# Bank of Ireland Group plc
# Year end Pillar 3 Disclosures
# 31 December 2024

## Forward-looking statement



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 regional conflicts on 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 Capital Requirements Directive & Regulation (CRD) 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 in the context of this document describes the package CRR as amended, CRD 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 2024. They have been prepared in accordance with the requirements of the CRD. In addition, we present disclosures as set out in Implementing Regulation (EU) 2021/763 relating to relevant information on Minimum Requirement for Own Funds and Eligible Liabilities (MREL).

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 2024, the majority of the quantitative data is sourced from the Group regulatory platform and is calculated according to regulatory requirements. Please note the figures in this report are in millions of euro and may contain rounding differences as they are compiled using information reported to supervisors in units of euro.

The difference between the accounting data and information sourced from the Group's regulatory returns is most evident for credit risk disclosures where credit exposure under CRD 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 2024.

Some details of the key differences between the Group's accounting and regulatory exposures are set out in Table 1.6.

Article 432(1) of the CRD 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 Disclosures on the basis of materiality.

**Frequency**
Under the CRD, 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 2024 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 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 2024 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 2024 [1] | September 2024 | June 2024 | March 2024 | December 2023 [1] |
| **Available own funds (amounts)** | | | | | | |
| 1 | Common equity tier 1 (CET1) (€m) | 8,055 | 7,544 | 7,520 | 7,542 | 7,636 |
| 2 | Tier 1 (€m) | 9,124 | 8,611 | 8,495 | 8,517 | 8,611 |
| 3 | Total capital (€m) | 10,819 | 10,304 | 10,482 | 10,003 | 10,091 |
| **Risk-weighted exposure amounts** | | | | | | |
| 4 | Total risk-weighted exposure amount (RWEA) (€m) | 55,302 | 53,583 | 52,187 | 52,951 | 52,556 |
| **Capital ratios (as a percentage of risk-weighted exposure amount)** | | | | | | |
| 5 | Common equity tier 1 ratio (%) | 14.57% | 14.08% | 14.41% | 14.24% | 14.53% |
| 6 | Tier 1 ratio (%) | 16.50% | 16.07% | 16.28% | 16.08% | 16.38% |
| 7 | Total capital ratio (%) | 19.56% | 19.23% | 20.09% | 18.89% | 19.20% |
| **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 (%) | 2.35% | 2.35% | 2.35% | 2.35% | 2.25% |
| | of which: | | | | | |
| EU 7b | to be made up of CET1 capital (percentage points) | 1.32% | 1.32% | 1.32% | 1.32% | 1.27% |
| EU 7c | to be made up of Tier 1 capital (percentage points) | 1.76% | 1.76% | 1.76% | 1.76% | 1.69% |
| EU 7d | Total SREP own funds requirements (%) | 10.35% | 10.35% | 10.35% | 10.35% | 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 (%) | 1.49% | 1.50% | 1.50% | 1.15% | 1.15% |
| 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 (%) | 5.49% | 5.50% | 5.50% | 5.15% | 5.15% |
| EU 11a | Overall capital requirements (%) | 15.84% | 15.85% | 15.85% | 15.50% | 15.40% |
| 12 | CET1 available after meeting the total SREP own funds requirements (%) | 8.74% | 8.26% | 8.52% | 8.32% | 8.70% |
| **Leverage ratio** | | | | | | |
| 13 | Total exposure measure | 137,013 | 136,407 | 134,565 | 133,285 | 134,192 |
| 14 | Leverage ratio (%) | 6.66% | 6.31% | 6.31% | 6.39% | 6.42% |
| **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) | 36,994 | 36,442 | 35,952 | 35,945 | 36,561 |
| EU 16a | Cash outflows - Total weighted value | 19,504 | 19,469 | 19,693 | 19,883 | 20,583 |
| EU 16b | Cash inflows - Total weighted value | 1,065 | 1,026 | 1,014 | 1,073 | 1,028 |
| 16 | Total net cash outflows (adjusted value) | 18,439 | 18,443 | 18,679 | 18,811 | 19,555 |
| 17 | Liquidity coverage ratio (%) | 200.64% | 197.65% | 192.61% | 191.20% | 187.44% |
| **Net Stable Funding Ratio** | | | | | | |
| 18 | Total available stable funding | 104,755 | 104,161 | 104,859 | 103,015 | 103,752 |
| 19 | Total required stable funding | 67,592 | 67,999 | 68,234 | 65,575 | 65,983 |
| 20 | NSFR ratio (%) | 154.98% | 153.2% | 153.7% | 157.1% | 157.2% |

1 The Group capital ratios have been presented including the retained profits in 2024 and 2023, availing of the regulatory profit verification process.

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 2024** [1] | **September 2024** | **June 2024** | **March 2024** | **December 2023** [1] |
| **Available capital** | | | | | | |
| 1 | Common equity tier 1 (CET1) (€m) | 8,055 | 7,544 | 7,520 | 7,542 | 7,636 |
| 2 | Common equity tier 1 (CET1) capital as if IFRS9 or analogous ECLs transitional arrangements had not been applied (€m) | 8,055 | 7,537 | 7,511 | 7,527 | 7,599 |
| 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] | 8,055 | 7,544 | 7,520 | 7,542 | 7,636 |
| 3 | Tier 1 (€m) | 9,124 | 8,611 | 8,495 | 8,517 | 8,611 |
| 4 | Tier 1 capital as if IFRS9 or analogous ECLs transitional arrangements had not been applied (€m) | 9,124 | 8,604 | 8,486 | 8,502 | 8,574 |
| 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] | 9,124 | 8,611 | 8,495 | 8,517 | 8,611 |
| 5 | Total capital (€m) | 10,819 | 10,304 | 10,482 | 10,003 | 10,091 |
| 6 | Total capital as if IFRS9 or analogous ECLs transitional arrangements had not been applied (€m) | 10,819 | 10,297 | 10,473 | 9,988 | 10,054 |
| 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] | 10,819 | 10,304 | 10,482 | 10,003 | 10,091 |
| **Risk weighted assets** | | | | | | |
| 7 | Total risk-weighted assets (RWA) (€m) | 55,302 | 53,583 | 52,187 | 52,951 | 52,556 |
| 8 | Total risk-weighted assets as if IFRS9 or analogous ECLs transitional arrangements had not been applied (€m) | 55,302 | 53,577 | 52,177 | 52,936 | 52,519 |
| **Risk-based capital ratios as a % of RWA** | | | | | | |
| 9 | Common equity tier 1 ratio (%) | 14.57% | 14.08% | 14.41% | 14.24% | 14.53% |
| 10 | Common equity tier 1 ratio (%) as if IFRS9 or analogous ECLs transitional arrangements had not been applied | 14.57% | 14.07% | 14.39% | 14.22% | 14.47% |
| 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] | 14.57% | 14.08% | 14.41% | 14.24% | 14.53% |
| 11 | Tier 1 ratio (%) | 16.50% | 16.07% | 16.28% | 16.08% | 16.38% |
| 12 | Tier 1 ratio (%) as if IFRS9 or analogous ECLs transitional arrangements had not been applied | 16.50% | 16.06% | 16.26% | 16.06% | 16.33% |
| 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] | 16.50% | 16.07% | 16.28% | 16.08% | 16.38% |
| 13 | Total capital ratio (%) | 19.56% | 19.23% | 20.09% | 18.89% | 19.20% |
| 14 | Total capital ratio (%) as if IFRS9 or analogous ECLs transitional arrangements had not been applied | 19.56% | 19.22% | 20.07% | 18.87% | 19.14% |
| 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] | 19.56% | 19.23% | 20.09% | 18.89% | 19.20% |
| **Leverage ratio** | | | | | | |
| 15 | Total Leverage ratio exposure measure (€m) | 137,013 | 136,407 | 134,565 | 133,285 | 134,192 |
| 16 | Leverage ratio (%) | 6.66% | 6.31% | 6.31% | 6.39% | 6.42% |
| 17 | Leverage ratio (%) as if IFRS9 or analogous ECLs transitional arrangements had not been applied | 6.66% | 6.31% | 6.31% | 6.38% | 6.39% |
| 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] | 6.66% | 6.31% | 6.31% | 6.39% | 6.42% |

1 The Group capital ratios have been presented including the retained profits in 2024 and 2023, 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.

As per Article 45i (3), points (a) and (c) of the Bank Recovery and Resolution Directive 'BRRD II', published in the Official Journal of the EU as Directive 2014/59/EU, amended by Directive (EU) 2019/879 in May 2019, the following template provides a summary of the Minimum Requirement for Own Funds and Eligible Liabilities (MREL) in accordance with Article 45 and 45e BRRD II.

Under BRRD II, the Group is subject to external MREL and associated disclosures. The purpose of the requirement is for the Group to hold sufficient financial resources to support an orderly resolution in the event of its failure. The Group is not subject to the Total Loss-Absorbing Capacity (TLAC) requirements which only applies to Global Systemically Important Institutions (G-SIIs).

The current MREL requirement for the Group is 28.56% on an RWA basis (this consists of a Single Resolution Board (SRB) Requirement of 23.07% and the Group's Combined Buffer Requirement of 5.49%) and 7.55% on a leverage basis. As of 31 December 2024, the Group exceeds these requirements.

**Table 1.3 - EU KM2 - Key metrics - MREL and, where applicable, G-SII requirement for own funds and eligible liabilities**

| | | Minimum requirement for own funds and eligible liabilities (MREL) | G-SII Requirement for own funds and eligible liabilities (TLAC) | | | | |
|---|---|---|---|---|---|---|---|
| | | a | b | c | d | e | f |
| | | December 2024 | December 2024 | September 2024 | June 2024 | March 2024 | December 2023 |
| **Own funds and eligible liabilities, ratios and components** | | | | | | | |
| 1 | Own funds and eligible liabilities (€m) | 17,829 | - | - | - | - | - |
| | *of which;* | | | | | | |
| EU-1a | *own funds and subordinated liabilities (€m)* | *17,829* | - | - | - | - | - |
| 2 | Total risk exposure amount of the resolution group (TREA) (€m) | 55,302 | - | - | - | - | - |
| 3 | Own funds and eligible liabilities as a percentage of TREA (row1/row2) (%) | 32.24% | - | - | - | - | - |
| | *of which;* | | - | - | - | - | - |
| EU-3a | *own funds and subordinated liabilities (%)* | *32.24%* | | | | | |
| 4 | Total exposure measure of the resolution group (€m) | 137,013 | - | - | - | - | - |
| 5 | Own funds and eligible liabilities as percentage of the total exposure measure (%) | 13.01% | - | - | - | - | - |
| | *of which;* | | - | - | - | - | - |
| EU-5a | *own funds or subordinated liabilities (%)* | *13.01%* | | | | | |
| 6a | Does the subordination exemption in Article 72b(4) of the CRR apply? (5% exemption) | | - | - | - | - | - |
| 6b | Pro-memo item - Aggregate amount of permitted non-subordinated eligible liabilities in-struments If the subordination discretion as per Article 72b(3) CRR is applied (max 3.5% exemption) | | - | - | - | - | - |
| 6c | Pro-memo item: If a capped subordination exemption applies under Article 72b (3) CRR, the amount of funding issued that ranks pari passu with excluded liabilities and that is recognised under row 1, divided by funding issued that ranks pari passu with excluded Liabilities and that would be recognised under row 1 if no cap was applied (%) | | - | - | - | - | - |
| **Minimum requirement for own funds and eligible liabilities (MREL)** | | | | | | | |
| EU-7 | MREL requirement expressed as percentage of the total risk exposure amount (%) | 28.56% | | | | | |
| | *of which;* | | | | | | |
| EU-8 | *to be met with own funds or subordinated liabilities (%)* | *14.12%* | | | | | |
| EU-9 | MREL requirement expressed as percentage of the total exposure measure (%) | 7.55% | | | | | |
| | *of which;* | | | | | | |
| EU-10 | *to be met with own funds or subordinated liabilities (%)* | *7.55%* | | | | | |

The Group's Pillar 3 disclosures are published on a consolidated basis for the year ended 31 December 2024.

Not all legal entities are within the scope of regulatory consolidation. A summarised diagrammatical representation (as at 31 December 2024) of the regulatory consolidation group is illustrated below. The disclosures within this document are based on the regulatory consolidated group. Table 1.4 highlights the main differences between the basis of consolidation for accounting purposes and the CRD IV regulatory treatment.

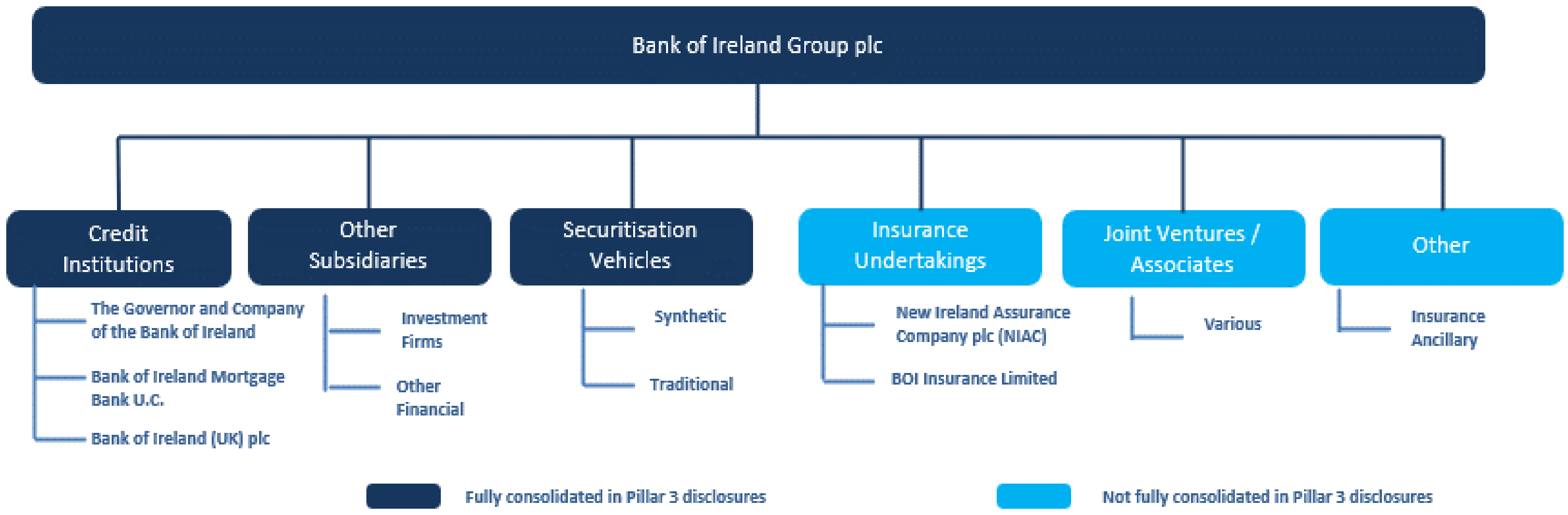


**Table 1.4 - Basis of Consolidation**

| 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.

