.26%	8.76%
10 to <20	491	13	2.65%	10.09%	10.01%	7.24%
20 to <30	127	12	9.45%	20.00%	20.00%	10.64%
30 to <100	206	32	15.53%	40.00%	40.00%	16.20%
100 (Default)	557	-	0.00%	100.00%	100.00%	0.00%
Corporates of which specialised lending						
0.00 to <0.15	-	-	0.00%	0.00%	0.00%	0.00%
0.00 to <0.10	-	-	0.00%	0.00%	0.00%	0.00%
0.10 to <0.15	-	-	0.00%	0.00%	0.00%	0.00%
0.15 to <0.25	8	-	0.00%	0.17%	0.17%	0.00%
0.25 to <0.50	7	-	0.00%	0.35%	0.35%	0.00%
0.50 to <0.75	12	-	0.00%	0.60%	0.60%	0.00%
0.75 to <2.5	25	-	0.00%	1.40%	1.51%	0.00%
0.75 to <1.75	24	-	0.00%	1.40%	1.51%	0.00%
1.75 to <2.5	1	-	0.00%	1.82%	0.00%	0.00%
2.5 to <10	9	-	0.00%	3.30%	3.37%	5.45%
2.5 to <5	9	-	0.00%	3.30%	3.37%	5.45%
5 to <10	-	-	0.00%	0.00%	0.00%	0.00%
10 to <100	1	1	100.00%	10.00%	10.00%	40.00%
10 to <20	1	1	100.00%	10.00%	10.00%	40.00%
20 to <30	-	-	0.00%	0.00%	0.00%	0.00%
30 to <100	-	-	0.00%	0.00%	0.00%	0.00%
100 (Default)	2	0	0.00%	100.00%	100.00%	0.00%
Corporates of which other						
0.00 to <0.15	119	-	0.00%	0.06%	0.06%	0.50%
0.00 to <0.10	115	-	0.00%	0.06%	0.06%	0.51%
0.10 to <0.15	4	-	0.00%	0.14%	0.10%	0.00%
0.15 to <0.25	85	1	1.18%	0.17%	0.17%	0.49%
0.25 to <0.50	102	2	1.96%	0.35%	0.35%	0.29%
0.50 to <0.75	72	1	1.39%	0.59%	0.59%	0.50%
0.75 to <2.5	166	1	0.60%	1.50%	1.51%	0.30%
0.75 to <1.75	102	1	0.98%	1.23%	1.21%	0.33%
1.75 to <2.5	64	-	0.00%	1.92%	1.92%	0.00%
2.5 to <10	226	11	4.87%	3.89%	3.84%	2.93%
2.5 to <5	206	6	2.91%	3.37%	3.43%	2.64%
5 to <10	20	5	25.00%	7.20%	7.20%	14.58%
10 to <100	59	5	8.47%	14.83%	16.21%	9.17%
10 to <20	35	4	11.43%	14.29%	14.46%	8.81%
20 to <30	3	0	0.00%	20.00%	20.00%	8.11%
30 to <100	21	1	4.76%	40.00%	40.00%	8.33%
100 (Default)	77	-	0.00%	100.00%	100.00%	0.00%

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As per Article 452(i) of the CRR, Table 4.10 below provides back testing data to validate the reliability of PD calculations under the Advanced IRB Approach.

Table 4.10 - EU CR9 - IRB approach - Back-testing of PD by exposure class and PD range (Advanced IRB)

Dec-23 PD Range b	Number of obligors at the end of previous year		Observed average default rate (%) e	Exposures weighted average PD (%) f	Average PD (%) g	Average historical annual default rate (%) h
	c	d of which number of obligors which defaulted in the year				
Total advanced IRB						
0.00 to <0.15	69,617	115	0.17%		0.09%	0.14%
0.00 to <0.10	26,709	37	0.14%		0.09%	0.12%
0.10 to <0.15	42,908	78	0.18%		0.11%	0.15%
0.15 to <0.25	189,690	489	0.26%		0.18%	0.18%
0.25 to <0.50	316,119	681	0.22%		0.38%	0.16%
0.50 to <0.75	129,415	613	0.47%		0.60%	1.19%
0.75 to <2.5	255,961	2,602	1.02%		1.20%	0.78%
0.75 to <1.75	197,630	1,569	0.79%		1.06%	0.62%
1.75 to <2.5	58,331	1,033	1.77%		1.89%	1.27%
2.5 to <10	165,033	5,611	3.40%		4.89%	2.74%
2.5 to <5	107,983	2,718	2.52%		3.70%	1.96%
5 to <10	57,050	2,893	5.07%		6.71%	4.30%
10 to <100	67,426	7,838	11.62%		27.31%	13.08%
10 to <20	38,030	2,385	6.27%		14.67%	7.92%
20 to <30	16,569	1,445	8.72%		23.79%	9.34%
30 to <100	12,827	4,008	31.25%		43.35%	27.58%
100 (Default)	38,684	-	0.00%		100.00%	0.00%
Secured by real estate property - Non SME						
0.00 to <0.15	18,681	20	0.11%	0.00%	0.09%	0.09%
0.00 to <0.10	18,664	19	0.10%	0.00%	0.09%	0.08%
0.10 to <0.15	17	1	5.88%	0.00%	0.10%	0.11%
0.15 to <0.25	91,959	324	0.35%	0.18%	0.18%	0.22%
0.25 to <0.50	69,241	395	0.57%	0.33%	0.39%	0.38%
0.50 to <0.75	16,239	227	1.40%	0.61%	0.60%	0.87%
0.75 to <2.5	57,845	795	1.37%	1.25%	1.18%	0.88%
0.75 to <1.75	45,685	478	1.05%	1.03%	1.05%	0.70%
1.75 to <2.5	12,160	317	2.61%	1.91%	1.85%	1.40%
2.5 to <10	17,741	997	5.62%	5.08%	5.30%	4.03%
2.5 to <5	9,049	344	3.80%	3.71%	3.91%	2.79%
5 to <10	8,692	653	7.51%	6.59%	6.63%	5.52%
10 to <100	3,809	1,409	36.99%	29.99%	29.86%	23.73%
10 to <20	1,386	314	22.66%	15.24%	15.76%	16.13%
20 to <30	769	277	36.02%	24.05%	23.74%	21.80%
30 to <100	1,654	818	49.46%	39.13%	43.77%	35.47%
100 (Default)	3,502	-	0.00%	100.00%	100.00%	0.00%
Qualifying revolving						
0.00 to <0.15	43,461	87	0.20%	0.09%	0.11%	0.13%
0.00 to <0.10	7,966	18	0.23%	0.05%	0.08%	0.14%
0.10 to <0.15	35,495	69	0.19%	0.11%	0.11%	0.13%
0.15 to <0.25	90,110	145	0.16%	0.20%	0.20%	0.10%
0.25 to <0.50	225,172	241	0.11%	0.36%	0.35%	0.08%
0.50 to <0.75	105,355	326	0.31%	0.62%	0.60%	1.28%
0.75 to <2.5	154,437	1,291	0.84%	1.36%	1.28%	0.58%
0.75 to <1.75	127,771	862	0.67%	1.14%	1.11%	0.48%
1.75 to <2.5	26,666	429	1.61%	2.18%	2.08%	1.10%
2.5 to <10	56,213	1,916	3.41%	4.96%	4.83%	2.89%
2.5 to <5	34,083	967	2.84%	3.65%	3.55%	2.21%
5 to <10	22,130	949	4.29%	7.11%	6.98%	4.16%
10 to <100	50,784	3,780	7.44%	27.19%	25.86%	9.54%
10 to <20	30,388	1,393	4.58%	13.62%	13.81%	6.17%
20 to <30	14,105	843	5.98%	25.19%	24.35%	6.64%
30 to <100	6,291	1,544	24.54%	44.13%	42.58%	23.13%
100 (Default)	18,674	0	0.00%	100.00%	100.00%	0.00%

Retail of which SME

0.00 to <0.15	129	-	0.00%	0.10%	0.11%	0.00%
0.00 to <0.10	49	-	0.00%	0.08%	0.07%	0.00%
0.10 to <0.15	80	-	0.00%	0.10%	0.12%	0.00%
0.15 to <0.25	125	-	0.00%	0.18%	0.19%	0.00%
0.25 to <0.50	456	-	0.00%	0.33%	0.40%	0.33%
0.50 to <0.75	829	4	0.48%	0.65%	0.63%	0.42%
0.75 to <2.5	25,238	268	1.06%	1.59%	1.66%	0.71%
0.75 to <1.75	12,089	97	0.80%	1.24%	1.26%	0.62%
1.75 to <2.5	13,149	171	1.30%	2.08%	2.16%	0.80%
2.5 to <10	61,698	1,977	3.20%	4.75%	4.22%	1.87%
2.5 to <5	46,450	1,065	2.29%	3.62%	3.54%	1.33%
5 to <10	15,248	912	5.98%	7.19%	5.99%	3.52%
10 to <100	4,452	1,486	33.38%	18.51%	22.50%	25.64%
10 to <20	2,482	374	15.07%	13.36%	13.47%	10.50%
20 to <30	470	155	32.98%	23.56%	25.06%	25.55%
30 to <100	1,500	957	63.80%	41.35%	39.09%	52.82%
100 (Default)	5,508	-	0.00%	100.00%	100.00%	0.00%

Retail of which other

0.00 to <0.15	7,346	8	0.11%	0.07%	0.10%	0.27%
0.00 to <0.10	30	-	0.00%	0.05%	0.07%	0.25%
0.10 to <0.15	7,316	8	0.11%	0.12%	0.10%	0.28%
0.15 to <0.25	7,496	20	0.27%	0.19%	0.18%	0.29%
0.25 to <0.50	21,250	45	0.21%	0.33%	0.33%	0.40%
0.50 to <0.75	6,992	56	0.80%	0.63%	0.65%	0.89%
0.75 to <2.5	18,441	248	1.34%	1.41%	1.67%	1.78%
0.75 to <1.75	12,085	132	1.09%	1.26%	1.24%	1.56%
1.75 to <2.5	6,356	116	1.83%	1.82%	2.08%	2.14%
2.5 to <10	29,381	721	2.45%	4.43%	4.69%	3.25%
2.5 to <5	18,401	342	1.86%	3.17%	3.59%	2.43%
5 to <10	10,980	379	3.45%	6.39%	7.26%	4.57%
10 to <100	8,381	1,163	13.88%	25.77%	19.09%	16.70%
10 to <20	3,774	304	8.06%	13.35%	13.01%	10.28%
20 to <30	1,225	170	13.88%	22.03%	23.51%	17.74%
30 to <100	3,382	689	20.37%	48.37%	41.62%	23.36%
100 (Default)	11,000	-	0.00%	100.00%	100.00%	0.00%

Number of obligors at the end of previous year	of which number of obligors which defaulted in the year	Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
		%	%	%	%

Dec-22

PD Range

b

Total advanced IRB

	c	d	e	f	g	h
0.00 to <0.15	62,826	97	0.15%		0.09%	0.16%
0.00 to <0.10	22,972	19	0.08%		0.09%	0.15%
0.10 to <0.15	39,854	78	0.20%		0.11%	0.16%
0.15 to <0.25	203,636	378	0.19%		0.18%	0.16%
0.25 to <0.50	342,749	589	0.17%		0.38%	0.15%
0.50 to <0.75	131,549	610	0.46%		0.59%	1.16%
0.75 to <2.5	251,915	2,314	0.92%		1.23%	0.75%
0.75 to <1.75	192,021	1,428	0.74%		1.04%	0.61%
1.75 to <2.5	59,894	886	1.48%		1.89%	1.18%
2.5 to <10	159,134	4,580	2.88%		4.90%	2.55%
2.5 to <5	103,067	2,227	2.16%		3.69%	1.83%
5 to <10	56,067	2,353	4.20%		6.70%	3.94%
10 to <100	35,647	5,420	15.20%		25.66%	12.85%
10 to <20	19,265	1,403	7.28%		14.63%	8.27%
20 to <30	5,400	819	15.17%		23.57%	8.60%
30 to <100	10,982	3,198	29.12%		42.69%	25.56%
100 (Default)	46,461	-	0.00%		100.00%	0.00%

Secured by real estate property - SME

0.00 to <0.15	953	-	0.00%	0.00%	0.09%	0.06%
0.00 to <0.10	953	-	0.00%	0.00%	0.09%	0.06%
0.10 to <0.15	-	-	0.00%	0.00%	0.00%	0.00%
0.15 to <0.25	20,098	57	0.28%	0.00%	0.19%	0.34%
0.25 to <0.50	18,166	60	0.33%	0.00%	0.37%	0.40%
0.50 to <0.75	5,478	93	1.70%	0.00%	0.61%	1.23%
0.75 to <2.5	15,005	222	1.48%	0.00%	1.23%	1.42%
0.75 to <1.75	10,771	141	1.31%	0.00%	1.00%	1.24%
1.75 to <2.5	4,234	81	1.91%	0.00%	1.89%	1.87%
2.5 to <10	5,111	152	2.97%	0.00%	5.53%	3.25%
2.5 to <5	2,121	40	1.89%	0.00%	3.56%	1.97%
5 to <10	2,990	112	3.75%	0.00%	6.64%	4.11%
10 to <100	1,490	451	30.27%	0.00%	29.37%	27.64%
10 to <20	538	85	15.80%	0.00%	15.60%	14.34%
20 to <30	307	77	25.08%	0.00%	23.77%	21.27%
30 to <100	645	289	44.81%	0.00%	43.45%	42.77%
100 (Default)	4,082	-	0.00%	0.00%	100.00%	0.00%

Secured by real estate property - Non SME

0.00 to <0.15	15,424	10	0.06%	0.09%	0.09%	0.15%
0.00 to <0.10	15,419	10	0.06%	0.09%	0.09%	0.14%
0.10 to <0.15	5	-	0.00%	0.10%	0.10%	0.17%
0.15 to <0.25	85,009	188	0.22%	0.18%	0.18%	0.18%
0.25 to <0.50	66,986	259	0.39%	0.39%	0.38%	0.32%
0.50 to <0.75	11,446	142	1.24%	0.60%	0.58%	0.66%
0.75 to <2.5	43,140	409	0.95%	1.18%	1.20%	0.80%
0.75 to <1.75	32,624	226	0.69%	1.05%	1.04%	0.66%
1.75 to <2.5	10,516	183	1.74%	1.85%	1.84%	1.26%
2.5 to <10	14,300	597	4.17%	5.30%	5.16%	3.21%
2.5 to <5	7,645	231	3.02%	3.91%	3.98%	2.57%
5 to <10	6,655	366	5.50%	6.63%	6.61%	3.78%
10 to <100	2,244	587	26.16%	30.08%	25.71%	18.34%
10 to <20	1,059	206	19.45%	15.76%	15.20%	11.40%
20 to <30	536	132	24.63%	23.74%	23.33%	18.80%
30 to <100	649	249	38.37%	44.17%	42.92%	30.27%
100 (Default)	8,146	-	0.00%	100.00%	100.00%	0.00%

Qualifying revolving						
0.00 to <0.15	39,290	69	0.18%	0.11%	0.11%	0.12%
0.00 to <0.10	6,506	9	0.14%	0.08%	0.09%	0.11%
0.10 to <0.15	32,784	60	0.18%	0.11%	0.11%	0.13%
0.15 to <0.25	90,930	106	0.12%	0.20%	0.20%	0.09%
0.25 to <0.50	235,482	208	0.09%	0.35%	0.35%	0.08%
0.50 to <0.75	105,928	312	0.29%	0.60%	0.60%	1.29%
0.75 to <2.5	151,013	1,206	0.80%	1.28%	1.28%	0.58%
0.75 to <1.75	124,446	821	0.66%	1.11%	1.10%	0.48%
1.75 to <2.5	26,567	385	1.45%	2.08%	2.08%	1.06%
2.5 to <10	52,951	1,761	3.33%	4.83%	4.78%	2.85%
2.5 to <5	31,114	851	2.74%	3.55%	3.51%	2.13%
5 to <10	21,837	910	4.17%	6.98%	6.96%	4.25%
10 to <100	20,861	2,399	11.50%	25.86%	27.19%	10.00%
10 to <20	11,863	602	5.07%	13.81%	13.80%	6.98%
20 to <30	3,115	313	10.05%	24.35%	24.29%	6.26%
30 to <100	5,883	1,484	25.23%	42.58%	43.07%	22.54%
100 (Default)	18,334	0	0.00%	100.00%	100.00%	0.00%
Retail of which SME						
0.00 to <0.15	153	-	0.00%	0.10%	0.10%	0.00%
0.00 to <0.10	60	-	0.00%	0.07%	0.07%	0.00%
0.10 to <0.15	93	-	0.00%	0.10%	0.12%	0.00%
0.15 to <0.25	141	-	0.00%	0.18%	0.19%	0.25%
0.25 to <0.50	458	3	0.66%	0.33%	0.40%	0.41%
0.50 to <0.75	972	7	0.72%	0.65%	0.63%	0.39%
0.75 to <2.5	23,414	217	0.93%	1.67%	1.66%	0.59%
0.75 to <1.75	11,461	96	0.84%	1.24%	1.26%	0.54%
1.75 to <2.5	11,953	121	1.01%	2.08%	2.15%	0.65%
2.5 to <10	54,858	1,294	2.36%	4.69%	4.18%	1.45%
2.5 to <5	41,954	727	1.73%	3.59%	3.53%	1.06%
5 to <10	12,904	567	4.39%	7.26%	5.99%	2.85%
10 to <100	3,160	936	29.62%	19.09%	22.31%	22.57%
10 to <20	1,798	242	13.46%	13.01%	13.61%	8.66%
20 to <30	322	99	30.75%	23.51%	25.26%	21.38%
30 to <100	1,040	595	57.21%	41.62%	38.98%	45.60%
100 (Default)	4,040	-	0.00%	100.00%	100.00%	0.00%
Retail of which other						
0.00 to <0.15	7,006	18	0.26%	0.11%	0.10%	0.28%
0.00 to <0.10	34	-	0.00%	0.07%	0.07%	0.21%
0.10 to <0.15	6,972	18	0.26%	0.12%	0.10%	0.35%
0.15 to <0.25	7,458	27	0.36%	0.19%	0.18%	0.26%
0.25 to <0.50	21,657	59	0.27%	0.40%	0.33%	0.47%
0.50 to <0.75	7,725	56	0.72%	0.63%	0.65%	0.86%
0.75 to <2.5	19,343	260	1.34%	1.66%	1.67%	1.68%
0.75 to <1.75	12,719	144	1.13%	1.26%	1.23%	1.49%
1.75 to <2.5	6,624	116	1.75%	2.16%	2.09%	1.97%
2.5 to <10	31,914	776	2.43%	4.22%	4.70%	3.35%
2.5 to <5	20,233	378	1.87%	3.54%	3.59%	2.50%
5 to <10	11,681	398	3.41%	5.99%	7.20%	4.67%
10 to <100	7,892	1,047	13.27%	22.50%	19.38%	16.29%
10 to <20	4,007	268	6.69%	13.47%	13.26%	10.69%
20 to <30	1,120	198	17.68%	25.06%	23.41%	16.78%
30 to <100	2,765	581	21.01%	39.09%	39.50%	21.75%
100 (Default)	11,859	-	0.00%	100.00%	100.00%	0.00%

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As per Article 442, points (c) and (e), Table 4.11 below presents gross carrying amount (including accrued interest) of performing and non-performing exposures and the related accumulated impairment, provisions, accumulated change in fair value due to credit risk, accumulated partial write-off, and collateral and financial guarantees received, according to the scope of regulatory consolidation. The Group's non performing loans (NPL) are 3.05% at December 2023 (3.45% December 2022).

Table 4.11 - EU CR1 - Performing and non-performing exposures and related provisions

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
	Gross carrying amount/nominal amount						Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						Accumulated partial write-off	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					
Dec-23	€m	€m	€m	€m	€m	€m	€m	€m	€m	€m	€m	€m	€m	€m	€m
5 Cash balances at central banks and other demand deposits	31,732	31,732	-	-	-	-	(5)	(5)	-	-	-	-	-	-	-
10 Loans and advances	80,548	67,633	12,555	2,537	23	2,364	(597)	(181)	(419)	(625)	(2)	(612)	(702)	58,940	1,298
20 Central banks	1,033	1,033	-	-	-	-	-	-	-	-	-	-	-	-	-
30 General governments	43	41	1	-	-	-	-	-	-	-	-	-	-	-	-
40 Credit institutions	735	735	-	-	-	-	-	-	-	-	-	-	-	-	-
50 Other financial corporations	805	556	87	2	-	2	(6)	(3)	(3)	(1)	-	(1)	-	39	-
60 Non-financial corporations of which;	25,543	17,487	8,056	1,468	19	1,449	(379)	(86)	(293)	(405)	(2)	(404)	(696)	10,197	522
70 SME	14,463	9,792	4,671	788	17	770	(250)	(59)	(191)	(224)	(1)	(223)	(261)	8,039	389
80 Households	52,389	47,781	4,411	1,067	4	913	(212)	(92)	(123)	(219)	-	(207)	(6)	48,704	776
90 Debt securities	9,784	9,749	1	-	-	-	(2)	(2)	-	-	-	-	-	-	-
100 Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
110 General governments	5,497	5,497	-	-	-	-	(1)	(1)	-	-	-	-	-	-	-
120 Credit institutions	4,210	4,210	-	-	-	-	(1)	(1)	-	-	-	-	-	-	-
130 Other financial corporations	57	42	1	-	-	-	-	-	-	-	-	-	-	-	-
140 Non-financial corporations	20	-	-	-	-	-	-	-	-	-	-	-	-	-	-
150 Off-balance-sheet exposures	19,044	17,108	1,790	159	-	159	55	25	29	6	-	6	-	-	-
160 Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
170 General governments	133	128	5	-	-	-	-	-	-	-	-	-	-	-	-
180 Credit institutions	331	287	-	-	-	-	-	-	-	-	-	-	-	-	-
190 Other financial corporations	1,860	1,627	192	-	-	-	2	1	-	-	-	-	-	-	-
200 Non-financial corporations	11,228	9,625	1,542	125	-	125	47	20	27	5	-	5	-	-	-
210 Households	5,492	5,441	51	34	-	34	6	4	2	1	-	1	-	-	-
220 Total	141,108	126,222	14,346	2,696	23	2,523	(654)	(208)	(448)	(631)	(2)	(618)	(702)	58,940	1,298

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
	Gross carrying amount/nominal amount						Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						Accumulated partial write-off	Collateral and financial guarantees received	
	Performing exposures			Non-performing exposures			Performing exposures –			Non-performing exposures –				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					
Dec-22	€m	€m	€m	€m	€m	€m	€m	€m	€m	€m	€m	€m	€m	€m	€m
5 Cash balances at central banks and other demand deposits	36,671	36,671	-	-	-	-	(6)	(6)	-	-	-	-	-	-	-
10 Loans and advances	73,811	60,795	12,670	2,640	19	2,509	(427)	(144)	(284)	(868)	(1)	(834)	(623)	50,907	992
20 Central banks	1,076	1,076	-	-	-	-	-	-	-	-	-	-	-	-	-
30 General governments	90	88	2	-	-	-	-	-	-	-	-	-	-	-	-
40 Credit institutions	1,746	1,746	-	-	-	-	-	-	-	-	-	-	-	-	-
50 Other financial corporations	1,289	1,078	50	3	-	3	(5)	(2)	(3)	(1)	-	(1)	-	669	-
60 Non-financial corporations of which;	26,561	18,024	8,537	1,962	10	1,875	(274)	(74)	(200)	(683)	(1)	(650)	(603)	10,359	565
70 SME	15,019	9,386	5,634	1,103	2	1,040	(169)	(50)	(118)	(414)	-	(384)	(235)	8,854	395
80 Households	43,049	38,783	4,081	675	9	631	(148)	(68)	(81)	(184)	-	(183)	(20)	39,879	427
90 Debt securities	8,818	8,778	1	-	-	-	(2)	(2)	-	-	-	-	-	-	-
100 Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
110 General governments	4,968	4,967	-	-	-	-	(1)	(1)	-	-	-	-	-	-	-
120 Credit institutions	3,763	3,762	-	-	-	-	(1)	(1)	-	-	-	-	-	-	-
130 Other financial corporations	66	49	1	-	-	-	-	-	-	-	-	-	-	-	-
140 Non-financial corporations	21	-	-	-	-	-	-	-	-	-	-	-	-	-	-
150 Off-balance-sheet exposures	17,078	15,772	1,221	211	4	207	42	22	19	14	-	14	-	122	-
160 Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
170 General governments	131	131	-	-	-	-	-	-	-	-	-	-	-	-	-
180 Credit institutions	210	190	-	-	-	-	-	-	-	-	-	-	-	122	-
190 Other financial corporations	1,797	1,795	1	-	-	-	1	-	-	-	-	-	-	-	-
200 Non-financial corporations	10,054	8,812	1,178	170	4	166	36	18	18	13	-	13	-	-	-
210 Households	4,886	4,844	42	41	-	41	5	4	1	1	-	1	-	-	-
220 Total	136,378	122,016	13,892	2,851	23	2,716	(471)	(168)	(303)	(882)	(1)	(848)	(623)	51,029	992

As per Article 442 point (g), Table 4.12 below provides a breakdown of gross carrying amount by residual contractual maturities net of related accumulated impairment, provisions, accumulated change in fair value due to credit risk.

Table 4.12 - EU CR1-A: Maturity of exposures

	a	b	c		d	e	f
			Net exposure value				
Dec-23	On demand	<=1 year	>1 year <= 5 years	>5 years	No stated maturity		Total
1 Loans and advances	1,867	12,706	31,606	35,553	131		81,863
2 Debt securities	-	561	5,663	3,558	-		9,782
3 Total	1,867	13,267	37,269	39,111	131		91,645

	a	b	c		d	e	f
			Net exposure value				
Dec-22	On demand	<=1 year	>1 year <= 5 years	>5 years	No stated maturity		Total
1 Loans and advances	2,085	14,240	30,023	28,648	160		75,156
2 Debt securities	-	2,502	5,308	1,006	-		8,816
3 Total	2,085	16,742	35,331	29,654	160		83,972

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As per Article 442 point (d), Table 4.13 below presents the gross carrying amount/nominal amount (including accrued interest) of performing and non-performing exposures according to the scope of regulatory consolidation. For the on-balance sheet exposures, the template shows the breakdown by past-due band. The gross non-performing loans and advances (NPL) ratio at 31 December 2023 is 3.05% (31 December 2022 3.45%).

Table 4.13 - EU CQ3 - Credit quality of performing and non-performing exposures by past due days

	a	b	c	d	e	f	g	h	i	j	k	l
	Performing exposures			Non-performing exposures								
	€m	Not past due or past due ≤ 30 days	Past due > 30 days ≤ 90 days	€m	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
Dec-23												
5 Cash balances at central banks and other demand deposits	31,732	31,732	-	-	-	-	-	-	-	-	-	-
10 Loans and advances	80,548	80,299	249	2,537	1,762	238	258	92	79	33	75	2,452
20 Central banks	1,033	1,033	-	-	-	-	-	-	-	-	-	-
30 General governments	43	43	-	-	-	-	-	-	-	-	-	-
40 Credit institutions	735	735	-	-	-	-	-	-	-	-	-	-
50 Other financial corporations	805	805	-	2	2	-	-	-	-	-	-	2
60 Non-financial corporations	25,543	25,480	64	1,468	1,164	87	95	40	46	18	18	1,450
of which;												
70 SME	14,463	14,402	60	788	525	78	91	34	36	11	13	771
80 Households	52,389	52,203	185	1,067	596	151	163	52	33	15	57	1,000
90 Debt securities	9,784	9,784	-	-	-	-	-	-	-	-	-	-
100 Central banks	-	-	-	-	-	-	-	-	-	-	-	-
110 General governments	5,497	5,497	-	-	-	-	-	-	-	-	-	-
120 Credit institutions	4,210	4,210	-	-	-	-	-	-	-	-	-	-
130 Other financial corporations	57	57	-	-	-	-	-	-	-	-	-	-
140 Non-financial corporations	20	20	-	-	-	-	-	-	-	-	-	-
150 Off-balance-sheet exposures	19,044			159								159
160 Central banks	-											
170 General governments	133											
180 Credit institutions	331											
190 Other financial corporations	1,860											
200 Non-financial corporations	11,228			125								125
210 Households	5,492			34								34
220 Total	141,108	121,815	249	2,696	1,761	238	258	92	79	33	76	2,611

	a	b	c	d	e	f	g	h	i	j	k	l
	Performing exposures			Non-performing exposures								
	€m	Not past due or past due ≤ 30 days	Past due > 30 days ≤ 90 days	€m	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
Dec-22												
5 Cash balances at central banks and other demand deposits	36,671	36,671	-	-	-	-	-	-	-	-	-	-
10 Loans and advances	73,811	73,641	170	2,640	1,479	169	298	205	273	77	139	2,621
20 Central banks	1,076	1,076	-	-	-	-	-	-	-	-	-	-
30 General governments	90	90	-	-	-	-	-	-	-	-	-	-
40 Credit institutions	1,746	1,746	-	-	-	-	-	-	-	-	-	-
50 Other financial corporations	1,289	1,283	6	2	1	-	-	1	-	-	-	2
60 Non-financial corporations	26,561	26,454	107	1,962	1,125	97	223	178	217	54	68	1,952
of which;												
70 SME	15,019	14,918	101	1,104	361	85	190	151	204	50	63	1,100
80 Households	43,049	42,992	57	676	353	72	75	27	55	23	71	667
90 Debt securities	8,818	8,818	-	-	-	-	-	-	-	-	-	-
100 Central banks	-	-	-	-	-	-	-	-	-	-	-	-
110 General governments	4,968	4,968	-	-	-	-	-	-	-	-	-	-
120 Credit institutions	3,763	3,763	-	-	-	-	-	-	-	-	-	-
130 Other financial corporations	66	66	-	-	-	-	-	-	-	-	-	-
140 Non-financial corporations	21	21	-	-	-	-	-	-	-	-	-	-
150 Off-balance-sheet exposures	17,078			211								207
160 Central banks	-											
170 General governments	131											
180 Credit institutions	210											
190 Other financial corporations	1,797											
200 Non-financial corporations	10,054			170								166
210 Households	4,886			41								41
220 Total	136,378	119,130	170	2,851	1,479	170	297	205	273	78	139	2,828

As per Article 442, point (f), Table 4.14 below presents movements of gross carrying amounts (including accrued interest) of non performing loans and advances during the period. The non-performing values in this template are in accordance with Article 178 default of an obligor.

Table 4.14 - EU CR2: Changes in the stock of non-performing loans and advances

	Dec-23 a Gross carrying amount €m	Dec-22 a Gross carrying amount €m
10 Initial stock of non-performing loans and advances	2,640	4,317
20 Inflows to non-performing portfolios	1,620	1,329
30 Outflows from non-performing portfolios	(1,723)	(3,006)
40 Outflows due to write-offs	(575)	(927)
50 Outflow due to other situations	(1,148)	(2,079)
60 Final stock of non-performing loans and advances	2,537	2,640

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As per Article 442 point (c), Table 4.15 below presents the gross carrying amount (including accrued interest) of forbore exposures and the related accumulated impairment, provisions, accumulated change in fair value due to credit risk, and collateral and financial guarantees received, according to the scope of regulatory consolidation.

Table 4.15 - EU CQ1 - Credit quality of forbore exposures

	a	b	c	d	e	f	g	h
	Gross carrying amount/nominal amount of exposures with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collateral received and financial guarantees received on forbore exposures	
	Performing forbore	Non-performing forbore		Of which impaired	On performing forbore exposures	On non-performing forbore exposures		Of which collateral and financial guarantees received on non-performing exposures with forbearance measures
		Of which defaulted						
	€m	€m	€m	€m	€m	€m	€m	€m
Dec-23								
5 Cash balances at central banks and other demand deposits	-	-	-	-	-	-	-	-
10 Loans and advances	2,353	1,306	1,277	1,274	(107)	(299)	1,832	547
20 Central banks	-	-	-	-	-	-	-	-
30 General governments	-	-	-	-	-	-	-	-
40 Credit institutions	-	-	-	-	-	-	-	-
50 Other financial corporations	2	-	-	-	-	-	-	-
60 Non-financial corporations	2,140	1,040	1,030	1,011	(102)	(241)	1,424	343
70 Households	212	266	248	263	(5)	(57)	408	204
80 Debt Securities	-	-	-	-	-	-	-	-
90 Loan commitments given	295	75	75	75	3	2	-	-
100 Total	2,648	1,382	1,353	1,349	(109)	(301)	1,832	547

	a	b	c	d	e	f	g	h
	Gross carrying amount/nominal amount of exposures with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collateral received and financial guarantees received on forbore exposures	
	Performing forbore	Non-performing forbore		Of which impaired	On performing forbore exposures	On non-performing forbore exposures		Of which collateral and financial guarantees received on non-performing exposures with forbearance measures
		Of which defaulted						
	€m	€m	€m	€m	€m	€m	€m	€m
Dec-22								
5 Cash balances at central banks and other demand deposits	-	-	-	-	-	-	-	-
10 Loans and advances	2,775	1,762	1,755	1,743	(66)	(551)	2,465	653
20 Central banks	-	-	-	-	-	-	-	-
30 General governments	-	-	-	-	-	-	-	-
40 Credit institutions	-	-	-	-	-	-	-	-
50 Other financial corporations	36	-	-	-	(2)	-	4	-
60 Non-financial corporations	2,450	1,545	1,537	1,529	(59)	(493)	2,050	513
70 Households	289	217	218	214	(5)	(58)	411	140
80 Debt Securities	-	-	-	-	-	-	-	-
90 Loan commitments given	358	147	147	147	5	6	-	-
100 Total	3,132	1,909	1,902	1,890	(71)	(557)	2,465	653

As per Article 442, points (c) and (e), Table 4.16 below presents gross carrying amount (includes accrued interest) of performing and non-performing exposures and the related accumulated impairment, provisions and accumulated change in fair value due to credit risk, according to the scope of regulatory consolidation.

Table 4.16 - EU CQ4: Quality of non-performing exposures by geography

	a	b ²		c	d ²	e	f	g
	€m	Gross carrying/nominal amount		Of which defaulted	Of which subject to impairment	Accumulated impairment	Provisions on off-balance-sheet commitments and financial guarantees given	Accumulated negative changes in fair value due to credit risk on non-performing exposures
		Of which non-performing						
Dec-23	€m	€m	€m	€m	€m	€m	€m	€m
10 On-balance-sheet exposures Total	92,869		2,452		(1,225)			-
20 Ireland	54,485		1,284		(676)			-
30 United Kingdom	26,349		721		(327)			-
70 Other countries ¹	12,036		448		(222)			-
80 Off-balance-sheet exposures Total	19,203		159				61	
90 Ireland	13,206		101				38	
100 United Kingdom	4,123		32				13	
140 Other countries ¹	1,874		26				11	
150 Total	112,072		2,611		(1,225)		61	-
Dec-22	€m	€m	€m	€m	€m	€m	€m	€m
10 On-balance-sheet exposures Total	85,269		2,621		(1,298)			-
20 Ireland	45,151		1,395		(723)			-
30 United Kingdom	27,511		825		(365)			-
70 Other countries ¹	12,607		401		(210)			-
80 Off-balance-sheet exposures Total	17,288		207				55	
90 Ireland	12,096		85				28	
100 United Kingdom	3,494		93				17	
140 Other countries ¹	1,698		29				10	
150 Total	102,557		2,828		(1,298)		55	-

¹ The gross carrying / nominal amount of individual countries in Other countries are not material (individually less than 5% of total gross carrying / nominal amount). Exposures to supranational organisations are assigned to 'Other countries'.

² In line with the requirements for large institutions with an NPL ratio (in accordance with Regulation (EU) 2021/637) lower than 5%, columns "Of which non-performing" and "of which subject to impairment" are not required to be disclosed.

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As per Article 442, points (c) and (e), Table 4.17 below presents gross carrying amount (including accrued interest) of loans and advances to non-financial corporations by industry and the related accumulated impairment and accumulated change in fair value due to credit risk, according to the scope of regulatory consolidation.

Table 4.17 - EU CQ5: Credit quality of loans and advances to non-financial corporations by industry

	a	b ¹	c	d ¹	e	f
	€m	Gross carrying amount		Of which loans and advances subject to impairment	Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures
		Of which non-performing	Of which defaulted			
Dec-23	€m	€m	€m	€m	€m	€m
10 Agriculture, forestry and fishing	1,746		84		(51)	-
20 Mining and quarrying	101		1		(2)	-
30 Manufacturing	4,437		249		(121)	-
40 Electricity, gas, steam and air conditioning supply	445		1		(3)	-
50 Water supply	101		-		(2)	-
60 Construction	156		19		(9)	-
70 Wholesale and retail trade	2,271		58		(44)	-
80 Transport and storage	832		67		(39)	-
90 Accommodation and food service activities	1,516		114		(34)	-
100 Information and communication	355		35		(11)	-
110 Financial and insurance activities	46		-		-	-
120 Real estate activities	7,664		430		(281)	-
130 Professional, scientific and technical activities	792		28		(18)	-
140 Administrative and support service activities	3,220		84		(76)	-
150 Public administration and defence, compulsory social security	-		-		-	-
160 Education	450		1		(6)	-
170 Human health services and social work activities	1,592		217		(58)	-
180 Arts, entertainment and recreation	353		13		(13)	-
190 Other services	932		50		(14)	-
200 Total	27,012		1,450		(784)	-

	a	b ¹	c	d ¹	e	f
	€m	Gross carrying amount		Of which loans and advances subject to impairment	Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures
		Of which non-performing	Of which defaulted			
Dec-22	€m	€m	€m	€m	€m	€m
10 Agriculture, forestry and fishing	1,741		99		(61)	-
20 Mining and quarrying	120		13		(3)	-
30 Manufacturing	4,853		322		(175)	-
40 Electricity, gas, steam and air conditioning supply	469		4		(4)	-
50 Water supply	81		-		(3)	-
60 Construction	232		76		(25)	-
70 Wholesale and retail trade	2,199		74		(60)	-
80 Transport and storage	837		108		(51)	-
90 Accommodation and food service activities	1,652		199		(79)	-
100 Information and communication	376		1		(6)	-
110 Financial and insurance activities	39		-		(3)	-
120 Real estate activities	8,723		485		(246)	-
130 Professional, scientific and technical activities	831		34		(30)	-
140 Administrative and support service activities	3,160		185		(98)	-
150 Public administration and defence, compulsory social security	-		-		-	-
160 Education	471		1		(5)	-
170 Human health services and social work activities	1,572		202		(62)	-
180 Arts, entertainment and recreation	428		46		(27)	-
190 Other services	740		103		(19)	-
200 Total	28,524		1,952		(957)	-

¹ In line with the requirements for large institutions with an NPL ratio (in accordance with Regulation (EU) 2021/637) lower than 5%, columns "Of which non-performing" and "of which subject to impairment" are not required to be disclosed.

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As per Article 453 point (f), Table 4.18 below includes all collateral, financial guarantees and credit derivatives used as credit risk mitigants for all secured exposures, irrespective of whether the standardised approach or the IRB approach is used for RWEA calculation. Any secured exposures by collateral or financial guarantees (eligible or not eligible as CRM techniques under Part Three, Title II, Chapter 4 of the CRR) have been disclosed.

Secured exposures are limited to those exposures against which eligible collateral which meets CRR definitions is held and has been used in the calculation of the Group's capital requirements. Haircuts are applied consistent with CRR requirements.

This table is not reflective of the total volume of exposures against which collateral and guarantees are actually held across the Group, nor does it reflect the full range of credit risk mitigation taken. A significant portion of the exposures included in Table 4.18 (exposures unsecured carrying amount) benefit from security taken to mitigate credit risk, but this security is not eligible for use in the regulatory capital calculations. For example, exposures in the Group's leasing business are included as unsecured exposures in the table, although the underlying assets financed are held to mitigate credit risk in this business.

The table excludes exposures where the Group nets derivative mark-to-market positions with certain interbank counterparties against cash collateral placed and received with those counterparties under CSA agreements. For cash collateral held against derivative exposures refer to the counterparty credit risk section.

Debt securities are included in the relevant exposure classes in the table. Credit risk mitigation realised through the netting of on-balance sheet assets and liabilities is not reflected in the table. Certain customer loans and overdrafts are netted against deposits as permitted by the CRR subject to certain criteria including a legal right of offset. Effectiveness of netting techniques is achieved through the execution of industry standard legal agreements.

Collateral used to mitigate risk, both for mortgage and other lending is diversified. The main types of guarantors are corporates, individuals, financial institutions, sovereigns and MDBs. Their creditworthiness is assessed on a case- by-case basis.

The increase in carrying amount secured by collateral is primarily due to the acquisition of the KBCI residential mortgage portfolio.

Table 4.18 - EU CR3 – CRM techniques overview: Disclosure of the use of credit risk mitigation techniques

	Unsecured carrying amount	Secured - carrying amount			
			of which: secured by collateral	of which: secured by financial guarantees	
	a	b	c	d	e
	€m	€m	€m	€m	€m
Dec-23					
1 Loans and advances	53,351	60,239	59,006	1,233	642
2 Debt securities	9,782	-	-	-	-
3 Total exposures	63,133	60,239	59,006	1,233	642
Of which;					
4 non-performing exposures	614	1,298	1,258	40	-
EU-5 defaulted	529	1,298	1,258	40	-

	Unsecured carrying amount	Secured - carrying amount			
			of which: secured by collateral	of which: secured by financial guarantees	
	a	b	c	d	e
	€m	€m	€m	€m	€m
Dec-22					
1 Loans and advances	59,922	51,900	50,716	1,184	632
2 Debt securities	8,815	-	-	-	-
3 Total exposures	68,737	51,900	50,716	1,184	632
Of which;					
4 non-performing exposures	780	992	958	34	-
EU-5 defaulted	762	992	958	34	-

Limits

Counterparty credit limits are based on the counterparty Credit Risk profile, Probability of Default (PD) IRB credit grade and with reference to the Maximum Exposure Limit Framework (MEL). The MEL sets risk appetite for counterparty credit limits for banks including derivative collateralised exposures. The IRB PD % assigned to counterparties is then used to derive RWAs

Policies

Credit Policies, Counterparty Credit Risk Standards and procedure are in place under the Groups Risk Management Framework. Policies are in place for securing collateral and establishing credit reserves. Legal agreements giving effect to netting International Swaps and Derivatives Association (ISDA) and / or collateral arrangements (Global Master Repurchase Agreement (GMRA), Credit Support Annex (CSA) and Cleared Derivatives Execution Agreements (CDEAs)) are negotiated and put in place with interbank and other counterparties.

Wrong-way risk

BOI's approach to WWR against limits for FX, CCY IRS and equity derivatives does not include a detailed assessment for wrong way risk (WWR) as the level of WWR would be limited if any in this type of transactions. Bol's approach prior to entering into SFTs, particularly for reverse-repos, where the Bank receives collateral and lends cash to counterparties, WWR risk is considered and assessed. This sees BOI apply a haircut to the cash amount we place with counterparties, with the exact haircut calculated in line with the relevant ECB haircut for the applicable asset class and BOI's appetite for this risk. Bol will avoid entering transaction with an obvious elevated level of wrong way risk, i.e. if there is a legal connection between the counterparty and the underlying security. However, if for business reasons, highly correlated transaction is executed then Bol will apply a full weighting (rather than the very significantly reduced weightings normally used) to either the counterparty or to the underlying security for credit risk exposure calculation purposes.

EMIR - Collateral

The Group complies with EMIR regulations, all derivatives transacted with Banks or Financial Counterparties (FC's) and NFC+ must have a negotiated CSA agreement in place. EMIR also includes the obligation to centrally clear certain classes of OTC derivative contracts through Central Counterparty Clearing (CCPs). The CCP is a regulated financial institution that takes on counterparty credit risk between financial parties. On a daily basis, in line with the CSA agreements, BOI calculates variation and initial margins. Variation margins are agreed with the counterparty daily and collateral is settled as cash. Initial Margins are primarily pledged as security collateral and can also include cash.

As at 31 December 2022 a two-notch downgrade of the Group by either S&P or Moody's on the Group's CSAs covering its interbank derivative positions will have little impact. Legally the Group is not required to post additional collateral in respect of its existing trades. Under EMIR requirements, threshold amounts can no longer be included in CSAs for over-the-counter (OTC) derivative transactions entered into on or after 1 March 2017. BOI holds only one legacy CSA agreement with a rating thresholds in place.

Exposure value measure

The Group determines derivative exposure values for counterparty credit risk using the Standardised Approach (SA-CCR), and therefore recognises the credit risk mitigating impact of cash collateral received under CSAs in accordance with the relevant specific regulatory rules. Original Exposure method is also used following the acquisition of Davy Group. The Group determines exposure values for repurchase transactions using the Financial Collateral Comprehensive Method (FCCM).

In determining the EAD for derivative credit exposure, the Group recognises the credit risk mitigating impact of cash collateral received under CSAs. EAD for particular netting sets is reduced by the amount of cash collateral held in accordance with the relevant specific regulatory rules. Separately, where the Group posts collateral under a CSA, the net negative mark-to-market on the related netting set is used to reduce the EAD on the collateral exposure, once again in accordance with the relevant specific regulatory rules.

In addition, a Credit Valuation Adjustment (CVA) is applied to the Group's non-collateralised derivatives based primarily on the creditworthiness of the client and the fair value of the underlying transaction. The Group determines CVA under the Standardised method.

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As per Article 439, points (f), (g), (k) and (m), Table 5.1 below sets out the methods used to calculate CCR regulatory requirements excluding CCPs and the resultant RWEAs. Article 439(m) is an annual requirement on disclosure of the size of on and off balance sheet derivatives.

Table 5.1 - EU CCR1 - Analysis of CCR exposure by approach

	a	b	c	d	e	f	g	h
	Replacement cost (RC) €m	Potential future exposure (PFE) €m	EEPE €m	Alpha used for computing regulatory exposure value	Exposure value pre- CRM €m	Exposure value post- CRM €m	Exposure value €m	RWEA
Dec-23								
EU1 EU - Original Exposure Method (for derivatives)	1	2		1.4	5	5	5	4
EU2 EU - Simplified SA-CCR (for derivatives)	-	-		1.4	-	-	-	-
1 SA-CCR (for derivatives)	282	528		1.4	2,145	1,097	1,097	595
2 IMM (for derivatives and SFTs)			-	-	-	-	-	-
of which:								
2a securities financing transactions netting sets			-	-	-	-	-	-
2b derivatives and long settlement transactions netting sets			-	-	-	-	-	-
2c from contractual cross-product netting sets			-	-	-	-	-	-
3 Financial collateral simple method (for SFTs)					-	-	-	-
4 Financial collateral comprehensive method (for SFTs)					150	10	10	4
5 VaR for SFTs					-	-	-	-
6 Total					2,300	1,112	1,112	603

	a	b	c	d	e	f	g	h
	Replacement cost (RC) €m	Potential future exposure (PFE) €m	EEPE €m	Alpha used for computing regulatory exposure value	Exposure value pre- CRM €m	Exposure value post- CRM €m	Exposure value €m	RWEA
Dec-22								
EU1 EU - Original Exposure Method (for derivatives)	2	9		1.4	16	16	16	16
EU2 EU - Simplified SA-CCR (for derivatives)	-	-		1.4	-	-	-	-
1 SA-CCR (for derivatives)	322	391		1.4	1,845	1,000	1,000	561
2 IMM (for derivatives and SFTs)			-	-	-	-	-	-
of which:								
2a securities financing transactions netting sets			-	-	-	-	-	-
2b derivatives and long settlement transactions netting sets			-	-	-	-	-	-
2c from contractual cross-product netting sets			-	-	-	-	-	-
3 Financial collateral simple method (for SFTs)					-	-	-	-
4 Financial collateral comprehensive method (for SFTs)					-	-	-	-
5 VaR for SFTs					-	-	-	-
6 Total					1,861	1,016	1,016	577

As per Article 439 point (l), which refers to point (e) of Article 444, Table 5.2 below presents a breakdown of CCR by exposure class and risk weight.