As per Article 436 point (c), Table 1.5 below shows both the Group's consolidated balance sheet as at 31 December 2024 on an accounting consolidated basis and the Group's consolidated balance sheet under the regulatory scope of consolidation. Certain assets and liabilities can be subject to multiple RWA frameworks.

**Table 1.5 - EU LI1 - Difference between accounting and regulatory scope of consolidation**

| | | a | b | c | d | e | f | g |
|---|---|---|---|---|---|---|---|---|
| | **2024** | | | Carrying values of items | | | | |
| | **Balance sheet category** | **Carrying values as reported in published financial statements** | **Carrying values under scope of regulatory consolidation** | **Subject to the credit risk framework** | **Subject to the CCR framework** | **Subject to the securitisation framework** | **Subject to the market risk framework** | **Not subject to own funds requirements or subject to deduction from own funds** |
| | **Assets** | **€m** | **€m** | **€m** | **€m** | **€m** | **€m** | **€m** |
| 1 | Cash and balances at central banks | 32,436 | 32,436 | 32,436 | | | | |
| 2 | Items in the course of collection from other banks | 114 | 114 | 114 | - | - | - | - |
| 3 | Trading securities | 166 | 166 | - | - | - | 166 | - |
| 4 | Derivative financial instruments | 3,477 | 3,481 | - | 3,481 | - | 1,604 | - |
| 5 | Fair value changes due to interest rate risk of the hedged items in portfolio hedges | 118 | 118 | - | - | - | - | 118 |
| 6 | Other financial assets at fair value through profit or loss | 24,000 | 175 | 175 | - | - | - | - |
| 7 | Loans and advances to banks | 1,738 | 1,738 | 1,738 | 343 | - | - | - |
| 8 | Debt securities at amortised cost | 6,387 | 6,387 | 6,387 | - | - | - | - |
| 9 | Financial assets at fair value through other comprehensive income | 3,384 | 3,384 | 3,384 | - | 499 | - | - |
| 10 | Loans and advances to customers | 82,538 | 82,650 | 76,644 | - | 5,844 | - | 162 |
| 11 | Investments in subsidiaries, joint ventures and associates | 213 | 882 | 882 | - | - | - | - |
| 12 | Intangible assets and goodwill | 1,500 | 1,442 | 1,442 | - | - | - | - |
| 13 | Investment properties | 771 | - | - | - | - | - | - |
| 14 | Property, plant and equipment | 811 | 811 | 359 | - | - | - | 451 |
| 15 | Current tax assets | 37 | 37 | 37 | - | - | - | - |
| 16 | Deferred tax assets | 546 | 546 | - | - | - | - | 546 |
| 17 | Other assets | 1,127 | 937 | 935 | - | - | - | - |
| 18 | Reinsurance contract assets | 1,453 | - | - | - | - | - | - |
| 19 | Retirement benefit assets | 997 | 995 | 995 | - | - | - | - |
| 20 | **Total assets** | **161,813** | **136,298** | **125,531** | **3,824** | **6,342** | **1,770** | **1,277** |
| | **Equity and liabilities** | | | | | | | |
| 1 | Deposits from banks | 1,805 | 1,805 | - | 234 | - | - | 1,805 |
| 2 | Customer accounts | 103,069 | 103,816 | - | - | - | - | 103,816 |
| 3 | Items in the course of transmission to other banks | 218 | 218 | - | - | - | - | 218 |
| 4 | Derivative financial instruments | 3,675 | 3,675 | - | 3,675 | - | 1,581 | - |
| 5 | Fair value changes due to interest rate risk of the hedged items in portfolio hedges | (365) | (365) | - | - | - | - | (365) |
| 6 | Debt securities in issue | 9,130 | 9,130 | - | - | - | - | 9,130 |
| 7 | Liabilities to customers under investment contracts | 9,203 | - | - | - | - | - | - |
| 8 | Insurance contract liabilities | 16,685 | - | - | - | - | - | - |
| 9 | Other liabilities | 2,760 | 2,410 | - | - | - | - | 2,410 |
| 10 | Leasing liabilities | 366 | 365 | - | - | - | - | 365 |
| 11 | Current tax liabilities | 29 | 28 | - | - | - | - | 28 |
| 12 | Provisions | 235 | 234 | - | - | - | - | 234 |
| 13 | Loss allowance provision on loan commitments and financial guarantees | 80 | 80 | - | - | - | - | 80 |
| 14 | Deferred tax liabilities | 58 | 29 | - | - | - | - | 29 |
| 15 | Retirement benefit obligations | 3 | 3 | - | - | - | - | 3 |
| 16 | Subordinated liabilities | 1,853 | 1,853 | - | - | - | - | 1,853 |
| 17 | **Total liabilities** | 148,804 | 123,281 | - | 3,909 | - | 1,581 | 123,281 |
| | **Equity** | | | | | | | |
| 1 | Capital stock | 1,003 | 995 | - | - | - | - | 995 |
| 2 | Share premium account | 456 | 456 | - | - | - | - | 456 |
| 3 | Retained earnings | 10,473 | 10,736 | - | - | - | - | 10,736 |
| 4 | Other reserves | 22 | (234) | - | - | - | - | (234) |
| 5 | Own stock held for the benefit of life assurance policyholders | (7) | 0 | - | - | - | - | 0 |
| 6 | Other equity instruments - Additional Tier 1 | 1,059 | 1,059 | - | - | - | - | 1,059 |
| 7 | Non-controlling interests | 3 | 3 | - | - | - | - | 3 |
| 8 | **Total equity** | 13,009 | 13,017 | - | - | - | - | 13,017 |
| 9 | **Total equity and liabilities** | **161,813** | **136,298** | **-** | **3,909** | **-** | **1,581** | **136,298** |

| | | a | b | c | d | e | f | g |
|---|---|---|---|---|---|---|---|---|
| | 2023 | | | Carrying values of items | | | | |
| | Balance sheet category | Carrying values as reported in published financial statements | Carrying values under scope of regulatory consolidation | Subject to the credit risk framework | Subject to the CCR framework | Subject to the securitisation framework | Subject to the market risk framework | Not subject to capital requirements or subject to deduction from capital |
| | Assets | €m | €m | €m | €m | €m | €m | €m |
| 1 | Cash and balances at central banks | 31,843 | 31,843 | 31,843 | - | - | - | - |
| 2 | Items in the course of collection from other banks | 126 | 126 | 126 | - | - | - | - |
| 3 | Trading securities | 72 | 72 | - | - | - | 72 | - |
| 4 | Derivative financial instruments | 4,341 | 4,358 | - | 4,358 | - | 2,003 | - |
| 5 | Fair value changes due to interest rate risk of the hedged items in portfolio hedges | (124) | (124) | - | - | - | - | (124) |
| 6 | Other financial assets at fair value through profit or loss | 20,899 | 131 | 131 | - | - | - | - |
| 7 | Loans and advances to banks | 1,907 | 1,805 | 1,805 | 314 | - | - | - |
| 8 | Debt securities at amortised cost | 5,715 | 5,715 | 5,715 | - | - | - | - |
| 9 | Financial assets at fair value through other comprehensive income | 3,968 | 3,968 | 3,968 | - | 432 | - | - |
| 10 | Assets classified as held for sale | - | - | - | - | - | - | - |
| 11 | Loans and advances to customers | 79,729 | 79,903 | 73,132 | - | 6,609 | - | 162 |
| 12 | Investments in subsidiaries, joint ventures and associates | 187 | 806 | 806 | - | - | - | - |
| 13 | Intangible assets and goodwill | 1,408 | 1,340 | 1,340 | - | - | - | - |
| 14 | Investment properties | 793 | - | - | - | - | - | - |
| 15 | Property, plant and equipment | 800 | 800 | 69 | - | - | - | 730 |
| 16 | Current tax assets | 3 | 3 | 3 | - | - | - | - |
| 17 | Deferred tax assets | 808 | 807 | - | - | - | - | 807 |
| 18 | Other assets | 1,127 | 992 | 992 | - | - | - | - |
| 19 | Reinsurance contract assets | 1,414 | - | - | - | - | - | - |
| 20 | Retirement benefit assets | 692 | 688 | 688 | - | - | - | - |
| 21 | Total assets | 155,708 | 133,233 | 120,618 | 4,672 | 7,041 | 2,075 | 1,575 |
| | Equity and liabilities | | | | | | | |
| 1 | Deposits from banks | 3,095 | 3,095 | - | 305 | - | - | 3,095 |
| 2 | Customer accounts | 100,183 | 100,823 | - | - | - | - | 100,823 |
| 3 | Items in the course of transmission to other banks | 322 | 322 | - | - | - | - | 322 |
| 4 | Derivative financial instruments | 4,490 | 4,490 | - | 4,490 | - | 2,043 | - |
| 5 | Fair value changes due to interest rate risk of the hedged items in portfolio hedges | (1,115) | (1,115) | - | - | - | - | (1,115) |
| 6 | Debt securities in issue | 8,670 | 8,670 | - | - | - | - | 8,670 |
| 7 | Liabilities to customers under investment contracts | 7,692 | - | - | - | - | - | - |
| 8 | Insurance contract liabilities | 15,113 | - | - | - | - | - | - |
| 9 | Other liabilities | 2,480 | 2,193 | - | - | - | - | 2,193 |
| 10 | Leasing liabilities | 404 | 404 | - | - | - | - | 404 |
| 11 | Current tax liabilities | 23 | 16 | - | - | - | - | 16 |
| 12 | Provisions | 58 | 57 | - | - | - | - | 57 |
| 13 | Loss allowance provision on loan commitments and financial guarantees | 61 | 61 | - | - | - | - | 61 |
| 14 | Deferred tax liabilities | 61 | 39 | - | - | - | - | 39 |
| 15 | Retirement benefit obligations | 10 | 12 | - | - | - | - | 12 |
| 16 | Subordinated liabilities | 1,600 | 1,600 | - | - | - | - | 1,600 |
| 17 | Total liabilities | 143,147 | 120,667 | - | 4,795 | - | 2,043 | 116,177 |
| | Equity | | | | | | | |
| 1 | Capital stock | 1,057 | 1,048 | - | - | - | - | 1,048 |
| 2 | Share premium account | 456 | 456 | - | - | - | - | 456 |
| 3 | Retained earnings | 10,285 | 10,522 | - | - | - | - | 10,522 |
| 4 | Other reserves | (199) | (429) | - | - | - | - | (429) |
| 5 | Own stock held for the benefit of life assurance policyholders | (7) | - | - | - | - | - | - |
| 6 | Other equity instruments - Additional Tier 1 | 966 | 966 | - | - | - | - | 966 |
| 7 | Non-controlling interests | 3 | 3 | - | - | - | - | 3 |
| 8 | Total equity | 12,561 | 12,566 | - | - | - | - | 12,566 |
| 9 | Total equity and liabilities | 155,708 | 133,233 | - | 4,795 | - | 2,043 | 128,743 |

As per Article 436 point (d), Table 1.6 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 2024) and those compiled using CRD IV methodologies. Unless specified otherwise, both sets of data reflect the position as at 31 December 2024. 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 1.6 - EU LI2 - Reconciliation between regulatory exposure amounts and carrying value in financial statements**

| | | a | b | c | d | e |
|---|---|---|---|---|---|---|
| | | | Items subject to | | | |
| | **2024** | **Total €m** | **Credit risk framework €m** | **CCR framework €m** | **Securitisation framework €m** | **Market Risk framework €m** |
| **1** | **Assets carrying value amount under the scope of regulatory consolidation (as per template EU LI1)** | **137,467** | **125,531** | **3,824** | **6,342** | **1,770** |
| 2 | Liabilities carrying value amount under the regulatory scope of consolidation (as per template EU LI1) | (5,490) | - | (3,909) | - | (1,581) |
| 3 | Total net amount under the regulatory scope of consolidation | 131,977 | 125,531 | (85) | 6,342 | 189 |
| 4 | Off-balance sheet amounts | 18,639 | 18,639 | - | - | |
| 5 | Differences in valuations | (7) | (7) | - | - | |
| 6 | Differences due to different netting rules, other than those already in row 2 | 835 | (823) | 1,658 | - | |
| 7 | Differences due to consideration of provisions | 873 | 906 | - | (33) | |
| 8 | Differences due to the use of credit risk mitigation techniques (CRMs) | 336 | 336 | - | - | |
| 9 | Differences due to credit conversion factors | (13,281) | (13,281) | - | - | |
| 10 | Differences due to Securitisation with risk transfer | (795) | - | - | (795) | |
| 11 | Other differences | 220 | (900) | 951 | 169 | |
| **12** | **Exposure amounts considered for regulatory purposes** | **138,797** | **130,400** | **2,524** | **5,684** | **189** |

| | | a | b | c | d | e |
|---|---|---|---|---|---|---|
| | | | Items subject to | | | |
| | 2023 | Total €m | Credit risk framework €m | CCR framework €m | Securitisation framework €m | Market Risk framework €m |
| 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 |
| 2 | Liabilities carrying value amount under the regulatory scope of consolidation (as per template EU LI1) | (6,838) | - | (4,795) | - | (2,043) |
| 3 | Total net amount under the regulatory scope of consolidation | 127,568 | 120,618 | (123) | 7,041 | 32 |
| 4 | Off-balance sheet amounts | 19,039 | 19,039 | - | - | |
| 5 | Differences in valuations | (8) | (8) | - | - | |
| 6 | Differences due to different netting rules, other than those already in row 2 | 919 | (658) | 1,577 | - | |
| 7 | Differences due to consideration of provisions | 939 | 973 | - | (34) | |
| 8 | Differences due to the use of credit risk mitigation techniques (CRMs) | 280 | 280 | - | - | |
| 9 | Differences due to credit conversion factors | (12,699) | (12,699) | - | - | |
| 10 | Differences due to Securitisation with risk transfer | (837) | - | - | (837) | |
| 11 | Other differences | 674 | (254) | 986 | (58) | |
| 12 | Exposure amounts considered for regulatory purposes | 135,875 | 127,291 | 2,440 | 6,112 | 32 |

**Definition:**
The risk that the Group does not hold sufficient capital to i) remain compliant with regulatory capital requirements; ii) support its business and medium-term strategic objectives; and iii) 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 14.57% at 31 December 2024 (31 December 2023: 14.53%) 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 1.4). 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-24** | Dec-23 |
|---|---|---|---|
| 1 | Supplementary own fund requirements of the financial conglomerate (€m) | **10,131** | 9,492 |
| 2 | Capital adequacy ratio of the financial conglomerate (%) | **108.37%** | 108.00% |

**Table 2 - EU OVC - ICAAP information**

The Internal Capital Adequacy Assessment Process (ICAAP) 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 €2.7 billion in RWA is primarily due to loan book movements, fx, 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-24** | Dec-23 | **Dec-24** |
| | | **Risk weighted exposure amounts (RWEAs) €m** | **Risk weighted exposure amounts (RWEAs)** €m | **Total own funds requirements €m** |
| 1 | Credit risk (excluding CCR) | **45,563** | 43,921 | **3,645** |
| | *of which;* | | | |
| 2 | *the standardised approach* | *13,751* | *14,788* | *1,100* |
| 3 | *the Foundation IRB (F-IRB) approach* | *17,757* | *16,689* | *1,421* |
| 4 | *slotting approach* | - | - | - |
| EU 4a | *equities under the simple risk weighted approach* | - | - | - |
| 5 | the Advanced IRB (A-IRB) approach | 13,601 | 12,094 | 1,088 |
| 6 | *Counterparty credit risk - CCR* | ***851*** | *828* | ***68*** |
| | *of which;* | | | |
| 7 | *the standardised approach* | *616* | *595* | *49* |
| 8 | *internal model method (IMM)* | - | - | - |
| EU 8a | *exposures to a CCP* | *28* | *28* | *2* |
| EU 8b | *credit valuation adjustment - CVA* | *161* | *197* | *13* |
| 9 | *other CCR* | *46* | *8* | *4* |
| 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) | **1,879** | 1,681 | **150** |
| | *of which;* | | | |
| 17 | *SEC-IRBA approach* | 1,707 | 1,499 | 137 |
| 18 | *SEC-ERBA (including IAA)* | *172* | *182* | *14* |
| 19 | SEC-SA approach | - | - | - |
| EU 19a | 1250% / deduction | - | - | - |
| 20 | *Position, foreign exchange and commodities risks (Market risk)* | ***346*** | *230* | ***28*** |
| | *of which;* | | | |
| 21 | the standardised approach | *346* | *230* | *28* |
| 22 | IMA | - | - | - |
| EU 22a | Large exposures | **-** | - | **-** |
| 23 | Operational risk | **6,662** | 5,896 | **533** |
| | *of which:* | | | |
| EU 23a | basic indicator approach | - | - | - |
| EU 23b | standardised approach | 6,662 | 5,896 | 533 |
| EU 23c | advanced measurement approach | - | - | - |
| **24** | **Amounts below the thresholds for deduction (subject to 250% risk weight)** | **1,986** | 1,722 | **159** |
| 25 | Not applicable | - | - | - |
| 26 | Not applicable | - | - | - |
| 27 | Not applicable | - | - | - |
| 28 | Not applicable | - | - | - |
| **29** | **Total** | **55,302** | 52,556 | **4,424** |

As per Article 437, points (a), (d), (e) and (f), Table 2.2 below provides a breakdown of the constituent elements of the Group'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 (Table 2.3) to facilitate full reconciliation of accounting and regulatory own funds.

**Table 2.2 - EU CC1 - Composition of regulatory own funds**

| | | a | b | |
|---|---|---|---|---|
| | | **Amounts** | **Source based on reference numbers of the balance sheet under the regulatory scope of consolidation** | |
| **Dec-24** | | | | Dec-23 |
| | | **€m** | | €m |
| **Common equity tier 1 (CET1) capital: Instruments and reserves** | | | | |
| 1 | Capital instruments and the related share premium accounts | 1,451 | | 1,505 |
| | *of which:* | | | |
| | *Ordinary stock* | *995* | *(a)* | *1,048* |
| | *Share premium* | *456* | *(b)* | *457* |
| 2 | Retained earnings | 10,231 | *(c)* | 10,301 |
| 3 | Accumulated other comprehensive income (and other reserves) | (916) | *(c, d)* | (1,506) |
| 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 | 293 | *(c)* | 125 |
| **6** | **Common equity tier 1 (CET 1) capital before regulatory adjustments** | **11,060** | | 10,424 |
| **Common equity tier 1 (CET1) capital regulatory adjustments** | | | | |
| 7 | Additional value adjustments (negative amount) | (7) | | (8) |
| 8 | Intangible assets (net of related tax liability) (negative amount) | (1,113) | *(f)* | (971) |
| 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) | (574) | *(g)* | (818) |
| 11 | Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value | 41 | | 43 |
| 12 | Negative amounts resulting from the calculation of expected loss amounts | (66) | | (153) |
| 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 | (17) | | (16) |
| 15 | Defined-benefit pension fund assets (negative amount) | (846) | *(h, i)* | (583) |
| 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) | - | | - |
| 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 | (5) | | (14) |
| EU-20b | *of which: qualifying holdings outside the financial sector (negative amount)* | - | | - |
| EU-20c | *of which: securitisation positions (negative amount)* | *(5)* | | *(14)* |
| 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 | (417) | | (268) |
| **28** | **Total regulatory adjustments to Common Equity Tier 1 (CET1)** | **(3,005)** | | (2,789) |
| **29** | ***Common Equity Tier 1 (CET1) capital*** | **8,055** | | 7,636 |
| **Additional Tier 1 (AT1) Capital: instruments** | | | | |
| 30 | Capital instruments and the related share premium accounts | 1,069 | *(e)* | 975 |
| 31 | *of which: classified as equity under applicable accounting standards* | *1,069* | *(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** | **1,069** | | 975 |
| **Additional Tier 1 (AT1) Capital: regulatory adjustments** | | | | |
| 37 | Direct, indirect and synthetic holdings by an institution of own AT1 instruments (negative amount) | (1) | | - |
| 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** | **(1)** | | - |
| **44** | **Additional Tier 1 (AT1) capital** | **1,068** | | 975 |
| **45** | **Tier 1 capital (T1 = CET1 + AT1)** | **9,124** | | 8,611 |
| **Tier 2 (T2) Capital: instruments and provisions** | | | | |
| 46 | Capital instruments and the related share premium accounts | 1,856 | *(j)* | 1,640 |
| 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** | **1,856** | | 1,640 |
| **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** | **1,696** | | 1,480 |
| **59** | **Total capital (TC = T1 + T2)** | **10,819** | | 10,091 |
| **60** | **Total Risk exposure amount** | **55,302** | | 52,556 |

| | | | |
|---|---|---|---|
| **Capital ratios and requirements including buffers** | | | |
| 61 | Common Equity Tier 1 capital | 14.57% | 14.53% |
| 62 | Tier 1 capital | 16.50% | 16.38% |
| 63 | Total capital | 19.56% | 19.20% |
| 64 | Institution CET1 overall capital requirements | 11.31% | 10.91% |
| 65 | of which: capital conservation buffer requirement | 2.50% | *2.50%* |
| 66 | of which: countercyclical capital buffer requirement | 1.49% | *1.15%* |
| 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 | 1.32% | 1.27% |
| 68 | Common Equity Tier 1 capital (as a percentage of risk exposure amount) available after meeting the minimum capital requirements | 8.74% | 8.70% |
| **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) | 1 | - |
| 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) | 672 | 601 |
| 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) | 123 | 88 |
| **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 | 173 | 186 |
| 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 | 192 | 176 |
| **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 the Group's balance sheet in the audited financial statements and the numbers that are used in the composition of own funds disclosure template (EU CC1 - Table 2.2).

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

| | | a | b | c | a | b |
|---|---|---|---|---|---|---|
| | | **Dec-24** | | | Dec-23 | |
| | **Balance sheet category** | **Balance sheet as in published financial statements** | **Under regulatory scope of consolidation** | **Reference** | Balance sheet as in published financial statements | Under regulatory scope of consolidation |
| | **Assets - Breakdown by asset classes according to the balance sheet in the published financial statements** | **€m** | **€m** | | **€m** | **€m** |
| 1 | Cash and balances at central banks | 32,436 | 32,436 | | 31,843 | 31,843 |
| 2 | Items in the course of collection from other banks | 114 | 114 | | 126 | 126 |
| 3 | Trading securities | 166 | 166 | | 72 | 72 |
| 4 | Derivative financial instruments | 3,477 | 3,481 | | 4,341 | 4,358 |
| 5 | Fair value changes due to interest rate risk of the hedged items in portfolio hedges | 118 | 118 | | (124) | (124) |
| 6 | Other financial assets at fair value through profit or loss | 24,000 | 175 | | 20,899 | 131 |
| 7 | Loans and advances to banks | 1,738 | 1,738 | | 1,907 | 1,805 |
| 8 | Debt securities at amortised cost | 6,387 | 6,387 | | 5,715 | 5,715 |
| 9 | Financial assets at fair value through other comprehensive income | 3,384 | 3,384 | | 3,968 | 3,968 |
| 10 | Loans and advances to customers | 82,538 | 82,650 | | 79,729 | 79,903 |
| 11 | Investments in subsidiaries, joint ventures and associates | 213 | 882 | *(f)* | 187 | 806 |
| 12 | Intangible assets and goodwill | 1,500 | 1,442 | | 1,408 | 1,340 |
| 13 | Investment properties | 771 | - | | 793 | - |
| 14 | Property, plant and equipment | 811 | 811 | | 800 | 800 |
| 15 | Current tax assets | 37 | 37 | *(g)* | 3 | 3 |
| 16 | Deferred tax assets | 546 | 546 | | 808 | 807 |
| 17 | Other assets | 1,127 | 937 | *(h)* | 1,127 | 992 |
| 18 | Reinsurance contract assets | 1,453 | - | | 1,414 | - |
| 19 | Retirement benefit assets | 997 | 995 | | 692 | 688 |
| 20 | **Total assets** | **161,813** | **136,298** | | **155,708** | **133,233** |
| | **Equity and liabilities - Breakdown by equity and liability classes according to the balance sheet in the published financial statements** | | | | | |
| 1 | Deposits from banks | 1,805 | 1,805 | | 3,095 | 3,095 |
| 2 | Customer accounts | 103,069 | 103,816 | | 100,183 | 100,823 |
| 3 | Items in the course of transmission to other banks | 218 | 218 | | 322 | 322 |
| 4 | Derivative financial instruments | 3,675 | 3,675 | | 4,490 | 4,490 |
| 5 | Fair value changes due to interest rate risk of the hedged items in portfolio hedges | (365) | (365) | | (1,115) | (1,115) |
| 6 | Debt securities in issue | 9,130 | 9,130 | | 8,670 | 8,670 |
| 7 | Liabilities to customers under investment contracts | 9,203 | - | | 7,692 | - |
| 8 | Insurance contract liabilities | 16,685 | - | | 15,113 | - |
| 9 | Other liabilities | 2,760 | 2,410 | | 2,480 | 2,193 |
| 10 | Leasing liabilities | 366 | 365 | | 404 | 404 |
| 11 | Current tax liabilities | 29 | 28 | | 23 | 16 |
| 12 | Provisions | 235 | 234 | | 58 | 57 |
| 13 | Loss allowance provision on loan commitments and financial guarantees | 80 | 80 | *(i)* | 61 | 61 |
| 14 | Deferred tax liabilities | 58 | 29 | | 61 | 39 |
| 15 | Retirement benefit obligations | 3 | 3 | *(j)* | 10 | 12 |
| 16 | Subordinated liabilities | 1,853 | 1,853 | | 1,600 | 1,600 |
| 17 | **Total liabilities** | **148,804** | **123,281** | | **143,147** | **120,667** |
| | **Equity** | | | | | |
| 1 | Capital stock | 1,003 | 995 | *(a)* | 1,057 | 1,048 |
| 2 | Share premium account | 456 | 456 | *(b)* | 456 | 456 |
| 3 | Retained earnings | 10,473 | 10,736 | *(c)* | 10,285 | 10,522 |
| 4 | Other reserves | 22 | (234) | *(d)* | (199) | (429) |
| 5 | Own stock held for the benefit of life assurance policyholders | (7) | 0 | | (7) | - |
| 6 | Other equity instruments - Additional Tier 1 | 1,059 | 1,059 | *(e)* | 966 | 966 |
| 7 | Non-controlling interests | 3 | 3 | | 3 | 3 |
| 8 | **Total equity** | **13,009** | **13,017** | | **12,561** | **12,566** |
| 9 | **Total equity and liabilities** | **161,813** | **136,298** | | **155,708** | **133,233** |

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 €822 million at 31 December 2024 (31 December 2023: €604m). The increase in capital requirement is due mainly to the increase in the required buffer rate for exposures based in Ireland. CRD 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.