Table 5.2 - EU CCR3 - Standardised approach – CCR exposures by regulatory exposure class and risk weights

Dec-23 EAD (€m)	a	b	c	d	e		f	g	h	i	j	k	l
	0%	2%	4%	10%	20%	50%	70%	75%	100%	150%	Others	Total	
1 Central governments or central banks	-	-	-	-	-	-	-	-	-	-	-	-	-
2 Regional governments or local authorities	-	-	-	-	-	-	-	-	-	-	-	-	-
3 Public sector entities	-	-	-	-	-	-	-	-	-	-	-	-	-
4 Multilateral development banks	-	-	-	-	-	-	-	-	-	-	-	-	-
5 International organisations	-	-	-	-	-	-	-	-	-	-	-	-	-
6 Institutions	-	26	-	-	-	-	-	-	-	-	-	-	26
7 Corporates	-	-	-	-	-	-	-	-	-	89	-	-	89
8 Retail	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-	-
10 Other items	-	-	-	-	-	-	-	-	-	-	-	-	-
11 Total	-	26	-	-	-	-	-	-	-	89	-	-	115

Dec-22 EAD (€m)	a	b	c	d	e		f	g	h	i	j	k	l
	0%	2%	4%	10%	20%	50%	70%	75%	100%	150%	Others	Total	
1 Central governments or central banks	-	-	-	-	-	-	-	-	-	-	-	-	-
2 Regional governments or local authorities	-	-	-	-	-	-	-	-	-	-	-	-	-
3 Public sector entities	-	-	-	-	-	-	-	-	-	-	-	-	-
4 Multilateral development banks	-	-	-	-	-	-	-	-	-	-	-	-	-
5 International organisations	-	-	-	-	-	-	-	-	-	-	-	-	-
6 Institutions	-	-	-	-	-	-	-	-	-	-	-	-	-
7 Corporates	-	-	-	-	-	-	-	-	-	92	-	-	92
8 Retail	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-	-
10 Other items	-	-	-	-	-	-	-	-	-	-	-	-	-
11 Total	-	-	-	-	-	-	-	-	-	92	-	-	92

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As per Article 439 point (l), which refers to point (g) of Article 452, Table 5.3 below presents a detailed view of counterparty credit risk positions subject to the IRB approach by exposure class and PD scale. The Group have no Advanced IRB CCR exposures.

Tale 5.3 - EU CCR4 - IRB approach - Credit risk exposures by exposure class and PD scale

	a	b	c	d	e	f	g
	Exposure Value €m	Exposure weighted average PD %	Number of obligors	Exposure weighted average LGD %	Exposure weighted average maturity (years)	RWEA €m	Density of risk weighted exposure amounts %
Dec-23							
PD Scale							
Total FIRB							
1 0.00 to 0.15	576	0.05%	54	45.00%	2.5	128	22.20%
2 0.15 to <0.25	62	0.17%	31	45.00%	2.5	31	50.54%
3 0.25 to <0.50	123	0.35%	39	45.00%	2.5	91	74.47%
4 0.50 to <0.75	62	0.60%	40	45.00%	2.5	53	84.61%
5 0.75 to <2.50	83	1.50%	68	45.00%	2.5	104	125.77%
6 2.50 to <10.00	84	3.26%	38	45.00%	2.5	117	139.28%
7 10.00 to <100.00	1	10.67%	12	45.00%	2.5	1	149.35%
8 100.00 (Default)	6	100.00%	9	45.00%	2.5	-	-
Total foundation IRB	997	1.02%	291	45.00%	2.5	526	52.77%
Institutions							
1 0.00 to 0.15	448	0.05%	31	45.00%	2.5	87	19.51%
2 0.15 to <0.25	-	-	-	-	-	-	-
3 0.25 to <0.50	69	0.36%	3	45.00%	2.5	53	76.48%
4 0.50 to <0.75	-	-	-	-	-	-	-
5 0.75 to <2.50	-	-	-	-	-	-	-
6 2.50 to <10.00	-	-	-	-	-	-	-
7 10.00 to <100.00	-	-	-	-	-	-	-
8 100.00 (Default)	-	-	-	-	-	-	-
Total institutions	516	0.08%	34	45.00%	2.5	140	27.09%
Corporates of which SME							
1 0.00 to 0.15	-	0.07%	4	45.00%	2.5	0	17.55%
2 0.15 to <0.25	13	0.17%	6	45.00%	2.5	5	37.38%
3 0.25 to <0.50	3	0.35%	8	45.00%	2.5	1	50.45%
4 0.50 to <0.75	3	0.60%	15	45.00%	2.5	2	58.90%
5 0.75 to <2.50	5	1.55%	39	45.00%	2.5	4	86.53%
6 2.50 to <10.00	3	2.89%	20	45.00%	2.5	3	96.62%
7 10.00 to <100.00	1	10.69%	11	45.00%	2.5	1	145.41%
8 100.00 (Default)	-	100.00%	4	45.00%	2.5	-	-
Total Corporates of which SME	27	1.27%	107	45.00%	2.5	16	58.00%
Corporates of which specialised lending							
1 0.00 to 0.15	-	-	-	-	-	-	-
2 0.15 to <0.25	6	0.17%	1	45.00%	2.5	3	42.55%
3 0.25 to <0.50	9	0.35%	3	45.00%	2.5	6	62.29%
4 0.50 to <0.75	39	0.60%	9	45.00%	2.5	32	79.98%
5 0.75 to <2.50	36	1.43%	12	45.00%	2.5	39	109.84%
6 2.50 to <10.00	54	2.97%	3	45.00%	2.5	73	135.41%
7 10.00 to <100.00	-	-	-	-	-	-	-
8 100.00 (Default)	4	100.00%	1	45.00%	2.5	-	-
Total corporates of which specialised lending	149	4.44%	29	45.00%	2.5	153	102.55%
Corporates of which other							
1 0.00 to 0.15	128	0.07%	19	45.00%	2.5	42	31.61%
2 0.15 to <0.25	43	0.17%	24	45.00%	2.5	24	55.78%
3 0.25 to <0.50	42	0.35%	25	45.00%	1.5	32	75.30%
4 0.50 to <0.75	20	0.59%	16	45.00%	2.5	20	97.49%
5 0.75 to <2.50	42	1.56%	17	45.00%	2.5	61	143.93%
6 2.50 to <10.00	27	3.89%	15	45.00%	2.5	42	151.48%
7 10.00 to <100.00	1	10.00%	1	45.00%	2.5	-	268.63%
8 100.00 (Default)	1	100.00%	4	45.00%	2.5	-	-
Total corporates of which other	304	1.10%	121	45.00%	1.5	218	71.56%

	a	b	c	d	e	f	g
Dec-22 PD Range Total FIRB	Exposure Value €m	Exposure weighted average PD %	Number of obligors	Exposure weighted average LGD %	Exposure weighted average maturity (years)	RWEA €m	Density of risk weighted exposure amounts %
1 0.00 to 0.15	537	0.05%	66	45.00%	2.5	140	26.11%
2 0.15 to <0.25	24	0.16%	26	45.00%	2.5	11	47.67%
3 0.25 to <0.50	168	0.30%	42	45.00%	2.5	121	72.46%
4 0.50 to <0.75	68	0.60%	33	45.00%	2.5	62	91.44%
5 0.75 to <2.50	92	1.58%	78	45.00%	2.5	104	113.14%
6 2.50 to <10.00	24	3.63%	39	45.00%	2.5	36	147.86%
7 10.00 to <100.00	3	10.07%	11	45.00%	2.5	6	214.82%
8 100.00 (Default)	7	100.00%	8	45.00%	2.5	-	-
Total foundation IRB	923	1.22%	303	45.00%	2.5	480	52.04%
Institutions							
1 0.00 to 0.15	490	0.04%	34	45.00%	2.5	127	25.88%
2 0.15 to <0.25	6	0.13%	2	45.00%	2.5	3	49.36%
3 0.25 to <0.50	28	0.06%	3	45.00%	2.5	8	30.58%
4 0.50 to <0.75	-	-	-	-	-	-	-
5 0.75 to <2.50	-	-	-	-	-	-	-
6 2.50 to <10.00	-	-	-	-	-	-	-
7 10.00 to <100.00	-	-	-	-	-	-	-
8 100.00 (Default)	-	-	-	-	-	-	-
Total institutions	524	0.05%	39	45.00%	2.5	138	26.41%
Corporates of which SME							
1 0.00 to 0.15	1	0.07%	8	45.00%	2.5	0	19.51%
2 0.15 to <0.25	8	0.17%	7	45.00%	2.5	3	36.55%
3 0.25 to <0.50	-	0.35%	11	45.00%	3.0	-	46.73%
4 0.50 to <0.75	-	0.60%	12	45.00%	3.0	-	58.56%
5 0.75 to <2.50	4	1.25%	46	45.00%	2.5	3	77.71%
6 2.50 to <10.00	5	3.51%	20	45.00%	2.5	5	94.00%
7 10.00 to <100.00	-	10.34%	8	45.00%	3.0	1	142.75%
8 100.00 (Default)	-	100.00%	3	45.00%	3.0	-	-
Total Corporates of which SME	18	1.99%	115	45.00%	2.5	12	63.12%
Corporates of which specialised lending							
1 0.00 to 0.15	-	-	-	-	-	-	-
2 0.15 to <0.25	1	0.17%	2	45.00%	2.5	-	42.55%
3 0.25 to <0.50	6	0.35%	2	45.00%	2.5	4	62.29%
4 0.50 to <0.75	37	0.60%	8	45.00%	2.5	29	79.98%
5 0.75 to <2.50	77	1.57%	14	45.00%	2.5	87	113.04%
6 2.50 to <10.00	7	2.70%	2	45.00%	2.5	9	132.24%
7 10.00 to <100.00	1	10.00%	1	45.00%	2.5	3	204.67%
8 100.00 (Default)	5	100.00%	2	45.00%	2.5	-	-
Total corporates of which specialised lending	134	5.21%	31	45.00%	2.5	132	98.80%
Corporates of which other							
1 0.00 to 0.15	46	0.06%	24	45.00%	2.5	13	28.70%
2 0.15 to <0.25	9	0.17%	15	45.00%	2.5	5	56.17%
3 0.25 to <0.50	134	0.35%	26	45.00%	2.5	109	81.73%
4 0.50 to <0.75	31	0.60%	13	45.00%	2.5	33	104.94%
5 0.75 to <2.50	11	1.76%	18	45.00%	2.5	14	127.66%
6 2.50 to <10.00	12	4.22%	17	45.00%	2.5	22	179.23%
7 10.00 to <100.00	2	10.05%	2	45.00%	2.5	2	268.40%
8 100.00 (Default)	2	100.00%	3	45.00%	2.5	-	-
Total corporates of which other	247	1.51%	118	45.00%	2.5	198	80.24%

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As per Article 439 point (h), Table 5.4 below presents the CVA charge broken down by approach.

Table 5.4 - EU CCR2 - Transactions subject to own funds requirements for CVA risk

	a	b
	Exposure value €m	RWEA €m
Dec-23		
1 Total portfolios subject to the advanced method	-	-
2 (i) VaR component (including the 3x multiplier)	-	-
3 (ii) SVaR component (including the 3x multiplier)	-	-
4 All portfolios subject to the standardised method	565	197
EU4 Based on the original exposure method	-	-
5 Total subject to the CVA capital charge	565	197
	Exposure value €m	RWEA €m
Dec-22		
1 Total portfolios subject to the advanced method	-	-
2 (i) VaR component (including the 3x multiplier)	-	-
3 (ii) SVaR component (including the 3x multiplier)	-	-
4 All portfolios subject to the standardised method	567	164
EU4 Based on the original exposure method	-	-
5 Total subject to the CVA capital charge	567	164

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As per Article 439 point (e), Table 5.5 below provides a breakdown of all types of collateral posted or received to support or reduce CCR exposures related to derivative transactions and to SFTs, including transactions cleared through CCP.

Table 5.5 - EU CCR5 - Composition of collateral for CCR exposures

	Collateral used in derivative transactions				Collateral used in SFTS											
	a		b		c		d		e		f		g		h	
	Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral	
	Segregated €m	Unsegregated €m	Segregated €m	Unsegregated €m	Segregated €m	Unsegregated €m	Segregated €m	Unsegregated €m	Segregated €m	Unsegregated €m	Segregated €m	Unsegregated €m	Segregated €m	Unsegregated €m	Segregated €m	Unsegregated €m
Dec-23																
1 Cash – domestic currency	94	228	163	50	-	-	-	-	-	-	-	-	-	-	-	-
2 Cash – other currencies	78	21	119	83	-	-	-	-	-	-	-	-	-	-	-	-
3 Domestic sovereign debt	-	-	-	-	-	56	-	-	-	-	-	-	-	-	-	70
4 Other sovereign debt	-	-	803	-	-	-	-	-	-	-	-	-	-	-	-	-
5 Government agency debt	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6 Corporate bonds	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7 Equity securities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8 Other collateral	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Total	172	250	1,084	134	-	56	-	-	-	-	-	-	-	-	-	70

	Collateral used in derivative transactions				Collateral used in SFTS											
	a		b		c		d		e		f		g		h	
	Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral	
	Segregated €m	Unsegregated €m	Segregated €m	Unsegregated €m	Segregated €m	Unsegregated €m	Segregated €m	Unsegregated €m	Segregated €m	Unsegregated €m	Segregated €m	Unsegregated €m	Segregated €m	Unsegregated €m	Segregated €m	Unsegregated €m
Dec-22																
1 Cash – domestic currency	-	308	-	1,219	-	-	-	-	-	-	-	-	-	-	-	-
2 Cash – other currencies	-	346	-	221	-	-	-	-	-	-	-	-	-	-	-	-
3 Domestic sovereign debt	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4 Other sovereign debt	-	-	-	759	-	-	-	-	-	-	-	-	-	-	-	-
5 Government agency debt	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6 Corporate bonds	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7 Equity securities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8 Other collateral	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Total	-	654	-	2,199	-	-	-	-	-	-	-	-	-	-	-	-

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As per Article 439 point (j), Table 5.6 below sets out the BOI's exposure to credit derivative transactions analysed between derivatives bought or sold.

Table 5.6 - EU CCR6 - Credit derivative exposures

	Dec-23		Dec-22	
	a	b	a	b
	Protection bought €m	Protection sold €m	Protection bought €m	Protection sold €m
Notionals				
1 Single-name credit default swaps	-	-	-	-
2 Index credit default swaps	-	-	-	-
3 Total return swaps	-	-	-	-
4 Credit options	-	-	-	-
5 Other credit derivatives	-	-	-	-
6 Total notionals	-	-	-	-
Fair values				
7 Positive fair value (asset)	-	-	-	-
8 Negative fair value (liability)	-	-	-	-

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As per Article 439 point (i), Table 5.7 below sets out the Group's exposure to Qualifying Central Counterparty (QCCP).

Table 5.7 - CCR8 - Exposures to CCPs

	Dec-23		Dec-22	
	a	b	a	b
	Exposure Value €m	RWEA €m	Exposure Value €m	RWEA €m
1 Exposure to QCCPs (total)		28		27
2 Exposures for trades at QCCPs (excluding initial margin and default fund contributions) of which;	551	12	519	10
3 (i) OTC derivatives	525	11	519	10
4 (ii) Exchange-traded derivatives	26	1	-	-
5 (iii) SFTs	-	-	-	-
6 (iv) Netting sets where cross-product netting has been approved	-	-	-	-
7 Segregated initial margin	-	-	-	-
8 Non-segregated initial margin	803	16	760	15
9 Prefunded default fund contributions	5	1	4	1
10 Unfunded default fund contributions	-	-	-	-
11 Exposure to non-QCCPs (total)	-	-	-	-
12 Exposures for trades at non-QCCPs (excluding initial margin and default fund contributions); of which;	-	-	-	-
13 (i) OTC derivatives	-	-	-	-
14 (ii) Exchange-traded derivatives	-	-	-	-
15 (iii) SFTs	-	-	-	-
16 (iv) Netting sets where cross-product netting has been approved	-	-	-	-
17 Segregated initial margin	-	-	-	-
18 Non-segregated initial margin	-	-	-	-
19 Prefunded default fund contributions	-	-	-	-
20 Unfunded default fund contributions	-	-	-	-

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Description of securitisation and re-securitisation activities:

The Group has acted as originator under a number of securitisation structures, both traditional and synthetic. The purpose of these securitisations is typically to diversify the sources of funding for the Group or to transfer credit risk. Information on the exposures securitised under these transactions, and which qualify for Pillar 1 derecognition, are provided in the tables in this Annex.

The Group has also purchased positions in securitisation transactions. These positions have been purchased in transactions where the individual notes were originally highly rated and benefited from strong credit enhancement provided by lower ranking notes. The purchased positions cover a broad range of asset classes including Commercial Mortgage-Backed Securities (CMBS), Residential Mortgage-Backed Securities (RMBS), Consumer loans and loans to Corporates/ SMEs.

For funding purposes, the Group has transacted the Bowbell 3 securitisation. This does not qualify for derecognition under Pillar 1 and the exposures securitised under this structure are included in the credit risk tables in this document. This securitisation is outside the scope of this section.

The Group has not acted as a sponsor in any securitisation transactions.

With the exception of the Bowbell 3 transaction, which as stated above is outside the scope of this section, none of the Group's originated securitisations qualify for STS. €388m of the purchased securitisation positions qualify for STS.

The type of risk activities:

For synthetic securitisations, the Group always retains the senior securitisation position. With the exception of one synthetic transaction, the Group also retains the first loss securitisation position.

For traditional securitisations, the Group has, to date, retained at least 5% of the aggregate principal amount of the issued notes as single vertical risk retention tranche. The exception to this is the Bowbell 3 transaction where horizontal risk retention of the first loss tranche is used to satisfy the risk retention criteria under the securitisation regulation.

For purchased securitisations, the Group has invested in securitisations positions of which €388m are STS eligible.

As stated above, with the exception of the Bowbell 3 transaction, none of the Group's originated securitisations qualify for STS.

Calculation of risk weighted exposure amounts:

At 31 December 2023, the Group's retained securitisation positions were risk weighted in accordance to the hierarchy of approaches set out in Article 254 of the CRR.

For the Group's synthetic securitisations, the SEC-IRBA method was used to risk weight the securitisation positions with retained junior positions deducted fully from CET1. The Group has recognised significant credit risk transfer for these transactions pursuant to Article 245 (2) of the CRR.

The risk weighted exposure amounts for the Group's purchased positions are calculated using the SEC-ERBA approach. The Group's purchased positions are all held in the Banking Book. A supervisory deduction is taken from CET1 for purchased positions which otherwise would have attracted a 1250% risk.

Listing of SSPEs:

- (i) SSPEs which acquire exposures originated by the institutions; Mulcair Securities No.2 DAC; Bowbell No.3 plc; Temple Quay No.1 plc
- (ii) SSPEs sponsored by the institutions; n/a
- (iii) SSPEs and other legal entities for which the institutions provide securitisation-related services, such as advisory, asset servicing or management services; Mulcair Securities No.2 DAC; Mulcair Securities No.3 DAC; Bowbell No.3 plc; Temple Quay No.1 plc;
- (iv) SSPEs included in the institutions' regulatory scope of consolidation; Bowbell No.3 plc; Mespil Securities DAC; Vale Securities Finance DAC; Glen Securities Finance DAC; Mespil Securities No.2 DAC, Vale Securities Finance No.2 DAC;

Accounting policies for securitisation activity:

Securitisations generally require Group companies to enter into transactions with a Structured Entity (SE). From an accounting perspective, the treatment of SEs is assessed in accordance with IFRS 10 which establishes the principles for when the Group is deemed to control another entity and therefore required to consolidate it through the Group's financial statements.

An SE is an entity that has been designed so that voting or similar rights are not the dominant factor in deciding who controls the entity, such as when any voting rights relate to administrative tasks only and the relevant activities are directed by means of contractual arrangements. The Group assesses whether it has power over the relevant activities in assessing control over such an entity by considering factors such as who manages the assets of these entities and whether the Group has lending to, or a residual interest in such entities.

Where the Group acts as originator in a securitisation, all financial assets continue to be held on the Group balance sheet, and a liability is recognised for the proceeds of the funding transaction, unless:

- the contractual rights to the cash flows have expired; or
- the financial assets have been transferred and the Group has transferred the contractual right to receive the cash flows of the financial asset or assumes a contractual obligation to pay the cash flows of the financial asset only where it collects equivalent amounts from the original asset, such amount are remitted without material delay and the Group is prohibited from selling or pledging the original asset other than as security.

Where any of the above conditions apply to a fully proportionate share of all or specifically identified cash flows, the relevant accounting treatment is applied to that proportion of the asset.

Use of External Credit Assessment Institutions (ECAIs):

For the purpose of the RWA calculation, ECAIs are used for the Group's purchased securitisation positions. The following ECAIs are used: Fitch Ratings, Moody's Investors Service, Standard & Poor's and DBRS Morningstar. These are used for all exposure types, though the securitisations may not have been rated by all agencies.

The Group's purchased positions are classified as either other financial assets at fair value through profit or loss or loans and receivables or off balance sheet commitments from an accounting perspective.

There is no change to the accounting treatment of assets securitised in originated securitisations or purchased securitisations from the previous reporting period.

As per Article 449 point (j), Table 6.1 below shows BOI as an originator and investor, non-trading book carrying amount of securitisation exposures broken down by type as at 31 December 2023.

Table 6.1 - EU-SEC1 - Securitisation exposures in the non-trading book

	Institution acts as originator							Institution acts as sponsor				Institution acts as investor			
	Traditional			Synthetic				Traditional			Sub-total	Traditional		Synthetic	Sub-total
	STS	Non-STS						STS	Non-STS			STS	Non-STS		
		of which SRT		of which SRT											
Dec-23															
1 Total exposures	-	-	35	35	5,034	5,034	5,069	-	-	-	-	900	143	-	1,043
2 Retail (total)	-	-	35	35	795	795	830	-	-	-	-	900	123	-	1,023
of which:															
3 residential mortgage	-	-	35	35	795	795	830	-	-	-	-	900	116	-	1,016
4 credit card	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5 other retail exposures	-	-	-	-	-	-	-	-	-	-	-	-	7	-	7
6 re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7 Wholesale (total)	-	-	-	-	4,239	4,239	4,239	-	-	-	-	-	20	-	20
of which:															
8 loans to corporates	-	-	-	-	4,239	4,239	4,239	-	-	-	-	-	-	-	-
9 commercial mortgage	-	-	-	-	-	-	-	-	-	-	-	-	20	-	20
10 lease and receivables	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11 other wholesale	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12 re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

	Institution acts as originator							Institution acts as sponsor				Institution acts as investor			
	Traditional			Synthetic				Traditional			Sub-total	Traditional		Synthetic	Sub-total
	STS	Non-STS						STS	Non-STS			STS	Non-STS		
		of which SRT		of which SRT											
Dec-22															
1 Total exposures	-	-	40	40	4,219	4,219	4,259	-	-	-	-	900	146	-	1,046
2 Retail (total)	-	-	40	40	919	919	959	-	-	-	-	900	125	-	1,025
of which:															
3 residential mortgage	-	-	40	40	919	919	959	-	-	-	-	900	117	-	1,017
4 credit card	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5 other retail exposures	-	-	-	-	-	-	-	-	-	-	-	-	8	-	8
6 re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7 Wholesale (total)	-	-	-	-	3,300	3,300	3,300	-	-	-	-	-	21	-	21
of which:															
8 loans to corporates	-	-	-	-	3,300	3,300	3,300	-	-	-	-	-	-	-	-
9 commercial mortgage	-	-	-	-	-	-	-	-	-	-	-	-	21	-	21
10 lease and receivables	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11 other wholesale	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12 re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

As per Article 449 point (k)(i) Table 6.2 below shows the aggregate amount of securitisation positions where institutions act as originator or sponsor and the associated risk-weighted assets and capital requirements by regulatory approaches, including exposures deducted from own funds or risk weighted at 1250 %, broken down between traditional and synthetic securitisations and between securitisation and re securitisation exposures, separately for STS and non-STs positions, and further broken down into a meaningful number of risk-weight or capital requirement bands and by approach used to calculate the capital requirements.

Table 6.2 - EU-SEC3 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as originator or as sponsor

	a Exposure values (by RW bands/deductions)					b Exposure values (by regulatory approach)				c RWEA (by regulatory approach)				d Capital charge after cap					
	≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW/ deductions	SEC-ERBA (including IAA)			1250% RW/ deductions	SEC-ERBA (including IAA)			1250% RW	SEC-ERBA (including IAA)					
						SEC-IRBA	SEC-SA			SEC-IRBA	SEC-SA			SEC-IRBA	SEC-SA				
Dec-23																			
1	Total exposures	2,564	2,470	-	-	35	5,034	-	-	35	1,499	-	-	-	120	-	-	-	-
2	Traditional securitisation	-	-	-	-	35	-	-	-	35	-	-	-	-	-	-	-	-	-
3	Securitisation	-	-	-	-	35	-	-	-	35	-	-	-	-	-	-	-	-	-
4	Retail underlying	-	-	-	-	35	-	-	-	35	-	-	-	-	-	-	-	-	-
5	of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Wholesale	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Synthetic securitisation	2,564	2,470	-	-	-	5,034	-	-	-	1,499	-	-	-	120	-	-	-	-
10	Securitisation	2,564	2,470	-	-	-	5,034	-	-	-	1,499	-	-	-	120	-	-	-	-
11	Retail underlying	2,564	2,470	-	-	-	5,034	-	-	-	1,499	-	-	-	120	-	-	-	-
12	Wholesale	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

	a Exposure values (by RW bands/deductions)					b Exposure values (by regulatory approach)				c RWEA (by regulatory approach)				d Capital charge after cap					
	≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW/ deductions	SEC-ERBA (including IAA)			1250% RW/ deductions	SEC-ERBA (including IAA)			1250% RW	SEC-ERBA (including IAA)					
						SEC-IRBA	SEC-SA			SEC-IRBA	SEC-SA			SEC-IRBA	SEC-SA				
Dec-22																			
1	Total exposures	919	3,300	-	-	40	4,219	-	-	40	1,242	-	-	-	99	-	-	-	-
2	Traditional securitisation	-	-	-	-	40	-	-	-	40	-	-	-	-	-	-	-	-	-
3	Securitisation	-	-	-	-	40	-	-	-	40	-	-	-	-	-	-	-	-	-
4	Retail underlying	-	-	-	-	40	-	-	-	40	-	-	-	-	-	-	-	-	-
5	of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Wholesale	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Synthetic securitisation	919	3,300	-	-	-	4,219	-	-	-	1,242	-	-	-	99	-	-	-	-
10	Securitisation	919	3,300	-	-	-	4,219	-	-	-	1,242	-	-	-	99	-	-	-	-
11	Retail underlying	919	3,300	-	-	-	4,219	-	-	-	1,242	-	-	-	99	-	-	-	-
12	Wholesale	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

As per Article 449 point (k)(ii) Table 6.3 below shows BOI non-trading book aggregate amount of securitisation positions, where the Group act as investor and the associated risk weighted assets and capital requirements by regulatory approaches as at 31 Dec 2022.

Table 6.3 - EU-SEC4 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as investor

	a Exposure values (by RW bands/deductions)					b Exposure values (by regulatory approach)				c RWEA (by regulatory approach)				d Capital charge after cap				EU-p	EU-q	
	≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW/ deductions	SEC- IRBA	SEC-ERBA (including IAA)		1250% RW/ deductions	SEC- IRBA	SEC-ERBA (including IAA)		1250% RW	SEC- IRBA	SEC-ERBA (including IAA)		SEC-SA			1250% RW
							IAA	SEC-SA			IAA	SEC-SA								
Dec-23																				
1	1,000	-	16	27	-	-	1,043	-	-	-	182	-	-	-	15	-	-	-	-	-
2	1,000	-	16	27	-	-	1,043	-	-	-	182	-	-	-	15	-	-	-	-	-
3	1,000	-	16	27	-	-	1,043	-	-	-	182	-	-	-	15	-	-	-	-	-
4	1,000	-	16	8	-	-	1,023	-	-	-	135	-	-	-	11	-	-	-	-	-
5	900	-	-	-	-	-	900	-	-	-	90	-	-	-	7	-	-	-	-	-
6	-	-	-	20	-	-	20	-	-	-	47	-	-	-	4	-	-	-	-	-
7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

	a Exposure values (by RW bands/deductions)					b Exposure values (by regulatory approach)				c RWEA (by regulatory approach)				d Capital charge after cap				EU-p	EU-q	
	≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW/ deductions	SEC- IRBA	SEC-ERBA (including IAA)		1250% RW/ deductions	SEC- IRBA	SEC-ERBA (including IAA)		1250% RW	SEC- IRBA	SEC-ERBA (including IAA)		SEC-SA			1250% RW
							IAA	SEC-SA			IAA	SEC-SA								
Dec-22																				
1	1,000	1	16	29	-	-	1,046	-	-	-	179	-	-	-	14	-	-	-	-	-
2	1,000	1	16	29	-	-	1,046	-	-	-	179	-	-	-	14	-	-	-	-	-
3	1,000	1	16	29	-	-	1,046	-	-	-	179	-	-	-	14	-	-	-	-	-
4	1,000	1	16	8	-	-	1,025	-	-	-	138	-	-	-	11	-	-	-	-	-
5	900	-	-	-	-	-	900	-	-	-	90	-	-	-	7	-	-	-	-	-
6	-	-	-	21	-	-	21	-	-	-	41	-	-	-	3	-	-	-	-	-
7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

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As per Article 449 point (I), Table 6.4 below shows for exposures securitised by the Group, the amount of exposures in default and the amount of the specific credit risk adjustments made by the Group during the current period, both broken down by exposure type.

Table 6.4 – EU-SEC5 - Exposures securitised by the institution - Exposures in default and specific credit risk adjustments

	a	b	c
	Exposures securitised by the institution - Institution acts as originator or as sponsor		
	Total outstanding nominal amount		Total amount of specific credit risk adjustments made during the period
		of which: exposures in default	
Dec-23	€m	€m	€m
1 Total exposures	7,047	837	5
2 Retail (total)	2,120	661	2
3 residential mortgages	2,120	661	2
4 credit card	-	-	-
5 other retail exposures	-	-	-
6 re-securitisation	-	-	-
7 Wholesale (total)	4,926	176	3
8 loans to corporates	4,926	176	3
9 commercial mortgages	-	-	-
10 lease and receivables	-	-	-
11 other wholesale	-	-	-
12 re-securitisation	-	-	-

	a	b	c
	Exposures securitised by the institution - Institution acts as originator or as sponsor		
	Total outstanding nominal amount		Total amount of specific credit risk adjustments made during the period
		of which: exposures in default	
Dec-22	€m	€m	€m
1 Total exposures	6,489	861	15
2 Retail (total)	2,591	758	(3)
3 residential mortgages	2,591	758	(3)
4 credit card	-	-	-
5 other retail exposures	-	-	-
6 re-securitisation	-	-	-
7 Wholesale (total)	3,898	103	18
8 loans to corporates	3,898	103	18
9 commercial mortgages	-	-	-
10 lease and receivables	-	-	-
11 other wholesale	-	-	-
12 re-securitisation	-	-	-

Definition and background *(audited)*

Market risk is the risk of loss arising from movements in interest rates, FX rates, equity, credit spreads or other market prices.

Market risk arises from the structure of the balance sheet, the Group's business mix and includes discretionary risk-taking. Additionally, market risk arises through the conduct of customer business, particularly in respect to fixed-rate lending and the execution of derivatives and foreign exchange business. The market risk profile of the Group may, in addition to the above risks which arise in the usual course of a business cycle, be impacted by shifts in market volatility as a result of external factors. Earnings for NIAC are also indirectly exposed to changes in equity and property markets through fee income generated on unit-linked customer investments.

Risk management, measurement and reporting *(audited)*

The management of market risk in the Group is governed by the Group's Risk Appetite Statement and by the Group Market Risk Policy, both of which are approved by the Board. These are supplemented by a range of ALCO approved limits and controls. The Group has an established governance structure for market risk that involves the Board, its risk committees (BRC and ERC) and ALCO, which has primary responsibility for the oversight of market risk in the Group.

The current status of market risk, including risk dashboards and risk appetite compliance, is reported through the Board Risk Report on a monthly basis.

Group Market & Liquidity Risk (GM&LR) provides 2LOD oversight of the Group's exposure to market risk, ensuring that the Group correctly identifies and assesses the market risks to which it is exposed. GM&LR is a part of the Group Risk Function reporting to the Group CRO.

It is Group policy to minimise exposure to market risk, subject to defined limits. Nonetheless, certain structural market risks remain and, in some cases, are difficult to eliminate fully. In addition, the Group bears economic exposure to adverse movements in the credit spreads of bonds held as liquid assets, or held as matching assets in NIAC in the matching assets portfolio. The latter is the predominant economic exposure arising on the NIAC fixed interest portfolio.

Market risks that arise are transferred to and managed by Bank of Ireland Global Markets (BoIGM) or Group Treasury, the treasury execution arms of the Group. These market risks are hedged as a matter of course with the external market.

Similarly, market risks in the Group's life assurance business, NIAC, are managed within defined tolerances. However, certain residual risks are inherent in this business, notably exposure to credit spreads on assets held to match policyholder liabilities and indirect exposure to equity markets through changes in the discounted value of fees applied to equity assets held by policyholders in insurance contracts. This is outlined in greater detail below.

Classification of market risk *(unaudited)*

In accordance with regulatory requirements and guidance the Group classifies market risk as follows:

- **Market Risk in the Trading Book:** Market risk on positions which are required to be booked in the trading book as set out in the CRR. The risk arises primarily as a result of discretionary risk taking or underwriting business in Davy or through the transaction of customer derivative or FX transactions.
- **Market Risk in the Banking Book:** Market risk on positions which are booked in the banking book. This risk is predominately made up of Credit Spread risk which arises primarily from the Groups bond holdings in its Liquid Asset portfolio, structural IRRBB which is intrinsic to a bank's balance sheet or arises from its franchise or business mix and Structural FX risk which is the exposure of the Group's principal capital ratios to changes in exchange rates.
- **Market Risks in the Life Business:** Market risk on positions held in the life business. These risks arise naturally from the non unit-linked life business (interest rate risk), securities holdings (credit spread risk) and unit-linked business (equity risk and other market risks).

Balance sheet linkage *(audited)*

The market risk linkage table on the following page classifies the balance sheet in terms of Banking Book, Trading Book (as defined above) and Insurance assets and liabilities. The principal risk factors which drive changes in earnings or value in relation to each line item are also outlined. Trading Book assets and liabilities were a small proportion of the balance sheet at 31 December 2023 and this is representative of the position throughout the year. Interest rates are the most significant risk factor.

Discretionary market risk *(audited)*

Discretionary risk is a risk that is carried in the expectation of gain from near-term movements in liquid financial markets. Davy is the Group's only business unit permitted to run discretionary market risk.

Residual gap risk arises when hedging is completed on a portfolio basis rather than with back-to-back trades. It is Group practice to hedge IRRBB to de minimis levels wherever possible but as these hedges may not be perfectly matched this can result in small residual hedging gaps.

Discretionary and residual market risk is subject to strict controls which set out the markets and instruments in which risk can be assumed, the types of positions which can be taken and the limits which must be complied with. These risks are managed by an approved framework of limits and controls, based on VaR (see below), scenario stress tests and sensitivities.

Equity risk, interest rate risk and credit spread risk arises within Davy Capital Markets market making business from the potential impact of changes in equity prices, interest rates and credit spreads. Davy Institutional Equities is responsible for the underwriting, distribution, and trading of Irish, UK and European equities. At 31 December 2023, Davy Capital Markets held a long position of €2 million in listed equities.

Davy Fixed Income team is responsible for the underwriting, distribution and trading of Irish Sovereign Bonds and Irish Financial Bonds. At 31 December 2023, Davy Capital Markets held a short position of €34 million in Irish Bonds, which are funded via repurchase agreements.

Value at Risk (VaR) *(audited)*

The Group employs a VaR approach to measure and set limits on discretionary and residual market risk. The Group utilises a Monte-Carlo simulation model approach for the calculation of the interest rate risk component at a 99% (two tailed) confidence level, using a one day holding period and based on one year of historic data. The volatilities and correlations which are used to generate these VaR numbers are estimated using the exponentially weighted moving average approach which gives more weight to recent data and responds quickly to changes in market volatility. Davy utilises historical simulation model for the calculation of equity risk, interest rate risk and credit spread risk at 99% confidence interval and based on one year of historic data.

For the nature of risks assumed by the Group, VaR remains a reliable basis of risk measurement, supplemented by stress testing. The Group recognises that VaR is subject to certain inherent limitations and therefore VaR limits are supplemented by scenario-based stress tests. These are particularly important in periods of low market volatility when VaR numbers can understate the risks of loss from large adverse market moves.

Structural and other risks *(audited)*

Notwithstanding the overriding objective of running minimal levels of market risk, certain structural market risks remain and are managed centrally as part of the Group's asset and liability management process.

Structural interest rate risk *(unaudited)*

Structural interest rate risk is predominantly the exposure of Group earnings to interest rate changes arising from the presence of non-interest bearing or behaviourally fixed-rate assets and liabilities on the balance sheet or variable rate deposits that are deemed insensitive to changes in market rates. The principal non-interest bearing liabilities are equity and non-interest bearing current accounts. It is Group policy to invest its net non-interest bearing liabilities (or free funds) in a portfolio of swaps with an average life of 3.5 years and a maximum life of seven years.

The Group also has in place a hedge of deposits that are deemed insensitive to changes in market rates. This has the effect of helping to mitigate the impact of the interest rate changes on interest income. The table outlines the Group's average volumes of structural hedges and contribution to interest income.

Other structural risks arise from credit-impaired loans and floored loans and deposits. The Group also has a portfolio of swaps which hedge fixed rate assets (including fixed rate lending and fixed rate securities) on the Balance Sheet. These swaps partially offset the Group's structural hedge.

Net interest income sensitivity analysis (unaudited)

The Group uses net interest income sensitivity analysis to measure the responsiveness of earnings to scenarios for short and long-term rates.

The following table shows the estimated sensitivity of the Group's net interest income (before tax) to an instantaneous and sustained 1% parallel movement in interest rates. The estimates are based on management assumptions primarily related to the repricing of customer transactions; the relationship between key official interest rates set by Monetary Authorities and market determined interest rates; and the assumption of a constant balance sheet by size and composition. The sensitivities should not be considered a forecast of future performance in these rate scenarios as they do not capture potential management action in response to unexpected changes in the interest rate environment.

Basis Risk

Basis risk is the exposure of the Group's earnings to sustained changes in the differentials between the floating market related benchmark rates to which the Group's assets, liabilities and derivative hedges are linked. In the Group's case, the principal rates used for product and derivative repricing are one, three and six month Euro Inter Bank Offered Rate (EURIBOR), Sterling Overnight Index Average, EUR short-term rate, the ECB refinancing rate, and the BoE base rate.

In addition, the Group funds an element of its sterling balance sheet in part from euro which creates a structural exposure to the cost of this hedging. The Group applies notional limits and stress scenario analysis to its basis positions.

Credit spread risk (unaudited)

Credit spread risk arises from the potential impact of changes to the spread between the bond yield and swap rates. Bonds purchased primarily as liquid assets and classified as fair value through other comprehensive income (FVOCI) are held at fair value on the balance sheet and as such, movements in the credit spreads can result in adverse impacts on the fair value of these holdings.

At 31 December 2023, the Group held €4.0 billion in securities classified as FVOCI (2022: €4.3 billion). A 1% increase in the average credit spread of the book in 2023 would have reduced its value by €134 million (2022: €168 million).

An analogous economic risk exists in relation to securities held by NIAC to match policyholder liabilities and to invest its capital. At 31 December 2023, NIAC's bond portfolio had a market value of €1.7 billion (2022: €1.3 billion). At 31 December 2023, a 1% widening of all credit spreads (measured as bond yields minus the corresponding swap rate) would have had an impact on profit before tax of €90 million negative, while a 1% tightening would have a positive impact of €104 million (2022 restated for IFRS 17: €78 million negative and €91 million positive impact respectively).

The Group also models the spread risk for both the FVOCI and NIAC portfolios over a one-year horizon using a delta-normal VaR model and deterministic spread stress model respectively. They approximate a potential one-year loss in portfolio value due to changes in credit spreads.

Interest rate risk in New Ireland Assurance Company plc (unaudited)

In managing the interest rate risk in its business, NIAC has regard to the sensitivity of its capital position, as well as its profit before tax, to market movements. NIAC follows a policy of asset / liability matching to ensure that the exposure of its capital position to interest rate movements remains within tolerances, while also managing the impact on IFRS profits. At 31 December 2023, a 1% increase in swap and yield rates would have reduced its excess own funds (own funds less solvency capital requirement (SCR)) by €2 million and reduced its IFRS profit by €47 million (2022 restated for IFRS 17: €2 million negative and €38 million negative respectively).

Equity risk (unaudited)

NIAC's profit before tax are also indirectly exposed to changes in equity markets. This arises because a management fee is charged on the value of €7.1 billion of equities held for policyholders in insurance contracts in its unit-linked book. As equity markets move up and down, this gives rise to a change in current and discounted future streams of equity-related fees which is reflected in NIAC's profits. Every 1% fall in equity markets applied to positions at 31 December 2023 would have reduced its IFRS profit by €1 million (2022 restated for IFRS 17: €1 million reduction). Every 1% increase in equity markets would have had a broadly equal and opposite impact.

Structural FX (unaudited)

The Group defines structural FX risk as the exposure of its key capital ratios to changes in exchange rates. Changes in exchange rates can increase or decrease the overall euro equivalent level of RWAs.

It is Group policy to manage structural FX risk by ensuring that the currency composition of its RWAs and its structural net asset position by currency are broadly similar. This is designed to minimise the impact of exchange rate movements on the principal capital ratios.

At 31 December 2023, the estimated sensitivity of the Group's fully loaded CET1 ratio to a 10% depreciation of sterling and dollar combined against the euro was seven basis points.

Use of derivatives in the management of market risk (audited)

The activities set out above involve, in many instances, transactions in a range of derivative instruments. The Group makes extensive use of derivatives to hedge its balance sheet and service its customer needs. The Group's participation in derivatives markets is subject to the requirements of the Group Market Risk Policy which is approved by the Board. The Group makes a clear distinction between derivatives which must be transacted on a perfectly hedged basis and those whose risks can be managed within broader interest rate or FX books.

The approach to hedging and managing market risk is governed by policies explicitly designed to ensure that all hedging activities are risk reducing. Interest rate risk arising on customer lending and term deposit-taking is centralised by way of internal hedging transactions with BoIGM or Group Treasury. This exposure is, in turn, substantially eliminated through external hedges.

Structural risk is managed by way of selective and strategic hedging initiatives which are executed under ALCO's authority.

Policy requires that, where behavioural optionality hedging relies on assumptions about uncertain customer behaviour and where material, it is subject to limits or other controls.

As per Article 445 Disclosure of exposure to market risk, Table 7.1 shows the RWEAs for standardised market risk split between outright products, options and securitisation. The Group uses the Standardised approach for its assessment of Pillar 1 capital requirements for trading book market risk, using the prescribed regulatory calculation method. Risk weighted assets for market risk arise predominantly from interest rate risk on the trading book and foreign exchange risk.

Table 7.1 - EU MR1 - Market risk under the standardised approach

	<u>Dec-23</u>	<u>Dec-22</u>
	a	
	RWEAs	RWEAs
	€m	€m
Outright products		
1 Interest rate risk (general and specific)	138	129
2 Equity risk (general and specific)	7	7
3 Foreign exchange risk	85	288
4 Commodity risk	-	-
Options		
5 Simplified approach	-	-
6 Delta-plus method	-	-
7 Scenario approach	-	-
8 Securitisation (specific risk)	-	-
9 Total	<u>230</u>	<u>424</u>

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Interest Rate Risk in the Banking Book (IRRBB)

Non-trading interest rate risk or Interest Rate Risk in the Banking Book refers to the risk to earnings and capital naturally arising through the conduct of retail and wholesale banking business as the various balance sheets components have different maturities, interest rate basis or behavioural attributes. Structural IRRBB is the inherent risk of a bank's balance sheet which can be mitigated but not fully eliminated. The Group's IRRBB is defined and measured in a manner that is consistent with regulatory definition and guidelines and is in line with the Group's Risk Appetite, which is approved by the Board at least annually. The Board defines its appetite for IRRBB risk through the setting of limits and other controls. Additionally, Board approved limits are supplemented by ALCO approved limits and controls.

IRRBB is based on a three lines of defence model, in line with the Group-wide approach to risk management.

First line of defence functions are responsible for management of structural interest rate risk, structural basis risk and bear the primary responsibility for protecting the Group from market risk-related losses. Group Treasury is the 1LOD function.

Second line of defence function for IRRBB is carried out by Group Market and Liquidity Risk (GM&LR) as part of Group Risk. GM&LR's primary responsibility is to identify, understand, measure and manage IRRBB to which the Group is exposed. Additionally it operates an effective monitoring, reporting and control framework.

Group Internal Audit provides an independent, reasonable assurance to key stakeholders on the effectiveness of the Group's risk management and internal control framework regarding IRRBB.

Group Asset and Liability Committee ("ALCO") is charged with the oversight of market risk, including IRRBB, and has appointed and delegated some structural hedging responsibilities to the Balance Sheet Structural Risk Committee ("BSSRC") and Group Treasurer.

The main aim of structural hedges is to manage Earnings Risk on Non-Interest Bearing Liabilities, Earnings Risk on Low-Rate Sensitive Deposits and Market Basis Risk.

IRRBB Measurement

Economic value of Equity (EVE) measures changes in the net present value of interest rate sensitive instruments over their remaining life resulting from interest rate movements.

Net Interest Income sensitivity measures the impact of interest earnings on interest sensitive assets and liabilities due to a sudden change in interest rates. This is measured using a constant balance sheet and a 200bp shock for EUR and USD, and 250bp shock on GBP on a quarterly basis in accordance with article 2 (a)(b) of the EBA/RTS/2022/10. An internal 100bp static balance sheet NII sensitivity model is performed on a monthly basis.

An earnings approach measures changes in expected future profitability within a given time horizon resulting from interest rate movements. A Gap analysis is an analysis of all interest earning assets and bearing liabilities by interest rate maturity and currency. These measures are calculated on a quarterly basis.

Credit Spread Risk in the Banking Book is measured and controlled using an annualised VaR approach, calculated on a monthly basis by GMLR.

Basis risk, defined as the spread between swap risk of different tenor and cross-currency basis. Nominal basis exposures are calculated by GMLR on a monthly basis. Basis Risk must be removed, as far as practicable, from individual books and balance sheets, and centralised in a structural basis book which is managed by Global Markets on behalf of Group Treasury.

The following interest rate scenario shocks are applied to measure the economic value of equity:

- Currency specific parallel shock up / Currency specific parallel shock down
- Steepener (short rates down and long rates up) / Flattener (short rates up and long rates down)
- Short rates up / Short rates down

The following scenarios are used to measure net interest income:

- Currency specific parallel shock up / Currency specific parallel shock down
- Parallel 100bp shock up / parallel 100bp shock down
- Change in the forecasted Earnings within 12 months under a currency specific parallel shock down / Currency specific parallel interest rate shock up

The Groups Net Interest Income scenarios assume a constant balance sheet.

For the purpose of the EU IRRBB1 template (see Tab 7.2), the below modelling parameters are assumed:

For the Groups Net Interest Income sensitivity, assumptions are used relating to the repricing rate of Bol priced or administered rate assets and liabilities.

Core Credit Balance is measured as the 3 year rolling average of the end of month point in time balances, capped at 85% of the 3 month average of point in time balances. This measurement methodology is reviewed annually by Group Treasury and approved by Group ALCO.

Structural Interest Rate Risk

Group Asset and Liability Committee ("ALCO") is charged with the oversight of market risk, including IRRBB, and has appointed and delegated some structural hedging responsibilities to the Balance Sheet Structural Risk Committee ("BSSRC") and Group Treasurer.

Structural Interest Rate Risk is predominantly the exposure of Group earnings to interest rate changes arising from the presence of non-interest bearing or behaviourally fixed-rate assets and liabilities on the balance sheet. The principal non-interest bearing liabilities are equity and non-interest bearing current accounts. It is Group policy to invest its net non-interest bearing liabilities in a portfolio of swaps with an average life of 3.5 years and a maximum life of 7 years. This has the effect of helping to mitigate the impact of the interest rate changes on interest income.

The Economic Value of Equity (EVE) measures the changes in the net present value of interest rate sensitive instruments over their remaining life.

The Net Interest Income measures the impact of interest earnings due to shifts in the interest rate environment. The following table shows the estimated sensitivity of the Group's net interest income (before tax) to an instantaneous and sustained 2-2.5% parallel movement in interest rates. The sensitivity assumes (i) an instantaneous and parallel movement in all interest rates, with a starting point of an ECB deposit rate of 4%; (ii) a static balance sheet; (iii) assets and liabilities whose pricing is mechanically linked to market or central bank policy rates reprice immediately; (iv) certain other assumptions including pass throughs to assets and liabilities. The sensitivities should not be considered a forecast of future performance in rate scenarios as they do not capture potential management action in response to unexpected changes in the interest rate environment. Net interest income sensitivities will change depending on interest rate starting point.

In the EVE metrics the equity is excluded from the cash flows as it is treated as an overnight maturing item. EVE and NII sensitivity is calculated under the regulatory EBA prescribed scenarios and uses standard key modelling and parametric assumptions set by regulatory guidelines. Table 7.2 below outlines the changes in the economic value of equity and net interest income in the period.