**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 | | | | | | |
| | **Dec-24 (€m)** | **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 Exposure value for non-trading book** | **Total exposure value** | **Relevant credit risk exposures - Credit risk** | **Relevant credit exposures – Market risk** | **Relevant credit exposures – Securitisation positions in the non-trading book** | **Total** | **Risk-weighted exposure amounts** | **Own funds requirement weights (%)** | **Countercyclical capital buffer rate (%)** |
| 10 | **Countries with a buffer** | | | | | | | | | | | | | |
| | Denmark | 0 | 15 | - | - | - | 15 | 1 | - | - | 1 | 18 | 0.04% | 2.50% |
| | Iceland | - | 0 | - | - | - | 0 | 0 | - | - | 0 | 0 | - | 2.50% |
| | Norway | 0 | 0 | - | - | - | 1 | 0 | - | - | 0 | 0 | 0.00% | 2.50% |
| | Bulgaria | 0 | 0 | - | - | - | 0 | 0 | - | - | 0 | 0 | - | 2.00% |
| | Netherlands | 1 | 212 | - | - | - | 213 | 16 | 0 | - | 16 | 204 | 0.44% | 2.00% |
| | Sweden | 1 | 22 | - | - | - | 23 | 1 | - | - | 1 | 18 | 0.04% | 2.00% |
| | United Kingdom | 4,725 | 20,896 | - | - | 20 | 25,641 | 840 | 0 | - | 840 | 10,495 | 22.60% | 2.00% |
| | Armenia | - | - | - | - | - | - | - | - | - | - | - | - | 1.50% |
| | Croatia | - | 0 | - | - | - | 0 | 0 | - | - | 0 | 0 | - | 1.50% |
| | Estonia | 0 | 0 | - | - | - | 0 | 0 | - | - | 0 | 0 | - | 1.50% |
| | Ireland | 13,648 | 43,392 | - | - | 5,626 | 62,667 | 2,317 | 0 | 145 | 2,463 | 30,791 | 66.31% | 1.50% |
| | Slovakia | - | 0 | - | - | - | 0 | 0 | - | - | 0 | 0 | 0.00% | 1.50% |
| | Czech Republic | 0 | 0 | - | - | - | 0 | 0 | - | - | 0 | 0 | 0.00% | 1.25% |
| | Australia | 8 | 17 | - | - | - | 25 | 1 | - | - | 1 | 12 | 0.03% | 1.00% |
| | Belgium | 1 | 42 | - | - | - | 42 | 4 | - | - | 4 | 47 | 0.10% | 1.00% |
| | Cyprus | - | 4 | - | - | - | 4 | 0 | - | - | 0 | 4 | 0.01% | 1.00% |
| | France | 42 | 687 | - | - | - | 729 | 67 | - | - | 67 | 839 | 1.81% | 1.00% |
| | Korea, Republic of | - | 0 | - | - | - | 0 | 0 | - | - | 0 | 0 | 0.00% | 1.00% |
| | Lithuania | - | 0 | - | - | - | 0 | 0 | - | - | 0 | 0 | 0.00% | 1.00% |
| | Romania | 0 | 0 | - | - | - | 0 | 0 | - | - | 0 | 0 | 0.00% | 1.00% |
| | Germany | 1 | 317 | - | - | - | 318 | 26 | - | - | 26 | 320 | 0.69% | 0.75% |
| | Chile | 0 | - | - | - | - | 0 | 0 | - | - | 0 | 0 | - | 0.50% |
| | Hong Kong | 0 | 2 | - | - | - | 2 | 0 | - | - | 0 | 1 | 0.00% | 0.50% |
| | Hungary | - | 0 | - | - | - | 0 | 0 | - | - | 0 | 0 | 0.00% | 0.50% |
| | Latvia | - | 0 | - | - | - | 0 | 0 | - | - | 0 | 0 | 0.00% | 0.50% |
| | Luxembourg | 62 | 419 | - | - | - | 481 | 40 | - | - | 40 | 497 | 1.07% | 0.50% |
| | Slovenia | - | 0 | - | - | - | 0 | 0 | - | - | 0 | 0 | - | 0.50% |
| | **Total countries with a buffer** | **18,489** | **66,025** | - | - | **5,646** | **90,161** | **3,314** | **1** | **145** | **3,460** | **43,246** | **93.13%** | |
| | **Countries with a zero rate or no buffer** | | | | | | | | | | | | | |
| | Other[1] | 202 | 2,404 | - | - | 38 | 2,643 | 250 | 0 | 5 | 255 | 3,190 | 6.87% | 0% |
| | **Total** | **202** | **2,404** | - | - | **38** | **2,643** | **250** | **0** | **5** | **255** | **3,190** | **6.87%** | |
| 20 | **Overall total** | **18,691** | **68,429** | - | - | **5,684** | **92,804** | **3,564** | **1** | **150** | **3,715** | **46,436** | **100%** | |

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** | **2024** |
|---|---|
| Total risk exposure amount (€m) | 55,302 |
| Institution specific countercyclical buffer rate (%) | 1.487% |
| Institution specific countercyclical buffer requirement (€m) | 822 |

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 | | | | | | |
| | Dec-23 (€m) | 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 Exposure value for non-trading book | Total exposure value | Relevant credit risk exposures - Credit risk | Relevant credit exposures – Market risk | Relevant credit exposures – Securitisation positions in the non-trading book | Total | Risk-weighted exposure amounts | Own funds requirement weights | Countercyclical capital buffer rate |
| 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 | - | - | - | - | - | - | - | - | - | - | - | - | 2.00% |
| | Bulgaria | - | - | - | - | - | - | - | - | - | - | - | - | 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 | - | - | - | - | - | - | - | - | - | - | - | - | 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 | - | - | - | - | - | - | - | - | - | - | - | - | 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% | 0.00% |
| | 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% | |

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 |

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)**

| | | a | b | c | d | e | EU e1 | EU e2 | f | g | h |
|---|---|---|---|---|---|---|---|---|---|---|---|
| **Dec-24** | | **Risk category** | | | | | **Category level AVA - Valuation uncertainty** | | **Total category level post-diversification** | | |
| | **Category level AVA** | **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* |
| | | **€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)** | | | | | | | | **7** | **-** | **-** |

| | | a | b | c | d | e | EU e1 | EU e2 | f | g | h |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Dec-23 | | Risk category | | | | | Category level AVA - | | Total category level post-diversification | | |
| | Category level AVA | 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* |
| | | €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 | - | - |

As per Article 45i (3), point (b) of the Bank Recovery and Resolution Directive 'BRRD II', published in the Official Journal of the EU as Directive 2014/59/EU, amended by Directive (EU) 2019/879 in May 2019, Template 2.6 below discloses the composition of own funds and eligible liabilities for the Group as of 31 December 2024. The available own funds and eligible liabilities of the Group amounted to €17.8bn, consisting of €10.8bn own funds and €7.0bn subordinated liabilities.

The Group is not subject to the Total Loss-Absorbing Capacity (TLAC) requirements which only applies to Global Systemically Important Institutions (G-SIIs) and therefore columns b and c are not applicable.

**Table 2.6 - EU TLAC 1- Composition - MREL and, where applicable, G-SII requirement for own funds and eligible liabilities**

| | | a<br>Minimum requirement for own funds and eligible liabilities (MREL) | b<br>G-SII requirement for own funds and eligible liabilities (TLAC) | c<br>Memo item: Amounts eligible for the purposes of MREL, but not of TLAC |
|---|---|---|---|---|
| **Own funds and eligible liabilities, ratios and components** | | | | |
| 1 | Common Equity Tier 1 capital (CET1) (€m) | 8,055 | - | - |
| 2 | Additional Tier 1 capital (AT1)(€m) | 1,068 | - | - |
| 3 | Not Applicable | | | |
| 4 | Not Applicable | | | |
| 5 | Not Applicable | | | |
| 6 | Tier 2 capital (T2) (€m) | 1,696 | - | - |
| 7 | Not Applicable | | | |
| 8 | Not Applicable | | | |
| 11 | Own funds for the purpose of Articles 92a CRR and 45 BRRD (€m) | 10,819 | - | - |
| **Own funds and eligible liabilities: Non-regulatory capital elements** | | | | |
| 12 | Eligible liabilities instruments- issued directly by the resolution entity that are subordinated to excluded that are subordinated to excluded liabilities (not grandfathered). (€m) | 7,009 | - | - |
| EU-12a | Eligible liabilities instruments issued by other entities within the resolution group that are subordinated to excluded liabilities (not grandfathered) (€m) | - | - | - |
| EU-12b | Eligible liabilities instruments that are subordinated to excluded liabilities, issued prior to 27 June 2019 (subordinated grandfathered) (€m) | - | - | - |
| EU-12c | Tier 2 instruments with a residual maturity of at least one year to the extent they do not qualify as Tier 2 items (€m) | - | - | - |
| 13 | Eligible liabilities that are not subordinated to excluded liabilities (not grandfathered pre cap) (€m) | - | - | - |
| EU-13a | Eligible liabilities that are not subordinated to excluded liabilities issued prior to 27 June 2019 (pre-cap) (€m) | - | - | - |
| 14 | Amount of non subordinated instruments eligible, where applicable after application of Article 72b (3) CRR (€m) | - | - | - |
| 15 | Not Applicable | | | |
| 16 | Not Applicable | | | |
| 17 | MREL requirement expressed as percentage of the total risk exposure amount (€m) | 7,009 | - | - |
| | *Of which* | | - | - |
| EU-17a | subordinated | 7,009 | - | - |
| **Own funds and eligible liabilities: Adjustments to non-regulatory capital elements** | | | | |
| 18 | Own funds and eligible liabilities items before adjustments (€m) | 17,829 | - | - |
| 19 | (Deduction of exposures between MPE resolution groups) (€m) | | | |
| 20 | (Deduction of investments in other eligible liabilities instruments) (€m) | | | |
| 21 | Not Applicable | | | |
| 22 | Own funds and eligible liabilities after adjustments (€m) | 17,829 | - | - |
| | Of which | | - | - |
| EU-22a | own funds and subordinated (€m) | 17,829 | - | - |
| **Risk-weighted exposure amount and leverage exposure measure of the resolution group** | | | | |
| 23 | Total risk exposure amount (€m) | 55,302 | - | - |
| 24 | Total exposure measure (€m) | 137,013 | - | - |
| **Ratio of own funds and eligible liabilities** | | | | |
| 25 | Own funds and eligible liabilities (as a percentage of total risk exposure amount) (%) | 32.24% | - | - |
| | *Of which* | | - | - |
| EU-25a | own funds and subordinated (%) | 32.24% | - | - |
| 26 | Own funds and eligible liabilities (as a percentage of total exposure measure) (%) | 13.01% | - | - |
| | *Of which* | | - | - |
| EU-26a | own funds and subordinated (%) | 13.01% | - | - |
| 27 | CET1 (as a percentage of TREA) available after meeting the resolution group's requirements | 8.74% | - | - |
| 28 | Institution-specific combined buffer requirement | | | |
| 29 | of which: capital conservation buffer requirement | | | |
| 30 | of which: countercyclical buffer requirement | | | |
| 31 | of which: systemic risk buffer requirement | | | |
| EU-31a | of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer | | | |
| **Memorandum items** | | | | |
| EU-32 | Total amount of excluded liabilities referred to in Article 72a(2) CRR | | | |

As per Article 45i (3), point (b) of the Bank Recovery and Resolution Directive 'BRRD II', published in the Official Journal of the EU as Directive 2014/59/EU, amended by Directive (EU) 2019/879 in May 2019, Table 2.7 below captures only own funds and liabilities eligible to meet the requirements of Article 45 of Directive 2014/59/EU in accordance with Article 45e of that Directive. It presents, at the level of the resolution entity BOI Group plc, a breakdown of own funds and liabilities based on their maturities and MREL eligibility, as well as their ranking in the creditor hierarchy in normal insolvency proceedings. Insolvency rankings shall be those communicated by the competent resolution authority in compliance with the standardised presentation specified in Article 8 of this Regulation.

**Table 2.7 -EU TLAC3b - creditor ranking - resolution entity**

| | | Insolvency Ranking | | | Sum of 1 to 3 |
|---|---|---|---|---|---|
| | | 1 (most junior) | 2 | 3 (most senior) | |
| 1 | Description of insolvency rank | Share Capital | Subordinated claims | Unsecured claims | |
| 5 | Own funds and liabilities potentially eligible for meeting MREL (€m) | 7,381 | 2,925 | 7,009 | 17,315 |
| | *of which* | | | | |
| 6 | residual maturity ≥ 1 year < 2 years (€m) | - | - | 1,963 | 1,963 |
| | *of which* | | | | |
| 7 | residual maturity ≥ 2 year < 5 years (€m) | - | - | 3,273 | 3,273 |
| | *of which* | | | | |
| 8 | residual maturity ≥ 5 years < 10 years (€m) | - | 1,856 | 1,774 | 3,630 |
| | *of which* | | | | |
| 9 | residual maturity ≥ 10 years, but excluding perpetual securities (€m) | - | - | - | - |
| | *of which* | | | | |
| 10 | perpetual securities (€m) | 7,381 | 1,069 | - | 8,450 |

Note: Rows in the template with "Empty set in EU" are not required to be populated and therefore removed

The Risk Management Report within the Group's Annual Report 31 December 2024 contains information on principal risks and uncertainties, the risk management framework and the management of principal risks.

Risk appetite is set in conjunction with the Group's business strategy and sets the outer boundaries for risk the Group is prepared to take. It guides the Group, including its subsidiaries, 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.

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**

| | **2024** | 2023 |
|---|---|---|
| **Loan book portfolio (on balance sheet - pre impairment loss allowance)** | **€bn** | **€bn** |
| Residential mortgages | 50.46 | 47.13 |
| Consumer | 5.12 | 5.80 |
| Non-property SME and corporate | 20.36 | 20.45 |
| Property and construction | 7.45 | 7.22 |
| | | |
| **Risk-based capital ratios as a % of RWA** | **%** | **%** |
| Common equity tier 1 ratio (%) | 14.57% | 14.53% |
| Tier 1 ratio (%) | 16.50% | 16.38% |
| Total capital ratio (%) | 19.56% | 19.20% |
| | | |
| **Leverage ratio** | | |
| Leverage ratio (%) | 6.66% | 6.42% |
| | | |
| **Liquidity coverage ratio (pit)** | | |
| LCR ratio (%) | 201.80% | 195.52% |
| | | |
| **Net stable funding ratio** | | |
| NSFR ratio | 154.98% | 157.24% |

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] |
|---|---|
| Akshaya Bhargava | 4 |
| Richard Goulding | 8 |
| Myles O'Grady | 2 |
| Mark Spain | 2 |
| Giles Andrews | 9 |
| Ian Buchanan | 3 |
| Eileen Fitzpatrick | 7 |
| Michele Greene | 7 |
| Stephen Pateman | 8 |
| Margaret Sweeney | 5 |

[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 2024**

The Board comprises ten Directors: two Executive Directors, the Chairman, who was independent on appointment, and seven 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 has oversight of the Group Code of Conduct, whichsets the standard for business conduct throughout the Group. The N&G also ensures a formal, rigorous, and transparent process 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, strategy, 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 Board positions.

In 2024, led by the N&G, the Board reviewed its skills, knowledge and experience and found it to be collectively suitable. Steered by the N&G, the Board reviews its collective suitability at least annually and with each change in membership.

The succession planning process has regard for the impact of expected retirements of Directors and the profiles needed in the context of the Group's strategic direction. Board Directors have successful track records in domestic and international businesses, including in business conduct standards and practices, as exhibited in their extensive executive careers. Five Directors are chartered accountants and comply with the conduct standards of the relevant professional bodies. The Board Directors have extensive executive careers, including as Chief Executives, Chief Financial Officers, Chief Risk Officers, Chief Information and Operating Officers, and Fintech Founders, during which they gained significant experience in business conduct standards and practices, business ethics, and professional conduct standards.

When commencing a search for a new Director, the N&G defines a detailed role profile, based on its analysis of the skills and experiences needed, and selects 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 relevant 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 are required and received for all Board appointments.

Two search firms, Board Works Ltd and MWM Consulting, were engaged during 2024 to support searches for new INEDs based on agreed specifications. The Board remains satisfied with the continued retention of Board Works Ltd and MWM Consulting. MWM Consulting is based in London with a team who have extensive international reach and provides board search services to the UK market. MWM Consulting has no connection with the Company other than in a recruitment capacity. Board Works Ltd provides similar services to the Irish market generally and through this work has engaged with firms associated with individual Directors on occasion. Board Works Ltd has no connection with the Company other than in a recruitment capacity.

A Board-approved Policy for the Assessment of Directors, which outlines the Board appointment process, is in place, and is aligned with applicable joint guidelines issued by ESMA and the EBA. With the introduction of the Central Bank (Individual Accountability Framework) Act 2023, the Board received briefings on the Individual Accountability Framework (Framework), including the Common and Additional Conduct Standards that came into effect on 29 December 2023, and approved a number of new and refreshed policies to ensure adherence to the Framework and the Common and AdditionalConduct Standards by the Board and the wider Group. These were reviewed during 2024 and plans are in place to ensure that NEDs are prepared for the applicability of Senior Executive Accountability Regime (SEAR) to NED role-holders on 1 July 2025.

The Board and its Committees continued to perform their duties in alignment with the Framework and the Common and Additional Conduct Standards during 2024.

**Diversity**

Our recruitment of Directors remains focused on past achievements, personal attributes, other objective criteria, and an assessment of whether the candidate will enhance the overall quality of the Board as a team.

Diversity, including of skills, background, and personal strengths, is an important driver of effectiveness, creating different perspectives among directors, and breaking down a tendency towards 'group think'. 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 commitment to diversity is set out in the Board Diversity Policy which, following review in 2024 led by N&G, has retained the following specific targets:
• maintaining a minimum of 40% female representation on the Board. Female representation on the Board is currently at 30% which falls below the target;
• the inclusion of at least one Director that is from an ethnic minority. This target has been met; and
• the appointment of a female to one of the four senior Board roles of CEO, CFO, Chairman and SID. This target has not yet been met.

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. We intend to make further progress on our specific diversity targets and on growing the Board's profile in relation to all aspects of diversity through our active and planned INED searches and through planned Board rotations.

The Board and its Committees comprise an appropriately diverse combination of skills, experience, and knowledge with Committee Members' demonstrating relevant experience and expertise / qualifications pursuant to the respective committee mandates.

The Board is assisted in its risk governance responsibilities by a Board Risk Committee. The Committee met a total of 12 times on a standalone basis in 2024.The Committee met jointly with Group Transformation Oversight Committee (GTOC) to discuss the risk aspects of investment allocation and 3 times with the Group Sustainability Committee (GSC) to consider ESG matters. Committee members also joined 3 sessions with the Group Audit Committee (GAC) to discuss impairment. These joint meetings and inter-committee communications allow the Board Risk Committee (BRC) to oversee risk more comprehensively across these important areas of common interest and overlap.

**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 is set in conjunction with the Group's business strategy and sets the outer boundaries for risk the Group is prepared to take. It guides the Group, including its subsidiaries, 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.

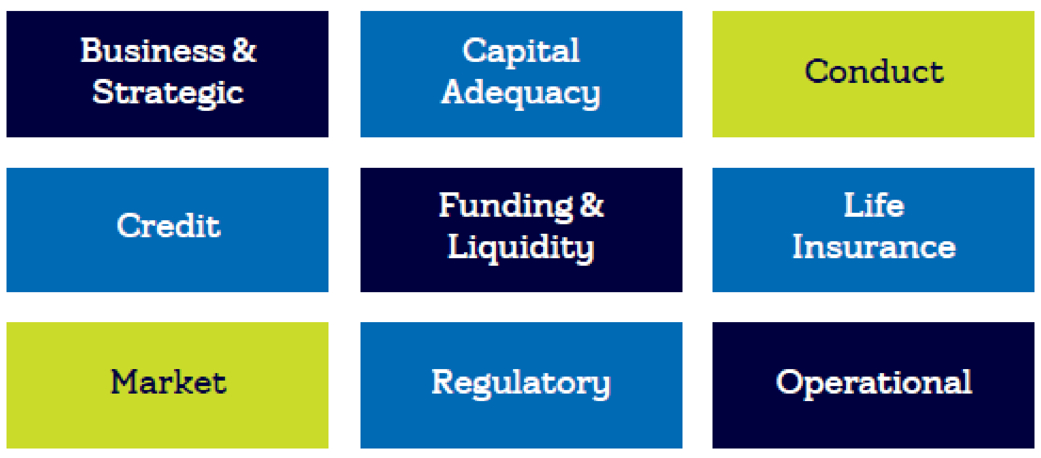
The Group maintains and updates the Risk Library in two ways:

• 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. To identify, assess, and appropriately control operational risk, it is necessary to systematically segment the Group's activities into a set of processes with risk owners.

The nine principal risk types are outlined below:




ESG factors represent a common risk driver across the Group's principal and sub risk types.

**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**

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.

Scenario analysis is used across risk types to help the Group understand the possible severe impacts of unlikely but plausible scenarios and help to strengthen our level of preparedness. It is also used to consider how the impact may be managed and the severity controlled. In the context of social media, scenario analysis is a useful tool in understanding the potential for social media use to amplify the negative impacts of an event for the Group.

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 mitigating controls and actions are put in place to ensure that the Group can continue to operate within risk appetite in that event.

Scenario modelling can be used in Stress Tests where the projected financial position and risk profile of the Group can be assessed under a range of severe but plausible adverse scenarios. These scenarios can include macroeconomic projections and assumptions on internal risk issues. They are run to assess the resilience of the Group to withstand the impact of a severe stress event. This allows the Group to make changes to plans as necessary to maintain its resilience at the required levels in that scenario.

The outputs of stress testing are used by the Group to inform risk appetite across risk types by assessing unlikely but plausible scenarios that may result in severe earnings volatility. This allows stress testing metrics to be used in setting risk appetite for credit, market, funding and liquidity risk so that earnings volatility in periods of stress is maintained at an acceptable level. They are also used by the Group to inform strategy and capital planning.

They are an integral component of the Group's ICAAP and ILAAP and are also used by regulators to assess the Group's ability to continue to meet its capital and liquidity requirements under severe adverse conditions.

The Group conducts:

• 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;

• earnings stress testing in respect of earnings volatility and tolerances in respect of required capital to withstand a severe but plausible stress;

•liquidity stress testing to evaluate the potential impact of a range of severe but plausible stress scenarios on the liquidity position of the Group. This affords senior management the ability to assess the degree to which the Group or an individual liquidity centre is vulnerable to liquidity shocks such as: i) impacts of rating downgrades; ii) withdrawal of customer deposits; or iii) inability to refine wholesale funding as they fall due at a reasonable cost;

• market risk stress testing in the Trading Book and Banking Book. Stress testing in the Trading Book consists of gap / residual interest rate risk positions, and in the Banking Book consists of gap / residual interest rate risk, structural interest rate and structural FX stress testing. The Group stress tests these risks as part of its ongoing risk measurement and management process. Gap / residual interest rate risk and basis risk are stressed using empirically based scenario analyses. For gap / residual interest rate risk, the stress test results are potential changes in the economic value of positions. For structural interest rate risk in the Banking Book, the results are potential changes in one year ahead net interest income. Structural FX risk is stressed by calculating the impact of standard 10% exchange rate movements on capital ratios;

• life Insurance risk stress testing 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;

• operational risk stress testing modelled based on a scenario-based approach. Severe, but plausible operational risk loss scenarios are applied on a group-basis to assess the impact of materialisation of key operational risks at various likelihoods and are used in the assessment of the Group's Economic Capital requirements. Scenario based exercises are also used as a means to work through scenarios to validate business continuity plans for operational resilience purposes; 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 and liquidity stress testing by exploring more extreme scenarios / events significantly beyond the likelihood thresholds looked at in solvency and liquidity 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 and liquidity stress testing works towards assessing a range of outcomes or probabilities given defined inputs.

A key focus of solvency stress testing activities during 2024 and into 2025 is the impact on the Group's key economies of potential adverse events such as rising geopolitical tensions, a sharp slowdown in global growth, reduced international trade and foreign direct investment, and further supply chain and energy shocks. How these shocks impact the Group's profitability and solvency under different interest rate and inflation environments is examined. In parallel the Group continued to develop its capabilities in the climate risk scenario modelling space.

**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, risk monitoring and reporting is a means for bringing management attention to where significant corrective actions are required and thereby enabling the Group to respond effectively and in a 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. Rhys Kiff assumed the Group CRO role on the 8th January 2025.

### 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 Group Speak Up Policy sets out the steps colleagues can take to raise any concerns they might have of relevant wrongdoing in the Group e.g. potential breach of Regulation or internal policy under the RMF.

### 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 21 times and the ALCO met 20 times, during 2024.

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.

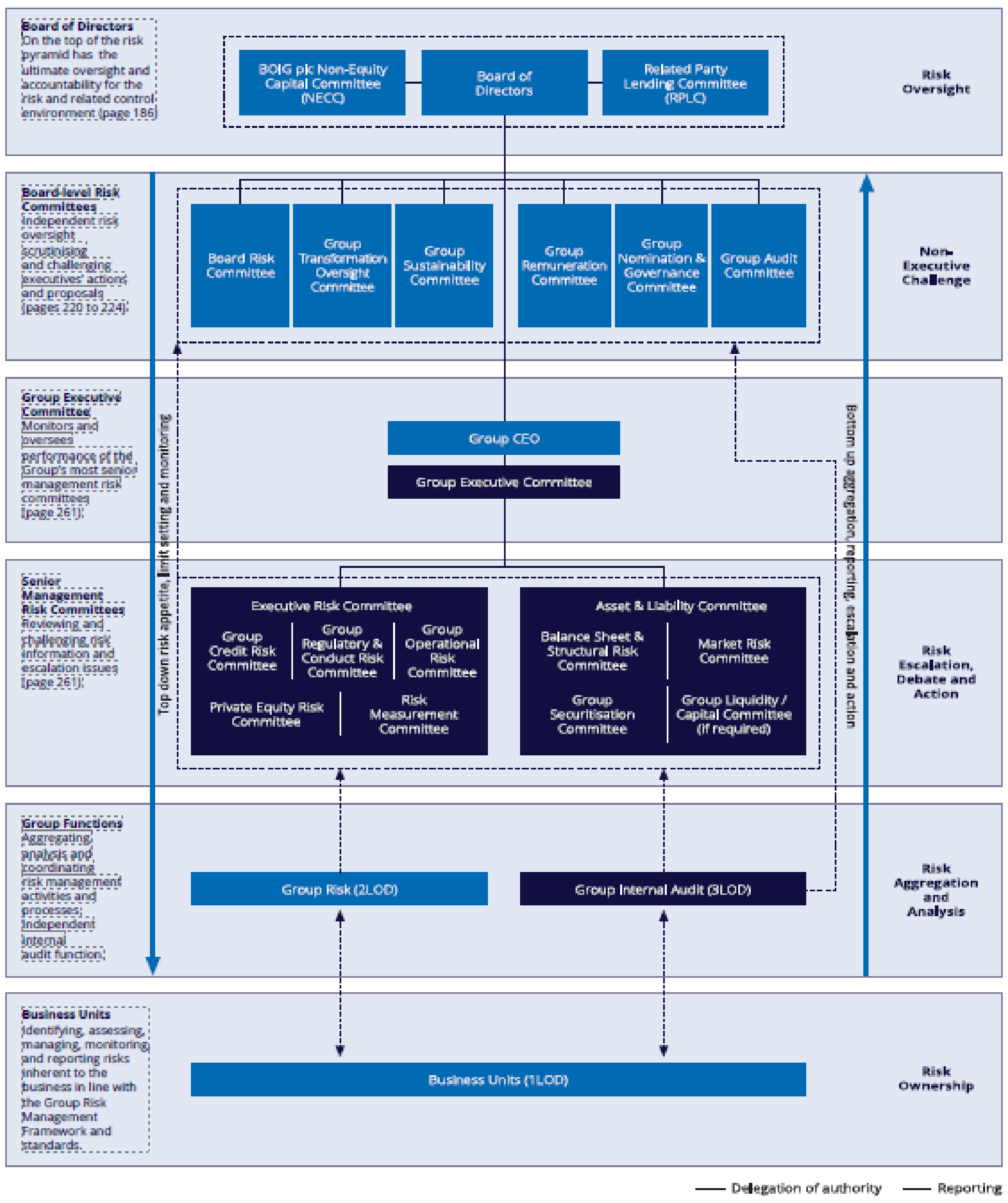
| Committee | Delegated responsibility |
|---|---|
| Group Credit Risk Committee | Oversight of credit risk |
| Group Regulatory and Conduct Risk Committee | Oversight of regulatory and conduct risk. |
| Group Operational Risk Committee | Oversight of operational risk. |
| Private Equity Governance Committee | 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 Funds 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 and asset encumbrance. |
| Group Liquidity / Capital Committee | May be established in line with the escalation process outlined in the Group's Recovery Plan to assist in the management of the Group's response to a stress scenario. |

**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.

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## 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 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 identified sub-risk within conduct risk. The Group's product approval policy and process incorporates provisions designed to scrutinise products marketed as 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. 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 Group Speak Up Policy sets out the steps colleagues can take to raise any concerns they might have of relevant wrongdoing in the Group e.g. potential breach of Regulation or internal policy under the RMF. 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**
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 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.