Table 7.2 - EU IRRBB1 - Interest rate risks of non-trading book activities

Supervisory shock scenarios	Dec-23		Dec-22	
	Changes of the Economic Value of Equity	Changes of the Net Interest Income ¹	Changes of the Economic Value of Equity	Changes of the Net Interest Income
	€m	€m	€m	€m
1 Parallel up	(550)	375	(465)	
2 Parallel down	305	(630)	260	
3 Steepener	15		5	
4 Flattener	(130)		(96)	
5 Short rates up	(295)		(238)	
6 Short rates down	150		124	

¹ For NII, December 2022 return reported a 100bp sensitivity only. Regulatory supervisory parallel up shock now reported for NII (±200/±250bps)

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Definition

Operational risk is the risk of loss resulting from suboptimal or failed internal processes, systems, human factors, or from external events.

This risk includes information technology, change management, information security and cyber, TPRM and outsourcing, transaction processing, people, physical infrastructure, legal (a component being litigation and regulatory proceedings), data, model, financial and regulatory reporting and tax risks.

Risk management

Operational risk, Resilience and ESG are intrinsically related. In order to ensure positive overarching ESG outcomes, operational risk management considers ESG more broadly within the relevant policies, crisis management framework, data, processes, risk indicators, monitoring and reporting.

The Group faces operational risks in the normal pursuit of its business objectives. The primary goals of operational risk management are ensuring the sustainability and integrity of the Group's operations and the protection of its reputation by controlling, mitigating, or transferring the impact of operational risk. Operational risk cannot be fully eliminated. The Group has established a formal approach to the management of operational risk in the form of the RMF which defines the Group's approach to identifying, assessing, managing, monitoring, and reporting the operational risks which may impact the achievement of the Group's business objectives.

This framework outlines, inter alia the following:

- formulation and dissemination of operational risk policies specifying the risk management obligations of management and staff within the Group;
- maintaining organisational structures for the oversight, monitoring and management of operational risk throughout the Group;
- setting aside capital and maintaining a suite of insurance policies;
- setting out the boundary conditions in which operational risks are to be managed, by way of Board approved Risk Appetite Statement; and
- embedding formal operational risk management processes and standards throughout the Group.

Operational risk policy and governance

The Group continues to maintain its ongoing oversight and control of its exposure to operational risk. A critical component of operational risk management are the operational risk policies which set out the Group's objectives and the obligations of management in respect of operational risk.

Governance and oversight of operational risk forms part of the RMF which aims to ensure that risk management activities are adequate and commensurate with the Board approved risk appetite. The GORC is appointed by the ERC and is responsible for the oversight and monitoring of operational risk within the Group and material subsidiaries. Business units hold primary responsibility for the management of operational risk and compliance with internal control requirements.

The Operational Risk function is accountable for the development and maintenance of operational risk policies to ensure a robust, consistent, and systematic approach is applied to managing operational risk exposures across the Group.

Operational risk appetite

The Board has set out its appetite for operational risk in terms of both qualitative factors and quantitative measures reflecting the nature of operational risks. As such, the monitoring of operational risk indicators is supplemented with qualitative review and discussion at senior management executive committees to ensure appropriate actions are taken to enhance controls.

Risk assessment

A systematic identification and assessment of the operational risks faced by the Group is a core component of the RMF. This is known as the Risk and Control Self Assessment (RCSA) and is a framework for capturing, measuring and managing operational risk as well as providing a mechanism for consistent identification, monitoring, reviewing, updating and reporting of risks throughout the Group. A key element of this process is the classification of risks in the Group's risk library.

Risk mitigation and transfer

In addition to business unit risk mitigation initiatives, the Group implements specific policies and risk mitigation measures for key operational risks including, but not limited to, information technology, information security and cyber, TPRM and outsourcing risks.

This strategy is further supported by risk transfer mechanisms such as the Group's insurance programme, whereby selected risks are insured externally.

The Group Insurance programme is reviewed annually to ensure coverage remains appropriate to the Group's risk management objectives. The Group's capital requirements arising from operational risk are calculated for Pillar 1 using The Standardised Approach (TSA) and Pillar 2 as assessed under the Group's ICAAP.

Operating Resilience

Operating resilience is the ability of the Group to identify and prepare for, respond and adapt to, recover and learn from an operational disruption. Operational resilience involves having forward looking plans that proactively prepares the Group to withstand and adapt to disruptions that will inevitably occur.

Risk reporting

Regular reporting of operational risk is a key component of the RMF.

The current status of operational risk, including risk dashboards and risk appetite compliance, is reported through the Board Risk Report on a monthly basis.

At least four times a year, the Head of Operational Risk reports to GORC on the status of operational risk in the Group, including the status of the material operational risks, the progress of risk mitigation initiatives and programmes, significant loss events and the nature, scale, and frequency of overall losses.

In addition, specified operational risk information is collated for the purposes of reporting to regulatory supervisors in the jurisdictions in which the Group operates.

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As per Articles 446 and Article 454. Income used in the calculation of own funds requirements is based on the Group's audited figures for each relevant year.

The Group holds operational risk capital to cover the potential financial impact of operational risk events, and uses the Standardised Approach (TSA) to determine its Pillar 1 capital requirement. Risk exposure amount for operational risk at 31 December 2023 is €5.9 billion (31 December 2022: €4.8 billion). The increase in operational risk rwa is a result of higher operating income.

Table 8.1 - EU OR1 - Operational risk under own funds requirements and risk-weighted exposure amounts

Banking activities	Relevant indicator			Own funds requirements	Risk Exposure amount
	a	b	c		
	Year-3	Year-2	Year-1		
Dec-23	€m	€m	€m	€m	€m
1 Banking activities subject to basic indicator approach (BIA)	-	-	-	-	-
2 Banking activities subject to standardised (TSA) / alternative standardised (ASA) approaches	2,955	3,260	4,231	472	5,896
3 Subject to TSA:	2,955	3,260	4,231		
4 Subject to ASA:	-	-	-		
5 Banking activities subject to advanced measurement approaches AMA	-	-	-	-	-

Banking activities	Relevant indicator			Own funds requirements	Risk Exposure amount
	a	b	c		
	Year-3	Year-2	Year-1		
Dec-22	€m	€m	€m	€m	€m
1 Banking activities subject to basic indicator approach (BIA)	-	-	-	-	-
2 Banking activities subject to standardised (TSA) / alternative standardised (ASA) approaches	2,606	2,821	3,137	386	4,827
3 Subject to TSA:	2,606	2,821	3,137		
4 Subject to ASA:	-	-	-		
5 Banking activities subject to advanced measurement approaches AMA	-	-	-	-	-

Definition *(audited)*

Funding and liquidity risk is the risk that the Group will experience difficulty in financing its assets and / or meeting its contractual payment obligations as they fall due or will only be able to do so at substantially above the prevailing market cost of funds.

Liquidity risk arises from differences in timing between cash inflows and outflows. Cash inflows are driven by, amongst other things, the maturity structure of loans and investments held by the Group, while cash outflows are driven by items such as the term maturity of debt issued by the Group and outflows from customer deposit accounts. The liquidity risk of the Group may also be impacted by external events which could result in a sudden withdrawal of deposits or the potential changes in customer behaviour.

Funding risk can occur where there is an over-reliance on a particular type of funding, a funding gap, or a concentration of wholesale funding (including securitisations) maturities.

The Group's ability to access funding markets at a sustainable cost and in a sufficient volume can be negatively impacted by a disruption to wholesale and / or currency funding markets, credit rating downgrade(s) or deterioration in market sentiment which in turn could impact the financial position of the Group.

Liquidity risk statement *(audited)*

Funding and liquidity risk arises from a fundamental part of the Group's business model, the maturity transformation of primarily short-term deposits into longer-term loans. The Group's funding and liquidity strategy is to maintain a stable funding base with loan portfolios substantially funded by retail originated customer deposit portfolios.

Liquidity risk framework *(audited)*

The Group has established a Liquidity Risk Management Framework which encompasses the liquidity policy, procedures and methodologies in place to ensure that the Group is positioned to address its daily liquidity obligations and to withstand a period of liquidity stress. Principal components of this framework are the Group's Risk Appetite Statement and associated limits and the Group's Funding and Liquidity Policy, both of which are approved by the Board on the recommendation of ALCO.

The Group Funding and Liquidity Policy outlines the Group's governance process with respect to funding and liquidity risk and sets out the core principles that govern the manner in which the risk is mitigated, monitored and managed. The operation of this policy is delegated to the Group's ALCO.

These principal components are supported by further liquidity, procedures, and methodologies which the Group has to manage funding and liquidity risk.

Liquidity risk management *(audited)*

Liquidity risk management within the Group focuses on the control, within prudent limits, of risk arising from the mismatch in contracted maturities of assets and liabilities and the risks arising from undrawn commitments and other contingent liabilities. The Group manages its liquidity by jurisdiction with liquid assets predominantly held in the currency of each jurisdiction.

The Group's treasury function within Group Finance provides top down centralised management of the Group's funding and liquidity position including overall responsibility for the management of the Group's liquidity position and funding strategy. This ensures a coordinated approach to balance sheet management and is accomplished through the incorporation of funding and liquidity risk appetite metrics into risk appetite at a consolidated level, monitoring liquidity metrics for each jurisdiction and compliance by the business units with the Group's funds transfer pricing methodology.

The Group Market and Liquidity Risk function provides independent oversight of funding and liquidity risk and is responsible for proposing and maintaining the Group's Funding and Liquidity Risk Management Framework and associated risk appetite metrics.

Liquidity risk management consists of two main activities:

- structural liquidity management focuses on the balance sheet structure, the funding mix, the expected maturity profile of assets and liabilities and the Group's debt issuance strategy; and
- tactical liquidity management focuses on monitoring current and expected daily cash flows to ensure that the Group's liquidity needs can be met.

The Group is required to comply with the regulatory liquidity requirements of the SSM and the requirements of local regulators in those jurisdictions where such requirements apply to the Group. SSM requirements include compliance with CRR / CRD IV and associated Delegated Acts. The Group has remained in full compliance with the regulatory liquidity requirements throughout 2023 and at 31 December 2023 maintained a buffer significantly in excess of regulatory liquidity requirements.

Bol (UK) plc is authorised by the PRA and is subject to the regulatory liquidity regime of the PRA. Bol (UK) plc has remained in full compliance with the regulatory liquidity regime in the UK throughout 2023 and at 31 December 2023 maintained a buffer significantly in excess of regulatory liquidity requirements.

The annual ILAAP enables the Board to assess the adequacy of the Group's Funding and Liquidity Risk Management Framework, to assess the key liquidity and funding risks to which it is exposed; and details the Group's approach to determining the level of liquid assets and contingent liquidity that is required to be maintained under both business as usual and severe stress scenarios.

A key part of this assessment is cash flow forecasting that includes assumptions on the likely behavioural cash flows of certain customer products. Estimating these behavioural cash flows allows the Group to assess the stability of its funding sources and potential liquidity requirements in both business as usual and stressed scenarios. The stressed scenarios incorporate Group specific and systemic risks and are run at different levels of possible, even if unlikely, severity. Actions and strategies available to mitigate the impacts of the stress scenarios are evaluated as to their appropriateness. Stress test results are reported to ALCO, the BRC and the Board.

The Group also monitors a suite of Recovery Indicators and Early Warning Signals in order to identify the potential emergence of a liquidity stress.

As part of its contingency and recovery planning, the Group has identified a suite of potential funding and liquidity options, which could be exercised to help the Group to restore its liquidity position on the occurrence of a major stress event.

Liquidity risk reporting *(audited)*

The Group's liquidity risk appetite is defined by the Board to ensure that funding and liquidity are managed in a prudent manner. The current status of funding and liquidity risk, including risk dashboards and risk appetite compliance, is reported through the Board Risk Report on a monthly basis, including any significant changes.

The Board Risk Report includes the results of the Group's liquidity stress testing. This estimates the potential impact of a range of stress scenarios on the Group's liquidity position including its available liquid assets and contingent liquidity.

Management reviews funding and liquidity reports and stress testing results on a daily, weekly, and monthly basis against the Group's Risk Appetite Statement. It is the responsibility of ALCO to ensure that the measuring, monitoring, and reporting of funding and liquidity is adequately performed and complies with the governance framework.

Liquidity risk measurement *(audited)*

The Group's cash flow and liquidity reporting processes provide management with daily liquidity risk information by designated cash flow categories. These processes capture the cash flows from both on-balance sheet and off-balance sheet transactions.

The Group measures liquidity risk by adjusting the contractual cash flows on deposit books to reflect their behavioural stability.

Unit-linked investment liabilities and unit-linked insurance liabilities with a carrying value of €7,692 million and €15,113 million respectively (2022 restated for IFRS 17: €6,859 million and €13,410 million respectively) are excluded from this analysis as their repayment is linked directly to the financial assets backing these contracts.

Customer accounts include a number of term accounts that contain access features. These allow the customer to access a portion or all of their deposits notwithstanding that this withdrawal could result in a financial penalty being paid by the customer.

For such accounts, the portion subject to the potential early access has been classified in the 'Demand' category in the following table.

Other financial assets at FVTPL and trading securities exclude equity shares which have no contractual maturity.

Funding strategy *(unaudited)*

The Group seeks to maintain a stable funding base with loan portfolios funded substantially by granular retail originated deposits with any residual funding requirements principally met through term wholesale funding and equity.

Customer deposits *(unaudited)*

The Group's customer deposit strategy is to:

- maintain and optimise its stable retail customer deposit base in line with balance sheet requirements;
- prudently manage deposit pricing and margins; and
- optimise stable funding levels in line with regulatory liquidity requirements.

Group customer deposit volumes of €100.2 billion are €1.0 billion higher predominantly driven by the acquisition of the KBCI deposit portfolio of €1.8 billion, partially offset by lower Rol deposits of €0.6 billion and lower Retail UK deposits of €0.2 billion. The Group's LDR at 31 December 2023 was 80% (2022: 73%).

Customer deposits do not include €0.5 billion (2022: €0.3 billion) of savings and investment products sold by Wealth and Insurance.

These products have fixed terms (typically five to seven years) and consequently are an additional source of stable funding for the Group.

Wholesale funding *(unaudited)*

The Group in the normal course aims to maintain funding diversification, minimise concentrations across funding sources and minimise refinancing maturity concentrations.

The Group issued c.€2.3 billion of MREL eligible senior debt and down-streamed it to the Bank in 2023 (2022: €2 billion).

Foreign exchange funding mismatch *(unaudited)*

The Group's strategy is to originate all new retail lending in the UK through Bol (UK) plc which is funded primarily via sterling deposits.

The Group also provides banking services in the UK through its UK branch. This comprises corporate and business banking activities and the management of certain residential mortgage contracts which have been retained by the UK branch and which are funded primarily via cross currency derivatives.

At 31 December 2023, the stock of sterling denominated assets funded by cross currency derivatives was c.£6.6 billion (2022: c.£6.7 billion) of which c.£0.9 million relates to funding provided to Bol (UK) plc.

Funding and liquidity position *(unaudited)*

During 2023, Standard & Poor's (S&P) upgraded the BolG plc senior debt rating to BBB (from BBB-) and The Governor and Company of the Bank of Ireland (GovCo) senior debt rating to A (from A-). They also revised the outlook to Stable (from Positive). Moody's revised the outlook to Positive (from Stable) and affirmed the senior debt ratings of A3 for BolG plc and A1 for GovCo. Fitch have upgraded the BolG plc senior debt rating to BBB+ (from BBB) and GovCo senior debt rating to A- (from BBB+).

Balance sheet encumbrance *(audited)*

It is Group policy to ensure that the level of encumbrance of the balance sheet is consistent and supportive of the Group's unsecured funding issuance plans.

As part of managing its funding requirements, the Group from time to time encumbers assets as collateral to support wholesale funding initiatives. This would include covered bonds, asset backed securities, securities repurchase agreements, and other structures that are secured over customer loans. At 31 December 2023, €9 billion (2022: €14 billion) of the Group's assets and collateral received were encumbered, primarily through these structures.

The Group's overall encumbrance level was 6% (2022: 10%). The decrease in encumbered assets is primarily due to the withdrawal of assets previously encumbered within the Group's Special Mortgage-Backed euro Promissory Note (SMBPN) programmes. The Group's overall encumbrance is prepared on a regulatory group basis, in accordance with the CRD IV, which comprises banking and other relevant financial institutions within the Bol Group, but excludes non-banking related institutions such as insurance entities. For further information, see tab 1.3.

Covered bonds, a key element of the Group's long-term funding strategy are issued through its subsidiary BoIMB. BoIMB is registered as a designated mortgage credit institution to issue Irish Asset Covered Securities in accordance with relevant legislative requirements. BoIMB is required to maintain minimum contractual overcollateralisation of 5% and minimum legislative overcollateralisation of 3% (both on a prudent market value basis). This is monitored by the Covered Asset Monitor on behalf of the CBI.

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As per Article 451a(2), Table 9.1 below provides qualitative information on the LCR ratio.

Table 9.1 - EU LIQB - qualitative information on LCR disclosures.

The Group is principally funded via granular retail customer deposits which are the primary driver of movements in the LCR over the period. Customer Deposits are originated in the Group's core franchises in ROI and UK with the top 20 deposits representing c.2% of the Group's deposit base.

The Group expects to remain a substantially deposit funded institution with loan portfolios principally funded by granular retail customer deposits and modest term wholesale funding issuance primarily to meet the Group's MREL requirements.

The Group maintains a strong LCR derived from deposit funding. The reduction in the LCR over the reference period, is primarily due to the acquisition of KBC Ireland loans and deposits in Q1 2023, which was funded from existing resources. The Group's liquidity buffer is comprised primarily of unencumbered High Quality Level 1 Liquid Assets.

The Group has modest net derivative exposures which primarily relate to the hedging of its own interest rate & currency risk. The outflows related to derivative and other collateral requirements are primary potential outflows under the adverse market scenario included in LCR per Article 423(3) of Regulation (EU) No 575/2013.

The Group manages its liquidity by jurisdiction with separate liquidity centres for each:

- GovCo is the Group's principal operating entity and one of the Group's two liquidity centres incorporating BOIMB and all subsidiaries except BOI UK.
- BOI UK is the Group's UK regulated subsidiary and the second liquidity centre. As such, it is separately managed from a liquidity perspective though there are intragroup flows between the two entities with GovCo providing unsecured wholesale funding to BOI UK.

From an LCR perspective, the Group holds GBP denominated liquid assets to meet GBP denominated outflows.

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As per Article 451a(2), Table 9.2 below sets out the liquidity coverage ratio detail of BOI Group. The table represents the 12 month average breakdown of the Group's high quality liquid assets, cash outflows and cash inflows on both an unweighted and weighted basis that are used to derive the liquidity coverage ratio.

Table 9.2 - EU LIQ1 - LCR disclosures

	a Total unweighted value (average)				e Total weighted value (average)			
	Dec-23 €m	Sep-23 €m	Jun-23 €m	Mar-23 €m	Dec-23 €m	Sep-23 €m	Jun-23 €m	Mar-23 €m
EU 1a Quarter ending 2023								
EU 1b Number of data points used in the calculation of averages	12	12	12	12	12	12	12	12
High-quality liquid assets								
1 Total high-quality liquid assets (HQLA)					36,561	38,026	39,106	39,145
Cash-outflows								
2 Retail deposits and deposits from small business customers <i>of which;</i>	71,935	71,552	70,714	69,614	5,335	5,286	5,194	5,082
3 <i>Stable deposits</i>	41,258	41,412	41,234	40,860	2,063	2,071	2,062	2,043
4 <i>Less stable deposits</i>	26,727	26,293	25,607	24,799	3,270	3,214	3,131	3,037
5 Unsecured wholesale funding <i>Operational deposits (all counterparties) and deposits in networks of</i>	28,438	28,539	28,142	27,232	12,185	12,261	12,126	11,738
6 <i>cooperative banks</i>	5,100	5,070	4,969	4,800	1,275	1,268	1,242	1,200
7 <i>Non-operational deposits (all counterparties)</i>	23,158	23,306	23,006	22,318	10,730	10,830	10,717	10,424
8 <i>Unsecured debt</i>	180	163	167	114	180	163	167	114
9 Secured wholesale funding					1	2	1	1
10 Additional requirements <i>Outflows related to derivative exposures and other collateral</i>	9,953	9,738	9,613	9,601	1,818	1,753	1,682	1,705
11 <i>requirements</i>	605	566	513	482	605	566	513	482
12 <i>Outflows related to loss of funding on debt products</i>	9	10	8	88	9	10	8	88
13 <i>Credit and liquidity facilities</i>	9,339	9,162	9,092	9,031	1,204	1,177	1,161	1,135
14 Other contractual funding obligations	832	811	829	848	664	647	665	680
15 Other contingent funding obligations	8,545	8,276	8,038	7,754	580	578	561	509
16 Total cash outflows					20,583	20,527	20,229	19,715
Cash-inflows								
17 Secured lending (e.g. reverse repos)	58	43	30	22	-	-	-	-
18 Inflows from fully performing exposures	800	801	799	795	550	550	541	528
19 Other cash inflows <i>(Difference between total weighted inflows and total weighted outflows</i>	1,215	1,266	1,300	1,185	478	513	547	449
<i>arising from transactions in third countries where there are transfer</i>								
EU-19a restrictions or which are denominated in non-convertible currencies)					-	-	-	-
EU-19b (Excess inflows from a related specialised credit institution)					-	-	-	-
20 Total cash inflows	2,073	2,110	2,129	2,002	1,028	1,063	1,088	977
EU-20a Fully exempt inflows	-	-	-	-	-	-	-	-
EU-20b Inflows Subject to 90% Cap	-	-	-	-	-	-	-	-
EU-20c Inflows Subject to 75% Cap	2,073	2,110	2,129	2,002	1,028	1,063	1,088	977
21 Liquidity buffer					36,561	38,026	39,106	39,145
22 Total net cash outflows					19,555	19,464	19,140	18,738
23 Liquidity coverage ratio (%)					187%	196%	206%	210%

The Group calculates additional liquidity outflows corresponding to collateral needs resulting from the impact of an adverse market scenario on the Group's derivative transactions using the Historical Look Back Approach (HLBA) as guided by the EBA. In preparing the LCR, the Group recognises restrictions on the transferability of liquidity between jurisdictions with surplus liquid assets in one jurisdiction not transferable to another jurisdiction.

As per Article 451a(3), Table 9.3 below sets out the NSFR ratio detail of BOI Group.

Table 9.3 - EU LIQ2 - Net Stable Funding Ratio

Dec-23	Unweighted value by residual maturity				Weighted value
	a	b	c	d	
	No maturity €m	< 6 months €m	6 months to < 1yr €m	>= 1 yr €m	€m
Available stable funding (ASF) Items					
1 Capital items and instruments	12,563	-	291	1,310	13,873
2 Own funds	12,563	-	291	1,310	13,873
3 Other capital instruments	-	-	-	-	-
4 Retail deposits	-	68,874	1,384	779	66,146
5 Stable deposits	-	41,814	892	444	41,015
6 Less stable deposits	-	27,059	492	335	25,132
7 Wholesale funding:	-	28,432	1,947	9,996	23,337
8 Operational deposits	-	5,464	-	-	2,732
9 Other wholesale funding	-	22,967	1,947	9,996	20,605
10 Interdependent liabilities	-	-	-	-	-
11 Other liabilities:	93	2,351	-	395	395
12 NSFR derivative liabilities	93	-	-	-	-
13 All other liabilities and capital instruments not included in the above categories	-	2,351	-	395	395
14 Total available stable funding (ASF)	-	-	-	-	103,752
Required stable funding (RSF) Items					
15 Total high-quality liquid assets (HQLA)	-	-	-	-	405
EU-15a Assets encumbered for a residual maturity of one year or more in a cover pool	-	39	39	1,936	1,712
16 Deposits held at other financial institutions for operational purposes	-	-	-	-	-
17 Performing loans and securities:	-	4,010	4,764	68,279	54,845
Performing securities financing transactions with financial customers collateralised by	-	4	-	-	-
18 Level 1 HQLA subject to 0% haircut	-	-	-	-	-
Performing securities financing transactions with financial customer collateralised by	-	306	93	557	634
19 other assets and loans and advances to financial institutions	-	-	-	-	-
Performing loans to non- financial corporate clients, loans to retail and small business	-	2,820	3,806	24,151	23,841
20 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	-	-	-	-	-
21 Approach for credit risk	-	-	-	-	-
22 Performing residential mortgages, of which:	-	860	860	42,532	29,459
With a risk weight of less than or equal to 35% under the Basel II Standardised	-	849	849	41,974	28,962
23 Approach for credit risk	-	-	-	-	-
Other loans and securities that are not in default and do not qualify as HQLA,	-	20	4	1,039	911
24 including exchange-traded equities and trade finance on-balance sheet products	-	-	-	-	-
25 Interdependent assets	-	-	-	-	-
26 Other assets:	-	1,765	-	6,455	7,728
27 Physical traded commodities	-	-	-	-	-
Assets posted as initial margin for derivative contracts and contributions to default	-	-	-	-	681
28 funds of CCPs	-	-	-	-	-
29 NSFR derivative assets	-	-	-	-	-
30 NSFR derivative liabilities before deduction of variation margin posted	-	644	-	-	32
31 All other assets not included in the above categories	-	1,121	-	6,455	7,016
32 Off-balance sheet items	-	18,815	-	171	1,293
33 Total RSF	-	-	-	-	65,983
34 Net Stable Funding Ratio (%)	-	-	-	-	157.24%

Dec-22	Unweighted value by residual maturity				Weighted value
	a	b	c	d	
	No maturity €m	< 6 months €m	6 months to < 1yr €m	>= 1 yr €m	€m
Available stable funding (ASF) Items					
1 Capital items and instruments	11,881	-	-	1,534	13,415
2 Own funds	11,881	-	-	1,534	13,415
3 Other capital instruments	-	-	-	-	-
4 Retail deposits	-	66,465	813	746	63,421
5 Stable deposits	-	41,836	656	297	40,664
6 Less stable deposits	-	24,629	157	449	22,757
7 Wholesale funding:	-	28,564	1,613	9,271	22,368
8 Operational deposits	-	5,455	-	-	2,728
9 Other wholesale funding	-	23,109	1,613	9,271	19,640
10 Interdependent liabilities	-	-	-	-	-
11 Other liabilities:	196	2,138	-	594	594
12 NSFR derivative liabilities	196	-	-	-	-
13 All other liabilities and capital instruments not included in the above categories	-	2,138	-	594	594
14 Total available stable funding (ASF)	-	-	-	-	99,799

Required stable funding (RSF) Items

15 Total high-quality liquid assets (HQLA)					327
EU-15a Assets encumbered for a residual maturity of one year or more in a cover pool	46	48	2,005		1,784
16 Deposits held at other financial institutions for operational purposes	-	-	-		-
17 Performing loans and securities:	4,062	5,072	59,621		49,808
Performing securities financing transactions with financial customers collateralised by	-	-	-		-
18 Level 1 HQLA subject to 0% haircut					
Performing securities financing transactions with financial customer collateralised by	213	317	818		998
19 other assets and loans and advances to financial institutions					
Performing loans to non- financial corporate clients, loans to retail and small business	3,069	3,942	23,859		23,785
20 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	-	-	-		-
21 Approach for credit risk					
22 Performing residential mortgages, of which:	776	813	33,895		24,114
With a risk weight of less than or equal to 35% under the Basel II Standardised	770	807	33,653		23,901
23 Approach for credit risk					
Other loans and securities that are not in default and do not qualify as HQLA,	4	-	1,050		911
24 including exchange-traded equities and trade finance on-balance sheet products					
25 Interdependent assets					
26 Other assets:	-	2,467	-	6,760	7,872
27 Physical traded commodities					
Assets posted as initial margin for derivative contracts and contributions to default					622
28 funds of CCPs					
29 NSFR derivative assets					
30 NSFR derivative liabilities before deduction of variation margin posted	1,652				83
31 All other assets not included in the above categories	815	-	6,760		7,167
32 Off-balance sheet items	16,671	-	421		1,291
33 Total RSF					61,082
34 Net Stable Funding Ratio (%)					163.39%

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As per Article 443, Table 9.4 shows the amounts of encumbered and unencumbered assets held by the Group. Assets are differentiated between those that are available for potential funding needs. The table below is based on EBA reporting templates pertaining to Asset Encumbrance under CRD IV. Please note that all figures are median values based on quarter end point-in-time (PIT) figures.

Table 9.4 - EU AE1 - Encumbered and unencumbered assets

	Carrying amount of encumbered assets	of which notionally eligible EHQLA and HQLA	Fair value of encumbered assets	of which notionally eligible EHQLA and HQLA	Carrying amount of unencumbered assets	of which EHQLA and HQLA	Fair value of unencumbered assets	of which EHQLA and HQLA
	10	30	40	50	60	80	90	100
Dec-23	€m	€m	€m	€m	€m	€m	€m	€m
10 Assets	13,247	956			120,948	7,507		
30 Equity instruments	-	-	-	-	122	-	122	-
40 Debt securities	960	956	992	989	8,506	7,507	8,591	7,593
of which:								
50 covered bonds	-	-	-	-	2,434	2,434	2,436	2,436
60 securitisations	-	-	-	-	443	360	444	361
70 issued by general governments	934	934	967	967	4,362	4,299	4,447	4,385
80 issued by financial corporations	26	22	26	22	4,122	3,226	4,125	3,229
90 issued by non-financial corporations	-	-	-	-	21	-	21	-
120 Other assets	12,223	-			112,466	-		

	Carrying amount of encumbered assets	of which notionally eligible EHQLA and HQLA	Fair value of encumbered assets	of which notionally eligible EHQLA and HQLA	Carrying amount of unencumbered assets	of which EHQLA and HQLA	Fair value of unencumbered assets	of which EHQLA and HQLA
	10	30	40	50	60	80	90	100
Dec-22	€m	€m	€m	€m	€m	€m	€m	€m
10 Assets	22,374	7,371			115,325	1,875		
30 Equity instruments	-	-	-	-	107	-	107	-
40 Debt securities	8,070	7,371	7,751	7,052	2,205	1,875	2,669	2,322
of which:								
50 covered bonds	1,971	1,971	1,971	1,971	546	546	554	554
60 securitisations	-	-	-	-	67	-	67	-
70 issued by general governments	5,285	5,285	4,965	4,965	824	813	1,259	1,248
80 issued by financial corporations	2,693	2,060	2,693	2,060	1,358	1,063	1,387	1,074
90 issued by non-financial corporations	-	-	-	-	22	-	22	-
120 Other assets	13,782	-			110,287	-		

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As per Article 443, Table 9.5 below sets out the encumbered and unencumbered assets of the collateral received. Please note that all figures are median values based on quarter end point-in-time (PiT) figures.

Table 9.5 - EU AE2 - Collateral received and own debt securities issued

Dec-23	Fair value of encumbered collateral received or own debt securities issued	of which notionally eligible EHQLA and HQLA	Unencumbered	
			Fair value of collateral received or own debt securities issued available for encumbrance	of which EHQLA and HQLA
	€m	€m	€m	€m
	010	030	040	060
130 Collateral received	-	-	53	53
140 Loans on demand	-	-	-	-
150 Equity instruments	-	-	-	-
160 Debt Securities	-	-	53	53
of which:				
170 covered bonds	-	-	-	-
180 securitisations	-	-	-	-
190 issued by general governments	-	-	53	53
200 issued by financial corporations	-	-	-	-
210 issued by non-financial corporations	-	-	-	-
220 Loans and advances other than loans on demand	-	-	-	-
230 Other collateral received	-	-	-	-
240 Own debt securities issued other than own covered bonds or securitisations	-	-	-	-
241 Own covered bonds and securitisations issued and not yet pledged			2,076	-
250 Total collateral received and own debt securities issued	13,248	957		

Dec-22	Fair value of encumbered collateral received or own debt securities issued	of which notionally eligible EHQLA and HQLA	Unencumbered	
			Fair value of collateral received or own debt securities issued available for encumbrance	of which EHQLA and HQLA
	€m	€m	€m	€m
130 Collateral received	-	-	37	37
140 Loans on demand	-	-	-	-
150 Equity instruments	-	-	-	-
160 Debt Securities	-	-	37	37
of which:				
170 covered bonds	-	-	-	-
180 securitisations	-	-	-	-
190 issued by general governments	-	-	37	37
200 issued by financial corporations	-	-	-	-
210 issued by non-financial corporations	-	-	-	-
220 Loans and advances other than loans on demand	-	-	-	-
230 Other collateral received	-	-	-	-
240 Own debt securities issued other than own covered bonds or securitisations	-	-	-	-
241 Own covered bonds and securitisations issued and not yet pledged			2,166	-
250 Total collateral received and own debt securities issued	22,374	7,371		

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As per Article 443, Table 9.6 below sets out the encumbered assets and associated liabilities. Please note that all figures are median values based on quarter end point-in-time (PiT) figures.

Table 9.6 - EU AE3 - Sources of encumbrance

	Matching liabilities, contingent liabilities or securities lent	Assets, collateral received and own debt securities issued other than covered bonds and securitisations encumbered
Dec-23	10 €m	30 €m
¹⁰ Carrying amount of selected financial liabilities	6,032	7,656
	Matching liabilities, contingent liabilities or securities lent	Assets, collateral received and own debt securities issued other than covered bonds and ABSs encumbered
Dec-22	10 €m	30 €m
¹⁰ Carrying amount of selected financial liabilities	16,586	20,312

As part of managing its funding requirements, the Group from time to time encumbers assets, as collateral to support wholesale funding initiatives. This would include covered bonds, asset backed securities, securities repurchase agreements and other structures that are secured over customer loans. At 31 December 2023, €8.6 billion of the Group's assets and collateral received were encumbered, primarily through these structures within GovCo, BOIMB and BOIUK Plc. The decrease in encumbered assets is primarily due to the withdrawal of assets previously encumbered within the Group's Special Mortgage-Backed euro Promissory Note (SMBPN) programmes.

Covered bonds, a key element of the Group's long term funding strategy are issued through its subsidiary Bank of Ireland Mortgage Bank (BoIMB). BoIMB is registered as a designated mortgage credit institution to issue Irish Asset Covered Securities (ACS) in accordance with relevant legislative requirements. BoIMB is required to maintain minimum contractual overcollateralization of 5% and minimum legislative overcollateralization of 3% (both on a prudent market value basis). This is monitored by the Covered Asset Monitor on behalf of the Central Bank of Ireland. The incidence of over-collateralisation on the levels of encumbrance is treated in line with the EBA guidelines on encumbrance.

The Group manages liquidity by jurisdiction and monitors asset encumbrance by jurisdiction. At 31 December 2023, €5.2bn billion of encumbered assets are denominated in GBP, with associated liabilities of €4.0bn billion, primarily related to drawings under the Bank of England (BOE) Term Funding Scheme and Notes in circulation.

At 31 December 2023, the Group has €124.7 billion of unencumbered assets. Included in this amount are assets of €7.4bn billion which would not be deemed available for encumbrance in the normal course of business and include intangible assets, tax assets, fixed assets and derivative assets.

At 31 December 2023, the Group has €2.4bn of assets securing retained covered bonds of €2.2bn. Of these assets, €0.7bn are encumbered.

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The leverage ratio measures the level of Tier 1 capital against both on and off balance sheet exposures. As at 31 December 2023, the leverage ratio was 6.42% on a regulatory basis (31 December 2022: 6.65%).

The purpose of monitoring and managing this metric is to enable Regulators to constrain the build-up of excessive leverage, which was considered to be one of the drivers of the banking crisis.

Tables 10.1, 10.2 and 10.3 illustrate the leverage ratio calculated in accordance with Articles 429 and 499 of the CRR and a breakdown of the Group's leverage ratio exposure as at 31 December 2023 on a regulatory basis.

The European Commission has introduced a binding leverage requirement of 3%. The Group expects to remain well in excess of this requirement.

LRQua: Disclosure on qualitative items

The leverage ratio is designed to serve as an important backstop to the risk-based capital measures by constraining the build-up of leverage in the banking system and providing an extra layer of protection against model risk and measurement error.

Leverage is the extent to which a firm funds its assets with borrowings rather than equity. More debt relative to each euro of equity results in a higher level of leverage. The leverage ratio measures the extent to which a firm has financed its assets with equity. It does not take into account what those assets are, or what their risk characteristics are. Leverage ratios effectively place a cap on borrowings as a multiple of a bank's equity.

The definition of the leverage ratio is Tier 1 capital divided by total assets (which include derivatives, SFT's, undrawn balances).

The Group's capital and exposures are monitored on a monthly basis which covers both a historical and a forward looking viewpoint. When proposed transactions or movements in capital or assets are being considered the impact on the leverage ratio is taken into account. The Group closely monitors the leverage ratio to ensure all regulatory requirements and internal targets are met. In addition the leverage ratio is monitored against the Board approved Risk Appetite Statement and suite of Recovery Indicators.

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As per Article 451(1) point (b), Table 10.1 below provides a reconciliation of the total assets in BOI published financial statements under IFRS and the total leverage exposure. The template includes a breakdown of all adjustments that lead from the total assets as published in the financial statements to the Leverage Ratio (LR) exposure measure on a transitional basis, some of these adjustments are new under CRR2.

Table 10.1 - EU LR1 - LRSum: Summary reconciliation of accounting assets and leverage ratio exposures

	<u>Dec-23</u> Applicable amount a €m	<u>Dec-22</u> Applicable amount a €m
1 Total assets as per published financial statements	155,708	151,324
2 Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation	(22,474)	(20,459)
3 (Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference)	-	-
4 (Adjustment for temporary exemption of exposures to central banks (if applicable))	-	-
5 (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)	-	-
6 Adjustment for regular-way purchases and sales of financial assets subject to trade date accounting	-	-
7 Adjustment for eligible cash pooling transactions	-	-
8 Adjustment for derivative financial instruments	(2,958)	(3,836)
9 Adjustment for securities financing transactions (SFTs)	-	330
10 Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	6,340	5,489
11 (Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital)	-	-
EU-11a (Adjustment for exposures excluded from the total exposure measure in accordance with point (c) of Article 429a(1) CRR)	-	-
EU-11b (Adjustment for exposures excluded from the total exposure measure in accordance with point (j) of Article 429a(1) CRR)	-	-
12 Other adjustments	(2,424)	(2,702)
13 Total exposure measure	134,192	130,146

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As per Article 451(1), points (a) and (b) and Article 451(3) (taking into account, where applicable, point (c) of Article 451(1) and Article 451(2) CRR), Table 10.2 below provides a detailed breakdown of the components of the LR denominator, as well as information on the actual LR, minimum requirements and buffers. This information is on a transitional basis.

Table 10.2 - EU LR2 - LRCom: Leverage ratio common disclosure

	Dec-23	Dec-22
	CRR leverage ratio exposures	CRR leverage ratio exposures
	a	b
	€m	€m
On-balance sheet exposures (excluding derivatives and SFTs)		
1 On-balance sheet items (excluding derivatives, SFTs but including collateral)	129,214	126,857
2 Gross-up for derivatives collateral provided, where deducted from the balance sheet assets pursuant to the applicable accounting framework	-	-
3 (Deductions of receivables assets for cash variation margin provided in derivatives transactions)	(350)	(1,165)
4 (Adjustment for securities received under securities financing transactions that are recognised as an asset)	-	-
5 (General credit risk adjustments to on-balance sheet items)	-	-
6 (Asset amounts deducted in determining Tier 1 capital)	(2,420)	(2,685)
7 Total on-balance sheet exposures (excluding derivatives and SFTs)	126,444	123,007
Derivative exposures		
8 Replacement cost associated with SA-CCR derivatives transactions (ie net of eligible cash variation margin)	409	457
EU-8a Derogation for derivatives: replacement costs contribution under the simplified standardised approach	-	-
9 Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions	986	845
EU-9a Derogation for derivatives: Potential future exposure contribution under the simplified standardised approach	-	-
EU-9b Exposure determined under Original Exposure Method	5	16
10 (Exempted CCP leg of client-cleared trade exposures) (SA-CCR)	-	-
EU-10a (Exempted CCP leg of client-cleared trade exposures) (simplified standardised approach)	-	-
EU-10b (Exempted CCP leg of client-cleared trade exposures) (Original Exposure Method)	-	-
11 Adjusted effective notional amount of written credit derivatives	-	-
12 (Adjusted effective notional offsets and add-on deductions for written credit derivatives)	-	-
13 Total derivatives exposures	1,400	1,318
Securities financing transaction exposures		
14 Gross SFT assets (with no recognition of netting), after adjustment for sales accounting transactions	8	2
15 (Netted amounts of cash payables and cash receivables of gross SFT assets)	-	-
16 Counterparty credit risk exposure for SFT assets	-	330
EU-16a Derogation for SFTs: Counterparty credit risk exposure in accordance with Articles 429e(5) and 222 CRR	-	-
17 Agent transaction exposures	-	-
EU-17a (Exempted CCP leg of client-cleared SFT exposure)	-	-
18 Total securities financing transaction exposures	8	332
Other off-balance sheet exposures		
19 Off-balance sheet exposures at gross notional amount	19,039	17,085
20 (Adjustments for conversion to credit equivalent amounts)	(12,699)	(11,596)
21 (General provisions deducted in determining Tier 1 capital and specific provisions associated with off-balance sheet exposures)	-	-
22 Off-balance sheet exposures	6,340	5,489
Excluded exposures		
EU-22a (Exposures excluded from the total exposure measure in accordance with point (c) of Article 429a(1) CRR)	-	-
EU-22b (Exposures exempted in accordance with point (j) of Article 429a(1) CRR (on and off balance sheet))	-	-
EU-22c (Excluded exposures of public development banks (or units) - Public sector investments)	-	-
EU-22d (Excluded exposures of public development banks (or units) - Promotional loans)	-	-
EU-22e (Excluded passing-through promotional loan exposures by non-public development banks (or units))	-	-
EU-22f (Excluded guaranteed parts of exposures arising from export credits)	-	-
EU-22g (Excluded excess collateral deposited at triparty agents)	-	-
EU-22h (Excluded CSD related services of CSD/institutions in accordance with point (o) of Article 429a(1) CRR)	-	-
EU-22i (Excluded CSD related services of designated institutions in accordance with point (p) of Article 429a(1) CRR)	-	-
EU-22j (Reduction of the exposure value of pre-financing or intermediate loans)	-	-
EU-22k (Total exempted exposures)	-	-
Capital and total exposures		
23 Tier 1 capital	8,611	8,656
24 Total exposure measure	134,192	130,146
Leverage ratio		
25 Leverage ratio	6.42%	6.65%
EU-25 Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%)	6.42%	6.65%
25a Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) (%)	6.42%	6.65%
26 Regulatory minimum leverage ratio requirement (%)	3.00%	3.00%
EU-26a Additional own funds requirements to address the risk of excessive leverage (%)	-	-
EU-26b of which: to be made up of CET1 capital	-	-
27 Required leverage buffer (%)	-	-
EU-27a Overall leverage ratio requirement (%)	3.00%	3.00%
Choice on transitional arrangements and relevant exposures		
EU-27b Choice on transitional arrangements for the definition of the capital measure	Transitional	Transitional
Disclosure of mean values		
28 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	15	13
29 Quarter-end value of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables	8	2
30 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)	134,199	130,157
30a 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)	134,199	130,157
31 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)	6.42%	6.65%
31a 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)	6.42%	6.65%

As per Article 451(1) point (b), Table 10.3 below analyses the calculation of the leverage ratio exposures on a transitional basis.

Table 10.3 - EU LR3 - LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)

	<u>Dec-23</u>	<u>Dec-22</u>
	<u>a</u>	<u>a</u>
	CRR leverage ratio exposures	CRR leverage ratio exposures
	€m	€m
EU-1 Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:	128,864	125,692
EU-2 Trading book exposures	81	9
EU-3 Banking book exposures	128,783	125,683
EU-4 Covered bonds	2,564	2,305
EU-5 Exposures treated as sovereigns	39,108	43,946
EU-6 Exposures to regional governments, MDB, international organisations and PSE not treated as sovereigns	-	-
EU-7 Institutions	1,104	1,248
EU-8 Secured by mortgages of immovable properties	45,036	36,320
EU-9 Retail exposures	7,898	7,466
EU-10 Corporate	18,750	21,318
EU-11 Exposures in default	1,615	1,523
EU-12 Other exposures (e.g. equity, securitisations, and other non-credit obligation assets)	12,708	11,557

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a) Remuneration Governance

The Group Remuneration Committee (GRC) has the responsibility to consider, agree and approve a remuneration policy that supports the Group's objectives of long-term sustainability and success, sound and effective risk management and good corporate governance. The GRC held 9 meetings in 2023.

With delegated authority from the Board, the GRC annually reviews and approves the Group Remuneration Policy (GRP) and the Directors' Remuneration Policy (DRP). The GRC also reviews and approves the remuneration of the Chairman of the Board, the Executive Directors, the Group Secretary, members of the GEC and Senior Officers in Independent Control Functions, as well as overseeing the remuneration of all staff whose professional activities have a material impact on the Group's risk profile.

External consultants

The GRC was assisted in its considerations by PwC UK, who was formally appointed by the GRC as its remuneration advisor in 2020 following a review of potential advisors.

PwC UK and its network firms, provides professional services in the ordinary course of business including assurance, advisory, tax and legal advice to Bank of Ireland. The GRC is satisfied that the advice received is independent and objective and receives an annual statement setting out protocols that have been followed by PwC UK to maintain independence. There are no connections between PwC and individual Directors to be disclosed.

Scope

The Group's objective of attracting, retaining and motivating high calibre people is deemed fundamental to the successful delivery of the Group's business strategy. The Group wants to ensure the right people are in the right roles and recognises the importance that the Group's shareholders place on the operation and management of the Group's remuneration framework. The Group Remuneration Policy (GRP) provides a framework for all colleagues and directors of the Group and its wholly owned subsidiaries. To reflect this, the Group operates strong governance across the organisation on the management of its remuneration framework.

The GRP applies, in its entirety, to all Group employees, directors (including Non-executive Directors), self-employed external contractors and temporary employees in all institutions and other entities within the scope of prudential consolidation, including all branches. This Policy does not apply to Joint Ventures, which are subject to specific contractual agreements with Joint Venture partners, nor to tied agents.

Bank of Ireland (UK) plc, New Ireland Assurance Company, and J&E Davy (Davy) have their own Remuneration Policies which are consistent with the Group Policy, as far as possible, while compliant with relevant regulations, and are approved by their own board and/or board remuneration committees and their Chief People Officer equivalent role holder. Local regulations or statutory requirements will override this policy where applicable.

Material Risk Takers

Staff whose professional activities have a material impact on the Group risk profile are identified as Material Risk Takers (MRTs) and can be summarised as: the management body; senior management; other staff with key functional, managerial or risk responsibilities; and staff who individually, or as part of a committee, have authority to approve new business products or to commit to credit risk exposures and market risk transactions above certain levels. All Pre-approval Controlled Function role holders and Key function holders are identified as MRTs as well as a number of senior staff whose quantum remuneration requires them to be identified as MRTs.

Remuneration Restrictions

In November 2022, the Irish Government announced changes to the remuneration restrictions following the sell down of their shareholding in Bank of Ireland, including:

- Removal of the €500,000 cap on total remuneration.
- The ability to operate variable pay schemes, subject to a cap of €20,000, which applies to all colleagues, group wide (excluding Davy).
- The ability to implement new benefits..

The cap on variable pay of €20,000 significantly constrains the Group's ability to structure and position senior role holder's compensation packages competitively against the market. This causes significant risk for the Group in terms of the recruitment and retention of senior high calibre employees with appropriate skills. The cap also constrains the Group's ability to create a strong link between senior role holders performance and their compensation outcomes.

The Group maintains an ongoing dialogue with the Department of Finance in this regard and if the remaining restrictions were to be lifted, the Group would consider these changes and seek shareholder approval to update the existing remuneration policy, as appropriate, including the possible introduction of a market consistent variable pay scheme for Executive Directors.

b) MRT Remuneration

The Remuneration ethos is to reward employees fairly and competitively for their contribution to the Group. Reward arrangements are reviewed on a regular basis to assess competitiveness of total reward arrangements against market norms, acknowledging constraints of the Remuneration Restrictions. The following principles are applied:

o Employee focused

Seeks to reward all employees fairly and transparently, promoting the concept of 'equal pay for equal work' by operating a consistent approach to remuneration for colleagues. Reward structures are designed to attract, retain, and engage high calibre employees.

o Customer focused reward structures:

Supporting and encouraging fair treatment of customers, whilst mitigating the potential for conflict between commercial, customer and public interests within pay practices. The reward structures avoid any conflict with an employee's duty to act in the best interests of customers or clients.

o Inclusive basis

The Policy is designed and implemented on an inclusive basis, including gender-neutrality, with pay for male and female colleagues monitored on an annual basis.

o Externally aligned

The Group uses recognised external benchmarks to understand the remuneration levels of industry peers and remuneration offered by other industries who compete with the Group for talent in each of the Group's geographical locations.

o Performance aligned

Performance development plays a key role in aligning individual objectives with the Group's overall strategy, financial and non-financial goals and values. Performance outcomes, using a combination of "What" objectives and "How" behaviours, inform individual remuneration and provide a clear link between performance and remuneration.

o ESG aligned

Reward is determined taking into account the Group's performance against its environmental objectives and its customer and employee goals.

o Risk aligned

The Policy is designed to promote high performance, a strong risk management culture where risk-taking is aligned to the Group Risk Appetite Statement. All employees are required to have a risk priority in their Thrive performance development plan. Increases in remuneration and the potential awarding of variable remuneration is subject to the Group's ability to pay and on maintaining strong capital and liquidity levels.