**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.

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**Definition** *(audited)*
Life insurance risk 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.

Note: 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** *(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.

**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 takes credit risk, consistent with the Group's Risk Identity, designed to deliver an appropriate return on capital, while ensuring credit exposures do not exceed levels which would produce unacceptable earnings and capital volatility under both stress and non-stress conditions. Concentrations are generally avoided except when they are necessary consistent with the Group's risk identity.

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 Group Chief Risk Officer. 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 Policy on Definition of Default;and vi) Group Bank Risk Policy. In addition, 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 and how the risk mitigation requirements, as set out in the Group Credit Risk Policy, are implemented. 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 scoring tools.

**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, forbearance has not occurred.  The key objective of granting forbearance measures is to ensure asustainable repayment situation can be achieved. This includes paving the way for non-performing borrowers to return to performing status and reducing the likelihood of performing borrowers reaching a non-performing status.

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 forbearance procedures for each key portfolio which set out in more detail the approach to and the application of forbearance.

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 possible 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.  This is 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; and
• **Expected Loss Best Estimate (ELBE)**: the expected loss incurred (after the realisation of any collateral) on a specific transaction given the borrower's default expressed as a percentage of EAD given current economic circumstances and recovery status.

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 default over an entire economic cycle, averaged to a twelve month basis. 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 assumed 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 challenge on an ongoing basis.

**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 Risk Adjusted Return on Capital (RAROC) /RoTE;
• 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 RMC and the BRC, 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 (including actual vs.expected testing);
– 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.

**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.

During 2024 two new IRB models were implemented for the General Corporate and UK SME segments of the Non-Retail portfolio. The ECL model framework was also updated in 2024 to reflect the implementation of these new models.

Assessment of the relationship between macroeconomic model factors and default rates during 2020 and 2021 considered default experience to be unrepresentative in certain retail portfolios due to Covid related supports and payment breaks available to borrowers during this period. As a result data points from the 2020 and 2021 period were excluded from the residential mortgage and Commercial Finance PD macro regression models.

**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. 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 Retail Ireland residential mortgage LGD model was enhanced in 2024 to include a higher degree of macroeconomic sensitivity. The enhancements resulted in an increase in impairment loss allowance of c.€5 million. Following these updates the post-model adjustment for LGD in the Retail Ireland residential mortgage portfolio recognised at 31 December 2023 and 30 June 2024 is no longer considered to be required.

The calibration of the PD, LGD and EAD components within the model utilised for the Commercial Finance segment of the SME portfolio were enhanced to address observations arising from model performance monitoring, primarily related to LGD estimation and back-testing, identified as part of the Group's internal model validation process. The updates resulted in a c€10 million increase in impairment loss allowance.

**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 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 initial recognition as estimated based on facts and circumstances at the reporting date (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;
• the exposure has been placed on a watchlist; and
• the exposure is a forborne loan.

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 prevailing interest rates on asset quality. Credit risk assessments to identify elevated or emerging affordability risk 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 c.€0.9 billion of stage 1 residential mortgage assets as stage 2 at the reporting date, and an associated c.€9 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 initial recognition.

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 updated its approach to identifying a significant increase in credit risk in 2024 following outcomes of staging effectiveness analysis combined with the introduction of watchlist for relationship managed portfolios. These updates resulted in €0.8 billion assets (including €0.2 billion of off balance sheet commitments) being classified as Stage 2 and an
c.€11 million increase in impairment loss allowance.

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 forborne 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 2024 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 Central Statistic Office (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 2024, the Group conducted a number of assessments in relation to credit risk associated with the impact of elevated affordability risk including impacts on UK residential mortgage interest only maturities and the possible lag effect of higher interest rate pass through on both RoI and UK residential mortgage customers rolling off fixed rate contracts. As outlined previously, credit risk assessments were implemented across the residential mortgage 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 c.€0.9 billion of Stage 1 assets as Stage 2 at the reporting date (2023: €2.8 billion), with a corresponding €9 million increase in impairment loss allowance (2023: €33 million). The impact of elevated affordability risk 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 continue to be classified as Stage 2 or Stage 3. In addition to this an Investment Property post-model adjustment to the Group's impairment loss allowance of c.€48 million has been retained to reflect the planned implementation of a new IRB model and further impairment model enhancements to the Investment Property portfolio planned in 2025.

Furthermore, the final set of probability weightings applied to the 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; trade tension and prevailing interest rates in the Group's key economies. The estimated impact of this judgement was a c.€7 million increase in impairment loss allowance (2023: c.€31 million).

**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 FLI scenarios at 31 December 2024, 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 2024 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, and trade disruption; varying impacts of energy price disruption and inflation, including the impact of transition related climate risk impacts; 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 further from the centre of the distribution. The final weightings were also informed by other qualitative factors and expert judgment.

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, as relevant for 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 individually assessed 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 medium term. At 31 December 2024 the Group assessed the risks to asset valuations in the Residential Mortgage portfolio from both physical and transitional risk associated with climate change. Resultantly the Group has recognised a post-model adjustment.

**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 €61,829 million (2023: €63,477 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**

| | | 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 |
| | **Dec-24** | a | b | c | d | e | f |
| | **Exposure classes** | **€m** | **€m** | **€m** | **€m** | **€m** | **%** |
| 1 | Central governments or central banks | 37,788 | 53 | 38,080 | 54 | 309 | 0.81% |
| 2 | Regional governments or local authorities | 245 | 121 | 245 | 1 | 10 | 4.04% |
| 3 | Public sector entities | 394 | 21 | 444 | - | 25 | 5.65% |
| 4 | Multilateral development banks | 257 | 0 | 429 | 0 | - | - |
| 5 | International organisations | 293 | - | 293 | - | - | - |
| 6 | Institutions | 70 | 0 | 78 | - | 20 | 25.24% |
| 7 | Corporates | 3,877 | 2,850 | 3,454 | 271 | 3,342 | 89.73% |
| 8 | Retail | 3,806 | 809 | 3,698 | 53 | 2,700 | 71.99% |
| 9 | Secured by mortgages on immovable property | 6,255 | 0 | 6,255 | 0 | 2,189 | 35.00% |
| 10 | Exposures in default | 253 | 12 | 251 | 2 | 268 | 105.89% |
| 11 | Items associated with particularly high risk | 188 | 197 | 188 | 98 | 430 | 150.00% |
| 12 | Covered bonds | - | - | - | - | - | - |
| 13 | Claims on institutions and corporates with a short-term credit assessment | - | - | - | - | - | - |
| 14 | Collective investment undertakings | 9 | - | 9 | - | 116 | 1250.00% |
| 15 | Equity exposures | 773 | - | 773 | - | 1,780 | 230.38% |
| 16 | Other items | 3,560 | - | 3,560 | - | 2,562 | 71.97% |
| **17** | **Total** | **57,766** | **4,063** | **57,756** | **478** | **13,751** | **23.61%** |

| | | 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 |
| | Dec-23 | a | b | c | d | e | f |
| | Exposure classes | €m | €m | €m | €m | €m | % |
| 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 | 6,874 | - | 6,874 | - | 2,406 | 0 |
| 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 | - | - | - | - | - | - |
| 13 | Claims on institutions and corporates with a short-term credit 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% |

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

# Analysis of credit risk Standardised approach



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-24** | **Risk weight** | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | **EAD (€m)** | **0%** | **2%** | **4%** | **10%** | **20%** | **35%** | **50%** | **70%** | **75%** | **100%** | **150%** | **250%** | **370%** | **1250%** | **Others** | **Total** | ***of which unrated*** [1] |
| | | a | b | c | d | e | f | g | h | i | j | k | l | m | n | o | p | q |
| 1 | Central governments or central banks | 37,999 | - | - | - | 12 | - | - | - | - | - | - | 123 | - | - | - | 38,133 | *33,878* |
| 2 | Regional governments or local authorities | 196 | - | - | - | 50 | - | - | - | - | - | - | - | - | - | - | 246 | *246* |
| 3 | Public sector entities | 394 | - | - | - | - | - | 50 | - | - | - | - | - | - | - | - | 444 | *444* |
| 4 | Multilateral development banks | 429 | - | - | - | - | - | - | - | - | - | - | - | - | - | - | 429 | *429* |
| 5 | International organisations | 293 | - | - | - | - | - | - | - | - | - | - | - | - | - | - | 293 | *293* |
| 6 | Institutions | - | - | - | - | 68 | - | 8 | - | - | 2 | - | - | - | - | - | 78 | *78* |
| 7 | Corporates | - | - | - | - | - | - | - | - | - | 3,725 | - | - | - | - | - | 3,725 | *3,725* |
| 8 | Retail | - | - | - | - | - | - | - | - | 3,750 | - | - | - | - | - | - | 3,750 | *3,750* |
| 9 | Secured by mortgages on immovable property | - | - | - | - | - | 6,255 | - | - | - | - | - | - | - | - | - | 6,255 | *6,255* |
| 10 | Exposures in default | - | - | - | - | - | - | - | - | - | 223 | 30 | - | - | - | - | 253 | *253* |
| 11 | Items associated with particularly high risk | - | - | - | - | - | - | - | - | - | - | 287 | - | - | - | - | 287 | *287* |
| 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 | - | - | - | - | - | - | - | - | - | 101 | - | 672 | - | - | - | 773 | *773* |
| 16 | Other items | 366 | - | - | - | 118 | - | 337 | - | - | 2,215 | - | - | - | - | 525 | 3,560 | *3,560* |
| 17 | Total | **39,676** | **-** | **-** | **-** | **247** | **6,255** | **395** | **-** | **3,750** | **6,266** | **317** | **794** | **-** | **9** | **525** | **58,234** | ***53,978*** |

| | Dec-23 | Risk Weight | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | EAD (€m) | 0% | 2% | 4% | 10% | 20% | 35% | 50% | 70% | 75% | 100% | 150% | 250% | 370% | 1250% | Others | Total | *of which unrated* [1] |
| 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* |

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 4.3 below presents the key parameters used for the calculation of capital requirements for credit risk exposures, under the Foundation IRB approach, split by PD range. All exposures are presented both pre and post CRM and CCF (EAD). The template excludes counterparty credit risk and securitisations.

**Table 4.3 EU CR6 - IRB approach - Credit risk exposures by exposure class and PD range (Foundation IRB)**

| Dec-24<br>PD Range | On-balance sheet exposures<br>€m | Off-balance sheet exposures pre-CCF<br>€m | Exposure weighted average CCF<br>% | EAD post CRM and post CCF<br>€m | Exposure weighted average PD<br>% | Number of obligors | Exposure weighted average LGD<br>% | Exposure weighted average maturity (years) | Risk weighted exposure amount after supporting factors<br>€m | Density of risk weighted exposure amount<br>% | Expected loss amount<br>€m | Value adjustments and provisions<br>€m |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| a | b | c | d | e | f | g | h | i | j | k | l | m |
| **Total Foundation IRB** | | | | | | | | | | | | |
| 0.00 to <0.15 | 4,416 | 2,080 | 36.79% | 5,181 | | 279 | | 2.5 | 921 | 17.78% | 1 | (1) |
| *0.00 to <0.10* | *4,007* | *1,127* | *59.49%* | *4,677* | | *203* | | *2.5* | *751* | *16.06%* | *1* | *(1)* |
| *0.10 to <0.15* | *409* | *953* | *0* | *504* | | *76* | | *2.5* | *170* | *33.77%* | *0* | (0.3) |
| 0.15 to <0.25 | 634 | 538 | 14.42% | 712 | | 128 | | 2.5 | 309 | 43.48% | 1 | (1) |
| 0.25 to <0.50 | 922 | 751 | 18.63% | 1,062 | | 234 | | 2.5 | 598 | 56.31% | 2 | (6) |
| 0.50 to <0.75 | 1,512 | 995 | 18.79% | 1,699 | | 339 | | 2.5 | 1,115 | 65.64% | 4 | (8) |
| 0.75 to <2.5 | 5,407 | 2,577 | 40.10% | 6,440 | | 1,530 | | 2.5 | 5,577 | 86.59% | 40 | (51) |
| *0.75 to <1.75* | *4,905* | *1,577* | *46.28%* | *5,635* | | *1,094* | | *2.5* | *4,665* | *82.78%* | *33* | *(42)* |
| *1.75 to <2.5* | *502* | *1,000* | *30.35%* | *805* | | *436* | | *2.5* | *912* | *113.30%* | *7* | *(8)* |
| 2.5 to <10 | 4,700 | 1,294 | 35.52% | 5,157 | | 2,462 | | 2.5 | 5,794 | 112.35% | 87 | (97) |
| *2.5 to <5* | *4,235* | *1,051* | *38.93%* | *4,642* | | *2,115* | | *2.5* | *5,064* | *109.11%* | *74* | *(75)* |
| *5 to <10* | *465* | *243* | *20.75%* | *516* | | *347* | | *2.5* | *730* | *141.51%* | *13* | *(22)* |
| 10 to <100 | 1,976 | 176 | 23.77% | 2,017 | | 712 | | 2.5 | 3,442 | 170.65% | 160 | (131) |
| *10 to <20* | *1,187* | *140* | *17.33%* | *1,212* | | *406* | | *2.5* | *1,975* | *162.97%* | *60* | *(65)* |
| *20 to <30* | *460* | *17* | *50.00%* | *468* | | *99* | | *2.5* | *822* | *175.61%* | *41* | *(23)* |
| *30 to <100* | *329* | *19* | *47.88%* | *337* | | *207* | | *2.5* | *646* | *191.32%* | *60* | *(43)* |
| 100 (Default) | 503 | 72 | 40.36% | 532 | | 232 | | 2.5 | - | - | 236 | (226) |
| **Total Foundation IRB** | **20,069** | **8,483** | **32.22%** | **22,799** | | **5,916** | | **2.5** | **17,757** | **77.88%** | **531** | **(522)** |
| **Institutions** | | | | | | | | | | | | |
| 0.00 to <0.15 | 3,944 | 242 | 83.83% | 4,147 | 0.05% | 130 | 24.64% | 2.5 | 645 | 15.55% | 1 | (0.3) |
| *0.00 to <0.10* | *3,744* | *242* | *83.83%* | *3,947* | *0.05%* | *118* | *24.14%* | *2.5* | *576* | *14.59%* | *1* | (0.3) |
| *0.10 to <0.15* | *200* | - | - | *200* | *0.13%* | *12* | *34.46%* | *2.5* | *69* | *34.50%* | *0* | (0.0) |
| 0.15 to <0.25 | 0 | - | - | 0 | 0.20% | 2 | 45.00% | 2.5 | 0 | 46.94% | 0 | (0.0) |
| 0.25 to <0.50 | 0 | - | - | 0 | 0.36% | 3 | 45.00% | 2.5 | 0 | 71.88% | 0 | (0.0) |
| 0.50 to <0.75 | 0 | 42 | 1 | 32 | 0.59% | 3 | 45.00% | 2.5 | 33 | 103.52% | 0 | (0.0) |
| 0.75 to <2.5 | 0 | - | - | 0 | 1.55% | 4 | 45.00% | 2.5 | 0 | 132.71% | 0 | (0.0) |
| *0.75 to <1.75* | *0* | - | - | *0* | *1.11%* | *3* | *45.00%* | *2.5* | *0* | *129.31%* | *0* | *(0.0)* |
| *1.75 to <2.5* | *0* | - | - | *0* | *2.09%* | *1* | *45.00%* | *2.5* | *0* | *136.98%* | *0* | *(0.0)* |
| 2.5 to <10 | - | - | - | - | - | - | - | - | - | - | - | - |
| *2.5 to <5* | - | - | - | - | - | - | - | - | - | - | - | - |
| *5 to <10* | - | - | - | - | - | - | - | - | - | - | - | - |
| 10 to <100 | 0 | 0 | 20.00% | 0 | 27.23% | 2 | 45.00% | 2.5 | 0 | 242.27% | 0 | (0.0) |
| *10 to <20* | - | *0* | *20.00%* | *0* | *13.75%* | *1* | *45.00%* | *2.5* | *0* | *228.61%* | *0* | - |
| *20 to <30* | - | - | - | - | - | - | - | - | - | - | - | - |
| *30 to <100* | *0* | - | - | *0* | *46.26%* | *1* | *45.00%* | *2.5* | *0* | *261.52%* | *0* | (0.0) |
| 100 (Default) | - | - | - | - | - | - | - | - | - | - | - | - |
| **Total Institutions** | **3,945** | **284** | **82.83%** | **4,181** | **0.06%** | **144** | **24.80%** | **2.5** | **680** | **16.26%** | **1** | **(0.3)** |
| **Corporates of which SME** | | | | | | | | | | | | |
| 0.00 to <0.15 | 96 | 67 | 8.54% | 102 | 0.07% | 83 | 44.06% | 2.5 | 18 | 18.15% | 0 | (0.2) |
| *0.00 to <0.10* | *80* | *51* | *3.78%* | *82* | *0.06%* | *51* | *43.84%* | *2.5* | *14* | *16.59%* | *0* | (0.2) |
| *0.10 to <0.15* | *16* | *17* | *0* | *20* | *0.11%* | *32* | *45.00%* | *2.5* | *5* | *24.63%* | *0* | (0.0) |
| 0.15 to <0.25 | 154 | 50 | 10.65% | 160 | 0.18% | 73 | 40.87% | 2.5 | 46 | 28.89% | 0 | (0.5) |
| 0.25 to <0.50 | 322 | 50 | 16.23% | 330 | 0.35% | 136 | 40.42% | 2.5 | 135 | 41.00% | 0 | (1) |
| 0.50 to <0.75 | 878 | 115 | 27.92% | 910 | 0.60% | 232 | 42.31% | 2.5 | 493 | 54.18% | 2 | (4) |
| 0.75 to <2.5 | 3,203 | 320 | 31.12% | 3,303 | 1.55% | 1,192 | 39.35% | 2.5 | 2,289 | 69.29% | 21 | (23) |
| *0.75 to <1.75* | *3,065* | *243* | *33.93%* | *3,147* | *1.51%* | *900* | *39.16%* | *2.5* | *2,158* | *68.57%* | *19* | *(21)* |
| *1.75 to <2.5* | *138* | *77* | *22.23%* | *155* | *2.26%* | *292* | *43.23%* | *2.5* | *130* | *83.90%* | *2* | *(2)* |
| 2.5 to <10 | 3,091 | 261 | 29.49% | 3,166 | 3.75% | 2,215 | 41.73% | 2.5 | 2,954 | 93.32% | 52 | (51) |
| *2.5 to <5* | *3,022* | *204* | *36.56%* | *3,094* | *3.67%* | *1,925* | *41.77%* | *2.5* | *2,881* | *93.11%* | *50* | *(48)* |
| *5 to <10* | *69* | *57* | *4.03%* | *72* | *6.99%* | *290* | *39.98%* | *2.5* | *73* | *102.70%* | *2* | *(3)* |
| 10 to <100 | 1,569 | 65 | 32.31% | 1,590 | 18.82% | 640 | 42.56% | 2.5 | 2,465 | 155.00% | 131 | (81) |
| *10 to <20* | *833* | *43* | *23.98%* | *843* | *10.16%* | *352* | *42.43%* | *2.5* | *1,135* | *134.65%* | *37* | *(26)* |
| *20 to <30* | *424* | *15* | *50.00%* | *431* | *20.03%* | *93* | *42.69%* | *2.5* | *740* | *171.68%* | *38* | *(22)* |
| *30 to <100* | *313* | *8* | *44.88%* | *316* | *40.26%* | *195* | *42.75%* | *2.5* | *590* | *186.51%* | *56* | *(32)* |
| 100 (Default) | 324 | 31 | 41.98% | 337 | 100.00% | 194 | 43.92% | 2.5 | - | - | 148 | (112) |
| **Total Corporate of which SME** | **9,638** | **959** | **27.30%** | **9,897** | **8.22%** | **4,765** | **41.16%** | **2.5** | **8,400** | **84.87%** | **355** | **(272)** |
| **Corporates of which specialised lending** | | | | | | | | | | | | |
| 0.00 to <0.15 | - | - | - | - | - | - | - | - | - | - | - | - |
| *0.00 to <0.10* | - | - | - | - | - | - | - | - | - | - | - | - |
| *0.10 to <0.15* | - | - | - | - | - | - | - | - | - | - | - | - |
| 0.15 to <0.25 | 91 | 21 | 50.00% | 101 | 0.17% | 4 | 45.00% | 2.5 | 43 | 42.55% | 0 | (0.2) |
| 0.25 to <0.50 | 74 | 5 | 50.00% | 76 | 0.35% | 6 | 44.99% | 2.5 | 48 | 62.27% | 0 | (0.2) |
| 0.50 to <0.75 | 52 | 14 | 56.48% | 60 | 0.60% | 11 | 44.83% | 2.5 | 48 | 79.67% | 0 | (0.2) |
| 0.75 to <2.5 | 337 | 64 | 45.48% | 366 | 1.45% | 24 | 42.94% | 2.5 | 386 | 105.42% | 2 | (4) |
| *0.75 to <1.75* | *337* | *54* | *53.68%* | *366* | *1.45%* | *19* | *42.94%* | *2.5* | *386* | *105.42%* | *2* | *(4)* |
| *1.75 to <2.5* | - | *10* | *0.00%* | *0* | *1.94%* | *5* | *45.63%* | *2.5* | *0* | *103.88%* | - | (0.1) |
| 2.5 to <10 | 108 | 4 | 66.45% | 111 | 3.67% | 10 | 43.87% | 2.5 | 155 | 140.02% | 2 | (5) |
| *2.5 to <5* | *108* | *4* | *66.45%* | *111* | *3.67%* | *10* | *43.87%* | *2.5* | *155* | *140.02%* | *2* | *(5)* |
| *5 to <10* | - | - | - | - | - | - | - | - | - | - | - | - |
| 10 to <100 | 32 | 3 | 1 | 33 | 10.00% | 1 | 45.00% | 2.5 | 68 | 204.67% | 2 | (7) |
| *10 to <20* | *32* | *3* | *1* | *33* | *10.00%* | *1* | *45.00%* | *2.5* | *68* | *204.67%* | *2* | *(7)* |
| *20 to <30* | - | - | - | - | - | - | - | - | - | - | - | - |
| *30 to <100* | - | - | - | - | - | - | - | - | - | - | - | - |
| 100 (Default) | 22 | 0 | 49.88% | 22 | 100.00% | 2 | 45.00% | 2.5 | - | - | 10 | (22) |
| **Total Corporates of which specialised lending** | **716** | **110** | **48.95%** | **769** | **4.66%** | **58** | **43.84%** | **2.5** | **747** | **97.09%** | **16** | **(39)** |
| **Corporates of which other** | | | | | | | | | | | | |
| 0.00 to <0.15 | 376 | 1,770 | 31.42% | 932 | 0.08% | 66 | 44.96% | 2.5 | 258 | 27.66% | 0 | (1) |
| *0.00 to <0.10* | *183* | *834* | *55.80%* | *648* | *0.07%* | *34* | *44.94%* | *2.5* | *162* | *24.94%* | *0* | *(1)* |
| *0.10 to <0.15* | *193* | *936* | *0* | *284* | *0.11%* | *32* | *45.00%* | *2.5* | *96* | *33.88%* | *0* | *-0* |
| 0.15 to <0.25 | 388 | 468 | 13.26% | 450 | 0.22% | 49 | 44.99% | 2.5 | 220 | 48.85% | 0 | (0.5) |
| 0.25 to <0.50 | 525 | 696 | 18.60% | 655 | 0.36% | 89 | 44.88% | 2.5 | 415 | 63.33% | 1 | (5) |
| 0.50 to <0.75 | 582 | 824 | 13.89% | 697 | 0.58% | 93 | 43.53% | 2.5 | 541 | 77.63% | 2 | (4) |
| 0.75 to <2.5 | 1,866 | 2,193 | 41.25% | 2,771 | 1.38% | 310 | 43.40% | 2.5 | 2,902 | 104.72% | 17 | (23) |
| *0.75 to <1.75* | *1,503* | *1,279* | *48.32%* | *2,122* | *1.22%* | *172* | *42.95%* | *2.5* | *2,120* | *99.94%* | *11* | *(17)* |
| *1.75 to <2.5* | *363* | *914* | *31.36%* | *650* | *1.93%* | *138* | *44.90%* | *2.5* | *782* | *120.32%* | *6* | *(7)* |
| 2.5 to <10 | 1,501 | 1,030 | 36.93% | 1,881 | 4.18% | 237 | 42.90% | 2.5 | 2,685 | 142.73% | 34 | (42) |
| *2.5 to <5* | *1,105* | *844* | *39.38%* | *1,437* | *3.49%* | *180* | *44.36%* | *2.5* | *2,029* | *141.18%* | *22* | *(22)* |
| *5 to <10* | *396* | *186* | *25.84%* | *444* | *6.38%* | *57* | *38.15%* | *2.5* | *656* | *147.76%* | *11* | *(20)* |
| 10 to <100 | 374 | 108 | 17.80% | 394 | 15.84% | 69 | 44.00% | 2.5 | 909 | 230.94% | 28 | (44) |
| *10 to <20* | *323* | *94* | *13.20%* | *335* | *13.85%* | *52* | *44.74%* | *2.5* | *771* | *230.01%* | *21* | *(32)* |
| *20 to <30* | *36* | *2* | *50.00%* | *37* | *20.00%* | *6* | *36.76%* | *2.5* | *82* | *221.22%* | *3* | *(1)* |
| *30 to <100* | *16* | *11* | *50.00%* | *21* | *40.00%* | *11* | *45.00%* | *2.5* | *56* | *262.57%* | *4* | *(10)* |
| 100 (Default) | 156 | 41 | 39.12% | 172 | 100.00% | 36 | 45.00% | 2.5 | - | - | 77 | (91) |
| **Total Corporates of which other** | **5,769** | **7,130** | **30.61%** | **7,952** | **4.52%** | **949** | **43.75%** | **2.5** | **7,929** | **99.72%** | **159** | **(210)** |