An individual risk assessment process applies to Group Profit Share scheme (GPS) outcomes, identifying if any adjustments to the GPS award are required outside of that resulting from performance rating. This evaluation is based on an examination of all disciplinary issues and the role of an individual in relation to any material risk events identified during the performance year.

Management Body review of Group Remuneration Policy

The GRC most recently reviewed and approved the Group Remuneration Policy in December 2023. As part of this review, a number of changes were made to the policy to reflect changes to the Directors' Remuneration Policy confirmed in an advisory vote at the 2023 AGM (and as outlined in the Group's 2022 Annual Report) and the implementation of the Group Profit Share scheme (GPS) in 2023. The GPS provides all eligible employees an opportunity to share in the success of the business based on Group and individual performance.

Group Profit Share (GPS)

All employees of participating Group entities, who meet certain criteria, are eligible for a GPS award. The award considers individual and Group performance over the year. Award levels, as a percentage of salary, are consistent for all employees, based on their individual performance rating and subject to overall Group performance.

The appropriateness of the final profit share is assessed against a mix of financial and non-financial criteria, including profit, affordability, customer, and ESG measures. Awards are subject to the relevant regulatory requirements, including risk adjustment. The risk adjustment process considers the Group's overall risk profile as well as any material risk events that occurred during the year.

Awards are limited to €20,000 in line with current remuneration restrictions or tax rules.

A standard individual performance assessment process applies to all colleagues across the Group, including Executive Directors, Senior Officers in Independent Control Functions, and Material Risk Takers, with employees' personal performance development rating determining the award, subject to available funding.

An individual risk assessment process is completed each year to identify if any individual risk adjustments are required.

Remuneration of Senior Officers in Independent Control Functions

The Group defines employees of Independent Control Functions as employees of Group Risk who are in a risk management or compliance role, as well as employees of Group Internal Audit, in line with regulations. Thus, Senior Officers in Independent Control Functions are identified as the Group Chief Risk Officer and the Group Chief Internal Auditor.

The remuneration of senior officers in Independent Control Functions is directly overseen by the Group Remuneration Committee.

The remuneration of independent control functions is predominantly fixed to reflect their objectivity. Staff of the Independent Control functions, including Senior Officers, are members of the Group Profit Share scheme.

Severance payments and guaranteed variable remuneration

Severance payments comply with relevant remuneration regulations and are made in accordance with approved criteria for all colleagues. Severance payments do not reward failure or misconduct. In particular, severance payments are not awarded where there is obvious failure which allows for the immediate cancellation of a contract or the dismissal of a colleague. The Group operates standard voluntary parting terms, including optional early retirement for eligible colleagues. There is no guaranteed variable remuneration permitted. The Group does not make discretionary pension payments.

c) Risk Management

- Each employee has risk goals as part of their individual performance achievement process which informs their end of year performance rating, thereby influencing their base pay level under the annual salary review process and their GPS outcome. The Group promotes a strong risk culture where the taking of risk is aligned with risk appetite.
- Both financial and non-financial risk goals align with the Group's key principal risks; Credit risk; Market risk; Funding & liquidity risk; Life insurance risk; Capital adequacy risk; Business & Strategic risk; Operational risk (which includes Conduct risk and Regulatory risk)
- The GPS meets required regulatory steps to ensure that it is appropriate to operate the scheme each year from a risk perspective. In advance of determining a GPS pool, a robust risk assessment of the Group's risk profile and any material risk events that may have occurred during the year is completed. Following review and challenge by the Board Risk Committee, the Group Chief Risk Officer presents the outcome of this risk assessment to the GRC, reflecting on the Group's risk profile and its implications for remuneration, including the GPS pool.
- Determination of each colleague's GPS award reflects individual performance, including performance versus risk goals. Individual awards can be adjusted where misconduct has been proven or a serious error has been committed (which may include adjustment through use of malus and / or clawback).
- To support the alignment of risk and remuneration, where possible, and for good governance, there is cross-membership between the GRC and the Board Risk Committee.

d) Fixed to Variable Remuneration Ratio

The Fixed to Variable maximum ratio permissible for Group MRTs, is 1:1.

e) Alignment of Remuneration to Performance

A Group Profit Share scheme was introduced for the performance year 2023. The appropriateness of the final profit share is assessed against a mix of Group financial and non-financial criteria, including profit and related metrics, affordability, customer, and ESG measures, with the pool as a whole subject to risk assessment, all of which can result in a reduction to the pool value (including to zero). Individual outcomes are then based on year end performance ratings and any individual risk adjustments, with awards currently delivered in cash.

f) Adjustment of Remuneration to account for Long-term Performance

- GPS Awards are dependent on annual performance versus the Group's strategic objectives.
- A Fixed Share Allowance (FSA) is provided to the Executive Directors and to a limited number of members of senior management. The FSA is not subject to performance conditions but as the FSA is delivered over a multi-year period, it aligns remuneration to the shareholder experience over the same time period.
- To provide long term alignment between the experience of Executive Directors and Bank of Ireland shareholders during and post-employment, Executive Directors are required to hold 100% of salary in Bank of Ireland Group shares. Shares are to be held for 2 years post departure from the Group

g) Parameters and Rationale for components of Variable Pay schemes

The Group operates a Group Profit Share Scheme, which operates according to the following parameters:

- Consistent terms for all employees including Executive Directors.
 - Award levels, as a percentage of salary, are consistent for all employees, based on their individual performance rating and subject to overall Group performance.
 - The appropriateness of the final profit share is assessed against a mix of financial and non-financial criteria, including profit.
 - Awards are subject to the relevant regulatory requirements, including risk adjustment.
 - Awards are limited to €20,000 in line with current remuneration restrictions or tax rules.
 - A standard individual performance assessment process applies to all colleagues across the Group, including Executive Directors, with a Colleague's personal performance rating determining the award, subject to bonus pool funding.
- The purpose of the scheme is to reward colleagues for Group and individual performance.

h) Management Body Remuneration

The total remuneration for each member of the management body is disclosed in the annual report and accounts of the Group.

i) Derogation

- The Group benefits from the derogation laid down in point (b) of Article 94(3) CRD in respect of the remuneration requirements in point (l) and (m) of Article 94(1). All MRTs receive variable pay of less than €50,000 and variable pay of less than 1/3 of their total remuneration.
- 153 MRTs benefited from this derogation, with aggregate fixed pay totalling €49.8m and aggregate variable pay totalling €2.3m.

j) Large Institution Reporting

The Group is identified as a systemically important institution by the Central Bank of Ireland and thus relevant large institutions' disclosures are made. The total remuneration for each member of the management body, differentiating between Executive and Non-executive Directors, is disclosed in the below table and in the annual report and accounts of the Group, in accordance with Article 450(2) CRR.

Single Total figure of Remuneration for Executive Directors in 2023

Executive Directors	Reported year	Salary €000	Benefits €000	Pension €000	Total Fixed Pay		
					€000	Annual Bonus	Total €000
Myles O'Grady ¹	2023	950	9	95	1054	17	1071
	2022	249	7	13	269	-	269
Mark Spain ²	2023	530	-	94	624	17	641
	2022	375	2	90	467	-	467

Benefits include car allowances and, where applicable, benefits in kind.

All pension amounts have been determined by Willis Towers Watson, the Group's actuarial advisors. A bonus of €16,500 was paid for performance year 2023 to Myles O'Grady, Group CEO and to Mark Spain, Group CFO, under the terms of the Group Profit Share scheme to which all employees are members.

Single Total figure of Remuneration for Non-executive Directors in 2023

Non-executive Directors	Reported year	Fees €000	Benefits €000	Total €000
Patrick Kennedy (Chair)	2023	394	-	394
	2022	394	-	394
Richard Goulding (Deputy Chair)	2023	206	-	206
	2022	180	-	180
Giles Andrews	2023	104	-	104
	2022	94	-	94
Ian Buchanan	2023	160	-	160
	2022	169	-	169
Evelyn Bourke	2023	117	-	117
	2022	110	-	110
Eileen Fitzpatrick	2023	175	-	175
	2022	139	-	139
Michele Greene	2023	156	-	156
	2022	123	-	123
Fiona Muldoon	2023	132	-	132
	2022	174	-	174
Steve Pateman	2023	98	-	98
	2022	98	-	98
Margaret Sweeney	2023	20	-	20
	2022	-	-	-

¹ M O'Grady held the role of CFO until 31 March 2022 and was appointed CEO on 17 November 2022.

² M Spain was appointed CFO on 31 March 2022.

As per Article 450(1), point (h)(i) and (h)(ii), Table 11.1 below discloses the amounts of remuneration awarded for the financial year, split into fixed remuneration including a description of the fixed components, and variable remuneration, and the number of beneficiaries; the amounts and forms of awarded variable remuneration, split into cash, shares, share-linked instruments and other types separately for the part paid upfront and the deferred part.

Table 11.1 - Template EU REM1 - Remuneration awarded for the financial year

		a	b	c	d
		MB Supervisory function	MB Management function	Other senior management	Other identified staff
1	Number of identified staff	10	2	11	130
2	Total fixed remuneration (€m)	1.38	1.71	6.70	40.10
3	of which:				
4	cash-based	1.38	1.71	6.46	39.67
EU-4a	(Not applicable in the EU)				
5	shares or equivalent ownership interests			0.24	0.02
EU-5x	share-linked instruments or equivalent non-cash instruments				
6	other instruments				
7	(Not applicable in the EU)				
8	other forms	-	-	-	0.41
9	(Not applicable in the EU)				
10	Number of identified staff	-	2	9	117
11	Total variable remuneration (€m)	-	0.03	0.14	2.10
12	of which:				
EU-13a	cash-based	-	0.03	0.14	2.10
EU-14a	deferred				
EU-13b	shares or equivalent ownership interests				
EU-14b	share-linked instruments or equivalent non-cash instruments				
EU-14x	other instruments				
EU-14y	other forms				
15	deferred				
16	deferred				
17	Total remuneration (2 + 10) (€m)	1.38	1.74	6.84	42.20

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As per Article 450(1), point (h)(v), (h)(vi) and (h)(vii) , Table 11.2 below discloses the guaranteed variable remuneration awards during the financial year, and the number of beneficiaries of those awards; the severance payments awarded in previous periods, that have been paid out during the financial year; the amounts of severance payments awarded during the financial year, split into paid upfront and deferred, the number of beneficiaries of those payments and highest payment that has been awarded to a single person.

Table 11.2 - Template EU REM2 - Special payments to staff whose professional activities have a material impact on institutions' risk profile (identified staff)

	a	b	c	d
	MB Supervisory function	MB Management function	Other senior management	Other identified staff
1	Guaranteed variable remuneration awards - Number of identified staff			
2	Guaranteed variable remuneration awards -Total amount			
	of which:			
3	guaranteed variable remuneration awards paid during the financial year, that are not taken into account in the bonus cap			
	Severance payments awarded in previous periods, that have been paid out during the financial year			
4	Severance payments awarded in previous periods, that have been paid out during the financial year - Number of identified staff			
5	Severance payments awarded in previous periods, that have been paid out during the financial year - Total amount			
	Severance payments awarded during the financial year			
6	Severance payments awarded during the financial year - Number of identified staff			
7	Severance payments awarded during the financial year - Total amount (€m)			
	of which:			
8	paid during the financial year			
9	deferred			
10	severance payments paid during the financial year, that are not taken into account in the bonus cap (€m)			
11	highest payment that has been awarded to a single person (€m)			

As per Articles 450(1), points (h)(iii) and (h)(iv), Table 11.3 below discloses the amounts of deferred remuneration awarded for previous performance periods, split into the amount due to vest in the financial year and the amount due to vest in subsequent years and the amount of deferred remuneration due to vest in the financial year that is paid out during the financial year, and that is reduced through performance adjustments.

Table 11.3 - Template EU REM3 - Deferred remuneration

	a	b	c	d	e	f	EU - g	EU - h
Deferred and retained remuneration	Total amount of deferred remuneration awarded for previous performance periods	Of which due to vest in the financial year	Of which vesting in subsequent financial years	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in the financial year	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in future performance years	Total amount of adjustment during the financial year due to ex post implicit adjustments (i.e. changes of value of deferred remuneration due to the changes of prices of instruments)	Total amount of deferred remuneration awarded before the financial year actually paid out in the financial year	Total amount of deferred remuneration awarded for previous performance period that has vested but is subject to retention periods
1 MB Supervisory function								
2 Cash-based								
3 Shares or equivalent ownership interests								
4 Share-linked instruments or equivalent non-cash instruments								
5 Other instruments								
6 Other forms								
7 MB Management function								
8 Cash-based								
9 Shares or equivalent ownership interests								
10 Share-linked instruments or equivalent non-cash instruments								
11 Other instruments								
12 Other forms								
13 Other senior management								
14 Cash-based								
15 Shares or equivalent ownership interests								
16 Share-linked instruments or equivalent non-cash instruments								
17 Other instruments								
18 Other forms								
19 Other identified staff								
20 Cash-based								
21 Shares or equivalent ownership interests								
22 Share-linked instruments or equivalent non-cash instruments								
23 Other instruments								
24 Other forms								
25 Total amount								

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As per Articles 450(1), point (g), Table 11.4 below discloses the number of individuals that have been remunerated €1m or more per financial year, with the remuneration between €1m and €5m broken down into pay bands of €0.5m and with the remuneration of €5m and above broken down into pay bands of €1m.

Table 11.4 - Template EU REM4 - Remuneration of 1 million EUR or more per year

€m	a Identified staff that are high earners as set out in Article 450(i) CRR
1 1 000 000 to below 1 500 000	2
2 1 500 000 to below 2 000 000	
3 2 000 000 to below 2 500 000	
4 2 500 000 to below 3 000 000	
5 3 000 000 to below 3 500 000	
6 3 500 000 to below 4 000 000	
7 4 000 000 to below 4 500 000	
8 4 500 000 to below 5 000 000	
9 5 000 000 to below 6 000 000	
10 6 000 000 to below 7 000 000	
11 7 000 000 to below 8 000 000	
x To be extended as appropriate, if further payment bands are needed.	

As per Articles 450(1), point (g), Table 11.5 below discloses the aggregate quantitative information on remuneration, broken down by business area.

Table 11.5 - Template EU REM5 - Information on remuneration of staff whose professional activities have a material impact on institutions' risk profile (identified staff)

	a	b	c	d	e	f	g	h	i	j
	Management body remuneration			Business areas						
	MB Supervisory function	MB Management function	Total MB	Investment banking	Retail banking	Asset management	Corporate functions	Independent internal control functions	All other	Total
1 Total number of identified staff										153
of which:										
2 members of the MB	10	2	12							
3 other senior management					5		4	1	1	
4 other identified staff					84.8		16	24	5	
5 Total remuneration of identified staff	1.38	1.74	3.12		30.49		7.14	8.89	2.52	
of which:										
6 variable remuneration (€m)	-	0.03	0.03		1.45		0.20	0.52	0.07	
7 fixed remuneration (€m)	1.38	1.71	3.09		29.04		6.94	8.37	2.45	

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As per Article 449a CRR, the following tabs cover the qualitative and quantitative information associated with Environmental, Social and Governance risks (ESG risks).

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Table 1 - Qualitative information on Environmental risk in accordance with Article 449a CRR

Row number	Business strategy and processes
(a)	<p>Institution's business strategy to integrate environmental factors and risks, taking into account the impact of environmental factors and risks on institution's business environment, business model, strategy and financial planning</p> <p>Sustainability a core strategic pillar</p> <p>In 2023, sustainability was embedded as one of Bank of Ireland Group's three core strategic pillars, Sustainable Company, and we continued to turn our ambitions into action, delivering practical sustainability solutions that make a difference. Sitting below the Group's Sustainable Company pillar is our 'Investing in Tomorrow' Sustainability strategy. Our focus is on our material Environmental, Social and Governance (ESG) impacts and opportunities aligning to science and best practice, starting with the UN Sustainable Development Goals (SDG), the blueprint for a more sustainable future for all. Our Sustainability strategy and approach centres on three pillars: supporting the green transition, enhancing financial wellbeing and enabling our colleagues to thrive, supported by a number of foundational topics.</p> <p>Strategy</p> <p>The Group continues to make progress in achieving its objectives under its Sustainability strategy through the application of the Five-Point Action Climate Plan for the 'Supporting the Green Transition' strategic pillar.</p> <p>For further details on the Group's Five-Point Action Climate Plan, please refer to pages 17-18 of the Group 2023 Annual Report and Accounts.</p> <p>The Group conducts ongoing assessments of climate-related opportunities which informs our business plans and strategic approach to sustainable finance. The 2022 output of these assessments was factored into the Strategic refresh to 2025 announced in March 2023. In 2023, in preparation for the upcoming Corporate Sustainability Reporting Directive (CSRD), a refreshed materiality assessment, using the double materiality concept was conducted across environmental, social and governance dimensions. These materiality assessment refreshes will continue to inform the Group's strategic direction and ensure that its Sustainability strategy continues to align with the views and needs of its stakeholders.</p> <p>In 2022, the Group set decarbonisation science-based targets (SBTs), validated by the Science-Based Targets Initiative (SBTi), that cover 76% of its lending portfolio, and have reported our progress against these targets for the first time in FY2023. In line with our decarbonisation ambitions, in 2023 we set targets for sustainable financing: c.€15 billion by 2025 and c.€30 billion by 2030. For further details on progress towards these targets, please see the Group's answer to (b) below.</p> <p>The Group ESG Risk Management Framework</p> <p>The Group recognises ESG factors (including climate-related risks) represent a common risk driver across the Group's Principal Risk types. The Group ESG Risk Management Framework sets out the approach to the management of ESG risk factors in the Group. ESG risk management is relatively immature across the industry and continues to evolve. Implementation to date, in the Group and across the industry, has largely focused on climate-related risk drivers. Informed by the 2023 materiality assessment this focus is expanding to include non-climate environmental risks.</p> <p>The Group has a detailed multi-year (2021-2024) Climate Risk Implementation Plan in place to address the ECB guidance on how banks should manage climate-related and environmental risks (November 2020). The guidance sets out expectations for institutions when formulating and implementing their business strategy, governance and risk management frameworks and disclosures.</p> <p>The Climate Risk Implementation Plan is consistent with the Group's overarching Five Point Climate Action Plan (first introduced in 2021). On behalf of the Board, the Group Sustainability Committee (GSC) together with the Board Risk Committee (BRC), oversees monitoring of the Climate Risk Implementation Plan. Execution of the plan has seen the Group progressively embed climate risk and ESG considerations in business and risk management processes in line with the Board approved plan.</p> <p>Integration of Environmental risks at a Group level</p> <p>The Group defines ESG factors as environmental, social or governance matters that may have a positive or negative impact on the Group and represent a common driver across the Group's Principal risk types. The Group defines ESG risks as risks that stem from the current or prospective impacts of ESG factors on the Group that, could cause an actual or potential material negative impact on:</p> <ul style="list-style-type: none"> • the Group's earnings, franchise value or reputation; • the Group's regulatory standing; • the long-term sustainability of our customers' operations and financial wellbeing; and • the communities and environment in which we and our customers operate. <p>Furthermore, in line with the ECB's guidelines on climate-related and environmental risks and the recommendations of the TCFD, the Group defines two key sub-categories of climate-related risks and environmental risks that impact our business. These are the risks associated with the transition to a low carbon economy and from climate-related physical events.</p> <p>Guided by the Group's ESG Risk Management Framework, we are progressively embedding environmental risk into the Group's key risk processes.</p> <p>Risk identification</p> <p>On an ongoing basis, through its risk management framework, policies and processes, the Group identifies and assesses risks to which the Group is exposed, including climate-related risks.</p> <p>ESG factors impact on the Group's business model over short, medium and long-term horizons and the Group assesses the risk impact over these time horizons (forward looking analysis).</p> <ul style="list-style-type: none"> • Short term horizon: less than 3 years. • Medium term horizon: 3-5 years. • Long term horizon: more than 5 years. <p>Climate-related change presents both risk and opportunities to the Group's business model. An annual quantitative assessment for these risks was established in 2022 and has now been embedded into the Group's annual internal capital adequacy assessment process (ICAAP). This assessment is disclosed in our 2023 Annual Report on pages 31-32 and the key climate-related risk impacts can be summarised as follows:</p> <ul style="list-style-type: none"> • Credit risk: Increased costs associated with physical and transition risks may impact financial soundness of households and businesses reducing their ability to service debt and impairing asset values, resulting in financial loss to the Group through higher probability of default and higher losses given default. • Business and Strategic risk: Long-term franchise impacts if strategic commitments are not achieved by the Group and the Group's product offering does not adapt to changing market dynamics. • Operational risk: Physical risks could impact continuity of the Group's operations or operations of its material suppliers, resulting in sustained disruption of the supply chain and ultimately our ability to service customers. • Conduct risk: Potential impact if failures in product design, market practice or customer engagement lead to greenwashing claims or poor customer outcomes. <p>Financial Planning and the internal capital adequacy assessment process (ICAAP)</p> <p>Climate risk considerations are being embedded in key processes where investment decisions and associated climate risks are material. The setting of Science Based Targets is ensuring that the Group's lending portfolios are aligned with the Paris agreement and through this alignment mitigating and reducing transition risk over the period to 2030.</p> <p>The ICAAP is a key planning process for the Group and facilitates the Board and senior management in identifying, measuring and monitoring the Group's risks and ensures that the Group holds adequate capital to support its risk profile. Given the long time horizon associated with climate change, scenario analysis is considered a key tool to inform strategic direction and risk management. The Group is developing scenario analysis capabilities on an iterative basis, leveraging improvements in climate data and methodologies as they become available. Climate scenario analysis is integrated within the ICAAP process in order to increase our understanding and insights into the potential impacts of climate risk. This is a standalone analysis separate to the standard ICAAP Base and Stress analysis that focusses on longer term impacts out to 2050, beyond the standard three year time horizon of ICAAP. This scenario analysis informs climate risk materiality assessments to quantify the potential impacts across the Group's risk types that is being integrated into the Group's ICAAP capital adequacy assessment.</p>
	<p>Objectives, targets and limits to assess and address environmental risk in short-, medium-, and long-term, and performance assessment against these objectives, targets and limits, including forward-looking information in the design of business strategy and processes</p> <p>As a signatory of the UNEP FI Principles for Responsible Banking (UNPRB), the Group has committed to aligning its strategy and processes with the Paris Agreement and is actively contributing to three specific Sustainable Development Goals (SDGs) in the Environmental area: (i) SDG 7: Affordable and clean energy; (ii) SDG 11: Sustainable cities and communities; and (iii) SDG 13: Climate action.</p> <p>The GSC's responsibilities include the following:</p> <ul style="list-style-type: none"> - Monitoring the execution of the Sustainability strategy 'Investing in Tomorrow', via periodic updates. - Overseeing and making recommendations to the Board on the proposed short and long-term objectives, and ESG metrics and targets. <p>2023 updates on key targets and limits set as part of the Group's Five-Point Action Climate Plan are as follows:</p> <p>Science Based Targets (SBTs)</p> <p>In December 2022, the Group's 2030 greenhouse gas emission reduction targets were formally validated by the SBTi. Targets validated by SBTi cover the Group's own operations and 76% of its loan book, with 2020 as base year for the targets. The Group has set a target of a 49% reduction in greenhouse gas emissions from its own operations (Scope 1 and 2) by 2030. Reduction targets have also been set for emissions arising from the Group's lending activities (Scope 3) of a 48% reduction in mortgage portfolio emissions (Ireland & UK) and a 56% reduction in commercial real estate portfolio emissions by 2030, which are consistent with the levels required to meet the goals set by the Paris Agreement. In addition, 25% of the Group's corporate loan portfolio will have SBTi-validated targets by 2025.</p>

Progress to date is in line with management's expectations and is reflective of progress at a national level in terms of decarbonisation and the early stage of the Group's Sustainability strategy implementation. By FY2023 we have achieved over 85% of our own operations 2030 target and over 90% of 2025 target for long-term corporate lending:

Science Based Targets Progress Report FY2023

•Own operations:

- Absolute Scope 1 & 2 emissions (Green - down 42% versus 2030 target reduction of 49%)
- Sourcing renewable electricity (Green – c.100% versus 2025 target of 100%)
- Lending decarbonisation: Emissions intensity reduced across:
 - Residential Mortgages (Amber - down 6% versus 2030 target reduction of 48%)
 - Commercial Real Estate (Amber - down 11% versus 2030 target reduction of 56%)
 - Electricity Generation Project Finance (Green - down 28% versus 2030 target reduction of 63%)
 - SBT lending coverage:

(b)

- % Corporate customer base to have set SBTs when weighted by emissions (Green – up 23% versus 2025 target of 25%)
- % Corporate bonds to have set SBTs when weighted by investment value (Amber – up 7% versus 2025 target of 25%)

Our progress is benchmarked against convergence pathways that in general reflect a linear progression to the targets. Where our progress to date is ahead or in line with the convergence pathway, we have assigned a green RAG rating. Where our progress is lagging the convergence pathway, we have assigned an amber RAG rating as we deem the lag to be recoverable by the target date. As property retrofit activity and the anticipated effect of our strategic interventions increase, reductions are expected in the medium term, with the full impact of decarbonisation of the energy grid expected in the back end of the decade.

The achievement of these targets is informing our strategic interventions in terms of portfolio management, credit policy products and customer engagement and credit policy. By using these targets to align our lending portfolios to the Paris Agreement, the SBTs can help mitigate the climate-related credit risks associated with the green transition and ensure that we can address the opportunities to support the transition with measurable impact.

Sustainable Finance Targets

We are at the heart of the movement towards sustainability in Ireland, particularly in supporting the green transition in line with Ireland's Climate Action Plan. Our goal is to help our customers adapt to this change. A key part of our commitment is to develop financial products that support the transition. This aligns with our dedication to the UNPRB.

Our range of sustainable finance products is carefully designed to help our customers make real, impactful changes. This includes green mortgages, loans for eco-friendly cars, and business loans for small and medium-sized enterprises (SMEs) and farmers, focusing on renewable energy, capital expenditure, and sustainability-linked lending. This year, we introduced the innovative Enviroflex loan, a new funding option for farmers to encourage sustainable farming practices. In our efforts to aid corporate clients in reducing their carbon footprint and enhancing their environmental strategies, we have been offering loans with sustainability-linked pricing since 2019.

Our approach to sustainable finance supports meeting our SBTs by reducing the greenhouse gas emissions that our business finances. With this science and policy-based approach, we can focus our resources where it matters to support credible action. We offer a growing portfolio of sustainable financing products and services, supported by our Green Bond programme. Through these offerings, we seek to not only align with the national climate action plans in both Ireland and the UK, as well as the Paris Agreement, but also to provide tangible benefits to our customer base in a more sustainable way.

In line with our ambitions, in 2023 we set targets for sustainable financing: c.€15 billion by 2025 and c.€30 billion by 2030. We've made significant strides towards these goals and are on track to meet our targets. By the end of 2023, our sustainable finance portfolio grew by c.35%, reaching c.€11.1 billion.

The Group has a Sustainability Exclusion list that sets out its ESG risk appetite for lending to potentially sensitive sectors which the Group believes cause environmental and/or social harm to society and the community. In addition during 2023, the Group Limits on property energy ratings across its Commercial Real Estate and Buy to Let Residential Real Estate portfolios, with these credit policy amendments supportive of both the national agenda to retrofit existing property stock and the Group's decarbonisation Science Based Targets.

The Group has an Environmental Policy that is reviewed annually as part of the ISO 14001 Environmental Management System certification process, which the Group is currently certified against.

Current investment activities and (future) investment targets towards environmental objectives and EU Taxonomy-aligned activities

Under the 'Supporting the Green Transition' pillar of the Group's Sustainability Strategy, we commit to 'providing sustainable finance' as one of the focus areas of our Five Point plan. To help realise this, in March 2023, as part of our Strategic refresh, the Group announced sustainability-related finance targets of €15 billion by 2025 and €30 billion by 2030.

By the end of 2023, our sustainable finance portfolio grew by c.35%, reaching about €11.1 billion. We are on track to meet our targets, thanks in part to the popularity of our green mortgages, which represented c.50% of all new mortgage lending in the Republic of Ireland in 2023. Additionally, we have seen considerable annual growth in financing for renewable energy projects and electric vehicles in Ireland. The Sustainability-Linked Loan amounts disclosed in the table below are the drawn figures. The Group also monitors the commitments which has increased from €1.4 billion in 2022 to €2.7 billion in 2023 demonstrating customers' increased appetite for such products.

Sustainable Finance at FY2023* All figures €bn GCA – Gross Carrying Amount

(c)

Total	€11.1bn
Of which	
- RoI Green Mortgages	€6.5bn
- UK Green Mortgages	€1.3bn
- Green CRE	€1.7bn
- Renewables Project Finance	€0.3bn
- Electric Vehicles	€0.1bn
- Sustainability-Linked Loans	€1.2bn

* Exposures disclosed in this table comprise loans within the Group's Green Bond eligible assets portfolio, UK residential mortgages to EPC A and B rated properties and Sustainability-Linked loans.

The Group has disclosed its EU Taxonomy Green Asset Ratio (GAR) KPIs for the first time in our 2023 Annual Report on pages 42-44. It should be noted that for this first round of disclosures we have taken a conservative application of the qualifying criteria underpinning the GAR based on the guidance provided to date and currently available data. Due to these current limitations across the industry changes in this ratio in future reporting periods will be driven in part by increased data availability.

Policies and procedures relating to direct and indirect engagement with new or existing counterparties on their strategies to mitigate and reduce environmental risks

The Group has put in place specific procedures outlined in its Corporate and Business Banking ESG Risk Lending Procedures for engaging with its customers. Credit submissions and review papers are required to critically assess environmental risk factors and their impact on the financial condition of the borrowers and are addressed in the same context as any business risk or financial input. The Group requires credit submissions to explicitly comment on a borrower's ESG policies, how it is incorporated into its strategic objectives and whether these are measured and evidenced. The Group acknowledges that each industry has its own specific ESG risk factors with varying impacts on borrowers, and relationship managers apply their analysis commensurate with the challenges identified. This adds relevance where a sector appears more vulnerable and potentially faces material costs associated with transitioning to achieve wider ESG objectives. For new business/corporate customers, the Group examines environmental considerations as part of its customer onboarding due-diligence process. This process is also conducted on an annual basis for existing customers.

(d)

In addition during 2023, the Group set limits on property energy ratings across its Commercial Real Estate and Buy to Let Residential Real Estate portfolios, with these credit policy amendments supportive of both the national agenda to retrofit existing property stock and the Group's decarbonisation Science Based Targets.

As the Group continues to further review and update its credit risk policy, it has rolled out specific sustainability training programmes based on a multi-level curriculum to deliver core, foundational sustainability training to all colleagues as well as more targeted and technical skills development for select groups. Training solutions are tailored across three colleague cohorts at (1) All-Colleague, (2) Divisional; and (3) Board and Leadership levels to meet the different training outcomes being targeted. This includes all colleague training on climate concepts and processes, as well as role specific training on sustainable finance and ESG risk management tailored to the various customer facing divisions. This customer facing training covers key activities such as ESG risk management and sustainable finance, as well as sectoral deep dives on key transitional sectors such as Food & Agri, Energy and Real Estate.

In addition the Group has a Code of Supplier Responsibility which outlines its expectations of their suppliers across human rights, health and safety, supply chain, inclusion and diversity, business integrity, doing business responsibly and environmental and energy management. The Group ensures suppliers' compliance with its Code through the Financial Supplier Qualification System (FSQS) process.

Governance

Responsibilities of the management body for setting the risk framework, supervising, and managing the implementation of the objectives, strategy, and policies in the context of environmental risk management covering relevant transmission channels

ESG Governance

Sustainability at Board-level

The Board is collectively responsible for the long-term sustainable success of the Group and for ensuring there is a strong corporate structure in place, which is aligned with the Group's strategy and purpose. It provides leadership of the Group, setting strategic aims, within the boundaries of the Group's risk appetite and a framework of prudent and effective controls.

Responsibilities in respect of Sustainability and ESG strategy are delegated to the Group Sustainability Committee (GSC), which, jointly with the Board Risk Committee (BRC), is also responsible for ensuring ESG risks have been integrated into the Group Risk Management Framework.

Group Sustainability Committee (GSC)

On behalf of the Board, the GSC oversees the development and implementation of the Group's Sustainability strategy and, together with the BRC, oversees related risks, including monitoring the Climate Risk Implementation Plan. As part of that role, the GSC oversees progress against ESG targets, review of ESG-related commitments and the publication of the Sustainability Report.

Board Risk Committee (BRC)

On behalf of the Board, the BRC is responsible, jointly with the GSC, for inter alia ensuring that ESG risks are integrated into the Risk Management Framework.

Group Audit Committee (GAC)

On behalf of the Board, the GAC is responsible for inter alia monitoring the quality and integrity of the financial statements, including sustainability disclosures. The level of GAC involvement in sustainability related matters is intended to increase over the course of 2024, given enhanced disclosure requirements under CSRD.

(e)

Group Executive Committee (GEC)

The most senior executive committee in the Group, the GEC, acts in an advisory capacity to the CEO and assists the CEO in the management and leadership of the Group on a day-to-day basis. The GEC has overarching responsibility for delivery and operationalisation of the Group's Sustainability strategy, with specific executive responsibility for sustainability (including climate change) delegated to the Chief Sustainability and Investor Relations Officer (CSIRO), who reports to the Group Chief Financial Officer (CFO). Members of the GEC include the CFO, Divisional CEOs and the Chief Risk Officer (CRO).

	<p>Executive Risk Committee (ERC) The ERC supports both the GEC and the BRC, in overseeing the material risks of the Group, taking a holistic approach to overseeing the effective management of risk, including climate and environmental risks.</p> <p>Sustainability Decision Group (SDG) The SDG brings together senior business and functional management across the Group to enable a coordinated approach to sustainability objectives across the 3 pillars and to provide a discussion and decision making forum to deliver on the Group's sustainability agenda. The SDG is chaired by the CSIRO and regularly updates the GEC on progress against key initiatives.</p> <p>The Board continued to oversee the progress on the Group's sustainability strategy, targets, risk management, resourcing and disclosures. In addition, the Board monitored the Group's identification and management of climate-related risks. Methods used included our risk identification and assessment processes, integration into the Internal Capital Adequacy Assessment Process (ICAAP) and ESG and climate risk reporting.</p> <p>Terms of reference for the GSC and BRC are available on the Group website.</p> <p>The Group recognises ESG factors represent a common risk driver across the Group's Principal Risk types. The Group ESG Risk Management Framework sets out the approach to the management of ESG risk factors in the Group, which is aligned with the approach to risk management in the Group Risk Management Framework. Co-ordinated by Group Risk, an ESG Risk Working Group brings together second line of defence risk management from across the Principal Risk types (with representation from the Group first line of defence) to ensure that there is a coordinated, cohesive and challenging approach to the management of ESG and climate-related risks within the Group.</p> <p>The Board comprises of 11 Directors: 2 Executive Directors, the Chairman and 8 independent Non-Executive Directors (NEDs). For further information on the number of directorships, including external directorships, held by the Group's Board, please refer to page 79 – 84 in the Annual Report 2023. The Group Nomination & Governance Committee undertakes a rigorous and transparent procedure when considering candidates for appointment to the Board and maintains oversight of the Board's composition to ensure it remains appropriate.</p>
(f)	<p>Management body's integration of short-, medium- and long-term effects of environmental factors and risks, organisational structure both within business lines and internal control functions</p> <p>The Board monitors the Group's identification and management of climate-related risks. Methods used include our risk identification and assessment processes, integration into the Internal Capital Adequacy Assessment Process (ICAAP) and ESG and climate risk reporting. The Group's oversight and management responsibilities in relation to our Sustainability and climate commitments in 2023 are outlined on page 24 of the 2023 Annual Report.</p> <p>The Group has continued to increase its understanding of the risks and opportunities that climate change and environmental risks presents to our business strategy. In Q4 2023, we conducted an assessment involving business leaders and subject matter experts from across the Group to assess the materiality of climate change and environmental risk drivers on different risk types (e.g. credit, strategic, operational, conduct and regulatory).</p> <p>The potential impact of climate transition and physical risk drivers is assessed annually for each key risk type over the short (< 3 years), medium (3-5 years) and long-term (> 5 years) in the ICAAP process. An overview of key risk types is set out on page 31-32 of the 2023 Annual Report.</p> <p>The Group recognises ESG factors represent a common risk driver across the Group's Principal Risk types. The Group ESG Risk Management Framework sets out the approach to the management of ESG risk factors in the Group, which is aligned with the approach to risk management in the Group Risk Management Framework. Co-ordinated by Group Risk, an ESG Risk Working Group brings together second line of defence risk management from across the Principal Risk types (with representation from the Group first line of defence) to ensure that there is a coordinated, cohesive and challenging approach to the management of ESG and climate-related risks within the Group.</p> <p>Per the Group's Risk Management Framework and its Group Risk Library, ESG risk factors such as climate-related risks are managed within the framework the Group has in place for its established risk types. Therefore, the Group is integrating the management of climate risk into its existing policies, controls, reporting and operating procedures, in accordance with the ECB guidelines on the management of climate and environmental-related risk.</p> <ul style="list-style-type: none"> •First Line of Defence (1LOD): The business divisions or functions taking on risk have the primary responsibility for managing the risk generated by their actions and this includes managing ESG factors. •Second Line of Defence (2LOD): 2LOD has the responsibility for ensuring the ESG risk factors are considered when executing second line responsibilities as set out in the Group Risk Management Framework. This includes consideration as part of policy setting and taking reasonable steps to ensure the Group does not suffer outcomes outside of Risk Appetite. •Third Line of Defence (3LOD): 3LOD is responsible for ensuring the first and second lines of defence assess whether all significant risks are identified and appropriately reported by management to the executive and board of management, as well as assessing whether risks are adequately controlled.
(g)	<p>Integration of measures to manage environmental factors and risks in internal governance arrangements, including the role of committees, the allocation of tasks and responsibilities, and the feedback loop from risk management to the management body covering relevant transmission channels</p> <p>Refer to the Group's answers to: (a) above for details on the Group's Board tasks and responsibilities in managing environmental factors and risks within internal governance arrangements. (e) above for details on the Group's organisation of Board committees (BRC and GSC) related to environmental risk and allocation of tasks and responsibilities within those committees to monitor and manage environmental risk.</p> <p>The Group has a reporting line between the BRC, GSC and the Board covering environmental factors and risks. The GSC and BRC receive quarterly updates related to environmental risks and the Board receives monthly updates via the Board Risk Report. The BRC/GSC holds a joint meeting on at least an annual basis and the Board is updated accordingly on ESG Risk.</p>
(h)	<p>Lines of reporting and frequency of reporting relating to environmental risk</p> <p>There is Board-level oversight of climate-related risks within the Group, provided by the Board and its GSC and BRC. The Board, GSC and BRC are supported by: - Sustainability and climate advisory forums comprising the Sustainability Decision Group and the ESG Risk Working Group - Sustainability and climate executive oversight is provided by the GEC and the Executive Risk Committee (ERC) For further details on the Group's governance arrangements, please refer to the Group's TCFD report (page 24) in the Annual Report 2023. For further details on internal reporting frequency, refer to the Group's answers to (a) and (g) above.</p> <p>The Board Risk Report (BRR) is used by the Group to review and monitor the Group's risk profile across all Principal risks, compliance with risk appetite and risk policies. The BRR is subject to review by the ERC prior to review by the Group's Board and BRC. The BRR is the primary source of reporting for the impact of ESG-related risks on the Group's risk profile and is submitted monthly to the Board; with a more detailed report submitted quarterly.</p> <p>This is supplemented by an annual ESG Risk Deep Dive presented to the BRC and GSC by the second line of defence. This deep dive addresses how climate risk management is embedded across the Group's management of its Principal Risks in terms of policies, processes and controls.</p> <p>In addition Climate KPI and Risk Management Reporting is also provided to the GEC and GSC on a quarterly basis, with the reporting also considered by the Board Risk Committee (BRC) as part of joint sessions of the GSC/BRC. This facilitates key risk metrics on the lending portfolio to be monitored by the Board on a quarterly basis, aligned to Pillar 3 ESG Reporting to ensure transparency and comparability. These include the following key metrics on the credit lending portfolio including credit concentrations: -Credit concentrations to sectors most sensitive to climate change; -The energy efficiency profile of property lending portfolios (RRE and CRE); -Geographical credit concentrations exposure to physical climate risks; -Emission reduction progress against Science Based Target pathways; and -Sustainable Finance Lending Volumes progress against Strategic Targets.</p>
(i)	<p>Alignment of the remuneration policy with institution's environmental risk-related objectives</p> <p>In November 2022, the Irish Government announced that a number of crisis-era restrictions related to remuneration were being lifted in respect of the Group, including the blanket prohibition on variable pay. Reintroducing an element of variable pay will allow us to better link remuneration to delivery for customers and the achievement of our long term strategic and commercial goals.</p> <p>As announced in the Group's strategy refresh in March 2023, 'Sustainable Company' is now one of the core strategic pillars of the Group, of which supporting wider society is a key focus area. With 'Sustainable Company' now a core strategic pillar, ESG is mainstreamed into our performance management system.</p> <p>The Group introduced a performance-related Profit Share Scheme which will see colleagues rewarded based on both the financial and operating performance of the company and individual performance during 2023. The appropriateness of the annual profit share is assessed against a mix of financial and non-financial criteria, including profit and related metrics, affordability, customer, and ESG, with the pool as a whole subject to risk adjustment. Environmental criteria include progress on our Green Transition strategic targets. The appropriateness of the final profit share will be assessed against a mix of financial and non-financial criteria, including profit and related metrics, affordability, customer, and ESG, with the pool as a whole subject to risk adjustment.</p>
Risk management	
(j)	<p>Integration of short-, medium- and long-term effects of environmental factors and risks in the risk framework</p> <p>On an ongoing basis, through its risk management frameworks and processes, the Group identifies and assesses risks to which the Group is exposed to, including climate risks. Due to the longer timeframes associated with climate impacts, a short, medium, and long-term horizon, as referenced in (e) above, is being applied to the consideration of impacts.</p> <p>The Group continues to embed climate-risk considerations into key risk reporting, as referenced in (g) above.</p>
(k)	<p>Definitions, methodologies and international standards on which the environmental risk management framework is based</p> <p>The Group ESG Risk Management Framework This framework sets out the approach to the management of ESG risk factors in the group. ESG risk management is relatively immature across the industry and continues to evolve. Implementation to date, in the Group and industry, has largely focused on climate-related risk drivers. During 2023, the focus of ESG risk management in the Group has expanded to include non-climate environmental risks.</p> <p>Our strategic commitment to supporting our customers' green transition is underpinned by our management of the risks associated with climate change. We do this by embedding climate-related impacts in key decision making processes.</p> <p>The Group has a detailed multi-year (2021-2024) Climate Risk Implementation Plan in place to address the ECB guidance on how banks should manage climate-related and environmental risks (November 2020). The guidance sets out expectations for institutions when formulating and implementing their business strategy, governance and risk management frameworks and disclosures.</p> <p>The Climate Risk Implementation Plan is consistent with the Group's overarching Five Point Climate Action Plan (first introduced in 2021). On behalf of the Board, the Group Sustainability Committee (GSC) together with the Board Risk Committee (BRC), oversees monitoring of the Climate Risk Implementation Plan. Execution of the plan has seen the Group progressively embed climate risk and ESG considerations in business and risk management processes in line with the Board approved plan.</p> <p>The Climate Risk Implementation Plan is consistent with the Group's overarching five-point climate action plan and has been jointly approved by the BRC and GSC. The Climate Risk Implementation Plan is a key step in progressively aligning the Group to the ECB guidelines on climate risk management in respect of strategy, risk governance and measurement. Progress continues to be made on embedding climate risk and ESG considerations in business and credit processes in line with the Board approved plan.</p>

	<p>Processes to identify, measure and monitor activities and exposures (and collateral where applicable) sensitive to environmental risks, covering relevant transmission channels</p> <p>Supporting the green transition also requires the Group to assess its own resilience to climate change. To address this requirement, the Group is taking steps to develop scenario analysis and stress testing capabilities in-line with emerging industry methodologies. Forward-looking climate scenarios are being used to manage climate-related risks and explore the resilience of the Group to physical and transition risks. We have further built on initial methodology developments and in 2023 developed scenarios internally to assess these impacts. As these methodologies continue to develop, we will be progressively drawing on our scenario analysis to inform our corporate strategy, business model and financial plans.</p> <p>During 2023, we continued to develop and test scenario analysis methodologies to quantify the potential impact of climate related risks across our commercial and retail customer lending portfolios from transition and physical risk drivers. Climate scenario analysis is integrated within the ICAAP in order to increase our understanding and insights into the potential impacts of climate risk.</p> <p>The ICAAP is a key planning process for the Group and facilitates the Board and senior management in identifying, measuring and monitoring the Group's risks and ensures that the Group holds adequate capital to support its risk profile.</p> <p>We have integrated climate into the ICAAP and its broader scenario analysis framework to assess the impacts of climate on different risk types (e.g. credit, business, operational, conduct and regulatory). The potential impact of transition and physical risk drivers is assessed for each key risk type over the short (< 3 years), medium (3-5 years) and long-term (> 5 years). An overview of key risk types is set out on page 31-32 of the 2023 Annual Report.</p> <p>The Group has continued to increase its understanding of the risks and opportunities that non-climate environmental risks presents to our business strategy. In Q4 2023, the Group conducted an initial double materiality assessment as part of the Group's CSRD preparations. We conducted an assessment involving business leaders and subject matter experts from across the Group to assess the materiality of climate change and environmental risk drivers on different risk types (e.g. credit, strategic, operational, conduct and regulatory).</p> <p>(l) This ongoing materiality assessment activity is supplemented by an annual ESG Risk Deep Dive presented to the BRC and GSC by the second line of defence. This deep dive addresses how climate risk management is embedded across the Group's management of its Principal Risks in terms of policies, processes and controls.</p> <p>In addition Climate KPI and Risk Management Reporting is also provided to the GEC and GSC on a quarterly basis, with the reporting also considered by the Board Risk Committee (BRC) as part of joint sessions of the GSC/BRC. This facilitates key risk metrics on the lending portfolio to be monitored by the Board on a quarterly basis, aligned to Pillar 3 ESG Reporting to ensure transparency and comparability. These include the following key metrics on the credit lending portfolio including credit concentrations:</p> <ul style="list-style-type: none"> -Credit concentrations to sectors most sensitive to climate change; -The energy efficiency profile of property lending portfolios (RRE and CRE); -Geographical credit concentrations exposure to physical climate risks; -Emission reduction progress against Science Based Target pathways; and Sustainable Finance Lending Volumes progress against Strategic Targets. <p>In terms of portfolio mix, the Group has no direct exposure to fossil fuels in energy and extraction, and as a predominantly retail lending bank, c.70% of our customer lending is in residential and commercial property and car finance.</p> <p>The breakdown table on page 33 of the Group's 2023 Annual Report shows the current composition of our commercial lending portfolio and the percentage of lending to sectors the Group considers most sensitive to climate change. This assessment also highlights that the Group's direct exposure to fossil fuels and to commercial lending segments with high emissions is relatively low (with the exception of the agricultural sector, which due to its specific challenges will require broader support in which we will play an active role. This year, we introduced the innovative Enviroflex loan, a new funding option for farmers to encourage sustainable farming practices.).</p> <p>In terms of the Group's property lending portfolios the energy efficiency of the property stock is monitored quarterly – see table on page 34 of the Group's 2023 Annual Report. Quarterly monitoring of physical risks is also conducted with a property level assessment of property collateral exposure to heightened flood risk - see pages 35-36 of the Group's 2023 Annual Report.</p>
	<p>Activities, commitments and exposures contributing to mitigate environmental risks</p> <p>The Group's key risk mitigation strategy is as follows:</p> <p>(i) The Group has committed to Science Based Targets aligning our lending portfolios on a pathway to the Paris Agreement and reducing the carbon emissions that we finance. This portfolio alignment will additionally build resilience against climate-related risks as we progressively embed climate-related considerations into our lending strategies; and</p> <p>(ii) The Group has committed to supporting our customers' transition to the green economy with sustainable financing to improve the energy efficiency of their properties, vehicles and business operations and adapting to climate change.</p> <p>In 2022, the Group's 2030 greenhouse gas emission reduction targets were formally validated by the Science Based Targets initiative (SBTi). For more information, refer to (b) above.</p> <p>The Group finances the development of renewable energy assets, green mortgages, sustainable transport, and the national decarbonisation agenda that aligns with the SDGs identified in (b) above. The Group has aligned its lending strategy, which includes the Sustainability Exclusion List, to minimise its exposures to environmental high-risk sectors. In addition during 2023, the Group set limits on property energy ratings across its Commercial Real Estate and Buy to Let Residential Real Estate portfolios, with these credit policy amendments supportive of both the national agenda to retrofit existing property stock and the Group's decarbonisation Science Based Targets.</p> <p>The Group continues to develop methodologies to enable climate and environmental risk to be actively measured and monitored in a similar manner to other key risk types. These methodologies are being developed collaboratively with peer institutions through engagement in industry initiatives (such as the UNEP FI TCFD Working Group and climate-focused European Banking Federation Working Groups).</p> <p>(m) The Group has continued to increase its understanding of the risks and opportunities that non-climate environmental risks presents to our business strategy. In Q4 2023, we conducted an assessment involving business leaders and subject matter experts from across the Group to assess the materiality of climate change and environmental risk drivers on different risk types (e.g. credit, strategic, operational, conduct and regulatory).</p> <p>This assessment was undertaken as part of our preparation for our first CSRD compliance report for 2024, using a Double Materiality (DMA) assessment approach which takes both an "inside-out" approach (i.e. Impacts (I) that the Group has on sustainability matters) and an "outside-in" approach (i.e. Risks (R) and Opportunities (O) that may be generated by sustainability matters that can have financial effects on the Group).</p> <p>To progress further action on nature, through 2023, we participated in several key initiatives to help us improve our understanding of our impacts, dependencies, risks and opportunities. This included participation in the Taskforce for Nature-Related Financial Disclosures (TNFD) Forum, the Partnership for Biodiversity Accounting Financials (PBAF), and the UNPRB Nature Target setting working group. We were also one of six inaugural partner organisations that supported the development of the first Irish Business and Biodiversity Platform.</p> <p>The Group has integrated climate KPIs in its strategic planning framework to ensure its progress against objectives laid out under the Sustainability strategy is measurable.</p> <p>These activities form the foundation of the Group's future risk analysis and target setting activities, leading to mitigation activities to help reduce future environmental risks to the Group, as well as to improve the Group's impact on the external environment.</p>
	<p>Implementation of tools for identification, measurement and management of environmental risks</p> <p>In identifying, measuring and managing environmental risk, the Group uses the following tools:</p> <p>(n) •Scenario Analysis - Given the long time horizon associated with climate change, scenario analysis is considered a key tool to inform strategic direction and risk management. The Group is developing scenario analysis capabilities on an iterative basis, leveraging improvements in climate data and methodologies as they become available. Climate scenario analysis is integrated within the ICAAP process in order to increase our understanding and insights into the potential impacts of climate risk.</p> <p>•Transition Pathways – Our decarbonisation Science Based Targets are independently validated based on their alignment to internationally recognised transition pathways. We RAG rate our progress towards our targets based on these transition pathways as a key assessment tool of our level of progress.</p> <p>•Third Party Data Models – We integrate third party data sources and models to ensure coverage and insight on key climate risk factors including physical risks, primarily flood risk and transition risk – company emissions and property energy ratings.</p> <p>•Credit Procedures - Corporate and commercial lenders are required to implement the requirements of the ESG screening process and incorporate ESG and climate change as a key credit risk which should be formally noted / documented where applicable in the credit rating and application process in the same way as other credit risks relevant to a transaction are highlighted and mitigants detailed.</p> <p>•Through our membership of the Financial Supplier Qualification System (FSQS), our on-line portal enables suppliers to submit environmental information and compliance data about their organisation.</p>
	<p>Results and outcome of the risk tools implemented and the estimated impact of environmental risk on capital and liquidity risk profile</p> <p>(o) See response to (l) above which addresses how we have integrated climate into the ICAAP and its broader scenario analysis framework to assess the impacts of climate on different risk types.</p> <p>For each Principal risk type the potential impact of transition and physical risk drivers is assessed for each key risk type over the short (< 3 years), medium (3-5 years) and long-term (> 5 years), with materiality categorised across four buckets (Negligible; Low; Moderate; and Significant). An overview of key risk types is set out on page 31-32 of the 2023 Annual Report.</p> <p>The impact on capital adequacy is from the risk of increased capital depletion from the aggregated impact of climate risks across the Group's other Principal risks. It is categorised as significant and is incorporated into the quantitative assessment of the Group's capital adequacy under the ICAAP Economic Perspective.</p> <p>Climate risk scenario analysis for funding & liquidity risk integrated into the Group's internal liquidity adequacy assessment process (ILAAP) as well as the ICAAP. The Group's liquidity risk profile does not include instruments where climate concerns may significantly impact funding and liquidity pools. Based on ongoing scenario analysis, impact materiality is classified as negligible.</p>

(p)	<p>Data availability, quality and accuracy, and efforts to improve these aspects</p> <p>Given the criticality of data to the climate risk management agenda, a multi-year data and technology roadmap was developed as part of the 2022 planning cycle to support delivery of the data needed to meet the evolving requirements on an agile and iterative basis. The roadmap saw an initial focus in 2022 on aggregating a golden source of data to support upcoming external and regulatory reporting requirements and to support progressive enhancements to risk management methodologies and reporting. Third party data has been onboarded from Moody's and JBA Risk Management to provide data insights on physical risks, including flood risk assessments across residential and commercial property in the Republic of Ireland and the United Kingdom. Modelled estimates by ICE Data Services on emissions and transition risk impacts have been integrated during 2023 to supplement internal data collection and analysis on the Group's portfolios. This developing capability was strengthened further in 2023 with the development focus moving to integrate ESG/climate data in front-end systems to aid credit and pricing decisions and support customers' transition plans.</p> <p>Climate KPI and Risk Management Reporting is centrally produced on a quarterly basis by the Group Sustainability function within Group Finance, with internal reporting definitions and data structures aligned to external Pillar 3 ESG Reporting to ensure transparency and comparability. This centralised reporting dataset also forms the basis for forward looking scenario analysis to assess climate and environmental risk drivers.</p> <p>The Group is continually developing its capabilities in this space given the expanding data requirements to meet the needs of stakeholder and the Group's reporting obligations under CSRD. As part of our preparation for our first CSRD compliance report for 2024, the results of the Double Materiality assessment (DMA) undertaken in Q4 2023 is shaping our future ESG data collection strategy and informing the basis of the Group's CSRD reporting approach.</p>
(q)	<p>Description of limits to environmental risks (as drivers of prudential risks) that are set, and triggering escalation and exclusion in the case of breaching these limits</p> <p>The Group's Corporate & Business Banking has published a Sustainability Exclusion List that sets out the Group's risk appetite for lending to potential environmentally sensitive sectors. This List applies to all new lending and customer service arrangements ensuring that the Group does not provide financing to customers who are deemed to engage in a defined list of excluded business activities. Any cases considered a heightened ESG risk during initial review will be subject to 'Enhanced Review' and will be considered by an ESG Risk Forum in addition to Corporate & Commercial Credit. The Group embeds these exclusions at the origination stage to ensure that these criteria continue to evolve in line with the Group's Sustainability strategy.</p> <p>The Group has aligned its Screening Criteria to its Sustainability Exclusion List. For further details on this process and its governance arrangements, please refer to the Group's disclosure in Governance Risk Template. In addition during 2023, the Group set limits on property energy ratings across its Commercial Real Estate and Buy to Let Residential Real Estate portfolios, with these credit policy amendments supportive of both the national agenda to retrofit existing property stock and the Group's decarbonisation Science Based Targets. Any breaches to these restrictions are escalated in the same manner as any credit exception as set out in the Group's Risk Management Framework.</p>
(r)	<p>Description of the link (transmission channels) between environmental risks with credit risk, liquidity and funding risk, market risk, operational risk and reputational risk in the risk management framework</p> <p>Both transition and physical risks can affect the creditworthiness of our customers and the stability of our lending portfolios, as well as the value of assets in the medium to long term. These climate risk drivers can intensify risks to the Group, impacting across existing key risk categories including, but not limited to:</p> <ul style="list-style-type: none"> • Credit risk: Increased costs associated with physical and transition risks may impact financial soundness of households and businesses reducing their ability to service debt and impairing asset values, resulting in financial loss to the Group through higher probability of default and higher losses given default. • Business and Strategic risk: Long term franchise impacts if strategic commitments are not achieved by the Group and the Group's product offering does not adapt to changing market dynamics • Operational risk: Physical risks could impact continuity of the Group's operations or operations of its material suppliers, resulting in sustained disruption of the supply chain and ultimately our ability to service customers. • Conduct risk: Potential impact if failures in product design, market practice or customer engagement lead to greenwashing claims or poor customer outcomes. <p>Climate risk can also have reputational impacts if the Group fails to meet investor, customer, community and regulatory expectations.</p> <p>On an ongoing basis, through its risk management frameworks and processes, the Group identifies and assesses risks to which the Group is exposed. The Group ensures appropriate identification of risk through both top-down and bottom-up risk identification processes. A standard risk library is used to categorise all of the Group's risks in a consistent manner. Principal Risks are the highest-level categorisation used to assist with identifying, assessing, monitoring and mitigating risks to which the Group is exposed. ESG factors represent a common risk driver across the Group's Principal Risk types. The Group ESG Risk Management Framework sets out the approach to the management of ESG risk factors in the Group.</p>
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Table 2 - Qualitative information on Social risk in accordance with Article 449a CRR

Row number	Business strategy and processes
	<p>Adjustment of the institution's business strategy to integrate social factors and risks taking into account the impact of social risk on the institution's business environment, business model, strategy and financial planning</p> <p>Strategy and processes As noted above, social factors have been considered within the Group's Sustainability strategy. The Group's Sustainability strategy takes into account changes in technology, business, environmental and stakeholder preferences, reflecting key social factors, under the 'Enhancing financial wellbeing', 'Enabling colleagues to thrive' and 'Foundations' pillars.</p> <p>The activities below demonstrate the ongoing implementation of the Group's Sustainability strategy to integrate social factors and risks. In addition the Group conducted an initial double materiality assessment in the second half of 2023 as part of the Group's CSRD preparations. The results will also help inform our continuing actions on social factors and risks thereby ensuring our strategy implementation continues to support the requirements of our stakeholders and society.</p> <p>'Enhancing financial wellbeing':</p> <ul style="list-style-type: none"> •Fostering financial inclusion – The Group's ambition is to ensure inclusive and effective access to products and services for priority groups, striving to leave no one behind on the journey to financial health. • Improving financial literacy and capability – The Group's ambition is to empower people (including colleagues) with the knowledge and skills to help improve their financial literacy and capability which are key building blocks on the journey to financial health. • Building a more financially resilient and confident Ireland - The Group's ambition is to increase the number of customers and colleagues who have the resilience to withstand the financial impact of an unexpected day-to-day expense or a major life event. <p>'Enabling Colleagues to Thrive':</p> <ul style="list-style-type: none"> • Build a future ready workforce - An essential part of our people strategy is developing growth skills and capabilities. • Create a differentiated colleague experience - We continue our journey to be an employer of choice through leading edge colleague supports, flexibility and an enhanced reward proposition. • Simplify our ways of working - Our hybrid work model recognises that one size does not fit all enabling teams and leaders to interpret hybrid working for their unique needs and purposes. <p>'Foundations': To enable the Group to operate as a sustainable company, it is crucial that we have solid foundations. Transparently managing, monitoring and disclosing against these foundational topics supports the Group's efforts to build and maintain the trust we have with our key stakeholders. Our Foundation topics consist of: Sourcing responsibly, Business ethics, Financial Crime, Health & Safety, Culture, Human Rights, Cyber Security, Data protection and Community Investment.</p>
	<p>Outcomes 2023: We made significant progress on our social commitments in 2023 with examples of key Group activities under each of our key strategic headings below.</p> <p>Financial Wellbeing: Under the 'Enhancing financial wellbeing' pillar of the Group's Sustainability strategy, the Group strives to leave no one behind on the journey to financial health. We continue to be the #1 bank for financial wellbeing in the Irish market and have made the following progress during 2023:</p> <ul style="list-style-type: none"> • Fostering financial inclusion - Our ambition is to ensure inclusive and effective access to products and services for priority groups, striving to leave no one behind on the journey to financial health. <ul style="list-style-type: none"> - Our Vulnerable Customer Unit (VCU) has supported c.33,000 customers since its establishment in 2019. It is fundamental to promoting financial inclusion amongst prioritised groups and provides enhanced expert banking support to customers in vulnerable circumstances or situations. - In 2023, we launched our 'Extra Help Hub' which centralizes information on our website on all the additional supports available to customers, families, carers and advocates across a range of topics e.g. safeguarding people, accessibility and assistance. - The Assisted Decision Making Capacity Act came into effect in Ireland in April 2023 ensuring that every person is treated individually and that certain groups of people are not automatically deemed to lack capacity. We are currently working with the Irish Alzheimer's Society and the Health Service Executive (HSE) to build a training and education programme, so all branches can become 'Dementia Friendly' by the end of 2024. • Improving Financial Literacy - Our ambition is to empower people with the knowledge and skills to help improve their financial literacy and capability which are key building blocks on the journey to financial health. <ul style="list-style-type: none"> - Championing youth financial education is a key focus for us. Our award winning financial literacy programmes continue to grow year-on year with more than 100,000 students participating in the 2022/2023 school year. During 2023, we provided financial education to over 17,700 customers, colleagues and communities. - Through Mi365, our in-app money management tool, we have delivered over 133 million personalised insights and tailored nudges to customers since launch enabling them to understand and manage day-to-day spending, stay in control of their finances, and enhance their financial wellbeing.
	<ul style="list-style-type: none"> • Building a more financially resilient and confident Ireland – Our ambition is to increase the number of customers and colleagues who have the resilience to withstand the financial impact of an unexpected day-to-day expense or a major life event. <ul style="list-style-type: none"> - We strengthened our commitment even further by publishing our United Nations Principles for Responsible Banking (UNPRB) Financial Health and Inclusion targets, one of 23 banks globally to do this (Please see published targets: https://www.unepfi.org/wordpress/wp-content/uploads/2023/07/PRB-Fin-Health-progress-report-1.pdf#page=15). This sets out our commitment to support universal financial inclusion and a banking sector that supports its customers' financial health (for further details see Section (b) below). Our commitment focuses on supporting our customers' day-to-day and life event financial resilience. - In 2023, to support customers with 'money worries' we launched a 'Money Worries Hub' on our website and set up a dedicated helpline. This will continue to be a key focus area for 2024. We also continued to build awareness and protect customers against the growing threat of fraud, encouraging customers not to immediately react to potentially fraudulent texts or click on suspicious links but instead 'Stop, Think, Check'. • Fraud Prevention: The Group runs a comprehensive consumer fraud awareness programme in Ireland as a central part of its commitment to safeguarding the financial wellbeing of its customers. Across the Group 225 colleagues are now solely dedicated to fraud prevention and protection, the provision of 24/7 phone support to customers every day of the year, and the detection of financial crime. In February 2024 the Group announced an investment of €50 million on customer fraud prevention and protection. The investment includes €15million on new fraud prevention technology, along with a range of high-profile consumer awareness campaigns and support for customers who are targeted by fraudsters. The majority of members of the Irish public surveyed see Bank of Ireland as the financial institution most associated with educating the general public about fraud (Red C, Feb '24). This latest investment enhances the Bank's response to this important social issue, and includes a nationwide series of free fraud awareness events for consumers.
(a)	<p>Colleague Wellbeing</p> <ul style="list-style-type: none"> • Inclusion and Diversity <ul style="list-style-type: none"> - As part of our commitment to transparency around Inclusion and Diversity (I&D) at Bank of Ireland, we have voluntarily published a Gender Pay Gap figure since 2020. In 2022, Bank of Ireland Group and its subsidiaries reported under the new 'Gender Pay Gap Information Act 2021' which came into law in Ireland on 31 May 2022. Gender imbalance at senior levels is a significant contributor to the gender pay gap at Bank of Ireland, which was 21% for 2022. This means we have proportionately more female colleagues in junior roles and proportionately fewer female colleagues in senior roles. For this reason, in 2018 Bank of Ireland announced a target to establish 50:50 gender balance in appointments to senior management and leadership. We saw 46% female leadership appointments in 2023 (40% in 2022) with an ongoing commitment to achieve a 50:50 ratio. - In 2023, we launched our refreshed three year I&D strategy and made strong progress against our gender, ethnicity, sexual orientation and disability diversity ambitions. We achieved the Gold Investors in Diversity EDI Mark. 14% of new joiners self-declared as ethnic minority against the 2022 Irish CSO data of 7%. This progress is also evident through our 'Investors in Diversity Gold Employer and 'Investing in Ethnicity' accreditations. - We progressed our inclusive education journey through targeted initiatives for the Board and Group executives focusing on unconscious bias training. - We also introduced an Inclusion Passport allowing colleagues with health conditions, disabilities, and caring responsibilities to communicate their unique needs and preferences to colleagues and managers. - Neuroinclusion strategy - We aim to create a working environment where everyone can thrive. We partnered with Auticon, a social enterprise that supports organisations to become more neuroinclusive. In Q2 2023, we commenced delivery of our 3 year neuroinclusion strategy to create a better experience for neurodiverse colleagues and customers, which focuses on Neurodiversity education and improvements to processes, policies and accommodations. • Family Matters - We offered further enhanced supports to women and families through our Family Matters initiative including, Surrogacy and Adoptive leave, 6 weeks paid paternity leave, and paid provisions for early pregnancy loss. Additionally, we launched progressive policies covering domestic violence, fertility and menopause leave. • Wellbeing - We are committed to being an employer that promotes opportunities to connect and improve social fitness, leveraging the flexibility of our hybrid working model. In 2023, colleagues participated in a number of social connection and engagement activities across the business including c.2,500 participants in Bank of Ireland's fittest teams, a 3 week fitness programme and further investment in mental health training for all colleagues. • Culture Embedding and Engagement - Through colleague feedback, we also refined our values to better align with our updated strategy. We have embedded our values across the Group and we have seen a year on year increase in colleague score for Culture Embedding and Engagement. • Future Ready Workforce <ul style="list-style-type: none"> - Our Emerging Careers programme continues to mature, providing people from all backgrounds with opportunities to enter the workforce. In 2023, we grew our community engagement initiatives in collaboration with Business in the Community Ireland. - We launched 11 new programmes as part of our Delivering Equality of Opportunity in Schools programme, specifically designed to enhance numeracy and literacy skills and aid in planning for future careers.

Foundational: In terms of its foundational activities, the Group has made the following progress during 2023:

- **Community investment:** We recognise our role in supporting the local communities where our customers live and work and it is an important part of our sustainable business activity. Our approach is focused on providing financial support to local not-for-profits, community groups and social enterprises who are working to address social issues and make a lasting change in their communities.
 - **Social Housing:** In addition, in support of the social need in Ireland and our UN PRB objectives, in February 2024 the Group announced it is increasing available funding for housing development to €2.5 billion by 2026. This announcement represents a 40% increase in funding available for home building, with the ambition to support the construction of 25,000 units of all types including houses and large and smaller scale apartment developments. As part of this package, available funding for social and affordable housing will more than double, from €400 million currently to €1 billion.
 - **First Home Scheme:** Bank of Ireland joined the First Home Scheme in 2022, a joint venture between the Irish State and the Irish retail banking sector. As a founding participant this will see the bank invest €70m into the scheme designed to help qualifying first time buyers purchase their own home by bridging the affordability gap between their deposit and mortgage, and the price of their first home.
 - **Begin Together:** In 2023, we provided support to a range of local initiatives working to foster inclusion and build capability amongst underserved groups across the island of Ireland through our Begin Together platform.
 - In 2023, the Community Fund in partnership with Community Foundation for Ireland distributed c.€500,000 to 20 organisations delivering initiatives spanning financial literacy and wellbeing, mental health, inclusion and diversity.
 - Our 2023 community activity brings our total community investment to c.€7.1 million since 2020.
 - We also recognise that sometimes there is a need for direct support. That is why in 2023 we provided a further c.€1.0 million of funding to support those most impacted by the cost-of-living crisis through a dedicated fund. This was fast tracked to organisations working directly with impacted groups.

• **Financial crime:** Protecting the integrity of the financial system from financial crime risks including money laundering, terrorist financing, bribery and corruption is of paramount importance to us. We are committed to playing our part in safeguarding the financial systems and our customers from the impact of financial crime. The Group's Financial Crime Framework, including our policies and procedures support this objective. All colleagues complete mandatory training and assessments annually, so that the Group's policies and procedures are embedded in operational activities.

• **Sourcing responsibly:** It is important that our supply partners who deliver goods and services to the Group, share our values and ambition to create a sustainable future. For this reason, we continue to review and update our Code of Supplier Responsibility which sets out the responsible business practices we expect of all our suppliers. This Code is further supported by our Group Procurement and Group Environmental policies.

• **Human rights:** Several policies and initiatives, including our Code of Supplier Responsibility, Modern Slavery Statement and Vulnerable Customer Unit, guide our approach to ensure that modern slavery and human trafficking does not affect our business or our supply chain. We have put in place Human Trafficking Awareness training and all staff have a legal obligation to report any suspicious activities that may indicate possible human trafficking, including modern slavery and sexual exploitation.

• Through the work of our Financial Crime Compliance team, in partnership with global non-governmental organisation (NGO), 'Stop the Traffic' and An Garda Síochána Protective Services Bureau, we are active in helping to identify and disrupt money flows from human trafficking and in improving the accessibility of financial services to victims of human trafficking.

• **Cyber security:** We continue to invest in our cyber capability across people, process and technology. We apply a 'security by design' approach to business and technology-driven change. We recognise the importance of a strong security culture within the Group, with annual mandatory web-based training for all colleagues coupled with a well-established and growing Cyber Community of Practice. The 'Security Zone' page on our website supports customer security awareness, including fraud alerts and information on how to report suspicious online activity, emails or phone calls.

• **Data Protection:** Our customers, clients and colleagues trust us with their data, including giving them the control they need while being fully committed to keeping their information private. Our Data Privacy Notices explain how we hold and use personal information and outline people's rights in relation to the collection of personal information.

Further detail on the initiatives delivered under these strategic pillars and foundations is available on pages 19-22 of the 2023 Annual Report.

Business environment & model

We have been progressively aligning our business model to address social factors and risks informed by the UN Principles for Responsible Banking across areas including Financial Wellbeing, digitalisation customer service, credit and supplier agreements.

The Group is a signatory to the following UN frameworks - the UNPRB, the UN Principles for Responsible Investment (UNPRI) and the UN Principles for Responsible Banking 'Commitment to Financial Health and Inclusion'. The Bank's Financial Health and Inclusion targets were submitted to the UNEP FI in June 2023 and were published by the UNEP FI in July 2023. Details of these targets are included in the Group's answer to (b) below. These initiatives support and complement the ambitions set out in our Group Sustainability strategy.

Reflecting the increased digitalisation of the banking services, the Group are delivering more digital and tailored touchpoints across our business and provide simpler, more effective servicing with reduced customer complaints. The Group offers a wide range of digital banking services through the mobile app, as well as local counter services a network of 169 branches across the island of Ireland. This is complemented by access to local counter services in c.900 post office locations through a partnership with An Post, the Irish postal service. This ensures that customers can bank with the Group in a way that is most convenient to them, while also protecting access to banking for communities in every part of the country and those who prefer to complete their banking in person.

Putting customers first is a core value and integral to our purpose of helping customers thrive. We bring this to life by making it easier to interact, as evidenced by our Relationship Net Promoter Score (RNPS) of +5 points, 1 point higher vs 2022, and a 5% reduction in complaints vs 2022 (and down 49% since 2018). In 2023, we saw ongoing evidence of increased digitalisation with improved customer metrics. Active digital users increased 18%, our mobile app customer effort score increased 3 points and complaints about our mobile app reduced 35%.

The Group has a Code of Supplier Responsibility which outlines its expectations of their suppliers across human rights, health and safety, supply chain, inclusion and diversity, business integrity, doing business responsibly and environmental and energy management. The Group ensures suppliers' compliance with its Code through the Financial Supplier Qualification System (FSQS) process.

The Group indicates its consideration for social factors and risks as it has the following policies in places such as Modern slavery and human trafficking statement; Code of Supplier responsibility (noted above); the vulnerability requirements of the Group Customer Protection Risk policy; Group procurement policy; Group Data Privacy policy; Board diversity policy; Group code of conduct; Inclusion and diversity policy; and Group health and safety policy.

The Group's Modern Slavery and Human Trafficking statement is approved by the Group Sustainability Committee, a sub-committee of the Group's Board.

The Group has published its Sustainability Exclusion List which sets out its risk appetite for lending to potentially sensitive sectors which the Group believes causes environmental and/or social harm to society and the community. The Group has integrated this List into its processes as part of its Corporate and Credit ESG Risk Lending Procedure as it has aligned its Screening Criteria to its Sustainability Exclusion List.

Financial planning

Currently the Group does not explicitly consider social risk within its ICAAP. However, the Group plans to integrate social risks into its ICAAP process over time, in line with industry practice by linking its mitigation to the investments we are making in Financial Wellbeing and Foundational activities.

Objectives, targets and limits to assess and address social risk in short-term, medium-term and long-term, and performance assessment against these objectives, targets and limits, including forward-looking information in the design of business strategy and processes

The Group's Sustainability strategy includes a number of target outcomes across social topics, in particular within the 'Enhancing Financial Wellbeing', 'Enabling colleagues to thrive' and Foundation pillars. These strategic pillars align to a number of Sustainable Development Goals: Quality Education, Gender Equality, Decent work & economic growth, Reduced inequalities and No Poverty.

We disclosed a number of metrics in the Group Sustainability Report 2022 (pages 125 and 126), which demonstrate the progress made against our strategic objectives and targets across these areas.

In March 2023, as part of our strategic refresh, we announced updated social targets:

- Retain the #1 brand position for financial wellbeing
- 50:50 gender ratio in appointments to management and leadership positions

The Group, as a founding signatory of the UNPRB 'Commitment to Financial Health and Inclusion', is committed to promoting financial health and inclusion through its products, services and customer engagement. In July 2023, the UN published the commitments made by 20 banks globally (including Bank of Ireland) to support universal financial inclusion and a banking sector that supports its customers' financial health. The Group's UNPRB commitment focuses on supporting its customers' day-to-day and life event financial resilience. The Group's goal is to contribute to the creation of a more financially resilient and confident Ireland by increasing the number of customers who have the resilience to withstand the financial impact of an unexpected day-to-day expense and/or a major life event by:

- Increasing from 62% (April 2023) to 70% the percentage of customers who are confident (strongly or somewhat) that they have funds available to cover an unexpected day-to-day expense by 2030
- Increasing from 44% (April 2023) to 50% the percentage of customers who are confident (strongly or somewhat) that they have funds (Savings or Insurance) available to cover a major unexpected event by 2030

(b)

These impact targets address a priority in Ireland in line with:

- Ireland's National Implementation Plan for the Sustainable Development Goals 2022–24
- Adult Literacy for Life Strategy
- Education for Sustainable Development—National Strategy
- The Financial Wellbeing of adults in Ireland
- The Financial Literacy of adults in Ireland
- The Financial Resilience of adults in Ireland

To monitor progress towards achieving its targets, the Bank will periodically track the following:

- Number of Adults supported with Financial Education Initiatives, starting from a baseline value of 9,643 in 2022
- Based on survey data the percentage of customers who state that they have a long term (greater than 12 months) savings and or investment plan in place, starting from a baseline value of 35% in 2023
- Based on survey data, the percentage of customers who state that they always have some money put aside to cover day-to-day unexpected expenses, starting from a baseline value of 60% in 2023
- Number of active partnerships to achieve financial health targets, starting from a baseline value of zero in 2023

Please see response to (a) above for further detail on our objectives with respect to social housing and the First Home Scheme.

(c)	<p>Policies and procedures relating to direct and indirect engagement with new or existing counterparties on their strategies to mitigate and reduce socially harmful activities</p> <p>The Group has a number of policies and procedures in place which mitigate/ reduce social risk.</p> <p>The Group examines ESG considerations as part of its customer onboarding due-diligence process and for lending ESG considerations are outlined in the Corporate and Business Banking ESG Lending Procedures. The Group requires credit submissions to explicitly comment on a borrower's ESG policies, how it is incorporated into its strategic objectives and whether these are measured and evidenced.</p> <p>The Group's Sustainability Exclusion List clearly sets out our risk appetite for lending to potentially sensitive sectors which we believe cause both environmental and/ or social harm to society and our communities.</p> <p>Please see response to (a) above for further detail on our engagement with respect to social housing and the First Home Scheme.</p>
Governance	
(d)	<p>Responsibilities of the management body for setting the risk framework, supervising and managing the implementation of the objectives, strategy and policies in the context of social risk management covering counterparties' approaches to:</p> <p>(i) Activities towards the community and society (ii) Employee relationships and labour standards (iii) Customer protection and product responsibility (iv) Human rights</p> <p>The Group's Board provides oversight over the Group's alignment with key regulations, as well as the objectives under the Sustainability strategy by engaging in communication with the Group Executive Committee (GEC), the BRC and the GSC on progress against key climate commitments and delivery of the Sustainability strategy, which includes social dimensions as indicated in the Group's answers to (a) and (b) above.</p> <p>The Board comprises of 11 Directors: 2 Executive Directors, the Chairman and 8 independent Non-Executive Directors (NEDs). For further information on the number of directorships, including external directorships, held by the Group's Board, please refer to page 79 – 84 in the Annual Report 2023. The Group Nomination & Governance Committee undertakes a rigorous and transparent procedure when considering candidates for appointment to the Board and maintains oversight of the Board's composition to ensure it remains appropriate.</p> <p>On behalf of the Board, the GSC oversees the development and implementation of the Group's Sustainability strategy and, together with the BRC, oversees related risk. In the context of social factors and risks this includes</p> <ul style="list-style-type: none"> -Oversee progress against ESG targets the UN Principles for Responsible Banking Commitment to Financial Health & Inclusion, and other social related targets, -Review and challenge material key sustainability policies of the Group in the context of the Group's sustainability strategy and ensure they are aligned to the Group's Purpose and support the long term success of the Company, including approval, on an annual basis, of the Group Modern Slavery and Human Trafficking Statement. -Receive periodic updates on the Group's diversity and inclusion activity, as it relates to the sustainability strategy. -Receive periodic updates on the status and effectiveness of supplier relations and related supplier topics, particularly with regard to ESG matters. <p>Please see its terms of reference for further details: https://www.bankofireland.com/app/uploads/assets/GSC-Terms-of-Reference-Approved-14-December-2023.pdf</p> <p>The Board is fully committed to diversity in all forms and believes that diversity is an essential ingredient of sound decision-making. The Board's approach to diversity in all its forms is set out in the Board Diversity Policy which has retained the specific gender target of maintaining a minimum of 40% female representation on the Board. The Policy was enhanced to reflect the commitment to ensure the inclusion of at least one Director that is from an ethnic minority, which has been met, and the appointment of a female to one of the four senior Board roles of CEO, CFO, Chairman and Senior Independent Director (SID).</p> <p>As at the end of 2023, the Group's Board comprised 36% of female representation. While not yet achieving all diversity targets, the Board's searches for new Independent Non-Executive Directors (INEDs) has included a focus on growing the Board's profile in relation to all aspects of diversity. We intend to make further progress on our diversity targets through our current INED and Chair searches. The Board is committed to the application of recruitment and selection criteria that are explicitly informed by the relevant targets for ethnic minority and female representation.</p> <p>The Group's Board level Group Sustainability Committee receives an annual update on Financial Wellbeing and a bi-annual update on UNPRB ((United Nations Principles for Responsible Banking) commitments. The GEC sponsor for Financial Wellbeing is the Chief Customer Officer.</p> <p>The Group's Begin Together Fund is delivered annually in partnership with third party experts in the Community Foundation for Ireland (CFI), which enables the Group to focus its community investment on a wide variety of causes within an overarching strategic framework, designed to enable inclusion and build capability among vulnerable groups.</p> <p>On an ongoing basis, through its risk management framework, policies and processes, the Group identifies and assesses risk to which the Group is exposed. The Group ESG Risk Management Framework sets out that ESG factors represent a common risk driver and are managed through each of the Group's Principal risks.</p> <ul style="list-style-type: none"> •Social risks, including employee relationships and labour standards, customer protections and product responsibility and human rights are managed through each of the Principal and sub risks. •Re counterparty risk, the Group's credit policies and loan origination standards, as well as the Group's Third Party Risk Management and Outsourcing policies address social risk factors. Please refer to the Group's answer to (a) above regarding the Group's Code of Supplier Responsibility outlining its expectations of their suppliers across different social considerations. •The Group has a Customer Protection Risk Policy that includes consideration of product design and delivery and outlines requirements that seek to ensure that in bringing products to the market we consider and address potential or actual negative outcomes for clients, customers and markets. The Policy is aligned with applicable regulatory requirements and guidance including the Consumer Protection Code 2012 (RoI), European Regulations, including the Markets in Financial Instruments Directive (MiFID II), Insurance Distribution Directive (IDD) and the Financial Conduct Authority's (UK) rules and principles on product oversight and governance arrangements. As part of the recent policy refresh cycle, specific provisions were added to address the risk of 'greenwashing' in situations where the Group intends to sell, promote or distribute products or services on the basis of 'green' credentials.
(e)	<p>Integration of measures to manage social factors and risks in internal governance arrangements, including the role of committees, the allocation of tasks and responsibilities, and the feedback loop from risk management to the management body</p> <p>The ESG Risk Management Framework is approved by the ERC and has been developed for senior management and committee members responsible for the management of risk and the implementation of the risk management process.</p> <p>The Group has identified Conduct Risk as a principal risk and has a focus on customer protection matters. For information on the Group's risk committees and their tasks and responsibilities for monitoring and managing ESG risks, please refer to the Group's answer to (d) above.</p> <p>Progress on the Group's Inclusion and Diversity (I&D) strategy is reported biannually to the Board. The Group has appointed individual GEC Champions for each of the six I&D networks within the Group. The Group has a full-time I&D Lead responsible for delivering the I&D strategy for the Group.</p>
(f)	<p>Lines of reporting and frequency of reporting relating to social risk</p> <p>The Group's Sustainability Board Committee receives quarterly updates on ESG, which includes progress against the social aspects of the Sustainability Strategy under the pillars of 'Enabling colleagues to thrive', 'Enhancing financial wellbeing' and the 'Foundations'.</p> <p>See response to (a) above for further detail.</p>
(g)	<p>Alignment of the remuneration policy in line with institution's social risk-related objectives</p> <p>In November 2022, the Irish Government announced that a number of crisis-era restrictions related to remuneration were being lifted in respect of the Group, including the blanket prohibition on variable pay. Reintroducing an element of variable pay will allow us to better link remuneration to delivery for customers and the achievement of our long term strategic and commercial goals.</p> <p>As announced in the Group's strategy refresh in March 2023, 'Sustainable Company' is now one of the core strategic pillars of the Group, of which supporting wider society is a key focus area. With 'Sustainable Company' now a core strategic pillar, ESG is mainstreamed into our performance management system.</p> <p>The Group introduced a performance-related Profit Share Scheme which will see colleagues rewarded based on both the financial and operating performance of the company and individual performance during 2023. The appropriateness of the annual profit share is assessed against a mix of financial and non-financial criteria, including profit and related metrics, affordability, customer, and ESG, with the pool as a whole subject to risk adjustment. Social criteria include progress on our People and Financial Wellbeing strategies as well as social risk focussed Foundation topics.</p> <p>The appropriateness of the final profit share will be assessed against a mix of financial and non-financial criteria, including profit and related metrics, affordability, customer, and ESG, with the pool as a whole subject to risk adjustment.</p>
Risk management	
(h)	<p>Definitions, methodologies and international standards on which the social risk management framework is based</p> <p>The Group manages ESG risks through its Principal risk categories (credit risk, market, funding & liquidity risk, capital adequacy risk, life insurance risk, business and strategic risk, conduct risk, regulatory risk and other operational risk).</p> <p>As outlined in (a), the Group leverages the UNPRB, UNPRI and the UN Principles for Responsible Banking 'Commitment to Financial Health and Inclusion', to help determine relevant ESG factors.</p> <p>Social risk factors and risks have been referenced in the ESG Risk Management Framework, but are subject to further ongoing development.</p>
(i)	<p>Processes to identify, measure and monitor activities and exposures (and collateral where applicable) sensitive to social risk, covering relevant transmission channels</p> <p>The Group ESG Risk Management Framework sets out the approach to the management of ESG risk factors in the Group. ESG risk management is relatively immature across the industry and continues to evolve. Implementation to date, in the Group and industry, has largely focused on climate-related risk drivers. The focus from stakeholders (investors, regulators, customers, colleagues etc.) and wider societal expectations is seeing an expanding of expectations to the wider ESG agenda with increasing emphasis on a fairer and inclusive society. Consequently, the Group does not yet specifically identify, measure and monitor activities and activities under the social risk lens. However the Group does address social risk factors through the risk policies attached to each of its Principal risks including Conduct Risk, Operational Risk (including Third Party Risk Management), and Credit Risk. The Group uses the definitions set out in the Principles for Responsible Investment (PRI) Reporting Framework as a guide when considering Social risk factors. Through the Group's Sustainability Exclusion List, the Group has aligned its lending strategy to minimise its exposures to environmentally and socially high-risk sectors.</p>

(j)	<p>Activities, commitments and assets contributing to mitigate social risk</p> <p>Please refer to the Group's answer to (a) and (b) above, for the Group's objectives regarding social factors such as the Financial Wellbeing Programme (FWP) including:</p> <ul style="list-style-type: none"> - Special assistance for vulnerable customers; - Enhancing learning and development opportunities for customers and colleagues; and - The Group's commitment to achieving 50:50 gender ratio within its management and leadership. <p>As noted in the Group's answer to (d) above, the Group's Begin Together Fund is delivered annually in partnership with third party experts in the Community Foundation for Ireland (CFI), which enables the Group to focus our community investment on a wide variety of causes within an overarching strategic framework.</p> <p>The Customer Protection Risk Policy Part III (Customer Engagement Risk) also mandates the establishment of various risk mitigating measures aimed at protecting the Group's vulnerable customers.</p>
(k)	<p>Implementation of tools for identification and management of social risk</p> <p>The Group has aligned its lending strategy to minimise its exposures to environmentally and socially high-risk sectors through the Group's Sustainability Exclusion List and through the requirement to address E, S and G risks as part of individual credit applications (Corporate & Commercial Banking).</p> <p>Furthermore the Group has leveraged behavioural science and digital tools to deliver its financial wellbeing behavioural campaigns. Behavioural science helps us understand why and how people make financial decisions and what works well. To support this work we continue to collaborate with behavioural science experts to bring best in class expertise to support customers' decision making and promote positive behaviours to support customers financial wellbeing. We are continuing our partnership with Harvard's Sustainability, Transparency, and Accountability Research (STAR) Lab.</p> <p>In 2022 the Group launched Money Insights 365 (Mi365), an in-app money management tool that delivers personalised insights and tailored nudges to enable customers to understand and manage day-to-day spending, stay in control of their finances, and enhance their financial wellbeing. It was launched to all mobile app users with 47 insights across a number of categories ranging from subscriptions to cash-flow tracking.</p>
(l)	<p>Description of setting limits to social risk and cases to trigger escalation and exclusion in the case of breaching these limits</p> <p>The Group's Corporate & Commercial Banking has published a Sustainability Exclusion List that sets out the Group's risk appetite for lending to potential socially sensitive sectors. This List applies to all new lending and customer service arrangements ensuring that the Group does not provide financing to customers who are deemed to engage in a defined list of excluded business activities. Any cases considered a heightened ESG risk during initial review will be subject to 'Enhanced Review' and will be considered by an ESG Risk Forum in addition to Corporate & Commercial Credit. The Group embeds these exclusions at the origination stage to ensure that these criteria continue to evolve in line with the Group's Sustainability strategy.</p> <p>Any cases deemed a heightened ESG risk during initial review by the relationship manager will be subject to 'Enhanced Review' and will be considered by an ESG Risk Forum during the credit process. The Group has aligned its Screening Criteria to its Sustainability Exclusion List. For further details on this process and its governance arrangements, please refer to the Group's disclosure in Governance Risk Template.</p> <p>Key policies addressing to social factors including (1) bribery and corruption; (2) respect for human rights; and (3) other social and employee matters include:</p> <p>(1) Bribery and Corruption</p> <ul style="list-style-type: none"> • Group code of conduct • Speak up policy • Group anti-money laundering policy • Group anti-bribery and corruption policy • Social and financial inclusion policy • Respect at work policy • Recruitment policy • Corporate affairs statement • Financial crime compliance statement <p>(2) Respect for human rights</p> <ul style="list-style-type: none"> • Modern slavery and human trafficking statement • Code of supplier responsibility • Group procurement policy • Group data protection and privacy policy <p>(3) Social and employee matters</p> <ul style="list-style-type: none"> • Inclusion and diversity policy • Group code of conduct • Equal opportunities policy • Group health and safety policy • Employee data privacy • Group vulnerable customers policy • Group learning policy • Third party policy • Responsible and sustainable sector statement <p>These policies are referenced in the Non-Financial statement on page 45 in the 2023 Annual Report.</p> <p>Key Performance Indicators (KPIs) reflecting key social factors under the 'Enhancing financial wellbeing', 'Enabling colleagues to thrive', and 'Foundations' pillars are disclosed in the Group's Annual Sustainability Report. The latest Social KPIs on pages 125-126 of the 2022 Sustainability Report include:</p> <ul style="list-style-type: none"> • Enhancing financial wellbeing – national financial wellbeing index score and number of vulnerable customers supported • Enabling colleagues to thrive - % Female senior leadership appointments and % of colleagues who graduated from future skills pathways • Foundation – Completions rates for mandatory training on Code of Conduct, Speak Up, Information Security and Anti-bribery and Corruption.
(m)	<p>Description of the link (transmission channels) between environmental risks with credit risk, liquidity and funding risk, market risk, operational risk and reputational risk in the risk management framework</p> <p>Currently, the Group has integrated climate-related (environmental) risk into its credit risk, liquidity risk, market risk and operational risk policies. The Group plans to develop the integration of social risks into its Principal risk categories over time in line with market and regulatory developments.</p>

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Table 3 - Qualitative information on Governance risk in accordance with Article 449a CRR

Row number	Governance
(a)	<p>Institution's integration in their governance arrangements governance performance of the counterparty, including committees of the highest governance body, committees responsible for decision-making on economic, environmental, and social topics</p> <p>The Group has integrated governance considerations as part of its implementation of E, S and G factors across the business through adopting ESG considerations into its existing governance model, with strong internal controls and governance through the relevant committee(s) and management body, in line with EBA guidelines on Internal Governance.</p> <p>The Group's Credit Policy is approved by the Board. The policy is aligned with and has regard to, the Group's Risk Appetite Statement, which is approved annually by the Board. The Group's credit risk management systems operate through a hierarchy of lending authorities which are related to internal loan ratings. Governance criteria have been integrated within the Group's procedures, as part of the Customer Due Diligence and Credit Process.</p> <p>With respect to counterparties, the Group assesses general governance arrangements of counterparties as part of due diligence requirements, both as part of ESG risk assessments but also as part of standard credit rating assessments. ESG risk due diligence includes assessment of counterparties' general risk management and sustainability performance, including sustainability commitments and efforts. As part of our credit rating process the general governance arrangements, including quality of management body and sound financials of the counterparty, are considered as part of the credit rating and PD (Probability of Default) assessments.</p> <p>The Group has in place specific procedures outlined within its Corporate and Business Banking ESG Lending Procedures for engaging with its counterparties. These procedures outline that credit submissions and review papers, submitted by the relationship managers on behalf of counterparties, are critically assessed with regard to its ESG-related governance arrangements. The Group assesses the governance considerations of its counterparties as part of its Customer Due Diligence process and the ongoing monitoring and review process. The Group requires credit submissions to explicitly comment on a borrower's ESG policies, how it is incorporated into its strategic objectives and whether these are measured and evidenced.</p> <p>The Group has published a Sustainability Exclusion List, approved by Group Credit Risk Committee, that sets out its ESG risk appetite for lending to potentially sensitive sectors which the Group believes cause environmental and/or social harm to society and the community. The Group has aligned its ESG Screening Criteria, within its lending procedures, to its Sustainability Exclusion List. The Group's current portfolio is materially aligned as ESG considerations have been embedded in these procedures at the point of origination and the procedure will continue to evolve in line with the Group's Sustainability strategy.</p> <p>In relation to the Group's internal governance on evaluating cases for corporate and commercial lending, any cases considered a heightened ESG risk during initial review by the relationship manager will be subject to enhanced review and consideration by the ESG Risk Credit Forum, prior to consideration by the Transaction Credit Risk Committee. The ESG Risk Credit Forum brings together relevant senior leaders on an ad-hoc basis, to consider the potential impact of ESG and reputational-sensitive issues/business decisions referred to it during the credit origination and review process based on the screening criteria.</p> <p>In order to evaluate the governance performance of its counterparties and integrate it into its internal governance arrangements, the Group's ESG Risk Credit Forum considers the following factors:</p> <ul style="list-style-type: none"> o ESG track record of the business o Internal ESG governance/ policy – including any ESG management credentials, for example ESG pledges, industry memberships, accreditations o Industry regulation o ESG Rating – from ESG or other rating agencies, if relevant o ESG media profile of the business.
(b)	<p>Institution's accounting of the counterparty's highest governance body's role in non-financial reporting</p> <p>As part of its customer onboarding process and ongoing customer due diligence process conducted annually, the Group conducts an assessment of its customers' non-financial reporting. The assessment is conducted in line with the Group's Sustainability Exclusion List and the Group's Corporate and Business Banking ESG Risk Lending Procedure. In cases where a fully extensive ESG Risk analysis may not be practical, due to limitations on available information and maturity of its counterparties ESG programme, relationship managers use best efforts to assess their counterparties' ESG risk.</p>
(c)	<p>Institution's integration in governance arrangements of the governance performance of their counterparties including:</p> <p>(i) Ethical considerations (ii) Strategy and risk management (iii) Inclusiveness (iv) Transparency (v) Management of conflict of interest (vi) Internal communication on critical concerns</p> <p>The Board is collectively responsible for the long-term sustainable success of the Group and for ensuring there is a strong corporate structure in place, which is aligned with the Group's strategy and purpose. It provides leadership of the Group, setting strategic aims, within the boundaries of the Group's risk appetite and a framework of prudent and effective controls.</p> <p>Responsibilities in respect of Sustainability and ESG strategy are delegated to the Group Sustainability Committee (GSC), which, jointly with the Board Risk Committee (BRC), is also responsible for ensuring ESG risks have been integrated into the Group Risk Management Framework.</p> <p>On behalf of the Board, the GSC oversees development and implementation of the Group's Sustainability strategy and, together with the BRC, oversees related risks, including monitoring the Climate Risk Implementation Plan. As part of that role, the GSC oversees progress against ESG targets, review of ESG-related commitments and the publication of the Sustainability Report. Both the GSC and the BRC are supported in their duties and oversight by a number of sub-committees and working groups, including the ESG Risk Working Group and the ESG Risk Credit Forum identified in the Group answer to (a) above. Counterparty governance flows from the business through the group risk owner, which reports into the relevant committees e.g. GCRC, ERC, and BRC.</p> <p>The GEC has overarching responsibility for delivery and operationalisation of the Group's Sustainability strategy, with specific executive responsibility for Sustainability (including climate change) delegated to the Sustainability and Investor Relations Officer (CSIRO) who reports to the Group Chief Financial Officer (CFO). Members of the GEC include the CFO, Divisional Chief Executive Officers (CEOs) and the Chief Risk Officer (CRO).</p> <p>The Sustainability Decision Group (SDG) brings together senior business and functional management across the Group to enable a coordinated approach to sustainability objectives across the 3 pillars and to provide a discussion and decision making forum to deliver on the Group's sustainability agenda. The SDG is chaired by the CSIRO and regularly updates the GEC on progress against key initiatives.</p> <p>Through the Group's ESG Risk Lending Procedures and the Sustainability Exclusion List, the Group integrates the ESG governance performance of its counterparties into its governance arrangements. For customers and transactions in all sectors, cases are initially screened using the Group's ESG Screening Criteria with the evidence in the public domain. The issues covered during the screening are as follows:</p> <ul style="list-style-type: none"> - Abuses of human rights, including displacement of indigenous peoples, child and forced labour, modern slavery, human trafficking, and exploitation of poverty - Operations in internationally protected conservation areas - Major or sustained environmental or socially related campaigns against the customer - Major environmental or social incident or fine, for example, a pollution event or accident such as a mine explosion, or companies with a poor health and safety record, particularly repeated non-compliance with environmental or health and safety legislation.
	Risk management

Institution's integration in risk management arrangements the governance performance of their counterparties considering:

- i) Ethical considerations
- ii) Strategy and risk management
- iii) Inclusiveness
- iv) Transparency
- v) Management of conflict of interest
- vi) Internal communication on critical concerns

ESG responsibilities extend across the Group, based on a 'Three Lines of Defence' approach, in line with the Group Risk Management Framework. Co-ordinated by Group Risk, an ESG Risk Working Group brings together second line of defence risk management from across the Principal Risk types (with representation from the Group first line of defence) to ensure that there is a co-ordinated, cohesive and challenging approach to the management of ESG and climate-related risks within the Group.

The ESG Risk Credit Forum brings together relevant senior leaders on an ad-hoc basis, to consider the potential impact of ESG and reputational-sensitive issues/business decisions referred to it during the credit origination and review process based on the screening criteria (as outlined in the Sustainability Exclusion List).

As noted in the Group's answer to (c), the issues covered during the relationship managers ESG screening process are as follows:

- Abuses of human rights, including displacement of indigenous peoples, child and forced labour, modern slavery, human trafficking, and exploitation of poverty
- Operations in internationally protected conservation areas
- Major or sustained environmental or socially related campaigns against the customer
- Major environmental or social incident or fine, for example, a pollution event or accident such as a mine explosion, or companies with a poor health and safety record, particularly repeated non-compliance with environmental or health and safety legislation

(d) As noted in the Group's answer to (a), the Group's corporate and business banking lending strategy is aligned to the Sustainability Exclusion List. The Group's lending activities are governed by the Group Credit Policy.

In addition to the screening for ESG governance issues described above the Group is dedicated to supporting the ongoing protection of the financial system and our customers from the impact of financial crime.

Our comprehensive Financial Crime Framework includes, policies, and standards to manage financial crime risks. Through this framework, we comply with our regulatory obligations and align our strategy with industry best practices, ensuring we are supporting our customers and communities while also building our own resilience.

We manage financial crime events through our Three Lines of Defence approach with the Group Board responsible for oversight of financial crime risk. Our Money Laundering Reporting Officer (MLRO) leads the Group's Financial Crime Compliance team and is responsible for undertaking annual Enterprise-Wide Risk Assessments. These assessments assess Anti-Money Laundering (AML) and Countering the Financing of Terrorism (CFT) Risk, Sanctions Risk, and Fraud Risks and identifies enhancements to the Financial Crime Framework to ensure continued compliance with relevant regulations and legislative duties. The outcome of these assessments are reported to the Group Board. Our MLRO monitors and oversees financial crime controls across the Group, working with our assurance teams to regularly report on Key Risk Indicators to Senior Management and the Board.

The Group Financial Crime policies are all essential to our framework and are informed by our engagement with law enforcement, regulators, and industry. All colleagues complete annual mandatory training and assessment on these topics so that these policies are embedded in our operational activities. The MLRO and wider team provide comprehensive annual training to the Board and issue bespoke training on AML and CFT risks to key business functions.

We monitor customer transactions to identify unusual or suspicious activities. When we onboard new customers, we conduct due diligence and screen them against national and international sanctions or terrorism lists. Where customers present as high-risk, we complete enhanced due-diligence, requesting further information to understand the risk.

Irrespective of risk rating, all our customers are screened on an ongoing basis to ensure continued compliance with screening obligations.

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Table 12.2 below requires institutions to disclose the total gross carrying amounts by level energy consumption and by EPC label with a breakdown by location (EU vs. non-EU area) differentiating between loans collateralised by commercial immovable property, loans collateralised by residential immovable property and collateral obtained by taking possession.

Table 12.2 - Template 2 - Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral

Counterparty sector	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
	Total gross carrying amount (in MEUR)															
	Level of energy efficiency (EP score in kWh/m ² of collateral)							Level of energy efficiency (EPC label of collateral)							Without EPC label of collateral	
	0; <= 100	> 100; <= 200	> 200; <= 300	> 300; <= 400	> 400; <= 500	> 500	A	B	C	D	E	F	G		Of which level of energy efficiency (EP score in kWh/m ² of	
1 Total EU area	39,105	9,988	11,632	8,214	3,055	2,533	3,658	1,029	545	352	160	59	41	11	36,909	100%
2 Of which Loans collateralised by commercial immovable property	6,627	1,019	737	306	704	179	3,658	1,029	545	352	160	59	41	11	4,431	99%
3 Of which Loans collateralised by residential immovable property	32,478	8,969	10,895	7,908	2,351	2,354	-	-	-	-	-	-	-	-	32,478	100%
4 Of which Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0%
5 Of which Level of energy efficiency (EP score in kWh/m ² of collateral) estimated	39,081	9,988	11,632	8,214	3,055	2,533	3,658	-	-	-	-	-	-	-	36,885	100%
6 Total non-EU area	17,717	1,120	3,694	6,875	2,472	607	263	60	1,540	3,675	5,154	1,683	276	53	5,275	58%
7 Of which Loans collateralised by commercial immovable property	2,687	-	-	-	-	-	-	30	225	124	87	23	-	2	2,197	0%
8 Of which Loans collateralised by residential immovable property	15,030	1,120	3,694	6,875	2,472	607	263	31	1,315	3,551	5,067	1,660	276	51	3,079	100%
9 Of which Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0%
10 Of which Level of energy efficiency (EP score in kWh/m ² of collateral) estimated	3,083	57	452	1,905	582	69	18	-	-	-	-	-	-	-	3,079	100%

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

Disclosure Basis

The Group is committed as part of its sustainability ambitions to support its customers to increase their residential energy efficiency whilst encouraging the purchase of energy efficient properties. Energy efficiency is represented by Energy Performance Certificate (EPC) rating, with A indicating the best and G the worst in terms of energy efficiency. The development of data capture capabilities for EPC and Energy Performance Scores was a key systems development focus area for the Group during 2023:

- the Group has developed data capture capabilities within its RoI home buying customer journey, so that data based on specific BER certificates is being collected from the start of 2024.
- the Group has developed data capture capabilities within its CRE lending business to progressively expand and enhance the collection of data based on specific EPC certificates. Data collection is being progressed in phases and this has seen coverage of the portfolio where specific EPC ratings are available, double from 14% in FY2022 to 29% in FY2023. Further increases in coverage expected in 2024 as further phases of the data collection process are progressively rolled out across the CRE portfolio.

The processes for disclosing EPC and Energy performance (EP) information differ across the key EU and non-EU jurisdictions that the Group operates in – Republic of Ireland (ROI) and United Kingdom (UK). They are set out as follows:

ROI lending collateralised by immovable property

For the December 2023 disclosure, 100% of the EPC data for ROI household lending collateralised by residential immovable property is estimated, and not based on specific EPC labels. The Group is continuing to develop data capture capabilities in the ROI jurisdiction for BER (Building Energy Rating) Certificates (the Irish version of EPCs) as they have not been stored on data systems historically. A national database maintained by the Sustainable Energy Authority of Ireland (SEAI) on domestic properties with recorded energy ratings has been used to provide a proxy view on the energy rating profile of ROI lending collateralised by residential property, based on key explanatory factors (namely year of build, property type and location).

For the December 2023 disclosure, c.33% of the EPC data for ROI commercial lending collateralised by commercial immovable property is based on specific EPC labels collected through internal processes. For the residual ROI located properties, SEAI national data on non-domestic properties is used to estimate the energy rating profile for those properties based on property type.

Energy Performance (EP) scores are estimated as a midpoint EP kWh/m² per annum value attaching to the energy rating per SEAI reference datasets.

UK lending collateralised by immovable property

In the UK jurisdiction, the Group has had procedures in place for the collection of EPC data for household lending collateralised by residential immovable property since 2020 and has extended the procedures to capture Energy Performance (EP) data from 2023. For the December 2023 disclosure, c.80% of the EPC ratings and EP data for UK household lending collateralised by residential immovable property is based on specific EPC labels. For the residual UK located properties, EPC ratings have been estimated based on key explanatory factors (namely year of build, property type and location).

For the December 2023 disclosure, c.24% of the EPC data for UK commercial lending collateralised by commercial immovable property is based on specific EPC labels collected through internal processes. For the residual UK located properties, UK national data on non-domestic properties was used to estimate the energy rating profile for those properties based on property type. Energy Performance (EP) scores and estimates are not currently available from the Group's data sources for UK commercial lending collateralised by commercial immovable property and this capability continues to be developed for year end 2023.

Other Jurisdictions

For the December 2023 disclosure, c.7% of the commercial lending collateralised by commercial immovable property is based outside of ROI and the UK, predominantly in the US. Energy Ratings and EP scores and estimates are not currently available from the Group's data sources for this cohort and this capability continues to be developed.

Table 12.3 below requires institutions to disclose in this template information on their alignment efforts with the Paris Agreement objectives for a selected number of sectors. The disclosures on the alignment shall capture the extent to which financial flows are consistent with a pathway towards low greenhouse gas emissions and climate-resilient development as defined in the Paris Agreement.

Table 12.3 - Template 3 - Banking Book – Climate Change Transition Risk: Alignment Metrics:

a	b	c	d	e	f	g
Sector	NACE Sectors (a minima)	Portfolio gross carrying amount (Mn EUR)	Alignment metric**	Year of reference	Distance to IEA NZE2050 in % ***	Target (year of reference + 3 years)
1 Power 2 Fossil fuel combustion 3 Automotive 4 Aviation 5 Maritime transport 6 Cement, clinker and lime production 7 Iron and steel, coke, and metal ore production 8 Chemicals 9 ... potential additions relevant to the business model of the institution *** PIT distance to 2030 NZE2050 scenario in % (for each metric)						

Template 3: Banking Book – Climate Change Transition Risk: Alignment Metrics:

The Group continues to develop its reporting capabilities for emissions and alignment with the Paris Agreement objectives, including regular and transparent reporting on progress towards its targets, which has commenced for the FY 2023 reporting cycle.

In December 2022, the Science Based Targets initiative (SBTi) formally validated the Group’s 2030 greenhouse gas emission reduction targets, including reduction targets from the Group lending activities (Scope 3) which are consistent with levels required to meet the goals set by the Paris Agreement.

Under the Group’s targets, the Group is committing to a 48% reduction in mortgage portfolio emissions (Ireland & UK), a 56% reduction in commercial real estate portfolio emissions, and its electricity generation project finance portfolio GHG emissions by 63%¹ per kWh. These targeted reductions are by 2030 with a base year of 2020.

Furthermore, the Group commits to 25% of its corporate loan and bond portfolios by financed emissions setting SBTi validated targets by 2025. This includes 100% of fossil fuels corporate loans.

The SBTi endorses the Sectoral Decarbonization Approach (SDA), which employs the International Energy Agency (IEA) Energy Transition Pathway (ETP) sector budgets, for physical intensity targets and the absolute contraction approach for absolute targets.

The Group plans to complete this template in line with the phased in requirement of 30 June 2024

Footnote:
 1 The Electricity Generation portfolio consists of a small number of projects (c.25) and during 2023 the financed power generation attributed to two projects in the baseline was found to have been overstated. This has resulted in a restatement of the 2022 baseline for the portfolio from 0.097 to 0.155 kgCO2/kWh – an increase of 60% (the size of the aggregate impact being due to the small sample size). Given consideration of this change in starting point and acknowledging the Group’s objective to align with the SBT 1.5 pathway by 2030, the targeted 2030 intensity of 0.058 kgCO2/kWh is maintained and the target reduction from 2020 is increased to 63% to reflect the reset 2020 baseline of 0.155 kgCO2/kWh. The update of this target reduction to 63% from 40% has been notified to the SBTi following restatement of the volume of electricity generation financed in the 2020 baseline.

Table 12.4 below shows the exposures towards the top 20 carbon-intensive companies in the world.

Table 12.4 - Template 4 - Banking book - Climate change transition risk: Exposures to top 20 carbon-intensive firms

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

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

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

The purpose of this disclosure is to show aggregate exposure to the 20 most carbon-intensive companies globally. The Group selected the following top 20 lists of carbon intensive counterparties globally from two sources referenced by the ECB guidance for this exposure assessment:

- Climate Accountability Institute (CAI)
- Carbon Disclosure Project (CDP)

For the December 2023 disclosure, these top 20 lists were reviewed to determine if the Group had any exposure to any of the counterparties on the listings in the banking book. This assessment resulted in a nil exposure return.

Table 12.5 below provides information on exposures in the banking book (including loans and advances, debt securities and equity instruments not held for trading and not held for sale) towards nonfinancial corporates, on loans collateralised with immovable property and on repossessed real estate collateral that are exposed to chronic and acute climate-related hazards.

Table 12.5.1 - Template 5 - Banking book - Climate change physical risk: Exposures subject to physical risk: Ireland

a	b	Gross carrying amount (Mln EUR)												
		of which exposures sensitive to impact from climate change physical events												
		Breakdown by maturity bucket					of which exposures sensitive to impact from chronic climate change events	of which exposures sensitive to impact from acute climate change events	of which exposures sensitive to impact both from chronic and acute climate change events	Of which Stage 2 exposures	Of which non-performing exposures	Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		
		<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity						of which Stage 2 exposures	Of which non-performing exposures	
1 A - Agriculture, forestry and fishing	1,497	-	-	-	-	-	-	-	-	-	-	-	-	
2 B - Mining and quarrying	57	-	-	-	-	-	-	-	-	-	-	-	-	
3 C - Manufacturing	1,456	-	-	-	-	-	-	-	-	-	-	-	-	
4 D - Electricity, gas, steam and air conditioning supply	212	-	-	-	-	-	-	-	-	-	-	-	-	
5 E - Water supply; sewerage, waste management and remediation activities	68	-	-	-	-	-	-	-	-	-	-	-	-	
6 F - Construction	63	-	-	-	-	-	-	-	-	-	-	-	-	
7 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	1,768	-	-	-	-	-	-	-	-	-	-	-	-	
8 H - Transportation and storage	544	-	-	-	-	-	-	-	-	-	-	-	-	
9 L - Real estate activities	5,436	-	-	-	-	-	-	-	-	-	-	-	-	
10 Loans collateralised by residential immovable property	32,478	14	43	135	212	20	-	404	-	27	4	(2)	(1)	
11 Loans collateralised by commercial immovable property	6,602	365	2	21	-	3	-	388	-	143	2	(14)	(12)	
12 Repossessed collaterals	-	-	-	-	-	-	-	-	-	-	-	-	-	
13 Other relevant sectors (breakdown below where relevant)	3,994	-	-	-	-	-	-	-	-	-	-	-	-	

Table 12.5.2 - Template 5 - Banking book - Climate change physical risk: Exposures subject to physical risk: UK

a	b	Gross carrying amount (Mln EUR)												
		of which exposures sensitive to impact from climate change physical events												
		Breakdown by maturity bucket					of which exposures sensitive to impact from chronic climate change events	of which exposures sensitive to impact from acute climate change events	of which exposures sensitive to impact both from chronic and acute climate change events	Of which Stage 2 exposures	Of which non-performing exposures	Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		
		<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity						of which Stage 2 exposures	Of which non-performing exposures	
1 A - Agriculture, forestry and fishing	238	-	-	-	-	-	-	-	-	-	-	-	-	
2 B - Mining and quarrying	28	-	-	-	-	-	-	-	-	-	-	-	-	
3 C - Manufacturing	704	-	-	-	-	-	-	-	-	-	-	-	-	
4 D - Electricity, gas, steam and air conditioning supply	140	-	-	-	-	-	-	-	-	-	-	-	-	
5 E - Water supply; sewerage, waste management and remediation activities	33	-	-	-	-	-	-	-	-	-	-	-	-	
6 F - Construction	38	-	-	-	-	-	-	-	-	-	-	-	-	
7 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	239	-	-	-	-	-	-	-	-	-	-	-	-	
8 H - Transportation and storage	137	-	-	-	-	-	-	-	-	-	-	-	-	
9 L - Real estate activities	1,620	-	-	-	-	-	-	-	-	-	-	-	-	
10 Loans collateralised by residential immovable property	15,030	91	136	109	215	16	183	357	11	54	17	(4)	(1)	
11 Loans collateralised by commercial immovable property	2,016	-	-	-	-	-	-	-	-	-	-	-	-	
12 Repossessed collaterals	-	-	-	-	-	-	-	-	-	-	-	-	-	
13 Other relevant sectors (breakdown below where relevant)	2,733	-	-	-	-	-	-	-	-	-	-	-	-	

Table 12.5.3 - Template 5 - Banking book - Climate change physical risk: Exposures subject to physical risk: Other

a	b	Gross carrying amount (Mln EUR)												
		of which exposures sensitive to impact from climate change physical events												
		Breakdown by maturity bucket					of which exposures sensitive to impact from chronic climate change events	of which exposures sensitive to impact from acute climate change events	of which exposures sensitive to impact both from chronic and acute climate change events	Of which Stage 2 exposures	Of which non-performing exposures	Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		
		<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity						of which Stage 2 exposures	Of which non-performing exposures	
1 A - Agriculture, forestry and fishing	11	-	-	-	-	-	-	-	-	-	-	-	-	
2 B - Mining and quarrying	16	-	-	-	-	-	-	-	-	-	-	-	-	
3 C - Manufacturing	2,291	-	-	-	-	-	-	-	-	-	-	-	-	
4 D - Electricity, gas, steam and air conditioning supply	93	-	-	-	-	-	-	-	-	-	-	-	-	
5 E - Water supply; sewerage, waste management and remediation activities	-	-	-	-	-	-	-	-	-	-	-	-	-	
6 F - Construction	55	-	-	-	-	-	-	-	-	-	-	-	-	
7 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	264	-	-	-	-	-	-	-	-	-	-	-	-	
8 H - Transportation and storage	151	5	-	-	-	3	5	-	-	5	-	-	-	
9 L - Real estate activities	627	-	-	-	-	6	-	-	-	-	-	-	-	
10 Loans collateralised by residential immovable property	-	-	-	-	-	-	-	-	-	-	-	-	-	
11 Loans collateralised by commercial immovable property	696	-	-	-	-	-	-	-	-	-	-	-	-	
12 Repossessed collaterals	-	-	-	-	-	-	-	-	-	-	-	-	-	
13 Other relevant sectors (breakdown below where relevant)	2,530	4	-	-	-	2	4	-	-	-	-	-	-	

Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk

Physical Risk Assessment

During 2022, the Group developed its capabilities to identify, measure and monitor the potential financial impacts emerging from climate-related physical risks. For this purpose, the Group has acquired data from Moody's to assess physical risks, also used by the ECB to provide physical risk assessments for the 2022 ECB Climate Stress Test.

The data provided by Moody's provides coverage at a NUTS 3 level (See Footnote 1) across six sub-types of physical risk that have been categorised into acute and physical risk categories as follows:

Acute Physical Risks:

- Floods
- Hurricanes & Typhoons
- Wildfires

Chronic Physical Risks:

- Heat Stress
- Sea Level Risk
- Water Stress

For exposures collateralised by immovable property (residential and commercial), in line with guidance the collateral location is used to assign exposures to the NUTS3 regions level to assess the exposure to physical risk. Where the lending is not collateralised, the country of risk is used.

- If any of the three chronic risks together with any of the three acute risks are classed as "Highly Exposed" for that region – the exposure is classed as Sensitive to Impact from both Chronic and Acute Physical Risks – column (j), if applicable.

- Else if any of the three chronic physical risks are classed as "Highly Exposed" for that region – the exposure is classed as "Sensitive to Impact from Chronic Physical Risks" - column (h)

- Else if any of the three acute physical risks are classed as "Highly Exposed" for that region – the exposure is classed as "Sensitive to Impact from Acute Physical Risks" – column (i)

Additional Risk Assessment

As an additional step a more property specific physical risk assessment has been undertaken for properties in ROI and UK that are residential or commercial property collateral for lending exposures. The locations of these properties have been geo-coded for flood risk assessment. Using latitude and longitude, properties are matched to building and street based on address data available.

JBA Flood Risk Management are a leading provider of climate flood modelling in the Irish and UK market. Flood scores, based on JBA's flood matrix, are allocated per geo-coded property based on the potential flood damage to property dependent on the type, frequency and depth of flooding modelled across different return periods; for example, coastal flooding will involve salt water, which can cause more property damage than river flood water and therefore has a higher score than the equivalent river flood score. The scoring ranges from 0 to 53, with 0 being lowest and 53 being the highest risk. The flood scores are projected forward based on the RCP 8.5 Pathway (See Footnote 2) where emissions continue to rise throughout the 21st century and global temperatures increase by 2100 by 3.2 to 5.4 degrees.

Properties are classed at high risk of flooding are:

- Properties in ROI with a score of 31 and above by 2050 on an undefended basis (See Footnote 3)
- Properties in UK with a probability of a flood event occurring by 2030 of >5% (See Footnote 4)

Then if they have not already flagged as sensitive in the previous steps, the exposures collateralised by properties classed as high risk of flooding in 2050 are then classed as:

- "Sensitive to Impact from Acute Physical Risks" – column (i); and
- "Sensitive to Impact from both Chronic and Acute Physical Risks"^{***} – column (j)."

Footnotes:

1 The Nomenclature of territorial units for statistics (NUTS) is a geographical nomenclature subdividing the economic territory of the European Union (EU) into regions at three different levels (NUTS 1, 2 and 3 respectively, moving from larger to smaller territorial units).

2 Representative Concentration Pathways for greenhouse gas concentration trajectories adopted by the IPCC (Intergovernmental Panel on Climate Change). The pathways describe different climate futures, all of which are considered possible depending on the volume of GHGs emitted in the years to come.

3 Undefended denotes that flood mitigating defences are not taken into account. The flood data provided is on an undefended basis in the Republic of Ireland as the Office of Public Works (OPW) currently only allows members of the Insurance Institute of Ireland access their defended areas data.

4 Probability based on projected JBA Flood Scores.

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Table 12.6 below provides an overview of the KPIs calculated on the basis of the assets used for the calculation of the green asset ratio (GAR).

Table 12.6 - Template 6 - Summary of GAR KPIs (Turnover based¹)

	KPI			% coverage (over total assets) ²
	Climate change mitigation	Climate change adaptation	Total (Climate change mitigation + Climate change adaptation)	
GAR stock	2.43	-	2.43	70.07
GAR flow	0.92	-	0.92	96.91

¹ Based on the Turnover KPI of the counterparty.

² Percentage of assets covered by the KPI over banks' total assets

Taxonomy KPIs

For the first time as at 31 December 2023, the Group is reporting on Taxonomy KPIs and green asset ratios (GAR). The EU Taxonomy disclosures reported here in Pillar 3 are based on the turnover KPIs for counterparties. The total GAR covers the two climate-related (CCM and CCA) EU environmental objectives.

The Group's total GAR based on turnover amounted to 2.4% of total covered assets as at 31 December 2023. The Taxonomy-aligned activities amounted to €2.3 billion at 31 December 2023. Gross carrying amount of total covered assets amounted to €94.2 billion as at 31 December 2023 (2022: €86.7 billion).

This template gives an overview of the KPIs calculated on the basis of templates 7 and 8.
For the GAR stock, the figures reported correspond to the KPIs included in columns b, g and I respectively of template 8.
For the GAR flow, the figures reported correspond to the KPIs included in row 1, columns r, w and ab of template 8.

Limitations in Data

When assessing Taxonomy-eligible and Taxonomy-aligned activities for financial and non-financial undertakings, actual published information provided by counterparties is required. However, a complete data collection has been limited as published reporting on Taxonomy-alignment KPIs from financial and non-financial undertakings is not yet available at the reporting date.

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Table 12.7 below provides information on gross carrying amount of institutions' loans and advances, debt securities and equity instruments on their banking book, with a breakdown of the information by type of counterparty, including financial corporations, non-financial corporations, households, local governments as well as real estate lending towards households, and the taxonomy eligibility and taxonomy alignment of the exposures with regards to the environmental objectives of climate change mitigation and climate change adaptation as defined in Article 9, points (a) and (b) of Regulation (EU) 2020/852.

Table 12.7 - Template 7 - Mitigating actions: Assets for the calculation of GAR

	a	b	c	d	e	f	Disclosure reference date T										p
							Climate Change Mitigation (CCM)			Climate Change Adaptation (CCA)			TOTAL (CCM + CCA)				
Million EUR	Total gross carrying amount	Of which towards taxonomy relevant sectors			Of which towards taxonomy relevant sectors			Of which towards taxonomy relevant sectors									
		Of which environmentally sustainable			Of which environmentally sustainable			Of which environmentally sustainable									
							Of which specialised lending	Of which transitional	Of which enabling	Of which specialised lending	Of which adaptation	Of which enabling	Of which specialised lending	Of which transitional/adaptation	Of which enabling		
GAR - Covered assets in both numerator and denominator																	
1	Loans and advances, debt securities and equity instruments not HTI eligible for GAR calculation	57,997	48,218	2,289	2,289	2,289	-	-	-	-	-	-	48,218	2,289	2,289	2,289	
2	Financial corporations	4,343	611	-	-	-	-	-	-	-	-	-	611	-	-	-	
3	Credit institutions	3,784	611	-	-	-	-	-	-	-	-	-	611	-	-	-	
4	Loans and advances	415	29	-	-	-	-	-	-	-	-	-	29	-	-	-	
5	Debt securities, including UoP	3,369	582	-	-	-	-	-	-	-	-	-	582	-	-	-	
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
7	Other financial corporations	559	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
8	of which investment firms	8	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
9	Loans and advances	2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
10	Debt securities, including UoP	6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
12	of which management companies	531	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
13	Loans and advances	502	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
14	Debt securities, including UoP	7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
15	Equity instruments	22	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
16	of which insurance undertakings	20	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
17	Loans and advances	20	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
20	Non-financial corporations (subject to NFRD disclosure obligations)	155	5	0	0	0	-	-	-	-	-	-	5	0	0	0	
21	Loans and advances	155	5	0	0	0	-	-	-	-	-	-	5	0	0	0	
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
24	Households	53,455	47,558	2,245	2,245	2,245	-	-	-	-	-	-	47,558	2,245	2,245	2,245	
25	of which loans collateralised by residential immovable property	47,508	47,508	2,245	2,245	2,245	-	-	-	-	-	-	47,508	2,245	2,245	2,245	
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
27	of which motor vehicle loans	2,547	50	-	-	-	-	-	-	-	-	-	50	-	-	-	
28	Local governments financing	44	44	44	44	44	-	-	-	-	-	-	44	44	44	44	
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
30	Other local governments financing	44	44	44	44	44	-	-	-	-	-	-	44	44	44	44	
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
32	TOTAL GAR ASSETS	57,997	48,218	2,289	2,289	2,289	-	-	-	-	-	-	48,218	2,289	2,289	2,289	
Assets excluded from the numerator for GAR calculation (covered in the denominator)																	
33	EU Non-financial corporations (not subject to NFRD disclosure obligations)	17,373															
34	Loans and advances	17,364															
35	Debt securities	-															
36	Equity instruments	9															
37	Non-EU Non-financial corporations (not subject to NFRD disclosure obligations)	11,023															
38	Loans and advances	10,052															
39	Debt securities	905															
40	Equity instruments	66															
41	Derivatives	2,338															
42	On demand interbank loans	149															
43	Cash and cash-related assets	304															
44	Other assets (e.g. Goodwill, commodities etc.)	5,031															
45	TOTAL ASSETS IN THE DENOMINATOR (GAR)	94,215															
Other assets excluded from both the numerator and denominator for GAR calculation																	
46	Sovereigns	5,540															
47	Central banks exposure	32,612															
48	Trading book	2,092															
49	TOTAL ASSETS EXCLUDED FROM NUMERATOR AND DENOMINATOR	40,244															
50	TOTAL ASSETS	134,459															

The Group's total GAR based on turnover amounted to 2.4% of total covered assets as at 31 December 2023. The Taxonomy-aligned activities amounted to €2.3 billion at 31 December 2023. Gross carrying amount of total covered assets amounted to €94.2 billion as at 31 December 2023 (2022: €86.7 billion).

Reporting on Taxonomy-aligned activities for FY 2023 has been constrained due to current limitations on the availability of relevant information across key categories:

- When assessing Taxonomy-eligible and Taxonomy-aligned activities for financial and non-financial counterparties, actual information published by counterparties is required:
 - published reporting on Taxonomy-alignment KPIs from financial undertakings is not available at the reporting date;
 - non-financial undertakings have not yet published data for FY2023; consequently, the Taxonomy reporting of eligibility and alignment for non-financial undertakings is based on published data from FY2022; and
 - exposure to non-financial counterparties in the Group's corporate lending portfolio currently considered taxonomy eligible is limited to c.€155 million due to the eligibility criteria requiring counterparties to be large companies publicly listed in the EU. The alignment of this exposure is <€1 million based on the data reported by the eligible counterparties at FY2022.
- One renewable energy project finance exposure of c.€44 million has been included as aligned in the GAR as it meets Local Government Financing eligibility criteria. Further cases will be under future consideration as reporting criteria regarding public-private joint ventures becomes more established.
- When assessing Taxonomy-eligible and Taxonomy-aligned activities for lending to households, other data limitations impact reporting:
 - Residential mortgage exposures of c. €2,245 billion have been included in the GAR only where they are not subject to high physical risk of flood and have been built before 31 December 2020. These exposures are aligned if collateralised by properties with an A EPC rating if RoI based and an A or B rating if UK based. This set of criteria reflects current limitations on data availability on our lending stock and as such will not be fully reflective of underlying alignment. Newly implemented data collection processes are expected to have a positive impact on data availability in future reporting periods; and
 - Electric Vehicle (EV) lending exposures originated since the beginning of FY2023 of c.€50 million are considered eligible per taxonomy criteria. However they are not classified as aligned due to the lack of available information in the industry to assess the vehicles against the Taxonomy DNSH (Do No Significant Harm) criteria.

Table 12.8 below provides information to show to what extent credit institutions' activities qualify as environmentally sustainable in accordance with Articles 3 and 9 of Regulation (EU) 2020/852 so that stakeholders can understand the actions put in place by the institutions to mitigate climate change transition and physical risks.

Table 12.8 - Template 8 - GAR (%)

	Disclosure reference date T: KPIs on stock														Disclosure reference date T: KPIs on flows																		
	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				TOTAL (CCM + CCA)				Proportion of total assets covered	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				TOTAL (CCM + CCA)				Proportion of total new assets covered							
	Proportion of eligible assets funding taxonomy relevant				Proportion of eligible assets funding taxonomy relevant				Proportion of eligible assets funding taxonomy relevant					Proportion of new eligible assets funding taxonomy relevant				Proportion of new eligible assets funding taxonomy relevant				Proportion of new eligible assets funding taxonomy relevant											
	Of which environmentally sustainable				Of which environmentally sustainable				Of which environmentally sustainable				Of which environmentally sustainable				Of which environmentally sustainable				Of which environmentally sustainable												
% (compared to total covered assets in the denominator)	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae	af	
	Of which specialised lending	Of which transitional	Of which enabling	Of which specialised lending	Of which adaptation	Of which enabling	Of which specialised lending	Of which transitional / adaptation	Of which enabling	Of which specialised lending	Of which transitional / adaptation	Of which enabling	Of which specialised lending	Of which transitional / adaptation	Of which enabling	Of which specialised lending	Of which transitional / adaptation	Of which enabling	Of which specialised lending	Of which transitional / adaptation	Of which enabling	Of which specialised lending	Of which transitional / adaptation	Of which enabling	Of which specialised lending	Of which transitional / adaptation	Of which enabling	Of which specialised lending	Of which transitional / adaptation	Of which enabling	Of which specialised lending	Of which transitional / adaptation	Of which enabling
1 GAR	51.18	2.43	2.43	2.43	-	-	-	-	-	-	51.18	2.43	2.43	2.43	-	70.07	45.52	0.92	0.92	0.92	-	-	-	-	-	-	45.52	0.92	0.92	0.92	-	96.91	
Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	83.14	3.95	3.95	3.95	-	-	-	-	-	-	83.14	3.95	3.95	3.95	-	43.13	96.86	1.96	1.96	1.96	-	-	-	-	-	-	96.86	1.96	1.96	1.96	-	45.54	
2 Financial corporations	14.08	-	-	-	-	-	-	-	-	-	14.08	-	-	-	-	3.23	71.83	-	-	-	-	-	-	-	-	-	71.83	-	-	-	-	0.35	
3 Credit institutions	16.15	-	-	-	-	-	-	-	-	-	16.15	-	-	-	-	2.81	100.00	-	-	-	-	-	-	-	-	-	100.00	-	-	-	-	0.24	
4 Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.42	9.88	-	-	-	-	-	-	-	-	-	9.88	-	-	-	-	0.11	
5 of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.01	9.88	-	-	-	-	-	-	-	-	-	9.88	-	-	-	-	0.11	
6 of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.39	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
7 of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.01	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
8 Non-financial corporations subject to NFRD disclosure obligations	2.98	0.00	-	0.00	-	-	-	-	-	-	2.98	0.00	-	0.00	-	0.12	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
9 Households	88.97	4.20	4.20	4.20	-	-	-	-	-	-	88.97	4.20	4.20	4.20	-	39.76	97.05	1.97	1.97	1.97	-	-	-	-	-	-	97.05	1.97	1.97	1.97	-	45.20	
10 of which loans collateralised by residential immovable property	100.00	4.73	4.73	4.73	-	-	-	-	-	-	100.00	4.73	4.73	4.73	-	35.33	100.00	2.04	2.04	2.04	-	-	-	-	-	-	100.00	2.04	2.04	2.04	-	43.55	
11 of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
12 of which motor vehicle loans	1.95	-	-	-	-	-	-	-	-	-	1.95	-	-	-	-	1.89	19.28	-	-	-	-	-	-	-	-	-	19.28	-	-	-	-	1.65	
13 Local government financing	100.00	100.00	100.00	100.00	-	-	-	-	-	-	100.00	100.00	100.00	100.00	-	0.03	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
14 Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
15 Other local governments financing	100.00	100.00	100.00	100.00	-	-	-	-	-	-	100.00	100.00	100.00	100.00	-	0.03	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
16 Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
17	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

Table 12.9 below requires institutions to disclose in this template information on other climate change mitigating actions and includes exposures of the institutions that are not taxonomy aligned according to templates 7 and 8 but that still support counterparties in the transition and adaptation process for the objectives of climate change mitigation and climate change adaptation. These mitigating actions and activities shall include bonds and loans issued under standards other than the EU standards, like e.g. green bonds; sustainable bonds that are linked to aspects on climate change; sustainability-linked bonds that are linked to aspects on climate change; green loans; sustainability loans that are linked to aspects on climate change; sustainability-linked loans that are linked to aspects on climate change.

Table 12.9 - Template 10 - Other climate change mitigating actions that are not covered in the EU Taxonomy

a	b	c	d	e	f
Type of financial instrument	Type of counterparty	Gross carrying amount (million EUR)	Type of risk mitigated (Climate change transition risk)	Type of risk mitigated (Climate change physical risk)	Qualitative information on the nature of the mitigating actions
1	Financial corporations	161	Yes	No	The green bonds held in Bank of Ireland's Liquid Asset Portfolio fund activities within the following categories: Renewable energy, energy efficient technologies, green real estate, green energy production and storage infrastructure, clean transportation, climate change adaption, sustainable aquaculture, sustainable water management, agriculture and forestry, eco-efficient products, and pollution prevention and control.
2	Non-financial corporations	-	-	-	
3	Of which Loans collateralised by commercial immovable property	-	-	-	
4	Households	-	-	-	
5	Of which Loans collateralised by residential immovable property	-	-	-	
6	Of which building renovation loans	-	-	-	
7	Other counterparties	583	Yes	No	The Group's Sustainable Finance portfolio of €11.1 billion at FY2023 comprises of loans within the Group's Green Bond eligible assets portfolio, UK residential mortgages to EPC A and B rated properties and Sustainability-Linked loans. Exposures of c.€8.8bn disclosed in this table represents the non-EU taxonomy-aligned loans within the Group's Sustainable Finance portfolio. Additionally, exposures of c.€2.3m of EU taxonomy-aligned loans within the Green Eligible Assets Portfolio are reported in ESG Template 7.
8	Financial corporations	-	-	-	
9	Non-financial corporations	3,123	Yes	No	
10	Of which Loans collateralised by commercial immovable property	1,576	Yes	No	
11	Households	5,680	Yes	No	
12	Of which Loans collateralised by residential immovable property	5,574	Yes	No	
13	Of which building renovation loans	-	-	-	The Group is an established provider of sustainable finance products which supports its customers in respect of climate change mitigation and climate change adaptation. The Group products include green mortgages, home loans to improve energy-efficiencies, electric vehicle finance through to green business loans for energy efficiency and the provision of sustainable linked loans to the Group's corporate customers.
14	Other counterparties	-	-	-	

Green bonds disclosed in the template cover the Group's Liquid Asset Portfolio, i.e. high quality liquid assets which can be sold or pledged to facilitate the funding of unanticipated outflows. For a bond to be accepted as Green, a second party opinion (SPO) from a recognized provider must be maintained by the Portfolio Manager and independently validated by Group Market & Liquidity Risk (second line function). The Liquid Asset Portfolio Manager also utilises green bond indicators as provided by Bloomberg for cross-checking purposes.

The Group is an established provider of sustainable finance products which supports its customers in respect of climate change mitigation and climate change adaptation. The Group's products include green mortgages, home loans to improve energy-efficiency, electric vehicle finance through to green business loans for energy efficiency and the provision of sustainable linked loans to the Group's corporate customers.

Lending within the Green Eligible Assets Portfolio includes lending to green buildings (both residential and commercial), renewable energy and clean transportation (electric vehicles). The Group issued €2.25 billion in bonds through its Green Bond Framework during 2023, bringing total issuances to date to €4.75 billion.

For 31 December 2023, the Group has carried out its EU Taxonomy alignment exercise, the results of which has been disclosed in ESG Templates 6, 7 and 8. As a result of exercise, exposures of c.€2.3 billion from within the Green Eligible Assets Portfolio at 31 December 2023 have been recognised as EU Taxonomy aligned and therefore separately reported in ESG Template 6.

Appendix I - Table References		Bank of Ireland Group plc	
Guideline Reference	Table Reference	Table Name	Location Pillar 3
Annex 1 - Disclosure of key metrics and overview of risk-weighted exposure amounts	EU OV1	Overview of total risk exposure amounts	Tab 2.1
Annex 1 - Disclosure of key metrics and overview of risk-weighted exposure amounts	EU KM1	Key metrics	Tab 1.1
Annex 1 - Disclosure of key metrics and overview of risk-weighted exposure amounts	EU INS1	Insurance participations	not applicable to BOI
Annex 1 - Disclosure of key metrics and overview of risk-weighted exposure amounts	EU INS2	Financial conglomerates information on own funds and capital adequacy ratio	Capital Adequacy Risk Tab
Annex 1 - Disclosure of key metrics and overview of risk-weighted exposure amounts	EU OVC	ICAAP information	Capital Adequacy Risk Tab
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CRD IV / CRR Article	Disclosure Requirement	Annex	Template	P3 Location
CRR 435 - Risk management objectives and policies	1. Institutions shall disclose their risk management objectives and policies for each separate category of risk, including the risks referred to under this Title. These disclosures shall include:	Annex 3 Annex 13 Annex 15 Annex 29 Annex 31	EU OVA - Institution risk management approach EU LIQA - Liquidity risk management EU CRA: General qualitative information about credit risk EU MRA: Qualitative disclosure requirements related to market risk EU ORA - Qualitative information on operational risk	Risk Management, Risk Management Framework, Business risk, People risk, Strategic risk, Credit risk, Market risk, Operational risk, Funding and liquidity risk, Life insurance risk, Conduct and regulatory risk tabs.
CRR 435 - Risk management objectives and policies	(a) the strategies and processes to manage those categories of risks;	Annex 3 Annex 13 Annex 15 Annex 29 Annex 31	EU OVA - Institution risk management approach EU LIQA - Liquidity risk management EU CRA: General qualitative information about credit risk EU MRA: Qualitative disclosure requirements related to market risk EU ORA - Qualitative information on operational risk	Risk Management, Risk Management Framework, Business risk, People risk, Strategic risk, Credit risk, Market risk, Operational risk, Funding and liquidity risk, Life insurance risk, Conduct and regulatory risk tabs.
CRR 435 - Risk management objectives and policies	(b) the structure and organisation of the relevant risk management function including information on the basis of its authority, its powers and accountability in accordance with the institution's incorporation and governing documents;	Annex 3 Annex 13 Annex 15 Annex 29 Annex 31	EU OVA - Institution risk management approach EU LIQA - Liquidity risk management EU CRA: General qualitative information about credit risk EU MRA: Qualitative disclosure requirements related to market risk EU ORA - Qualitative information on operational risk	Risk Management, Risk Management Framework, Business risk, People risk, Strategic risk, Credit risk, Market risk, Operational risk, Funding and liquidity risk, Life insurance risk, Conduct and regulatory risk tabs.
CRR 435 - Risk management objectives and policies	(c) the scope and nature of risk reporting and measurement systems;	Annex 3 Annex 13 Annex 29 Annex 31	EU OVA - Institution risk management approach EU LIQA - Liquidity risk management EU MRA: Qualitative disclosure requirements related to market risk EU ORA - Qualitative information on operational risk	Risk Management, Risk Management Framework, Business risk, People risk, Strategic risk, Credit risk, Market risk, Operational risk, Funding and liquidity risk, Life insurance risk, Conduct and regulatory risk tabs.
CRR 435 - Risk management objectives and policies	(d) the policies for hedging and mitigating risk, and the strategies and processes for monitoring the continuing effectiveness of hedges and mitigants;	Annex 3 Annex 13 Annex 15 Annex 29 Annex 31	EU OVA - Institution risk management approach EU LIQA - Liquidity risk management EU CRA: General qualitative information about credit risk EU MRA: Qualitative disclosure requirements related to market risk EU ORA - Qualitative information on operational risk	Risk Management, Risk Management Framework, Business risk, People risk, Strategic risk, Credit risk, Market risk, Operational risk, Funding and liquidity risk, Life insurance risk, Conduct and regulatory risk tabs.
CRR 435 - Risk management objectives and policies	(e) a declaration approved by the management body on the adequacy of risk management arrangements of the institution providing assurance that the risk management systems put in place are adequate with regard to institution's profile and strategy;	Annex 3 Annex 13 Annex 31	EU OVA - Institution risk management approach EU LIQA - Liquidity risk management EU ORA - Qualitative information on operational risk	Risk Management, Risk Management Framework, Business risk, People risk, Strategic risk, Credit risk, Market risk, Operational risk, Funding and liquidity risk, Life insurance risk, Conduct and regulatory risk tabs.
CRR 435 - Risk management objectives and policies	(f) a concise risk statement approved by the management body succinctly describing the institution's overall risk profile associated with the business strategy. This statement shall include i) key ratios and figures providing external stakeholders with a comprehensive view of how the risk profile of the institution interacts with the risk tolerance set by the management body.	Annex 3 Annex 13 Annex 15 Annex 31	EU OVA - Institution risk management approach EU LIQA - Liquidity risk management EU CRA: General qualitative information about credit risk EU ORA - Qualitative information on operational risk	Risk Management, Risk Management Framework, Business risk, People risk, Strategic risk, Credit risk, Market risk, Operational risk, Funding and liquidity risk, Life insurance risk, Conduct and regulatory risk tabs.
CRR 435 - Risk management objectives and policies	(ii) information on intragroup transactions and transactions with related parties that may have a material impact of the risk profile of the consolidated group.	Annex 3 Annex 13 Annex 15 Annex 31	EU OVA - Institution risk management approach EU LIQA - Liquidity risk management EU CRA: General qualitative information about credit risk EU ORA - Qualitative information on operational risk	Risk Management, Risk Management Framework, Business risk, People risk, Strategic risk, Credit risk, Market risk, Operational risk, Funding and liquidity risk, Life insurance risk, Conduct and regulatory risk tabs.
CRR 435 - Risk management objectives and policies	2. Institutions shall disclose the following information, including regular, at least annual updates, regarding governance arrangements:	Annex 3	EU OVB - Disclosure on governance arrangements	EU OVB - Tab 3.2
CRR 435 - Risk management objectives and policies	(a) the number of directorships held by members of the management body;	Annex 3	EU OVB - Disclosure on governance arrangements	EU OVB - Tab 3.2
CRR 435 - Risk management objectives and policies	(b) the recruitment policy for the selection of members of the management body and their actual knowledge, skills and expertise;	Annex 3	EU OVB - Disclosure on governance arrangements	EU OVB - Tab 3.2
CRR 435 - Risk management objectives and policies	(c) the policy on diversity with regard to selection of members of the management body, its objectives and any relevant targets set out in that policy, and the extent to which these objectives and targets have been achieved;	Annex 3	EU OVB - Disclosure on governance arrangements	Risk Management Framework Tab
CRR 435 - Risk management objectives and policies	(d) whether or not the institution has set up a separate risk committee and the number of times the risk committee has met;	Annex 3	EU OVB - Disclosure on governance arrangements	Risk Management Framework Tab
CRR 435 - Risk management objectives and policies	(e) the description of the information flow on risk to the management body	Annex 3	EU OVB - Disclosure on governance arrangements	Risk Management Framework Tab
CRR 436 – Scope of application	Institutions shall disclose the following information regarding the scope of application of this Regulation as follows:	Annex 5		Forward looking statement Tab
CRR 436 – Scope of application	(a) the name of the institution to which the requirements of this Regulation apply;			
CRR 436 – Scope of application	(b) a reconciliation between the consolidated financial statements prepared in accordance with the applicable accounting framework and the consolidated financial statements prepared in accordance with the requirements on regulatory consolidation pursuant to Sections 2 and 3 of Title II of Part One; that reconciliation shall outline the differences between the accounting and regulatory scopes of consolidation and the legal entities included within the regulatory scope of consolidation where it differs from the accounting scope of consolidation; the outline of the legal entities included within the regulatory scope of consolidation shall describe the method of regulatory consolidation where it is different from the accounting consolidation method, whether those entities are fully or proportionally consolidated and whether the holdings in those legal entities are deducted from own funds;	Annex 5	EU LI3 - Outline of the differences in the scopes of consolidation (entity by entity) EU LIA - Explanations of differences between accounting and regulatory exposure amounts	EU LI3 - Appendix III EU LIA - Tab 1.4
CRR 436 – Scope of application	(c) a breakdown of assets and liabilities of the consolidated financial statements prepared in accordance with the requirements on regulatory consolidation pursuant to Sections 2 and 3 of Title II of Part One, broken down by type of risks as referred to under this Part;	Annex 5	EU LI1 - Differences between accounting and regulatory scopes of consolidation and mapping of financial statement categories with regulatory risk categories	EU LI1 - Tab 1.4
CRR 436 – Scope of application	(d) a reconciliation identifying the main sources of differences between the carrying value amounts in the financial statements under the regulatory scope of consolidation as defined in Sections 2 and 3 of Title II of Part One, and the exposure amount used for regulatory purposes; that reconciliation shall be supplemented by qualitative information on those main sources of differences;	Annex 5	EU LI2 - Main sources of differences between regulatory exposure amounts and carrying values in financial statements	EU LI2 - Tab 1.5
CRR 436 – Scope of application	(e) for exposures from the trading book and the non-trading book that are adjusted in accordance with Article 34 and Article 105, a breakdown of the amounts of the constituent elements of an institution's prudent valuation adjustment, by type of risks, and the total of constituent elements separately for the trading book and non-trading book positions;	Annex 5	EU PV1: Prudent valuation adjustments (PVA)	EU PV1 - Tab 2.5
CRR 436 – Scope of application	(f) any current or expected material practical or legal impediment to the prompt transfer of own funds or repayment of liabilities among the parent undertaking and its subsidiaries;	Annex 5	EU LIB - Other qualitative information on the scope of application	EU LIB - Tab 1.4
CRR 436 – Scope of application	(g) the aggregate amount by which the actual own funds are less than required in all subsidiaries not included in the consolidation, and the name or names of such subsidiaries;	Annex 5	EU LIB - Other qualitative information on the scope of application	EU LIB - Tab 1.4
CRR 436 – Scope of application	(h) if applicable, the circumstances of making use of the provisions laid down in Articles 7 and 9.	Annex 5	EU LIB - Other qualitative information on the scope of application	EU LIB - Tab 1.4
CRR 437 – Own funds	1. Institutions shall disclose the following information regarding their own funds:	Annex 7	EU CC1 - Composition of regulatory own funds EU CC2 - reconciliation of regulatory own funds to balance sheet in the audited financial statements	EU CC1 - Tab 2.2 EU CC1 - Tab 2.3
CRR 437 – Own funds	(a) A full reconciliation of Common Equity Tier 1 items, Additional Tier 1 items, Tier 2 items and filters and deductions applied pursuant to Articles 32 to 36, 56, 66 and 79 with the balance sheet in the audited financial statements of the institution;			
CRR 437 – Own funds	1.) b.) A description of the main features of the Common Equity Tier 1 and Additional Tier 1 instruments and Tier 2 instruments issued by the institution.	Annex 7	EU CCA: Main features of regulatory own funds instruments and eligible liabilities instruments	EU CCA - Appendix IV
CRR 437 – Own funds	1.) c.) the full terms and conditions of all Common Equity Tier 1, Additional Tier 1 and Tier 2 instruments;	Annex 7	EU CCA: Main features of regulatory own funds instruments and eligible liabilities instruments	EU CCA - Appendix IV
CRR 437 – Own funds	1.) d.) separate disclosure of the nature and amounts of the following:	Annex 7	EU CC1 - Composition of regulatory own funds	EU CC1 - Tab 2.2
CRR 437 – Own funds	(i) each prudential filter applied pursuant to Articles 32 to 35;			
CRR 437 – Own funds	(ii) each deduction made pursuant to Articles 36, 56 and 66;	Annex 7	EU CC1 - Composition of regulatory own funds	EU CC1 - Tab 2.2
CRR 437 – Own funds	(iii) items not deducted in accordance with Articles 47, 48, 56, 66 and 79;	Annex 7	EU CC1 - Composition of regulatory own funds	EU CC1 - Tab 2.2
CRR 437 – Own funds	1.) e.) a description of all restrictions applied to the calculation of own funds in accordance with this Regulation and the instruments, prudential filters and deductions to which those restrictions apply;	Annex 7	EU CC1 - Composition of regulatory own funds	EU CC1 - Tab 2.2
CRR 437 – Own funds	1.) f.) a comprehensive explanation of the basis on which capital ratios are calculated where those capital ratios are calculated by using elements of own funds determined on a basis other than the basis laid down in this Regulation.	Not applicable to BOI		
CRR 437a – Own funds and eligible liabilities	Institutions that are subject to Article 92a or 92b shall disclose the following information regarding their own funds and eligible liabilities:	Not applicable to BOI		

CRR 437a – Own funds and eligible liabilities	(a) the composition of their own funds and eligible liabilities, their maturity and their main features;	Not applicable to BOI		
CRR 437a – Own funds and eligible liabilities	(b) the ranking of eligible liabilities in the creditor hierarchy;	Not applicable to BOI		
CRR 437a – Own funds and eligible liabilities	(c) the total amount of each issuance of eligible liabilities instruments referred to in Article 72b and the amount of those issuances that is included in eligible liabilities items within the limits specified in Article 72b(3) and (4);	Not applicable to BOI		
CRR 437a – Own funds and eligible liabilities	(d) the total amount of excluded liabilities referred to in Article 72a(2).	Not applicable to BOI		
CRR 438 – Capital own funds requirements and risk weighted exposure amounts	Institutions shall disclose the following information regarding the compliance by the institution with the requirements laid down in Articles 92 of this Regulation and Article 73 of Directive 2013/36/EU: (a) A summary of the institution's approach to assessing the adequacy of its internal capital to support current and future activities;	Annex 1	EU OVC - ICAAP information	EU OVC - Capital Tab
CRR 438 – Capital own funds requirements and risk weighted exposure amounts	(b) the amount of the additional own funds requirements based on the supervisory review process as referred to in point (a) of Article 104(1) of Directive 2013/36/EU and its composition in terms of Common Equity Tier 1, additional Tier 1 and Tier 2 instruments;	Annex 1	EU KM1 - Overview of risk weighted exposure amounts	EU KM1 - Tab 1.1
CRR 438 – Capital own funds requirements and risk weighted exposure amounts	(c) upon demand from the relevant competent authority, the result of the institution's internal capital adequacy assessment process;	Annex 1	EU OVC - ICAAP information	EU OVC - Capital Tab
CRR 438 – Capital own funds requirements and risk weighted exposure amounts	(d) the total risk-weighted exposure amount and the corresponding total own funds requirement determined in accordance with Article 92, to be broken down by the different risk categories set out in Part Three and, where applicable, an explanation of the effect on the calculation of own funds and risk-weighted exposure amounts that results from applying capital floors and not deducting items from own funds;	Annex 1	EU OV1 - Overview of risk weighted exposure amounts	EU OV1 - Tab 2.1
CRR 438 – Capital own funds requirements and risk weighted exposure amounts	(e) the on- and off-balance-sheet exposures, the risk-weighted exposure amounts and associated expected losses for each category of specialised lending referred to in Table 1 of Article 153(5) and the on- and off-balance-sheet exposures and risk-weighted exposure amounts for the categories of equity exposures set out in Article 155(2);	Annex 23	EU CR10 – Specialised lending and equity exposures under the simple risk weighted approach	EU CR10 - Not applicable to BOI
CRR 438 – Capital own funds requirements and risk weighted exposure amounts	(f) the exposure value and the risk-weighted exposure amount of own funds instruments held in any insurance undertaking, reinsurance undertaking or insurance holding company that the institutions do not deduct from their own funds in accordance with Article 49 when calculating their capital requirements on an individual, sub-consolidated and consolidated basis;	Annex 1	EU INS1 - Insurance participations	EU INS1 - Not applicable to BOI
CRR 438 – Capital own funds requirements and risk weighted exposure amounts	(g) the supplementary own funds requirement and the capital adequacy ratio of the financial conglomerate calculated in accordance with Article 6 of Directive 2002/87/EC and Annex I to that Directive where method 1 or 2 set out in that Annex is applied;	Annex 1	EU INS2 - Financial conglomerates information on own funds and capital adequacy ratio	EU OVC - Capital Tab
CRR 438 – Capital own funds requirements and risk weighted exposure amounts	(h) the variations in the risk-weighted exposure amounts of the current disclosure period compared to the immediately preceding disclosure period that result from the use of internal models, including an outline of the key drivers explaining those variations.	Annex 21 Annex 25 Annex 29	EU CR8 – RWEA flow statements of credit risk exposures under the IRB approach EU CCR7 – RWEA flow statements of CCR exposures under the IMM EU MR2-B - RWA flow statements of market risk exposures under the IMA	EU CR8 - Tab 4.7 EU CCR7 - Not applicable to BOI EU MR2-B - Not applicable to BOI
CRR 439 – Exposure to counterparty credit risk	Institutions shall disclose the following information regarding the institution's exposure to counterparty credit risk as defined in Part Three, Title II, Chapter 6: (a) a description of the methodology used to assign internal capital and credit limits for counterparty credit exposures, including the methods to assign those limits to exposures to central counterparties;	Annex 25	EU CCRA – Qualitative disclosure related to CCR	EU CCRA – Counterparty Credit Risk Tab
CRR 439 – Exposure to counterparty credit risk	(b) a description of policies related to guarantees and other credit risk mitigants, such as the policies for securing collateral and establishing credit reserves;	Annex 25	EU CCRA – Qualitative disclosure related to CCR	EU CCRA – Counterparty Credit Risk Tab
CRR 439 – Exposure to counterparty credit risk	(c) a description of policies with respect to General Wrong-Way risk and Specific Wrong-Way risk as defined in Article 291;	Annex 25	EU CCRA – Qualitative disclosure related to CCR	EU CCRA – Counterparty Credit Risk Tab
CRR 439 – Exposure to counterparty credit risk	(d) the amount of collateral the institution would have to provide if its credit rating was downgraded;	Annex 25	EU CCRA – Qualitative disclosure related to CCR	EU CCRA – Counterparty Credit Risk Tab
CRR 439 – Exposure to counterparty credit risk	(e) the amount of segregated and unsegregated collateral received and posted per type of collateral, further broken down between collateral used for derivatives and securities financing transactions;	Annex 25	EU CCR5 – Composition of collateral for CCR exposures	EU CCR5 – Tab 5.5
CRR 439 – Exposure to counterparty credit risk	(f) for derivative transactions, the exposure values before and after the effect of the credit risk mitigation as determined under the methods set out in Sections 3 to 6 of Chapter 6 of Title II of Part Three, whichever method is applicable, and the associated risk exposure amounts broken down by applicable method;	Annex 25	EU CCR1 – Analysis of CCR exposure by approach	EU CCR1 - Tab 5.1
CRR 439 – Exposure to counterparty credit risk	(g) the notional value of credit derivative hedges, and the distribution of current credit exposure by types of credit exposure;	Annex 25	EU CCR1 – Analysis of CCR exposure by approach	EU CCR1 - Tab 5.2
CRR 439 – Exposure to counterparty credit risk	(h) the exposure values after credit risk mitigation effects and the associated risk exposures for credit valuation adjustment capital charge, separately for each method as set out in Title VI of Part Three;	Annex 25	EU CCR2 – Transactions subject to own funds requirements for CVA risk	EU CCR2 - Tab 5.4
CRR 439 – Exposure to counterparty credit risk	(i) the exposure value to central counterparties and the associated risk exposures within the scope of Section 9 of Chapter 6 of Title II of Part Three, separately for qualifying and non-qualifying central counterparties, and broken down by types of exposures;	Annex 25	EU CCR8 – Exposures to CCPs	EU CCR8 – Tab 5.7
CRR 439 – Exposure to counterparty credit risk	(j) the notional amounts and fair value of credit derivative transactions; credit derivative transactions shall be broken down by product type; within each product type, credit derivative transactions shall be broken down further by credit protection bought and credit protection sold;	Annex 25	EU CCR6 – Credit derivatives exposures	EU CCR6 – Tab 5.6
CRR 439 – Exposure to counterparty credit risk	(k) the estimate of alpha where the institution has received the permission of the competent authorities to use its own estimate of alpha in accordance with Article 284(9);	Annex 25	EU CCR1 – Analysis of CCR exposure by approach	EU CCR1 - Tab 5.2
CRR 439 – Exposure to counterparty credit risk	(l) separately, the disclosures included in point (e) of Article 444 and point (g) of Article 452;	Annex 25	EU CCR3 – Standardised approach – CCR exposures by regulatory exposure class and risk weights EU CCR4 – IRB approach – CCR exposures by exposure class and PD scale	EU CCR3 – Tab 5.2 EU CCR4 – Tab 5.3
CRR 439 – Exposure to counterparty credit risk	(m) for institutions using the methods set out in Sections 4 to 5 of Chapter 6 of Title II Part Three, the size of their on- and off-balance-sheet derivative business as calculated in accordance with Article 273a(1) or (2), as applicable. Where the central bank of a Member State provides liquidity assistance in the form of collateral swap transactions, the competent authority may exempt institutions from the requirements in points (d) and (e) of the first subparagraph where that competent authority considers that the disclosure of the information referred to therein could reveal that emergency liquidity assistance has been provided. For those purposes, the competent authority shall set out appropriate thresholds and objective criteria.	Annex 25	EU CCR1 – Analysis of CCR exposure by approach	EU CCR1 - Tab 5.1
CRR 440 - Capital Buffers	1. An institution shall disclose the following information in relation to its compliance with the requirement for a countercyclical capital buffer referred to in Title VII, Chapter 4 of Directive 2013/36/EU.:	Annex 9	EU CCyB1 - Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer	EU CCyB1 - Tab 2.4
CRR 440 - Capital Buffers	a. the geographical distribution of the exposure amounts and risk-weighted exposure amounts of its credit exposures used as a basis for the calculation of their countercyclical capital buffer;	Annex 9	EU CCyB1 - Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer	EU CCyB1 - Tab 2.4
CRR 440 - Capital Buffers	b. the amount of their institution-specific countercyclical capital buffer.	Annex 9	EU CCyB2 - Amount of institution-specific countercyclical capital buffer	EU CCyB2 - Tab 2.4
CRR 441 - Indicators of global systemic importance	G-SIIs shall disclose, on an annual basis, the values of the indicators used for determining their score in accordance with the identification methodology referred to in Article 131 of Directive 2013/36/EU.	Not applicable to BOI as BOI is not a G-SII.		
CRR 442 – exposures to credit risk and dilution risk	Institutions shall disclose the following information regarding their exposures to credit risk and dilution risk:	Annex 15	EU CRB: Additional disclosure related to the credit quality of assets	EU CRB - Credit Risk Tab
CRR 442 – exposures to credit risk and dilution risk	(a) the scope and definitions that they use for accounting purposes of 'past due' and 'impaired' and the differences, if any, between the definitions of 'past due' and 'default' for accounting and regulatory purposes;	Annex 15	EU CRB: Additional disclosure related to the credit quality of assets	EU CRB - Credit Risk Tab
CRR 442 – exposures to credit risk and dilution risk	(b) a description of the approaches and methods adopted for determining specific and general credit risk adjustments;	Annex 15	EU CRB: Additional disclosure related to the credit quality of assets	EU CRB - Credit Risk Tab
CRR 442 – exposures to credit risk and dilution risk	(c) information on the amount and quality of performing, non-performing and forbore exposures for loans, debt securities and off-balance-sheet exposures, including their related accumulated impairment, provisions and negative fair value changes due to credit risk and amounts of collateral and financial guarantees received;	Annex 15	EU CQ3: Credit quality of performing and non-performing exposures by past due days EU CR1: Performing and non-performing exposures and related provisions EU CQ1: Credit quality of forbore exposures EU CQ4: Quality of non-performing exposures by geography EU CQ5: Credit quality of loans and advances by industry EU CQ2: Quality of forbearance EU CR2a: Changes in the stock of non-performing loans and advances and related net accumulated recoveries EU CQ7: Collateral obtained by taking possession and execution processes EU CQ4: Quality of non-performing exposures by geography EU CQ5: Credit quality of loans and advances by industry EU CQ6: Collateral valuation - loans and advances EU CQ8: Collateral obtained by taking possession and execution processes – vintage breakdown	EU CQ3 - Tab 4.13 EU CR1 - Tab 4.11 EU CQ1 - Tab 4.15 EU CQ4 - Tab 4.16 EU CQ5 - Tab 4.17 EU CQ2 - not applicable to BOI as NPL below 5% threshold EU CR2a - not applicable to BOI as NPL below 5% threshold EU CQ7 - Not applicable to BOI EU CQ8 - Not applicable to BOI
CRR 442 – exposures to credit risk and dilution risk	(d) an ageing analysis of accounting past due exposures;	Annex 15	EU CQ3: Credit quality of performing and non-performing exposures by past due days	EU CQ3 - Tab 4.13

CRR 442 – exposures to credit risk and dilution risk	(e) the gross carrying amounts of both defaulted and non-defaulted exposures, the accumulated specific and general credit risk adjustments, the accumulated write-offs taken against those exposures and the net carrying amounts and their distribution by geographical area and industry type and for loans, debt securities and off-balance-sheet exposures;	Annex 15	EU CQ4: Quality of non-performing exposures by geography EU CQ5: Credit quality of loans and advances by industry EU CQ4: Quality of non-performing exposures by geography EU CQ5: Credit quality of loans and advances by industry	EU CQ4 - Tab 4.16 EU CQ5 - Tab 4.17
CRR 442 – exposures to credit risk and dilution risk	(f) any changes in the gross amount of defaulted on- and off-balance-sheet exposures, including, as a minimum, information on the opening and closing balances of those exposures, the gross amount of any of those exposures reverted to non-defaulted status or subject to a write-off;	Annex 15	EU CR2: Changes in the stock of non-performing loans and advances EU CR1: Performing and non-performing exposures and related provisions EU CR2a: Changes in the stock of non-performing loans and advances and related net accumulated recoveries	EU CR2 - Tab 4.14 EU CR1 - Tab 4.11 EU CR2a - not applicable to BOI as NPL below 5% threshold
CRR 442 – exposures to credit risk and dilution risk	(g) the breakdown of loans and debt securities by residual maturity.	Annex 15	EU CR1-A: Maturity of exposures	EU CR1-A - Tab 4.12
CRR 443 – Unencumbered Assets	Institutions shall disclose information concerning their encumbered and unencumbered assets. For those purposes, institutions shall use the carrying amount per exposure class broken down by asset quality and the total amount of the carrying amount that is encumbered and unencumbered. Disclosure of information on encumbered and unencumbered assets shall not reveal emergency liquidity assistance provided by central banks.	Annex 35	EU AE1 - Encumbered and unencumbered assets EU AE2 - Collateral received and own debt securities issued EU AE3 - Sources of encumbrance EU AE4 - Accompanying narrative information	EU AE1 - Tab 9.4 EU AE2 - Tab 9.5 EU AE3 - Tab 9.6 EU AE4 - Tab 9.6
CRR 444 – use of the standardised approach	Institutions calculating their risk-weighted exposure amounts in accordance with Chapter 2 of Title II of Part Three shall disclose the following information for each of the exposure classes set out in Article 112:	Annex 19	EU CRD – Qualitative disclosure requirements related to standardised model	EU CRD – Standardised Approach Tab
CRR 444 – use of the standardised approach	(a) the names of the nominated ECAIs and ECAs and the reasons for any changes in those nominations over the disclosure period;	Annex 19	EU CRD – Qualitative disclosure requirements related to standardised model	EU CRD – Standardised Approach Tab
CRR 444 – use of the standardised approach	(b) the exposure classes for which each ECAI or ECA is used;	Annex 19	EU CRD – Qualitative disclosure requirements related to standardised model	EU CRD – Standardised Approach Tab
CRR 444 – use of the standardised approach	(c) a description of the process used to transfer the issuer and issue credit ratings onto items not included in the trading book;	Annex 19	EU CRD – Qualitative disclosure requirements related to standardised model	EU CRD – Standardised Approach Tab
CRR 444 – use of the standardised approach	(d) the association of the external rating of each nominated ECAI or ECA with the risk weights that correspond to the credit quality steps as set out in Chapter 2 of Title II of Part Three, taking into account that it is not necessary to disclose that information where the institutions comply with the standard association published by EBA;	Annex 19	EU CRD – Qualitative disclosure requirements related to standardised model	EU CRD – Standardised Approach Tab
CRR 444 – use of the standardised approach	(e) the exposure values and the exposure values after credit risk mitigation associated with each credit quality step as set out in Chapter 2 of Title II of Part Three, by exposure class, as well as the exposure values deducted from own funds.	Annex 19 Annex 25	EU CR4 – standardised approach – Credit risk exposure and CRM effects EU CR5 – standardised approach EU CCR3 – Standardised approach – CCR exposures by regulatory exposure class and risk weights	EU CR4 – Tab 4.1 EU CR5 – Tab 4.2 EU CCR3 – Tab 5.2
CRR 445 – Exposure to market risk	The institutions calculating their own funds requirements in accordance with points (b) and (c) of Article 92(3) shall disclose those requirements separately for each risk referred to in those provisions. In addition, the own funds requirement for specific interest rate risk of securitisation positions shall be disclosed separately.	Annex 29	EU MR1 - Market risk under the standardised approach	EU MR1 - Tab 7.1
CRR 446 – Operational risk	Institutions shall disclose the following information about their operational risk management: (a) the approaches for the assessment of own funds requirements for operation risk that the institution qualifies for;	Annex 31	EU ORA - Qualitative information on operational risk EU OR1 - Operational risk own funds requirements and risk-weighted exposure amounts	EU ORA - Operational Risk Tab EU OR1 - Tab 8.1
CRR 446 – Operational risk	(b) where the institution makes use of it, a description of the methodology set out in Article 312(2), which shall include a discussion of the relevant internal and external factors being considered in the institution's advanced measurement approach;	Annex 31	EU ORA - Qualitative information on operational risk EU OR1 - Operational risk own funds requirements and risk-weighted exposure amounts	EU ORA - Operational Risk Tab EU OR1 - Tab 8.1
CRR 446 – Operational risk	(c) in the case of partial use, the scope and coverage of the different methodologies used.	Annex 31	EU ORA - Qualitative information on operational risk EU OR1 - Operational risk own funds requirements and risk-weighted exposure amounts	EU ORA - Operational Risk Tab EU OR1 - Tab 8.1
CRR 447 – Key Metrics	Institutions shall disclose the following key metrics in a tabular format:	Annex 1	EU KM1 - Overview of risk weighted exposure amounts	EU KM1 - Tab 1.1
CRR 447 – Key Metrics	(a) the composition of their own funds and their own funds requirements as calculated in accordance with Article 92;	Annex 1	EU KM1 - Overview of risk weighted exposure amounts	EU KM1 - Tab 1.1
CRR 447 – Key Metrics	(b) the total risk exposure amount as calculated in accordance with Article 92(3);	Annex 1	EU KM1 - Overview of risk weighted exposure amounts	EU KM1 - Tab 1.1
CRR 447 – Key Metrics	(c) where applicable, the amount and composition of additional own funds which the institutions are required to hold in accordance with point (a) of Article 104(1) of Directive 2013/36/EU;	Annex 1	EU KM1 - Overview of risk weighted exposure amounts	EU KM1 - Tab 1.1
CRR 447 – Key Metrics	(d) their combined buffer requirement which the institutions are required to hold in accordance with Chapter 4 of Title VII of Directive 2013/36/EU;	Annex 1	EU KM1 - Overview of risk weighted exposure amounts	EU KM1 - Tab 1.1
CRR 447 – Key Metrics	(e) their leverage ratio and the total exposure measure as calculated in accordance with Article 429;	Annex 1	EU KM1 - Overview of risk weighted exposure amounts	EU KM1 - Tab 1.1
CRR 447 – Key Metrics	(f) the following information in relation to their liquidity coverage ratio as calculated in accordance with the delegated act referred to in Article 460(1): (i) the average or averages, as applicable, of their liquidity coverage ratio based on end-of-the-month observations over the preceding 12 months for each quarter of the relevant disclosure period; (ii) the average or averages, as applicable, of total liquid assets, after applying the relevant haircuts, included in the liquidity buffer pursuant to the delegated act referred to in Article 460(1), based on end-of-the-month observations over the preceding 12 months for each quarter of the relevant disclosure period; (iii) the averages of their liquidity outflows, inflows and net liquidity outflows as calculated pursuant to the delegated act referred to in Article 460(1), based on end-of-the-month observations over the preceding 12 months for each quarter of the relevant disclosure period;	Annex 1	EU KM1 - Overview of risk weighted exposure amounts	EU KM1 - Tab 1.1
CRR 447 – Key Metrics	(g) the following information in relation to their net stable funding requirement as calculated in accordance with Title IV of Part Six: (i) the net stable funding ratio at the end of each quarter of the relevant disclosure period; (ii) the available stable funding at the end of each quarter of the relevant disclosure period; (iii) the required stable funding at the end of each quarter of the relevant disclosure period;	Annex 1	EU KM1 - Overview of risk weighted exposure amounts	EU KM1 - Tab 1.1
CRR 447 – Key Metrics	(h) their own funds and eligible liabilities ratios and their components, numerator and denominator, as calculated in accordance with Articles 92a and 92b and broken down at the level of each resolution group, where applicable.	Not applicable to BOI		
CRR 448 – Exposure to interest rate risk on positions not included in the trading book	11. As from 28 June 2021, institutions shall disclose the following quantitative and qualitative information on the risks arising from potential changes in interest rates that affect both the economic value of equity and the net interest income of their non-trading book activities referred to in Article 84 and Article 98(5) of Directive 2013/36/EU:	new IRRBB Disclosures	EU IRRBB1 - Interest rate risks of non-trading book activities	EU IRRBB1 - Tab 7.2
CRR 448 – Exposure to interest rate risk on positions not included in the trading book	(a) the changes in the economic value of equity calculated under the six supervisory shock scenarios referred to in Article 98(5) of Directive 2013/36/EU for the current and previous disclosure periods;	new IRRBB Disclosures	EU IRRBB1 - Interest rate risks of non-trading book activities	EU IRRBB1 - Tab 7.2
CRR 448 – Exposure to interest rate risk on positions not included in the trading book	(b) the changes in the net interest income calculated under the two supervisory shock scenarios referred to in Article 98(5) of Directive 2013/36/EU for the current and previous disclosure periods;	new IRRBB Disclosures	EU IRRBB1 - Interest rate risks of non-trading book activities	EU IRRBB1 - Tab 7.2
CRR 448 – Exposure to interest rate risk on positions not included in the trading book	(c) a description of key modelling and parametric assumptions, other than those referred to in points (b) and (c) of Article 98(5a) of Directive 2013/36/EU used to calculate changes in the economic value of equity and in the net interest income required under points (a) and (b) of this paragraph;	new IRRBB Disclosures	EU IRRBB1 - Interest rate risks of non-trading book activities	EU IRRBB1 - Tab 7.2
CRR 448 – Exposure to interest rate risk on positions not included in the trading book	(d) an explanation of the significance of the risk measures disclosed under points (a) and (b) of this paragraph and of any significant variations of those risk measures since the previous disclosure reference date;	new IRRBB Disclosures	EU IRRBB1 - Interest rate risks of non-trading book activities	EU IRRBB1 - Tab 7.2
CRR 448 – Exposure to interest rate risk on positions not included in the trading book	(e) the description of how institutions define, measure, mitigate and control the interest rate risk of their non-trading book activities for the purposes of the competent authorities' review in accordance with Article 84 of Directive 2013/36/EU, including: (i) a description of the specific risk measures that the institutions use to evaluate changes in their economic value of equity and in their net interest income; (ii) a description of the key modelling and parametric assumptions used in the institutions' internal measurement systems that would differ from the common modelling and parametric assumptions referred to in Article 98(5a) of Directive 2013/36/EU for the purpose of calculating changes to the economic value of equity and to the net interest income, including the rationale for those differences; (iii) a description of the interest rate shock scenarios that institutions use to estimate the interest rate risk; (iv) the recognition of the effect of hedges against those interest rate risks, including internal hedges that meet the requirements laid down in Article 106(3); (v) an outline of how often the evaluation of the interest rate risk occurs;	new IRRBB Disclosures	EU IRRBBA - Qualitative information on interest rate risks of non-trading book activities	EU IRRBBA - IRRBB Tab
CRR 448 – Exposure to interest rate risk on positions not included in the trading book	(f) the description of the overall risk management and mitigation strategies for those risks	new IRRBB Disclosures	EU IRRBBA - Qualitative information on interest rate risks of non-trading book activities	EU IRRBBA - IRRBB Tab

CRR 448 – Exposure to interest rate risk on positions not included in the trading book	(g) average and longest repricing maturity assigned to non-maturity deposits.	new IRRBB Disclosures	EU IRRBBA - Qualitative information on interest rate risks of non-trading book activities	EU IRRBBA - IRRBB Tab
CRR 448 – Exposure to interest rate risk on positions not included in the trading book	2.By way of derogation from paragraph 1 of this Article, the requirements set out in points (c) and (e)(i) to (e) (iv) of paragraph 1 of this Article shall not apply to institutions that use the standardised methodology or the simplified standardised methodology referred to in Article 84(1) of Directive 2013/36/EU.	new IRRBB Disclosures	EU IRRBBA - Qualitative information on interest rate risks of non-trading book activities	EU IRRBBA - IRRBB Tab
CRR 449 – Exposure to securitisation positions	Institutions calculating risk-weighted exposure amounts in accordance with Chapter 5 of Title II of Part Three or own funds requirements in accordance with Article 337 or 338 shall disclose the following information separately for their trading book and non-trading book activities:	Annex 27	EU-SECA - Qualitative disclosure requirements related to securitisation exposures	EU SECA - Securitisations Tab
CRR 449 – Exposure to securitisation positions	(a) a description of their securitisation and re-securitisation activities, including their risk management and investment objectives in connection with those activities, their role in securitisation and re-securitisation transactions, whether they use the simple, transparent and standardised securitisation (STS) as defined in point (10) of Article 242, and the extent to which they use securitisation transactions to transfer the credit risk of the securitised exposures to third parties with, where applicable, a separate description of their synthetic securitisation risk transfer policy;	Annex 27	EU-SECA - Qualitative disclosure requirements related to securitisation exposures	EU SECA - Securitisations Tab
CRR 449 – Exposure to securitisation positions	(b) the type of risks they are exposed to in their securitisation and re-securitisation activities by level of seniority of the relevant securitisation positions providing a distinction between STS and non-STs positions and: (i) the risk retained in own-originated transactions; (ii) the risk incurred in relation to transactions originated by third parties;	Annex 27	EU-SECA - Qualitative disclosure requirements related to securitisation exposures	EU SECA - Securitisations Tab
CRR 449 – Exposure to securitisation positions	(c) their approaches for calculating the risk-weighted exposure amounts that they apply to their securitisation activities, including the types of securitisation positions to which each approach applies and with a distinction between STS and non-STs positions;	Annex 27	EU-SECA - Qualitative disclosure requirements related to securitisation exposures	EU SECA - Securitisations Tab
CRR 449 – Exposure to securitisation positions	(d) a list of SSPEs falling into any of the following categories, with a description of their types of exposures to those SSPEs, including derivative contracts: (i) SSPEs which acquire exposures originated by the institutions; (ii) SSPEs sponsored by the institutions; (iii) SSPEs and other legal entities for which the institutions provide securitisation-related services, such as advisory, asset servicing or management services; (iv) SSPEs included in the institutions' regulatory scope of consolidation;	Annex 27	EU-SECA - Qualitative disclosure requirements related to securitisation exposures	EU SECA - Securitisations Tab
CRR 449 – Exposure to securitisation positions	(e) a list of any legal entities in relation to which the institutions have disclosed that they have provided support in accordance with Chapter 5 of Title II of Part Three;	Annex 27	EU-SECA - Qualitative disclosure requirements related to securitisation exposures	EU SECA - Securitisations Tab
CRR 449 – Exposure to securitisation positions	(f) a list of legal entities affiliated with the institutions and that invest in securitisations originated by the institutions or in securitisation positions issued by SSPEs sponsored by the institutions;	Annex 27	EU-SECA - Qualitative disclosure requirements related to securitisation exposures	EU SECA - Securitisations Tab
CRR 449 – Exposure to securitisation positions	(g) a summary of their accounting policies for securitisation activity, including where relevant a distinction between securitisation and re-securitisation positions;	Annex 27	EU-SECA - Qualitative disclosure requirements related to securitisation exposures	EU SECA - Securitisations Tab
CRR 449 – Exposure to securitisation positions	(h) the names of the ECAs used for securitisations and the types of exposure for which each agency is used;	Annex 27	EU-SECA - Qualitative disclosure requirements related to securitisation exposures	EU SECA - Securitisations Tab
CRR 449 – Exposure to securitisation positions	(i) where applicable, a description of the Internal Assessment Approach as set out in Chapter 5 of Title II of Part Three, including the structure of the internal assessment process and the relation between internal assessment and external ratings of the relevant ECAI disclosed in accordance with point (h), the control mechanisms for the internal assessment process including discussion of independence, accountability, and internal assessment process review, the exposure types to which the internal assessment process is applied and the stress factors used for determining credit enhancement levels;	Annex 27	EU-SECA - Qualitative disclosure requirements related to securitisation exposures	EU SECA - Securitisations Tab
CRR 449 – Exposure to securitisation positions	(j) separately for the trading book and the non-trading book, the carrying amount of securitisation exposures, including information on whether institutions have transferred significant credit risk in accordance with Articles 244 and 245, for which institutions act as originator, sponsor or investor, separately for traditional and synthetic securitisations, and for STS and non-STs transactions and broken down by type of securitisation exposures;	Annex 27	EU-SEC1 - Securitisation exposures in the non-trading book EU-SEC2 - Securitisation exposures in the trading book	EU-SEC1 - Tab 6.1 EU-SEC2 - Not applicable to BOI
CRR 449 – Exposure to securitisation positions	(k) for the non-trading book activities, the following information: (i) the aggregate amount of securitisation positions where institutions act as originator or sponsor and the associated risk-weighted assets and capital requirements by regulatory approaches, including exposures deducted from own funds or risk weighted at 1 250 %, broken down between traditional and synthetic securitisations and between securitisation and re-securitisation exposures, separately for STS and non-STs positions, and further broken down into a meaningful number of risk-weight or capital requirement bands and by approach used to calculate the capital requirements; (ii) the aggregate amount of securitisation positions where institutions act as investor and the associated risk-weighted assets and capital requirements by regulatory approaches, including exposures deducted from own funds or risk weighted at 1 250 %, broken down between traditional and synthetic securitisations, securitisation and re-securitisation positions, and STS and non-STs positions, and further broken down into a meaningful number of risk weight or capital requirement bands and by approach used to calculate the capital requirements;	Annex 27	EU-SEC3 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as originator or as sponsor EU-SEC4 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as investor	EU-SEC3 - Tab 6.2 EU-SEC4 - Tab 6.3
CRR 449 – Exposure to securitisation positions	(l) for exposures securitised by the institution, the amount of exposures in default and the amount of the specific credit risk adjustments made by the institution during the current period, both broken down by exposure type.	Annex 27	EU-SEC5 - Exposures securitised by the institution - Exposures in default and specific credit risk adjustments	EU-SEC5 - Tab 6.4
CRR 449a – Environmental, social and governance risks (ESG risks)	From 28 June 2022, large institutions which have issued securities that are admitted to trading on a regulated market of any Member State, as defined in point (21) of Article 4(1) of Directive 2014/65/EU, shall disclose information on ESG risks, including physical risks and transition risks, as defined in the report referred to in Article 98(8) of Directive 2013/36/EU. The information referred to in the first paragraph shall be disclosed on an annual basis for the first year and biannually thereafter.	Annex XL	Table 1 - Qualitative information on Environmental risk Table 2 - Qualitative information on Social Risk Table 3 - Qualitative information on Governmental risk Template 1: Climate change transition risk: Quality of exposures by sector Template 2: Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral Template 4: Climate change transition risk: Exposures to top 20 carbon-intensive firms Template 5: Climate change physical risk: Exposures subject to physical risk	Table 1 - ESG Risk Tab Table 2 - ESG Risk Tab Table 3 - ESG Risk Tab Template 1 - Tab 12.1 Template 2 - Tab 12.2 Template 4 - Tab 12.3 Template 5 - Tab 12.4
CRR 450 – Remuneration policy	1.Institutions shall disclose the following information regarding their remuneration policy and practices for those categories of staff whose professional activities have a material impact on the risk profile of the institutions:	Annex 33	EU REMA - Remuneration policy	EU REMA - Remuneration Tab
CRR 450 – Remuneration policy	(a) information concerning the decision-making process used for determining the remuneration policy, as well as the number of meetings held by the main body overseeing remuneration during the financial year, including, where applicable, information about the composition and the mandate of a remuneration committee, the external consultant whose services have been used for the determination of the remuneration policy and the role of the relevant stakeholders;	Annex 33	EU REMA - Remuneration policy	EU REMA - Remuneration Tab
CRR 450 – Remuneration policy	(b) information about the link between pay of the staff and their performance;	Annex 33	EU REMA - Remuneration policy	EU REMA - Remuneration Tab
CRR 450 – Remuneration policy	(c) the most important design characteristics of the remuneration system, including information on the criteria used for performance measurement and risk adjustment, deferral policy and vesting criteria;	Annex 33	EU REMA - Remuneration policy	EU REMA - Remuneration Tab
CRR 450 – Remuneration policy	(d) the ratios between fixed and variable remuneration set in accordance with point (g) of Article 94(1) of Directive 2013/36/EU;	Annex 33	EU REMA - Remuneration policy	EU REMA - Remuneration Tab
CRR 450 – Remuneration policy	(e) information on the performance criteria on which the entitlement to shares, options or variable components of remuneration is based;	Annex 33	EU REMA - Remuneration policy	EU REMA - Remuneration Tab
CRR 450 – Remuneration policy	(f) the main parameters and rationale for any variable component scheme and any other non-cash benefits;	Annex 33	EU REMA - Remuneration policy	EU REMA - Remuneration Tab
CRR 450 – Remuneration policy	(g) aggregate quantitative information on remuneration, broken down by business area;	Annex 33	EU REM5 - Information on remuneration of staff whose professional activities have a material impact on institutions' risk profile (identified staff)	EU REM5 - Tab 11.5
CRR 450 – Remuneration policy	(h) aggregate quantitative information on remuneration, broken down by senior management and members of staff whose professional activities have a material impact on the risk profile of the institutions, indicating the following: (i) the amounts of remuneration awarded for the financial year, split into fixed remuneration including a description of the fixed components, and variable remuneration, and the number of beneficiaries;	Annex 33	EU REM1 - Remuneration awarded for the financial year	EU REM1 - Tab 11.1
CRR 450 – Remuneration policy	(ii) the amounts and forms of awarded variable remuneration, split into cash, shares, share-linked instruments and other types separately for the part paid upfront and the deferred part;	Annex 33	EU REM1 - Remuneration awarded for the financial year	EU REM1 - Tab 11.1
CRR 450 – Remuneration policy	(iii) the amounts of deferred remuneration awarded for previous performance periods, split into the amount due to vest in the financial year and the amount due to vest in subsequent years;	Annex 33	EU REM3 - Deferred remuneration	EU REM3 - Tab 11.3
CRR 450 – Remuneration policy	(iv) the amount of deferred remuneration due to vest in the financial year that is paid out during the financial year, and that is reduced through performance adjustments;	Annex 33	EU REM3 - Deferred remuneration	EU REM3 - Tab 11.3
CRR 450 – Remuneration policy	(v) the guaranteed variable remuneration awards during the financial year, and the number of beneficiaries of those awards;	Annex 33	EU REM2 - Special payments to staff whose professional activities have a material impact on institutions' risk profile (identified staff)	EU REM2 - Tab 11.2
CRR 450 – Remuneration policy	(vi) the severance payments awarded in previous periods, that have been paid out during the financial year;	Annex 33	EU REM2 - Special payments to staff whose professional activities have a material impact on institutions' risk profile (identified staff)	EU REM2 - Tab 11.2

CRR 450 – Remuneration policy	(vii) the amounts of severance payments awarded during the financial year, split into paid upfront and deferred, the number of beneficiaries of those payments and highest payment that has been awarded to a single person; (i) the number of individuals that have been remunerated EUR 1 million or more per financial year, with the remuneration between EUR 1 million and EUR 5 million broken down into pay bands of EUR 500 000 and with the remuneration of EUR 5 million and above broken down into pay bands of EUR 1 million;	Annex 33	EU REM2 - Special payments to staff whose professional activities have a material impact on institutions' risk profile (identified staff)	EU REM2 - Tab 11.2
CRR 450 – Remuneration policy	(i) the number of individuals that have been remunerated EUR 1 million or more per financial year, with the remuneration between EUR 1 million and EUR 5 million broken down into pay bands of EUR 500 000 and with the remuneration of EUR 5 million and above broken down into pay bands of EUR 1 million;	Annex 33	EU REM4 - Remuneration of 1 million EUR or more per year	EU REM4 - Tab 11.4
CRR 450 – Remuneration policy	(j) upon demand from the relevant Member State or competent authority, the total remuneration for each member of the management body or senior management;	Annex 33	EU REMA - Remuneration policy	EU REMA - Remuneration Tab
CRR 450 – Remuneration policy	(k) information on whether the institution benefits from a derogation laid down in Article 94(3) of Directive 2013/36/EU. For the purposes of point (k) of the first subparagraph of this paragraph, institutions that benefit from such a derogation shall indicate whether they benefit from that derogation on the basis of point (a) or (b) of Article 94(3) of Directive 2013/36/EU. They shall also indicate for which of the remuneration principles they apply the derogation(s), the number of staff members that benefit from the derogation(s) and their total remuneration, split into fixed and variable remuneration.	Annex 33	EU REMA - Remuneration policy	EU REMA - Remuneration Tab
CRR 450 – Remuneration policy	2.For large institutions, the quantitative information on the remuneration of institutions' collective management body referred to in this Article shall also be made available to the public, differentiating between executive and non-executive members. Institutions shall comply with the requirements set out in this Article in a manner that is appropriate to their size, internal organisation and the nature, scope and complexity of their activities and without prejudice to Regulation (EU) 2016/679 of the European Parliament and of the Council (*).	Annex 33	EU REMA - Remuneration policy	EU REMA - Remuneration Tab
CRR 451 - Leverage	1.Institutions that are subject to Part Seven shall disclose the following information regarding their leverage ratio as calculated in accordance with Article 429 and their management of the risk of excessive leverage:	Annex 11	EU LR1 - LRSum: Summary reconciliation of accounting assets and leverage ratio exposures EU LR2 - LRCom: Leverage ratio common disclosure EU LR3 - LRSpI: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures) EU LRA: Free format text boxes for disclosure on qualitative items	EU LR1 - Tab 10.1 EU LR2 - Tab 10.2 EU LR3 - Tab 10.3 EU LRA - Leverage Ratio Tab
CRR 451 - Leverage	(a) the leverage ratio and how the institutions apply Article 499(2);	Annex 11	EU LR2 - LRCom: Leverage ratio common disclosure	EU LR2 - Tab 10.2
CRR 451 - Leverage	(b) a breakdown of the total exposure measure referred to in Article 429(4), as well as a reconciliation of the total exposure measure with the relevant information disclosed in published financial statements;	Annex 11	EU LR1 - LRSum: Summary reconciliation of accounting assets and leverage ratio exposures EU LR2 - LRCom: Leverage ratio common disclosure EU LR3 - LRSpI: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)	EU LR1 - Tab 10.1 EU LR2 - Tab 10.2 EU LR3 - Tab 10.3
CRR 451 - Leverage	(c) where applicable, the amount of exposures calculated in accordance with Articles 429(8) and 429a(1) and the adjusted leverage ratio calculated in accordance with Article 429a(7);	Annex 11	EU LR2 - LRCom: Leverage ratio common disclosure	EU LR2 - Tab 10.2
CRR 451 - Leverage	(d) a description of the processes used to manage the risk of excessive leverage;	Annex 11	EU LRA: Free format text boxes for disclosure on qualitative items	EU LRA - Leverage Ratio Tab
CRR 451 - Leverage	(e) a description of the factors that had an impact on the leverage ratio during the period to which the disclosed leverage ratio refers.	Annex 11	EU LRA: Free format text boxes for disclosure on qualitative items	EU LRA - Leverage Ratio Tab
CRR 451 - Leverage	2.Public development credit institutions as defined in Article 429a(2) shall disclose the leverage ratio without the adjustment to the total exposure measure determined in accordance with point (d) of the first subparagraph of Article 429a(1).	Annex 11	EU LR2 - LRCom: Leverage ratio common disclosure (up to rows 28)	EU LR2 - Tab 10.2
CRR 451 - Leverage	3.In addition to points (a) and (b) of paragraph 1 of this Article, large institutions shall disclose the leverage ratio and the breakdown of the total exposure measure referred to in Article 429(4) based on averages calculated in accordance with the implementing act referred to in Article 430(7).	Annex 11	EU LR2 - LRCom: Leverage ratio common disclosure (rows 28 to 31a)	EU LR2 - Tab 10.2
CRR 451a - Liquidity requirements for credit institutions and systemic investment firms	1.Institutions that are subject to Part Six shall disclose information on their liquidity coverage ratio, net stable funding ratio and liquidity risk management in accordance with this Article.	Annex 13	EU LIQ1 - Quantitative information of LCR EU LIQB on qualitative information on LCR, which complements template EU LIQ1	EU LIQ1 - Tab 9.2 EU LIQB - Tab 9.1
CRR 451a - Liquidity requirements for credit institutions and systemic investment firms	2.Institutions shall disclose the following information in relation to their liquidity coverage ratio as calculated in accordance with the delegated act referred to in Article 460(1):	Annex 13	EU LIQ1 - Quantitative information of LCR EU LIQB on qualitative information on LCR, which complements template EU LIQ1	EU LIQ1 - Tab 9.2 EU LIQB - Tab 9.1
CRR 451a - Liquidity requirements for credit institutions and systemic investment firms	(a) the average or averages, as applicable, of their liquidity coverage ratio based on end-of-the-month observations over the preceding 12 months for each quarter of the relevant disclosure period;	Annex 13	EU LIQ1 - Quantitative information of LCR EU LIQB on qualitative information on LCR, which complements template EU LIQ1	EU LIQ1 - Tab 9.2 EU LIQB - Tab 9.1
CRR 451a - Liquidity requirements for credit institutions and systemic investment firms	(b) the average or averages, as applicable, of total liquid assets, after applying the relevant haircuts, included in the liquidity buffer pursuant to the delegated act referred to in Article 460(1), based on end-of-the-month observations over the preceding 12 months for each quarter of the relevant disclosure period, and a description of the composition of that liquidity buffer;	Annex 13	EU LIQ1 - Quantitative information of LCR EU LIQB on qualitative information on LCR, which complements template EU LIQ1	EU LIQ1 - Tab 9.2 EU LIQB - Tab 9.1
CRR 451a - Liquidity requirements for credit institutions and systemic investment firms	(c) the averages of their liquidity outflows, inflows and net liquidity outflows as calculated in accordance with the delegated act referred to in Article 460(1), based on end-of-the-month observations over the preceding 12 months for each quarter of the relevant disclosure period and the description of their composition.	Annex 13	EU LIQ1 - Quantitative information of LCR EU LIQB on qualitative information on LCR, which complements template EU LIQ1	EU LIQ1 - Tab 9.2 EU LIQB - Tab 9.1
CRR 451a - Liquidity requirements for credit institutions and systemic investment firms	3.Institutions shall disclose the following information in relation to their net stable funding ratio as calculated in accordance with Title IV of Part Six:	Annex 13	EU LIQ2: Net Stable Funding Ratio	EU LIQ2 - Tab 9.3
CRR 451a - Liquidity requirements for credit institutions and systemic investment firms	(a) quarter-end figures of their net stable funding ratio calculated in accordance with Chapter 2 of Title IV of Part Six for each quarter of the relevant disclosure period;	Annex 13	EU LIQ2: Net Stable Funding Ratio	EU LIQ2 - Tab 9.4
CRR 451a - Liquidity requirements for credit institutions and systemic investment firms	(b) an overview of the amount of available stable funding calculated in accordance with Chapter 3 of Title IV of Part Six;	Annex 13	EU LIQ2: Net Stable Funding Ratio	EU LIQ2 - Tab 9.5
CRR 451a - Liquidity requirements for credit institutions and systemic investment firms	(c) an overview of the amount of required stable funding calculated in accordance with Chapter 4 of Title IV of Part Six.	Annex 13	EU LIQ2: Net Stable Funding Ratio	EU LIQ2 - Tab 9.6
CRR 451a - Liquidity requirements for credit institutions and systemic investment firms	4.Institutions shall disclose the arrangements, systems, processes and strategies put in place to identify, measure, manage and monitor their liquidity risk in accordance with Article 86 of Directive 2013/36/EU.	Annex 13	EU LIQA - Liquidity risk management	EU LIQA - Funding and liquidity risk tab
CRR 452 – Use of the IRB Approach to credit risk	Institutions calculating the risk-weighted exposure amounts under the IRB Approach to credit risk shall disclose the following information:	Annex 21	EU CRE – Qualitative disclosure requirements related to IRB approach	EU CRE – IRB Approach Tab
CRR 452 – Use of the IRB Approach to credit risk	(a) the competent authority's permission of the approach or approved transition;	Annex 21	EU CRE – Qualitative disclosure requirements related to IRB approach	EU CRE – IRB Approach Tab
CRR 452 – Use of the IRB Approach to credit risk	(b) for each exposure class referred to in Article 147, the percentage of the total exposure value of each exposure class subject to the Standardised Approach laid down in Chapter 2 of Title II of Part Three or to the IRB Approach laid down in Chapter 3 of Title II of Part Three, as well as the part of each exposure class subject to a roll-out plan; where institutions have received permission to use own LGDs and conversion factors for the calculation of risk-weighted exposure amounts, they shall disclose separately the percentage of the total exposure value of each exposure class subject to that permission;	Annex 21	EU CRE – Qualitative disclosure requirements related to IRB approach EU CR6-A – Scope of the use of IRB and SA approaches	EU CRE – IRB Approach Tab
CRR 452 – Use of the IRB Approach to credit risk	(c) the control mechanisms for rating systems at the different stages of model development, controls and changes, which shall include information on: (i) the relationship between the risk management function and the internal audit function; (ii) the rating system review; (iii) the procedure to ensure the independence of the function in charge of reviewing the models from the functions responsible for the development of the models; (iv) the procedure to ensure the accountability of the functions in charge of developing and reviewing the models;	Annex 21	EU CRE – Qualitative disclosure requirements related to IRB approach	EU CRE – IRB Approach Tab
CRR 452 – Use of the IRB Approach to credit risk	(d) the role of the functions involved in the development, approval and subsequent changes of the credit risk models;	Annex 21	EU CRE – Qualitative disclosure requirements related to IRB approach	EU CRE – IRB Approach Tab
CRR 452 – Use of the IRB Approach to credit risk	(e) the scope and main content of the reporting related to credit risk models;	Annex 21	EU CRE – Qualitative disclosure requirements related to IRB approach	EU CRE – IRB Approach Tab
CRR 452 – Use of the IRB Approach to credit risk	(f) a description of the internal ratings process by exposure class, including the number of key models used with respect to each portfolio and a brief discussion of the main differences between the models within the same portfolio, covering: (i) the definitions, methods and data for estimation and validation of PD, which shall include information on how PDs are estimated for low default portfolios, whether there are regulatory floors and the drivers for differences observed between PD and actual default rates at least for the last three periods; (ii) where applicable, the definitions, methods and data for estimation and validation of LGD, such as methods to calculate downturn LGD, how LGDs are estimated for low default portfolio and the time lapse between the default event and the closure of the exposure; (iii) where applicable, the definitions, methods and data for estimation and validation of conversion factors, including assumptions employed in the derivation of those variables;	Annex 21	EU CRE – Qualitative disclosure requirements related to IRB approach	EU CRE – IRB Approach Tab

CRR 452 – Use of the IRB Approach to credit risk	(g) as applicable, the following information in relation to each exposure class referred to in Article 147: (i) their gross on-balance-sheet exposure; (ii) their off-balance-sheet exposure values prior to the relevant conversion factor; (iii) their exposure after applying the relevant conversion factor and credit risk mitigation; (iv) any model, parameter or input relevant for the understanding of the risk weighting and the resulting risk exposure amounts disclosed across a sufficient number of obligor grades (including default) to allow for a meaningful differentiation of credit risk; (v) separately for those exposure classes in relation to which institutions have received permission to use own LGDs and conversion factors for the calculation of risk-weighted exposure amounts, and for exposures for which the institutions do not use such estimates, the values referred to in points (i) to (iv) subject to that permission;	Annex 21 Annex 25	EU CR6 – IRB approach – Credit risk exposures by exposure class and PD range EU CCR4 – IRB approach – CCR exposures by exposure class and PD scale	EU CR6 – Tab 4.3 and Tab 4.4 EU CCR4 – Tab 5.3
CRR 452 – Use of the IRB Approach to credit risk	(h) institutions' estimates of PDs against the actual default rate for each exposure class over a longer period, with separate disclosure of the PD range, the external rating equivalent, the weighted average and arithmetic average PD, the number of obligors at the end of the previous year and of the year under review, the number of defaulted obligors, including the new defaulted obligors, and the annual average historical default rate. For the purposes of point (b) of this Article, institutions shall use the exposure value as defined in Article 166.	Annex 21	EU CR9 – IRB approach – Back-testing of PD per exposure class (fixed PD scale) EU CR9.1 – IRB approach – Back-testing of PD per exposure class (only for PD estimates according to point (f) of Article 180(1) CRR)	EU CR9 – Tab 4.9 and 4.10 EU CR9.1 - Not applicable to BOI
CRR 453 – Use of credit risk mitigation techniques	Institutions using credit risk mitigation techniques shall disclose the following information:	Annex 17	EU CRC – Qualitative disclosure requirements related to CRM techniques	EU CRC – Tab 4.18
CRR 453 – Use of credit risk mitigation techniques	(a) the core features of the policies and processes for on- and off-balance-sheet netting and an indication of the extent to which institutions make use of balance sheet netting;	Annex 17	EU CRC – Qualitative disclosure requirements related to CRM techniques	EU CRC – Tab 4.18
CRR 453 – Use of credit risk mitigation techniques	(b) the core features of the policies and processes for eligible collateral evaluation and management;	Annex 17	EU CRC – Qualitative disclosure requirements related to CRM techniques	EU CRC – Tab 4.18
CRR 453 – Use of credit risk mitigation techniques	(c) a description of the main types of collateral taken by the institution to mitigate credit risk;	Annex 17	EU CRC – Qualitative disclosure requirements related to CRM techniques	EU CRC – Tab 4.18
CRR 453 – Use of credit risk mitigation techniques	(d) for guarantees and credit derivatives used as credit protection, the main types of guarantor and credit derivative counterparty and their creditworthiness used for the purpose of reducing capital requirements, excluding those used as part of synthetic securitisation structures;	Annex 17	EU CRC – Qualitative disclosure requirements related to CRM techniques	EU CRC – Tab 4.18
CRR 453 – Use of credit risk mitigation techniques	(e) information about market or credit risk concentrations within the credit risk mitigation taken;	Annex 17	EU CRC – Qualitative disclosure requirements related to CRM techniques	EU CRC – Tab 4.18
CRR 453 – Use of credit risk mitigation techniques	(f) for institutions calculating risk-weighted exposure amounts under the Standardised Approach or the IRB Approach, the total exposure value not covered by any eligible credit protection and the total exposure value covered by eligible credit protection after applying volatility adjustments; the disclosure set out in this point shall be made separately for loans and debt securities and including a breakdown of defaulted exposures;	Annex 17	EU CR3 – CRM techniques overview: Disclosure of the use of credit risk mitigation techniques	EU CR3 – Tab 4.18
CRR 453 – Use of credit risk mitigation techniques	(g) the corresponding conversion factor and the credit risk mitigation associated with the exposure and the incidence of credit risk mitigation techniques with and without substitution effect;	Annex 19 Annex 21	EU CR4 – standardised approach – Credit risk exposure and CRM effects EU CR7-A – IRB approach – Disclosure of the extent of the use of CRM techniques	EU CR4 – Tab 4.1 EU CR7-A - Tab 4.6
CRR 453 – Use of credit risk mitigation techniques	(h) for institutions calculating risk-weighted exposure amounts under the Standardised Approach, the on- and off-balance-sheet exposure value by exposure class before and after the application of conversion factors and any associated credit risk mitigation;	Annex 19	EU CR4 – standardised approach – Credit risk exposure and CRM effects	EU CR4 – Tab 4.1
CRR 453 – Use of credit risk mitigation techniques	(i) for institutions calculating risk-weighted exposure amounts under the Standardised Approach, the risk-weighted exposure amount and the ratio between that risk-weighted exposure amount and the exposure value after applying the corresponding conversion factor and the credit risk mitigation associated with the exposure; the disclosure set out in this point shall be made separately for each exposure class;	Annex 19	EU CR4 – standardised approach – Credit risk exposure and CRM effects	EU CR4 – Tab 4.1
CRR 453 – Use of credit risk mitigation techniques	(j) for institutions calculating risk-weighted exposure amounts under the IRB Approach, the risk-weighted exposure amount before and after recognition of the credit risk mitigation impact of credit derivatives; where institutions have received permission to use own LGDs and conversion factors for the calculation of risk-weighted exposure amounts, they shall make the disclosure set out in this point separately for the exposure classes subject to that permission.	Annex 21	EU CR7 – IRB approach – Effect on the RWEAs of credit derivatives used as CRM techniques	EU CR7 – Tab 4.5
CRR 454 - Use of the Advanced Measurement Approaches to operational risk	The institutions using the Advanced Measurement Approaches set out in Articles 321 to 324 for the calculation of their own funds requirements for operational risk shall disclose a description of their use of insurance and other risk-transfer mechanisms for the purpose of mitigating that risk.	Annex 31	EU ORA - Qualitative information on operational risk EU OR1 - Operational risk own funds requirements and risk-weighted exposure amounts	EU ORA - Operational Risk Tab EU OR1 - Tab 8.1
CRR 455 - Use of Internal Market Risk Models	Institutions calculating their capital requirements in accordance with Article 363 shall disclose the following information: (a) for each sub-portfolio covered: (i) the characteristics of the models used; (ii) where applicable, for the internal models for incremental default and migration risk and for correlation trading, the methodologies used and the risks measured through the use of an internal model including a description of the approach used by the institution to determine liquidity horizons, the methodologies used to achieve a capital assessment that is consistent with the required soundness standard and the approaches used in the validation of the model; (iii) a description of stress testing; (b) the scope of permission by the competent authority;	Annex 29	EU MRB: Qualitative disclosure requirements for institutions using the internal Market Risk Models EU MR2-A - Market risk under the internal Model Approach (IMA) EU MR3 - IMA values for trading portfolios EU MR4 - Comparison of VaR estimates with gains/losses	EU MRB - Not applicable to BOI EU MR2-A - Not applicable to BOI EU MR3 - Not applicable to BOI EU MR4 - Not applicable to BOI
CRR 455 - Use of Internal Market Risk Models		Annex 29	EU MRB: Qualitative disclosure requirements for institutions using the internal Market Risk Models EU MR2-A - Market risk under the internal Model Approach (IMA) EU MR3 - IMA values for trading portfolios EU MR4 - Comparison of VaR estimates with gains/losses	EU MRB - Not applicable to BOI EU MR2-A - Not applicable to BOI EU MR3 - Not applicable to BOI EU MR4 - Not applicable to BOI
CRR 455 - Use of Internal Market Risk Models	(c) a description of the extent and methodologies for compliance with the requirements set out in Articles 104 and 105;	Annex 29	EU MRB: Qualitative disclosure requirements for institutions using the internal Market Risk Models EU MR2-A - Market risk under the internal Model Approach (IMA) EU MR3 - IMA values for trading portfolios EU MR4 - Comparison of VaR estimates with gains/losses	EU MRB - Not applicable to BOI EU MR2-A - Not applicable to BOI EU MR3 - Not applicable to BOI EU MR4 - Not applicable to BOI
CRR 455 - Use of Internal Market Risk Models	(d) the highest, the lowest and the mean of the following: (i) the daily value-at-risk measures over the reporting period and at the end of the reporting period; (ii) the stressed value-at-risk measures over the reporting period and at the end of the reporting period; (iii) the risk numbers for incremental default and migration risk and for the specific risk of the correlation trading portfolio over the reporting period and at the end of the reporting period;	Annex 29	EU MRB: Qualitative disclosure requirements for institutions using the internal Market Risk Models EU MR2-A - Market risk under the internal Model Approach (IMA) EU MR3 - IMA values for trading portfolios EU MR4 - Comparison of VaR estimates with gains/losses	EU MRB - Not applicable to BOI EU MR2-A - Not applicable to BOI EU MR3 - Not applicable to BOI EU MR4 - Not applicable to BOI
CRR 455 - Use of Internal Market Risk Models	(e) the elements of the own funds requirement as specified in Article 364;	Annex 29	EU MRB: Qualitative disclosure requirements for institutions using the internal Market Risk Models EU MR2-A - Market risk under the internal Model Approach (IMA) EU MR3 - IMA values for trading portfolios EU MR4 - Comparison of VaR estimates with gains/losses	EU MRB - Not applicable to BOI EU MR2-A - Not applicable to BOI EU MR3 - Not applicable to BOI EU MR4 - Not applicable to BOI
CRR 455 - Use of Internal Market Risk Models	(f) the weighted average liquidity horizon for each sub-portfolio covered by the internal models for incremental default and migration risk and for correlation trading;	Annex 29	EU MRB: Qualitative disclosure requirements for institutions using the internal Market Risk Models EU MR2-A - Market risk under the internal Model Approach (IMA) EU MR3 - IMA values for trading portfolios EU MR4 - Comparison of VaR estimates with gains/losses	EU MRB - Not applicable to BOI EU MR2-A - Not applicable to BOI EU MR3 - Not applicable to BOI EU MR4 - Not applicable to BOI
CRR 455 - Use of Internal Market Risk Models	(g) a comparison of the daily end-of-day value-at-risk measures to the one-day changes of the portfolio's value by the end of the subsequent business day together with an analysis of any important overshooting during the reporting period.	Annex 29	EU MRB: Qualitative disclosure requirements for institutions using the internal Market Risk Models EU MR2-A - Market risk under the internal Model Approach (IMA) EU MR3 - IMA values for trading portfolios EU MR4 - Comparison of VaR estimates with gains/losses	EU MRB - Not applicable to BOI EU MR2-A - Not applicable to BOI EU MR3 - Not applicable to BOI EU MR4 - Not applicable to BOI

The following table provides information on entities which are treated differently under the accounting and regulatory scope of consolidation.

Table 1 - EU LI3 - Differences in scope of consolidation (entity by entity)

Name of the entity	Method of accounting consolidation	Method of regulatory consolidation				Description of the entity
		Full consolidation	Proportional consolidation	Equity Method ¹	Neither consolidated nor deducted	
BOI Insurance Limited	Full consolidation			X		Financial corporations other than credit institutions
GD 5&6 Basement Company Limited	Full consolidation			X		Financial corporations other than credit institutions
General Investment Trust Limited DAC	Full consolidation			X		Financial corporations other than credit institutions
Leopardstown Offices Management Company Limited by Guarantee	Full consolidation			X		Financial corporations other than credit institutions
Life Fund Syndication B.V.	Full consolidation			X		Financial corporations other than credit institutions
Life Fund Syndication Holding B.V.	Full consolidation			X		Financial corporations other than credit institutions
New Ireland Assurance Company plc	Full consolidation			X		Financial corporations other than credit institutions
New Ireland Real Estate France	Full consolidation			X		Financial corporations other than credit institutions
SCI Immeuble Saint Georges	Full consolidation			X		Financial corporations other than credit institutions
SCI Jupiter Immeuble	Full consolidation			X		Financial corporations other than credit institutions
SCI Sang Rouge	Full consolidation			X		Financial corporations other than credit institutions
Weesperpelin 6 BV	Full consolidation			X		Financial corporations other than credit institutions
Weesperpelin 6 Holding BV	Full consolidation			X		Financial corporations other than credit institutions

¹ Subject to 10/15% threshold which determines capital deduction or RWA

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Template EU CCA: Main features of regulatory own funds instruments

As per Article 437 points (b) and (c), the table below provides the main features of regulatory own instruments of Bank of Ireland Group as at 31 December 2023.

Capital instruments' and main features table of Bank of Ireland Group plc as at 31 December 2023							
Issued by Bank of Ireland Group plc / Subsidiaries not subject restriction in recognition in consolidated Tier 2							
Instrument Name	Ordinary Stock	€300m Subordinated Tier 2 Notes due 2029	€300m Subordinated Tier 2 Notes due 2032	€500 Subordinated Tier 2 Notes due 2033	€675m Fixed Rate Reset Additional Tier 1 Perpetual Contingent Temporary Write-Down Securities	€300m Fixed Rate Reset Additional Tier 1 Perpetual Contingent Temporary Write-Down Securities	€500 Subordinated Tier 2 Notes due 2031
1 Issuer	Bank of Ireland Group plc	Bank of Ireland Group plc	Bank of Ireland Group plc	Bank of Ireland Group plc	Bank of Ireland Group plc	Bank of Ireland Group plc	Bank of Ireland Group plc
2 Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)	N/A	XS206555562	XS2528657567	XS2561182622	XS2178043530	XS226123573	XS2340236327
2a Public or private placement	Public	Public	Public	Public	Public	Public	Public
3 Governing law(s) of the instrument	Irish	Irish	Irish	Irish	Irish	Irish	Irish
3a Contractual recognition of write down and conversion powers of resolution authorities	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<i>Regulatory treatment</i>							
4 Transitional CRR rules	Common equity tier 1	Tier 2	Tier 2	Tier 2	Additional Tier 1	Additional Tier 1	Tier 2
5 Post-transitional CRR rules	Common equity tier 1	Tier 2	Tier 2	Tier 2	Additional Tier 1	Additional Tier 1	Tier 2
6 Eligible at solo / (sub-)consolidated / solo & (sub-)consolidated	Group	Group	Group	Group	Group	Group	Group
7 Instrument type (types to be specified by each jurisdiction)	Ordinary Shares	Subordinated Debt	Subordinated Debt	Subordinated Debt	Perpetual Contingent Temporary Write-Down Securities	Perpetual Contingent Temporary Write-Down Securities	Subordinated Debt
8 Amount recognised in regulatory capital (currency in million, as of most recent reporting date)	€1,057m	€300m	€344m	€497m	€675m	€300m	€499m
9 Nominal amount of instrument	€1,057m	€300m	€345m (€300m)	€500m	€675m	€300m	€500m
EU-9a Issue price	€1.00 each (current issue price)	99.972 per cent	100 per cent	99.715 per cent	100 per cent	100 per cent	99.951 per cent
EU-9b Redemption price	Non-redeemable.	par	par	par	par	par	par
10 Accounting classification	Shareholders' equity	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost	Shareholders' equity	Shareholders' equity	Liability - amortised cost
11 Original date of issuance	07-Jul-17	14-Oct-19	06-Sep-22	01-Dec-22	19-May-20	01-Sep-20	11-May-21
12 Perpetual or dated	Perpetual	Dated	Dated	Dated	Perpetual	Perpetual	Dated
13 Original maturity date	No Maturity	14-Oct-29	06-Dec-32	01-Mar-33	No Maturity	No Maturity	11-Aug-31
14 Issuer call subject to prior supervisory approval	N/A	Yes	Yes	Yes	Yes	Yes	Yes
15 Optional call date, contingent call dates, and redemption amount	N/A	Optional call date is 14 October 2024. Optional early redemption (i) for tax reasons (if trustee satisfied) and (ii) on the occurrence of a capital event, in each case subject to prior supervisory approval. Redemption Amount: €1,000 per Calculation Amount of €1,000	Optional call date is any date falling in the period commencing (and including) 6 September 2027 and ending on (and including) 6 December 2027. Optional early redemption (i) for tax reasons (if trustee satisfied) and (ii) on the occurrence of a capital event, in each case subject to prior supervisory approval. Redemption Amount: €1,000 per Calculation Amount of €1,000	Optional call date is any date falling in the period commencing (and including) 1 December 2027 and ending on (and including) 1 March 2028. Optional early redemption (i) for tax reasons (if trustee satisfied) and (ii) on the occurrence of a capital event, in each case subject to prior supervisory approval. Redemption Amount: €1,000 per Calculation Amount of €1,000	Optional call date from and including 19 May 2025 (First Call Date) to and including 19 November (First Reset Date) or any Interest Payment Date thereafter. Interest Payment Dates being 19 May / 19 November. Regulatory Event: Applicable Tax Event: Applicable Redemption Amount: Prevailing Principal Amount	Optional Call date from and including 1 September 2025 (First Call Date) to and including 1 March (First Reset Date) or any Interest Payment Date thereafter. Interest Payment Dates being 1 September / 1 March. Regulatory event call: Yes Tax call: Yes Redemption Amount: principal amount	Optional call date is any date falling in the period commencing on (and including) 11 May 2026 and ending on (and including) 11 August 2026. Optional early redemption (i) for tax reasons (if trustee satisfied) and (ii) on the occurrence of a capital event, in each case subject to prior supervisory approval. Redemption Amount: €1,000 per Calculation Amount of €1,000
16 Subsequent call dates, if applicable	N/A	N/A	N/A	N/A	See above	See above	N/A
<i>Coupons / dividends</i>							
17 Fixed or floating dividend/coupon	N/A	Fixed	Fixed	Fixed	Fixed	Fixed	Fixed
18 Coupon rate and any related index	As declared	Fixed with one reset date. 2.375%; reset to the sum of the Subsequent Reset Reference Rate plus the applicable Reset Margin of 2.8% at Reset Date (14 October 2024)	Fixed with one reset date. 7.594%; reset to the sum of the Subsequent Reset Reference Rate plus the applicable Reset Margin of 4.7% at Reset Date (6 December 2027)	Fixed with one reset date. 6.750%; reset to the sum of the Subsequent Reset Reference Rate plus the applicable Reset Margin of 4.15% at Reset Date (1 March 2023)	7.5% until 19 November 2025 and thereafter at the relevant Reset Rate of Interest	6.0% until 1 March 2026 and thereafter at the relevant Reset Rate of Interest	Fixed with one reset date 1.375%; reset to the sum of the Subsequent Reset Reference Rate plus the applicable Reset Margin of 1.65% at Reset Date (11 August 2026)
19 Existence of a dividend stopper	No	No	No	No	No	No	No
EU-20a Fully discretionary, partially discretionary or mandatory (in terms of timing)	Fully discretionary	Mandatory	Mandatory	Mandatory	Fully discretionary	Fully discretionary	Mandatory
EU-20b Fully discretionary, partially discretionary or mandatory (in terms of amount)	Fully discretionary	Mandatory	Mandatory	Mandatory	Fully discretionary	Fully discretionary	Mandatory
21 Existence of step up or other incentive to redeem	No	No	No	No	No	No	No
22 Noncumulative or cumulative	N/A	Cumulative	Cumulative	Cumulative	Non Cumulative	Non Cumulative	Cumulative
23 Convertible or non-convertible	Non-Convertible	Non-Convertible	Non-Convertible	Non-Convertible	Non-Convertible	Non-Convertible	Non-Convertible
24 If convertible, conversion trigger (s)	N/A	N/A	N/A	N/A	N/A	N/A	N/A
25 If convertible, fully or partially	N/A	N/A	N/A	N/A	N/A	N/A	N/A
26 If convertible, conversion rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A
27 If convertible, mandatory or optional conversion	N/A	N/A	N/A	N/A	N/A	N/A	N/A
28 If convertible, specify instrument type convertible into	N/A	N/A	N/A	N/A	N/A	N/A	N/A
29 If convertible, specify issuer of instrument it converts into	N/A	N/A	N/A	N/A	N/A	N/A	N/A
30 Write-down features	No	No	No	No	Yes	Yes	No
31 If write-down, write-down trigger (s)	N/A	N/A	N/A	N/A	Common Equity Tier 1 Ratio of the the Group at any time falls below 7 per cent.	Common Equity Tier 1 Ratio of the the Group at any time falls below 7 per cent.	N/A
32 If write-down, full or partial	N/A	N/A	N/A	N/A	Fully or Partially	Fully or Partially	N/A
33 If write-down, permanent or temporary	N/A	N/A	N/A	N/A	Temporary	Temporary	N/A
34 If temporary write-down, description of write-up mechanism	N/A	N/A	N/A	N/A	To the extent permitted by the Regulatory Capital Requirements and subject to the Maximum Distributable Amount (if any) the Issuer may at its sole and full discretion reinstate the Prevailing Principal Amount of each Security (a Write-Up), up to a maximum of its Initial Principal Amount, on a pro rata basis with the other Securities and with any Written Down Additional Tier 1 Instruments.	To the extent permitted by the Regulatory Capital Requirements and subject to the Maximum Distributable Amount (if any) the Issuer may at its sole and full discretion reinstate the Prevailing Principal Amount of each Security (a Write-Up), up to a maximum of its Initial Principal Amount, on a pro rata basis with the other Securities and with any Written Down Additional Tier 1 Instruments.	N/A
34a Type of subordination (only for eligible liabilities)	N/A	N/A	N/A	N/A	N/A	N/A	N/A
EU-34b Ranking of the instrument in normal insolvency proceedings	1	2(b)	2(b)	2(b)	2(a)	2(a)	2(b)
35 Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Most junior.	Notes constitute direct, unsecured and, subordinated obligations of the Issuer and rank pari passu without any preference among themselves. Subordinated to all unsubordinated creditors or any subordinated creditors (if any) which rank, or are expressed to rank, in priority to claims in respect of the Notes.	Notes constitute direct, unsecured and, subordinated obligations of the Issuer and rank pari passu without any preference among themselves. Subordinated to all unsubordinated creditors or any subordinated creditors (if any) which rank, or are expressed to rank, in priority to claims in respect of the Notes.	Notes constitute direct, unsecured and, subordinated obligations of the Issuer and rank pari passu without any preference among themselves. Subordinated to all unsubordinated creditors or any subordinated creditors (if any) which rank, or are expressed to rank, in priority to claims in respect of the Notes.	The Securities are direct, unsecured, unguaranteed and subordinated obligations of the Issuer and rank pari passu, without any preference among themselves. Subordinated to all Senior Creditors, including (i) unsubordinated creditors; (ii) creditors subordinated to unsubordinated creditors but not further or otherwise; (iii) Tier 2 Capital; and (iv) any other creditors whose claims are, or are expressed to be, subordinate to the claims of other creditors.	The Securities are direct, unsecured, unguaranteed and subordinated obligations of the Issuer and rank pari passu, without any preference among themselves. Subordinated to all Senior Creditors, including (i) unsubordinated creditors; (ii) creditors subordinated to unsubordinated creditors but not further or otherwise; (iii) Tier 2 Capital; and (iv) any other creditors whose claims are, or are expressed to be, subordinate to the claims of other creditors.	Notes constitute direct, unsecured and, subordinated obligations of the Issuer and rank pari passu without any preference among themselves. Subordinated to all unsubordinated creditors (if any) which rank, or are expressed to rank, in priority to claims in respect of the Notes.
36 Instrument type	Instrument type immediately senior: AT1	Instrument type immediately senior: Senior Preferred Notes	Instrument type immediately senior: Senior Preferred Notes	Instrument type immediately senior: Senior Preferred Notes	Instrument type immediately senior: Dated Subordinated Notes	Instrument type immediately senior: Dated Subordinated Notes	Instrument type immediately senior: Senior Preferred Notes
37 Non-compliant transitioned features	No	No	No	No	No	No	No
37 If yes, specify non-compliant features	N/A	N/A	N/A	N/A	N/A	N/A	N/A
37a Link to the full term and conditions of the instrument (signposting)	https://investorrelations.bankofireland.com/capital-instruments/						

Appendix V: Related Party Transactions

Bank of Ireland Group plc

Related parties in the Group include the parent company, BOIG plc, subsidiary undertakings, associated undertakings, joint arrangements, post-employment benefits, the State, KMP and connected parties. A number of banking transactions are entered into between the Company and its subsidiaries in the normal course of business. These include extending secured and unsecured loans, investing in debt securities issued by subsidiaries, taking of deposits and undertaking foreign currency transactions.

Associates, joint ventures and joint operations

The Group provides to and receives from its associates, joint ventures and joint operations, certain banking and financial services, which are not material to the Group, on similar terms to third party transactions. These include loans, deposits and foreign currency transactions.

Pension funds

The Group provides a range of normal banking and financial services, which are not material to the Group, to various pension funds operated by the Group for the benefit of its employees (principally to the BSPF), which are conducted on similar terms to third party transactions.

The Group occupies one property owned by the BSPF. At 31 December 2023, the total value of this property was €27 million (2022: €32 million). In 2023, the rental income paid to BSPF was €2 million (2022: €2 million).

Transactions with Directors and Key Management Personnel

(i) Loans to Directors

The following information is presented in accordance with the Companies Act 2014, as amended ('Companies Acts'). For the purposes of the Companies Acts disclosures, Directors means the Board of Directors and any past Directors who were Directors during the relevant period. Where no amount is shown in the tables below, this indicates either a credit balance, a balance of €nil, or a balance of less than €500. The value of arrangements at the beginning and end of the financial year as stated below in accordance with Section 307 of the Companies Act 2014, expressed as a percentage of the net assets of the Group at the beginning and end of the financial year, is less than 1%. In the tables below, 'balances' include principal and interest and 'repayments' include principal and interest; revolving credit facilities are not included. The 'aggregate maximum amount outstanding' includes credit card exposures at the maximum statement balance. While the closing balance includes interest accrued and interest paid, the maximum balance includes interest paid only.

Companies Act disclosure	Balance as	Balance as at	Aggregate maximum amount outstanding during the year ended 31 December 2023	Repayments during the year ended 31 December 2023
	at 1 January 2023	31 December 2023	December 2023	December 2023
	€000	€000	€000	€000
Directors at 31 December 2022				
E Bourke				
Credit card total	4	6	8	-
Total	4	6	8	-
P Kennedy				
Credit card total	13	-	14	-
Total	13	-	14	-
E Fitzpatrick				
Loan total	26	18	26	8
Total	26	18	26	8
M Spain				
Mortgage total	300	277	300	34
Total	300	277	300	34
Director no longer in office at 31 December 2023				
F Muldoon				
	5	3	11	-
Total	5	3	11	-

G Andrews, I Buchanan, R Goulding, M Greene, M O'Grady, S Pateman and M Sweeney had no loans from the Group in 2023. No advances were made during the year. No amounts were waived during 2023. None of the loans were credit-impaired at 31 December 2023 or at 31 December 2022. There is no interest which having fallen due on the above loans has not been paid in 2023 (2022: €nil).

All Directors have other transactions with the Bank. The nature of these transactions includes investments, pension funds, deposits, general insurance, life assurance and current accounts with credit balances. Other than as indicated, all loans to Directors are made in the ordinary course of business on substantially the same terms, including interest rates and collateral, as those prevailing at the time for similar transactions with other persons unconnected with the Group and of similar financial standing and do not involve more than normal risk of collectability.

(ii) Loans to connected persons on favourable terms

Connected persons of Directors are defined by Section 220 of the Companies Act 2014. On terms, including interest rates and collateral, similar to those available to staff generally. In the tables below, 'balances' include principal and interest. The 'maximum amounts outstanding' includes credit card exposures at the maximum statement balance. While the closing balance includes interest accrued and interest paid, the maximum balance includes interest paid only.

	Balance as at 31 December 2023	Maximum amounts outstanding during 2023	Number of persons as at 31 December 2023	Maximum number of persons during 2023
	€000			
Loans to connected persons¹ on favourable terms				
E Bourke	1	3	2	2
M Spain	-	1	1	1

(iii) Loans to connected persons - Central Bank licence condition disclosures

Under its banking licence, the Bank is required to disclose in its annual audited financial statements details of:

- the aggregate amount of lending to all connected persons, as defined in Section 220 of the Companies Act 2014; and
- the aggregate maximum amount outstanding during the year for which those financial statements are being prepared.

Disclosure is subject to certain de minimis exemptions and to exemptions for loans relating to principal private residences where the total of such loans to an individual connected person does not exceed €1 million. The following information is presented in accordance with this licence condition. In these tables, 'balances' include principal and interest. The 'maximum amounts outstanding' includes credit card exposures at the maximum statement balance. While the closing balance includes interest accrued and interest paid, the maximum balance includes interest paid only.

Connected persons of the following directors	Balance as	Maximum	Number of	Maximum
	at 31 December 2022 €000	amounts outstanding during 2022	persons as at 31 December 2022	number of persons during 2022
Persons connected to P Kennedy	1,837	1,936	1	1

(iv) Key management personnel - loans and deposits (IAS 24)

For the purposes of IAS 24 'Related party disclosures', the Group has 25 KMP (2022: 23) which comprise the Directors, the members of the GEC and any past KMP who was a KMP during the relevant period. In addition to Executive Directors, the GEC comprises: the Group Secretary & Head of Corporate Governance, Chief of Staff and Head of Group Corporate Affairs, Interim Chief Executive - Retail (UK), Chief People Officer, Chief Executive - Corporate & Commercial, Chief Executive - Retail Ireland, Group Chief Risk Officer, Interim Chief Technology Officer, Chief Strategy and Transformation Officer and Chief Customer Officer. KMP, including Directors, hold products with Group companies in the ordinary course of business.

Other than as indicated, all loans to NEDs are made in the ordinary course of business on substantially the same terms, including interest rates and collateral, as those prevailing at the time for similar transactions with other persons unconnected with the Group and do not involve more than the normal risk of collectability. Loans to KMP other than NEDs are made on terms similar to those available to staff generally and / or in the ordinary course of business on normal commercial terms.

The aggregate amounts outstanding, in respect of all loans, quasi-loans and credit transactions between the Bank and its KMP, as defined above, together with members of their close families and entities influenced by them are shown in the following table:

Key management personnel	Balance as	Balance as at	Maximum	Total number	Total number
	at 1 January 2023 €000	31 December 2023 €000	amount outstanding during the year ended 31 December 2023 €000	of relevant KMP as at 1 January 2023	of relevant KMP as at 31 December 2023
Loans	2,170	1,780	2,171	13	9
Deposits	4,707	4,594	11,324	18	17

KMP have other protection products with the Bank. The nature of these products includes mortgage protection, life assurance and critical illness cover. It also includes general insurance products which are underwritten by a number of external insurance companies and for which the Bank acts as an intermediary only. None of these products has any encashment value at 31 December 2023 (2023: €nil).

In the above IAS 24 disclosures, there was no loan advancements to KMP and close family members of KMP on preferential staff rates (2022: €nil).

None of the loans were credit-impaired at 31 December 2023 or at 31 December 2022. There is no interest which having fallen due on the above loans has not been paid in 2023 (2022: €nil). There are no guarantees entered into by the Bank in favour of KMP of the Bank and no guarantees in favour of the Bank have been entered into by KMP of the Bank.

v) Compensation of KMP

Details of compensation paid to KMP are provided below:

Remunerations	2023 €000
Salaries and other short-term benefits	11,278
Post employment benefits	640
Termination benefits	300
Total	12,218
Number of KMP	25

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Advanced IRB	Advanced Internal Ratings Based approach. The approach which allows banks to calculate their capital requirement for credit risk for their retail and non-retail portfolios using their own internally generated estimates of PD, LGD and CCF. These variables are then fed into a standard formula to calculate the capital requirement for the asset. Referred to as Retail IRB in this document.
Banking Book	The Banking Book consists of all banking assets, liabilities and derivatives other than those held with trading intent and booked on this basis in the Trading Book.
CRD	The CRD package transposes, via a Regulation and a Directive, the new global standards on bank capital (commonly known as the Basel III agreement) into the EU legal framework. The Capital Requirements Directive and the Capital Requirements Regulation were published in the Official Journal of the EU in June 2013 (also called CRD IV / CRR) and have been subsequently updated.
Collateral	Property or assets made available by a borrower as security against a loan. Under a collateralisation arrangement, a party who has an obligation to another party posts collateral (typically consisting of cash or securities) to secure the obligation. In the event that the counterparty defaults on the obligation, the secured party may seize the collateral.
Counterparty Credit Risk	Counterparty credit risk (CCR) means the risk that the counterparty to derivatives and security finance transactions could default before the final settlement of the transaction's cash flows.
Credit Conversion Factor (CCF)	An estimate of the proportion of undrawn commitments expected to be drawn down at the point of default. The CCF is expressed as a percentage and is used in the calculation of Exposure at Default (EAD).
Credit Risk Standardised Approach	A method for calculating risk capital requirements using ECAI ratings (where available) and supervisory risk weights.
Credit Risk Mitigation	A technique to reduce the credit risk associated with an exposure by the application of credit risk mitigants such as collateral, guarantees and credit protection.
Derecognition	The removal of a previously recognised financial asset or financial liability from an entity's balance sheet.
EBA	The European Banking Authority, formerly CEBS (the Committee of European Banking Supervisors).
Expected Loss	A regulatory calculation of the amount expected to be lost on an exposure using a twelve month time horizon and downturn loss estimates. Expected loss is calculated by multiplying the Probability of Default (a percentage) by the Exposure at Default (an amount) and Loss Given Default (a percentage).
External Credit Assessment Institution (ECAI)	An eligible External Credit Assessment Institution (ECAI) is an entity, other than an Export Credit Agency, that issues external credit assessments, and that has been determined by the competent authorities to meet the eligibility requirements set out in the Capital Requirements Directive. The credit assessment provided by the ECAI is used to provide a basis for capital requirement calculations in the Standardised approach for securitisation positions as well as an input into the IRB Institutions model. Further information on the use of ECAs under the Standardised approach for other asset classes has not been disclosed due to immateriality.
Exposure at Default (EAD)	The estimated value of the bank's exposure at the moment of the borrower's default determined under regulatory rules.
Exposure Weighted Average (LGD)	Calculating the exposure weighted average LGD involves multiplying the exposure values by the relevant LGD, summing the answers and dividing by the total exposure values.
Exposure Weighted Average (PD)	Calculating the exposure weighted average PD involves multiplying the exposure values by the relevant PD, summing the answers and dividing by the total exposure values.
Financial collateral comprehensive method	Takes into account price and volatility when valuing financial collateral for the purpose of credit risk mitigation.
Foundation IRB	The approach where institutions use their own estimates of PD to calculate risk weights for each exposure. Supervisory estimates of LGDs and EADs are used.
GMRA	Global Master Repurchase Agreements, are standard industry agreements that permit the netting and the collateralisation of repo type transactions.
Gross carrying amount	The gross carrying amount related to the exposures subject to impairment is the net of accumulated partial and total write-off.
Gross non-performing loans and advances (NPL) ratio	The gross NPL ratio is the ratio of the gross carrying amount of NPLs and advances to the total gross carrying amount of loans and advances subject to the NPE definition. For the purpose of this calculation, loans and advances classified as held for sale, cash balances at central banks and other demand deposits are to be excluded both from the denominator and from the numerator.
IFRS	International Financial Reporting Standards.
Internal Ratings Basel Approach (IRB)	Approach to credit risk under which a bank may use internal estimates to generate risk components for use in the calculation of their credit risk regulatory capital requirements. There are two approaches: Foundation and Advanced (including Retail).
Immateriality	The CRD permits non-disclosure where the information to be provided is not regarded as material. Information is deemed to be material under the CRD if its omission or misstatement could change or influence the assessment or decision of a user relying on that information for the purposes of making an economic decision. Any required items left out of this document due to immateriality are referenced in the relevant section of this document.
IRB Exposure Classes	<ul style="list-style-type: none"> • <i>Institutions:</i> Exposures to Financial Institutions authorised and supervised by the competent authorities and subject to prudential requirements. Includes exposure to Covered Bonds. • <i>Corporates:</i> CRD does not provide a definition of the corporate exposure class; it simply provides that any exposure not falling into any of the other exposure classes will be allocated to the corporate exposure class. • <i>Secured by immovable property collateral:</i> Residential mortgages. • <i>Qualifying revolving:</i> The exposures (to individuals) are revolving and unsecured. Primarily comprises of credit cards. • <i>Securitisation positions:</i> Exposures belonging to a pool - as defined below under securitisation.
ISDA	ISDA is the International Swaps and Derivatives Association. ISDA Agreements are standard industry agreements issued by ISDA which permit the netting of derivative transactions.
Leverage Ratio	The leverage ratio is a monitoring tool which allows competent authorities to assess the risk of excessive leverage in their respective institutions.
Loss Given Default (LGD)	The likely financial loss associated with default, net of collections / recovery costs and realised security.
Mark-to-Market (MTM)	The act of recording the price or value of a security, portfolio or account to reflect its current market value rather than its book value.

Market Risk Standardised Approach	The Standardised approach to the determination of Pillar 1 capital for market risk in the trading book involves estimating a minimum required capital charge based on the difference in the re-pricing periods for assets, liabilities and derivatives (treated as equivalent on-balance sheet assets and liabilities). In addition, depending on the nature of the positions, it also provides for a specific risk charge. The total minimum capital charge is converted to a risk weighted asset equivalent for the trading book which is summed with other risk weighted assets in determining overall regulatory capital ratios.
Minimum capital requirements	8% of RWA
Net Value	Net value is the gross carrying value (pre CRM and CCF) of On and Off balance sheet exposures less specific credit risk adjustments (value adjustments and provisions per COREP including the Article 3 calendar provisioning).
Non-performing exposure (NPE)	'Non-performing exposures' (NPEs): These are: (i) credit-impaired loans which includes loans where the borrower is considered unlikely to pay in full without recourse by the Group to actions such as realising security, including FCR cases, and loans where the borrower is greater than 90 days past due and the arrears amount is material; and (ii) other / probationary loans that have yet to satisfy exit criteria in line with EBA guidance to return to performing.
Off Balance Sheet	Off balance sheet items include undrawn commitments to lend, guarantees, letters of credit, acceptances and other items as listed in Annex I of the CRR.
Operational Risk Standardised Approach	The Pillar 1 approach which allows banks to calculate their capital requirement in respect of operational risk by multiplying the gross income from each business line by the relevant factor specified in respect of that business line (as set out in CRD).
Originator	An entity which, either itself or through related entities, directly or indirectly, was involved in the original agreement which created the obligations or potential obligations of the debtor or potential debtor giving rise to the exposure being securitised; or an entity which purchases a third party's exposures onto its balance sheet and then securitises them.
Probability of Default (PD)	The likelihood that a debt instrument will default within a stated timeframe (For CRD this is a twelve month time horizon). For example, the probability of default of a certain loan is 2%; this means that there are 2 chances out of 100 that the borrower will default in the next 12 months.
Regulatory Basis	The application of the requirements in accordance with competent authority application of transitional provisions.
Risk Exposure Amounts (REA)	Risk Exposure Amount refers to an amount in respect of which capital requirements arise under CRR and is used interchangeably in this document with RWA. REA is used in the calculation of risk-based capital ratios. Total assets are calculated by applying predetermined calculations (set by the regulators) to the nominal outstanding amount of each on-balance sheet asset and the notional principal amount of each off-balance sheet item and incorporating risk weighted factors.
RWA Density (%) Securitisation	Total REA divided by Total EAD post CRM. Converting an asset such as a loan into a marketable commodity by turning it into securities. Assets are pooled and sold, often in unitised form, enabling the lender to relinquish the asset. Any asset that generates an income stream can be securitised - i.e. mortgages, car loans, credit-card receivables.
Settlement Risk	The risk to which a bank is exposed on certain transactions unsettled after their due date.
Stage 1	Stage 1 - 12 month Expected Credit Losses (ECL) (not credit-impaired). Financial instruments which have not experienced a significant increase in credit risk since initial recognition and are not credit-impaired. An impairment loss allowance equal Stage 1 - 12 month ECL is recognised, which is the portion of lifetime ECL resulting from default events that are possible within the next 12 months.
Stage 2	Stage 2 - Lifetime ECL (not credit-impaired). Financial instruments which have experienced a 'significant increase in credit risk since initial recognition' and are not credit-impaired. An impairment loss allowance equal to lifetime ECL is recognised, being the ECL resulting from all possible default events over the expected life of the financial instrument. 'Credit risk' in this context refers to the change in the risk of a default occurring over the expected life of the financial instrument.
Stage 3	Stage 3 - Lifetime ECL (credit-impaired). Credit-impaired financial instruments, other than Purchased or originated credit-impaired financial assets. An impairment loss allowance equal to lifetime ECL is recognised. The manner in which the Group identifies financial assets as credit-impaired results in the Group's population of credit-impaired financial assets being consistent with its population of defaulted financial assets (in accordance with Article 178 of the CRR) in scope for the impairment requirements of IFRS 9. This encompasses loans where: (i) the borrower is considered unlikely to pay in full without recourse by the Group to actions such as realising security (including 'forborne collateral realisation' (FCR) loans); and / or (ii) the borrower is greater than 90 days past due and the arrears amount is material.
SME	Small Medium Enterprise is defined as an enterprise which employs fewer than 250 people and whose annual turnover is less than €50 million, or annual balance sheet total less than €43 million.
Standardised Exposure Classes	<ul style="list-style-type: none"> • <i>Retail:</i> Exposures must be to an individual person or person or to a small or medium sized entity. It must be one of a significant number of exposures with similar characteristics such that the risks associated with such lending are substantially reduced and, the total amount owed, shall not, to the knowledge of the credit institution, exceed €1 million. • <i>Public Sector Entities:</i> Exposures to Public Sector Entities and non-commercial undertakings. • <i>Corporates:</i> In general, a corporate exposure is defined as a debt obligation of a corporate, partnership or proprietorship. • <i>Exposures in default:</i> Where the exposure is past due more than 90 days or unlikely to pay. • <i>Exposures associated with particularly high risks:</i> Exposures associated with particularly high risks such as investments in venture capital firms and private equity investments. • <i>Institutions Corporates with short-term credit assessment:</i> Exposures for which a short-term credit assessment by a nominated ECAI is available. • <i>Other items:</i> Exposures not falling into the other exposure classes outlined.
Trading Book	A trading book consists of positions in financial instruments and commodities held either with intent to trade, or in order to hedge other elements of the Trading Book. To be eligible for trading book capital treatment, financial instruments must either be free of any restrictive covenants on their tradability, or are able to be hedged completely.
Through-the-Cycle PD (TtC PD)	A version of the Probability of Default measure engineered to estimate the average one-year probability of default over an economic cycle. For example, if the TtC PD of a certain loan is 2% this means that there is, on average over an economic cycle, a 2 in 100 chance that the borrower will default in any given year.

1LOD	First Line of Defence
2LOD	Second Line of Defence
3LOD	Third Line of Defence
ACS	Asset Covered Securities
A-IRB/AIRB	Advanced Internal Ratings-Based Approach
ALCO	Asset and Liability Committee
AMA	Advanced Measurement Approach
AML	Anti-Money Laundering
ASA	Alternative Standardised Approach
ASF	Available Stable Funding
AT1	Additional Tier 1 capital
AVA	Additional Valuation Adjustments
BEEL	Best Estimates of Expected Loss
BER	Building Energy Rating
BIA	Basic Indicator Approach
BoE	Bank of England
BOIG	Bank of Ireland Group plc
BoIGM	Bank of Ireland Global Markets
BoIMB	Bank of Ireland Mortgage Bank
BRC	Bord Risk Committee
BRR	Board Risk Report
BRRD	Bank Recovery and Resolution Directive
BSSRC	Balance Sheet Structural Risk Committee
CAI	Climate Accountability Institute
CBI	Central Bank of Ireland
CCA	Climate Change Adaption
CCF	Credit conversion factor
CCM	Climate Change Mitigation
CCP	Central Counterparty Clearing
CCR	Counterparty credit risk
CCyB	Countercyclical Capital Buffer
CDEAs	Cleared Derivatives Execution Agreements
CDP	Carbon Disclosure Project
CET 1	Common equity tier 1 capital
CFI	Community Foundation for Ireland
CFT	Countering the Financing of Crime
CMBS	Commercial Mortgage-Backed Securities
CRD	Capital Requirements Directive
CRE	Commercial Real Estate
CRM	Credit risk mitigation
CRR	Capital Requirements Regulation
CSA	Credit support annex
CSRD	Corporate Sustainability Reporting Directive
CVA	Credit valuation adjustment
DCF	Discounted Cash Flow
DMA	Double Materiality Assessment
DRP	Directors' Remuneration Policy
EAD	Exposure at default
EBA	European Banking Authority
ECAI	External Credit Assessment Institutions
ECL	Expected credit loss
EHQLA	Encumbered High Quality Liquid Asset
EL	Expected loss
EMIR	European Market Infrastructure Regulation
EP	Energy Performance
EPC	Energy Performance Certificate
ERBA	External Ratings Based Approach
ERC	Executive Risk Committee
ERU	Economic Research Unit
ESG	Environmental, Social and Governance
ETP	Energy Transition Pathway
EU	European Union
EURIBOR	Euro Inter Bank Offered Rate
EV	Electric Vehicle
EVE	Economic Value of Equity
FCCM	Financial collateral comprehensive method

FCR	Forborne collateral realisation
FCs	Financial Counterparties
F-IRB/FIRB	Foundation Internal Ratings-Based Approach
FLI	Forward Looking Information
FSQS	Financial Supplier Qualification System
FVOCI	Fair Value through Other Comprehensive Income
FVTPL	Fair Value Through Profit and Loss
FWP	Financial Wellbeing Programme
GAC	Group Audit Committee
GAR	Green Asset Ratio
GCRC	Group Credit Risk Committee
GCTC	Group Credit Transactions Committee
GEC	Group Executive Committee
GHG	Greenhouse gas
GIA	Group Internal Audit
GM & LR	Group Market and Liquidity Risk
GMRA	Global master repurchase agreement
GORC	Group Operational Risk Committee
GovCo	The Governor and Company of the Bank of Ireland
GPS	Group Profit Share Scheme
GRC	Group Remuneration Committee
GRCRC	Group Regulatory and Conduct Risk Committee
GRP	Group Remuneration Policy
GSC	Group Sustainability Committee
G-SII	Global Systemically Important Institution
HLBA	Historical Look Back Approach
HQLA	High quality liquid assets
I&D	Inclusion and Diversity
IAA	Internal Assessment Approach
ICAAP	Internal Capital Adequacy Assessment Process
IDD	Insurance Distribution Directive
IEA	International Energy Agency
IFRS	International Financial Reporting Standards
ILAPP	Internal Liquidity Adequacy Assessment Process
IMA	Internal Models Approach
IMM	Internal Models Method
IRB	Internal Ratings-Based
IRBA	Internal Ratings Based Approach
IRRBB	Interest Rate Risk in Banking Book
ISDA	International Swaps and Derivative Association
IVU	Independent Valuation Unit
KPI	Key Performance Indicators
LCR	Liquidity coverage ratio
LDR	Loan to Deposit Ratio
LGD	Loss given default
LR	Leverage Ratio
MDB	Multilateral development bank
MiFID	Markets in Financial Instruments Directive
MLRO	Money Laundering Reporting Officer
MRC	Model Risk Committee
MREL	Minimum Requirement for own funds and eligible liabilities.
MRT	Material Risk Takers
MTM	Mark-to-market
NACE	Nomenclature of Economic Activities
NED	Non-Executive Directorship
NFRD	Non-Financial Reporting Directive
NGO	Non-Governmental Organisations
NIAC	New Ireland Assurance Company
NPE	Non-performing exposures
NPL	Non-Performing Loans
NSFR	Net Stable Funding Ratio
OCI	Other Comprehensive Income
ORSA	Own Risk and Solvency Assessment
O-SII	Other Systemically Important Institutions
OTC	Over-the-counter
PD	Probability of default
PERC	Private Equity Risk Committee
PFE	Potential future exposure

PiT	Point-in-time
POCI	Purchased or Originated Credit-impaired
PRI	Principles for Responsible Reporting
PSE	Public sector entity
PVA	Prudent valuation adjustment
QCCP	Qualifying central counterparty
QRRE	Qualifying revolving retail exposure
RAG	Red Amber Green
RCF	Revolving Credit Facilities
RCSA	Risk and Control Self-Assessment
REAU	Real Estate Advisory Unit
Retail IRB	Retail Internal Ratings Based Approach
RMBS	Residential Mortgage-Backed Securities
RMC	Risk Measurement Committee
RMF	Risk Management Framework
RPPI	Residential Property Price Index
RRE	Residential Real Estate
RSF	Required Stable Funding
RW	Risk Weight
RWEA/RWA	Risk weighted exposure amounts
SBTi	Science Based Targets Initiative
SDA	Sectoral Decarbonisation Approach
SDG	Sustainable Decision Group
SE	Structured Entity
SEAI	Sustainable Energy Authority of Ireland
SFT	Securities financing transactions
SMBPN	Special Mortgage-Backed euro Promissory Note
SME	Small Medium Enterprise
SNT	Science Based Targets
SREP	Supervisory Review and Evaluation Process
SRT	Significant Risk Transfer
SSM	Single Supervisory Mechanism
SSPEs	Securitisation Single Purpose Entity
STS	Simple Transparent and Standardised
SVaR	Stressed Value at Risk
T2 Capital	Tier 2 Capital
TPRM	Third Party Risk Management
TREA	Total Risk exposure amounts
TSA/SA	The Standardised Approach
TtC	Through-the-cycle
UNPRB	United Nations Principles for Responsible Banking
UNPRI	United Nations Principles for Responsible Investment
UoP	Use of Proceeds
VaR	Value at risk
WWR	Wrong Way Risk

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