| Dec-23<br>PD Range | On-balance sheet exposures<br>€m | Off-balance sheet exposures pre-CCF<br>€m | Exposure weighted average CCF<br>% | EAD post CRM and post CCF<br>€m | Exposure weighted average PD<br>% | Number of obligors | Exposure weighted average LGD<br>% | Exposure weighted average maturity (years) | Risk weighted exposure amount after supporting factors<br>€m | Density of risk weighted exposure amount<br>% | Expected loss amount<br>€m | Value adjustments and provisions<br>€m |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| a | b | c | d | e | f | g | h | i | j | k | l | m |
| Total Foundation IRB | | | | | | | | | | | | |
| 0.00 to <0.15 | 4,481 | 2,730 | 47.02% | 5,765 | | 316 | | 2.5 | 1,123 | 19.49% | 1 | (1) |
| 0.00 to <0.10 | 4,425 | 2,730 | 47.02% | 5,709 | | 304 | | 2.5 | 1,101 | 19.29% | 1 | (1) |
| 0.10 to <0.15 | 56 | - | 0.00% | 56 | | 12 | | 2.5 | 22 | 39.96% | - | - |
| 0.15 to <0.25 | 968 | 1,066 | 29.93% | 1,287 | | 148 | | 2.5 | 674 | 52.45% | 1 | (2) |
| 0.25 to <0.50 | 1,052 | 1,105 | 28.78% | 1,370 | | 246 | | 2.5 | 851 | 262.01% | 2 | (6) |
| 0.50 to <0.75 | 969 | 562 | 37.68% | 1,180 | | 329 | | 2.5 | 877 | 74.29% | 3 | (8) |
| 0.75 to <2.5 | 4,174 | 1,802 | 50.88% | 5,089 | | 1,162 | | 2.5 | 4,506 | 88.52% | 32 | (40) |
| 0.75 to <1.75 | 3,394 | 1,330 | 51.22% | 4,074 | | 1,069 | | 2.5 | 3,335 | 81.86% | 23 | (33) |
| 1.75 to <2.5 | 780 | 472 | 49.93% | 1,015 | | 93 | | 2.5 | 1,171 | 115.24% | 9 | (7) |
| 2.5 to <10 | 4,863 | 1,150 | 36.47% | 5,281 | | 2,574 | | 2.5 | 5,948 | 112.66% | 88 | (110) |
| 2.5 to <5 | 4,538 | 1,100 | 35.80% | 4,930 | | 2,516 | | 2.5 | 5,383 | 109.21% | 77 | (95) |
| 5 to <10 | 325 | 50 | 51.21% | 351 | | 58 | | 2.5 | 565 | 161.05% | 11 | (15) |
| 10 to <100 | 1,773 | 99 | 41.21% | 1,814 | | 705 | | 2.5 | 2,710 | 149.36% | 125 | (109) |
| 10 to <20 | 1,209 | 95 | 40.75% | 1,248 | | 420 | | 2.5 | 1,783 | 142.81% | 55 | (60) |
| 20 to <30 | 240 | 3 | 50.00% | 242 | | 97 | | 2.5 | 403 | 266.93% | 20 | (13) |
| 30 to <100 | 324 | 1 | 50.00% | 324 | | 188 | | 2.5 | 524 | 161.50% | 50 | (36) |
| 100 (Default) | 901 | 90 | 31.18% | 928 | | 314 | | 2.5 | - | - | 363 | (224) |
| Total FIRB | 19,181 | 8,604 | 41.12% | 22,714 | | 5,794 | | 2.5 | 16,689 | 73.47% | 615 | (500) |
| | | | | | | | | | | | | |
| Institutions | | | | | | | | | | | | |
| 0.00 to <0.15 | 3,539 | 256 | 86.02% | 3,759 | 0.05% | 130 | 24.09% | 2.5 | 544 | 14.47% | - | - |
| 0.00 to <0.10 | 3,483 | 256 | 86.02% | 3,703 | 0.05% | 121 | 23.77% | 2.5 | 522 | 14.08% | - | - |
| 0.10 to <0.15 | 56 | - | - | 56 | 0 | 9 | 0 | 3 | 22 | 0 | - | - |
| 0.15 to <0.25 | 72 | - | - | 72 | 0.20% | 5 | 34.21% | 2.5 | 34 | 47.45% | - | - |
| 0.25 to <0.50 | - | - | - | - | 0.36% | 4 | 45.00% | 2.5 | - | 66.67% | - | - |
| 0.50 to <0.75 | - | 38 | 73.10% | 28 | 0.59% | 3 | 45.00% | 2.5 | 29 | 103.52% | - | - |
| 0.75 to <2.5 | 1 | - | - | 1 | 1.11% | 4 | 45.00% | 2.5 | 1 | 112.35% | - | - |
| 0.75 to <1.75 | 1 | - | - | 1 | 1.11% | 4 | 45.00% | 2.5 | 1 | 112.35% | - | - |
| 1.75 to <2.5 | - | - | - | - | - | - | - | - | - | - | - | - |
| 2.5 to <10 | - | - | - | - | - | - | - | - | - | - | - | - |
| 2.5 to <5 | - | - | - | - | - | - | - | - | - | - | - | - |
| 5 to <10 | - | - | - | - | - | - | - | - | - | - | - | - |
| 10 to <100 | - | 2 | 20.00% | - | 14.54% | 4 | 45.00% | 2.5 | 1 | 254.12% | - | - |
| 10 to <20 | - | 2 | 20.00% | - | 13.75% | 3 | 45.00% | 2.5 | 1 | 253.94% | - | - |
| 20 to <30 | - | - | - | - | - | - | - | - | - | - | - | - |
| 30 to <100 | - | - | - | - | 46.26% | 1 | 45.00% | 2.5 | - | 261.52% | - | - |
| 100 (Default) | - | - | - | - | - | - | - | - | - | - | - | - |
| Total Institutions | 3,612 | 296 | 84.01% | 3,860 | 0.06% | 150 | 24.43% | 2.5 | 609 | 15.78% | - | - |
| | | | | | | | | | | | | |
| Corporates of which SME | | | | | | | | | | | | |
| 0.00 to <0.15 | 83 | 93 | 40.57% | 121 | 0.07% | 86 | 43.86% | 2.5 | 25 | 20.94% | - | - |
| 0.00 to <0.10 | 83 | 93 | 40.57% | 121 | 0.07% | 85 | 43.86% | 2.5 | 25 | 20.94% | - | - |
| 0.10 to <0.15 | - | - | - | - | 0 | 1 | 0 | 3 | - | 0 | - | - |
| 0.15 to <0.25 | 106 | 20 | 16.85% | 109 | 0.17% | 68 | 43.49% | 2.5 | 32 | 29.73% | - | (1) |
| 0.25 to <0.50 | 525 | 114 | 32.85% | 563 | 0.35% | 130 | 36.78% | 2.5 | 223 | 39.52% | 1 | (3) |
| 0.50 to <0.75 | 488 | 90 | 23.82% | 509 | 0.60% | 230 | 39.60% | 2.5 | 265 | 52.08% | 1 | (3) |
| 0.75 to <2.5 | 2,718 | 236 | 30.20% | 2,789 | 1.52% | 923 | 38.02% | 2.5 | 1,882 | 67.49% | 17 | (27) |
| 0.75 to <1.75 | 2,623 | 223 | 29.09% | 2,688 | 1.51% | 907 | 37.78% | 2.5 | 1,792 | 66.68% | 16 | (26) |
| 1.75 to <2.5 | 95 | 13 | 50.00% | 101 | 1.91% | 16 | 44.23% | 2.5 | 90 | 88.82% | 1 | (1) |
| 2.5 to <10 | 3,082 | 276 | 31.56% | 3,167 | 3.89% | 2,327 | 39.38% | 2.5 | 2,810 | 88.72% | 51 | (54) |
| 2.5 to <5 | 2,988 | 276 | 31.48% | 3,073 | 3.74% | 2,294 | 39.51% | 2.5 | 2,709 | 88.17% | 48 | (52) |
| 5 to <10 | 94 | - | 99.99% | 94 | 8.54% | 33 | 35.15% | 2.5 | 101 | 106.91% | 3 | (2) |
| 10 to <100 | 1,475 | 69 | 39.46% | 1,502 | 17.72% | 642 | 37.61% | 2.5 | 1,961 | 130.56% | 103 | (87) |
| 10 to <20 | 957 | 65 | 38.71% | 982 | 10.01% | 373 | 37.51% | 2.5 | 1,155 | 117.54% | 38 | (40) |
| 20 to <30 | 199 | 3 | 50.00% | 201 | 20.00% | 90 | 38.21% | 2.5 | 294 | 146.90% | 16 | (12) |
| 30 to <100 | 319 | 1 | 50.00% | 319 | 40.00% | 179 | 37.55% | 2.5 | 512 | 160.39% | 49 | (35) |
| 100 (Default) | 460 | 24 | 36.33% | 468 | 100.00% | 259 | 38.70% | 2.5 | - | - | 181 | (109) |
| Total Corporate of which SME | 8,937 | 922 | 31.92% | 9,228 | 9.81% | 4,665 | 38.61% | 2.5 | 7,198 | 78.01% | 354 | (284) |
| | | | | | | | | | | | | |
| Corporates of which specialised lending | | | | | | | | | | | | |
| 0.00 to <0.15 | - | - | - | - | - | - | - | - | - | - | - | - |
| 0.00 to <0.10 | - | - | - | - | - | - | - | - | - | - | - | - |
| 0.10 to <0.15 | - | - | - | - | - | - | - | - | - | - | - | - |
| 0.15 to <0.25 | 65 | 70 | 47.95% | 99 | 0.17% | 4 | 45.00% | 2.5 | 42 | 42.55% | - | - |
| 0.25 to <0.50 | 50 | 7 | 50.00% | 53 | 0.35% | 6 | 42.70% | 2.5 | 32 | 59.11% | - | - |
| 0.50 to <0.75 | 71 | 15 | 50.00% | 78 | 0.60% | 11 | 43.61% | 2.5 | 61 | 77.51% | - | - |
| 0.75 to <2.5 | 188 | 78 | 51.01% | 227 | 1.42% | 24 | 44.71% | 2.5 | 247 | 108.79% | 1 | (1) |
| 0.75 to <1.75 | 188 | 78 | 51.01% | 227 | 1.42% | 23 | 44.71% | 2.5 | 247 | 108.79% | 1 | (1) |
| 1.75 to <2.5 | - | - | 1 | - | 0 | 1 | 0 | 3 | - | 1 | - | - |
| 2.5 to <10 | 85 | 4 | 66.09% | 88 | 3.42% | 10 | 42.43% | 2.5 | 116 | 132.73% | 1 | (2) |
| 2.5 to <5 | 85 | 4 | 66.09% | 88 | 3.42% | 10 | 42.43% | 2.5 | 116 | 132.73% | 1 | (2) |
| 5 to <10 | - | - | - | - | - | - | - | - | - | - | - | - |
| 10 to <100 | 1 | 1 | 1 | 2 | 10.00% | 1 | 45.00% | 2.5 | 4 | 204.67% | - | - |
| 10 to <20 | 1 | 1 | 1 | 2 | 10.00% | 1 | 45.00% | 2.5 | 4 | 204.67% | - | - |
| 20 to <30 | - | - | - | - | - | - | - | - | - | - | - | - |
| 30 to <100 | - | - | - | - | - | - | - | - | - | - | - | - |
| 100 (Default) | 19 | 0 | 50.00% | 19 | 100.00% | 2 | 45.00% | 2.5 | - | - | 9 | (7) |
| Total Corporates of which specialised lending | 479 | 175 | 50.01% | 566 | 4.64% | 58 | 44.08% | 2.5 | 502 | 88.59% | 11 | (10) |
| | | | | | | | | | | | | |
| Corporates of which other | | | | | | | | | | | | |
| 0.00 to <0.15 | 859 | 2,381 | 43.07% | 1,885 | 0.06% | 100 | 44.95% | 2.5 | 554 | 29.41% | 1 | (1) |
| 0.00 to <0.10 | 859 | 2,381 | 43.07% | 1,885 | 0.06% | 98 | 44.95% | 2.5 | 554 | 29.41% | 1 | (1) |
| 0.10 to <0.15 | 0 | - | 0.00% | 0 | 0.14% | 2 | 44.98% | 2.5 | 0 | 49.02% | 0 | 0 |
| 0.15 to <0.25 | 725 | 976 | 28.90% | 1,007 | 0.17% | 71 | 45.11% | 2.5 | 566 | 56.23% | 1 | (1) |
| 0.25 to <0.50 | 477 | 984 | 28.17% | 754 | 0.35% | 106 | 44.42% | 2.5 | 596 | 78.98% | 1 | (3) |
| 0.50 to <0.75 | 410 | 419 | 37.03% | 565 | 0.62% | 85 | 41.97% | 2.5 | 522 | 92.43% | 2 | (5) |
| 0.75 to <2.5 | 1,267 | 1,488 | 54.15% | 2,072 | 1.52% | 211 | 44.26% | 2.5 | 2,376 | 114.59% | 14 | (12) |
| 0.75 to <1.75 | 582 | 1,029 | 56.04% | 1,158 | 1.20% | 135 | 44.33% | 2.5 | 1,295 | 111.77% | 6 | (6) |
| 1.75 to <2.5 | 685 | 459 | 49.93% | 914 | 1.92% | 76 | 44.18% | 2.5 | 1,081 | 118.17% | 8 | (6) |
| 2.5 to <10 | 1,696 | 870 | 37.89% | 2,026 | 3.90% | 237 | 44.73% | 2.5 | 3,022 | 149.21% | 36 | (54) |
| 2.5 to <5 | 1,465 | 820 | 37.10% | 1,769 | 3.42% | 212 | 44.69% | 2.5 | 2,558 | 144.60% | 28 | (41) |
| 5 to <10 | 231 | 50 | 50.91% | 257 | 7.21% | 25 | 44.99% | 2.5 | 464 | 180.94% | 8 | (13) |
| 10 to <100 | 297 | 27 | 46.60% | 310 | 16.08% | 58 | 44.53% | 2.5 | 744 | 240.03% | 22 | (22) |
| 10 to <20 | 251 | 27 | 46.56% | 264 | 14.99% | 43 | 44.74% | 2.5 | 623 | 236.35% | 17 | (20) |
| 20 to <30 | 41 | 0 | 50.00% | 41 | 20.00% | 7 | 43.93% | 2.5 | 109 | 265.45% | 4 | -1 |
| 30 to <100 | 5 | - | 50.00% | 5 | 40.00% | 8 | 38.71% | 2.5 | 12 | 228.03% | 1 | (1) |
| 100 (Default) | 422 | 66 | 29.23% | 441 | 100.00% | 53 | 38.99% | 2.5 | - | - | 173 | (108) |
| Total Corporates of which other | 6,153 | 7,211 | 40.32% | 9,060 | 6.74% | 921 | 44.23% | 2.5 | 8,380 | 92.49% | 250 | (206) |

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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-24 | On-balance sheet exposures | Off-balance sheet exposures pre-CCF | Exposure weighted average CCF | EAD post CRM and post CCF | Exposure weighted average PD | Number of obligors | Exposure weighted average LGD | Exposure weighted average maturity (years) | Risk weighted exposure amount after supporting factors | Density of risk weighted exposure amount | Expected loss amount | Value adjustments and provisions |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| PD Range | €m | €m | % | €m | % | | % | | €m | % | €m | €m |
| a | b | c | d | e | f | g | h | i | j | k | l | m |
| **Total Advanced IRB** | | | | | | | | | | | | |
| 0.00 to <0.15 | 5,321 | 593 | 43.08% | 5,606 | | 178,598 | | | 408 | 7.28% | 2 | (4) |
| *0.00 to <0.10* | *5,284* | *204* | *51.24%* | *5,418* | | *77,166* | | | *400* | *7.39%* | *1* | *(4)* |
| *0.10 to <0.15* | *36* | *390* | *38.82%* | *188* | | *101,432* | | | *8* | *4.39%* | *0* | (0.1) |
| 0.15 to <0.25 | 13,474 | 710 | 38.38% | 13,802 | | 218,692 | | | 1,519 | 11.01% | 7 | (11) |
| 0.25 to <0.50 | 3,405 | 779 | 43.14% | 3,759 | | 163,251 | | | 531 | 14.12% | 3 | (6) |
| 0.50 to <0.75 | 14,347 | 2,959 | 68.30% | 16,418 | | 168,805 | | | 4,834 | 29.44% | 30 | (12) |
| 0.75 to <2.5 | 5,214 | 628 | 51.42% | 5,549 | | 248,209 | | | 2,441 | 43.98% | 24 | (25) |
| *0.75 to <1.75* | *3,682* | *541* | *51.44%* | *3,970* | | *183,717* | | | *1,575* | *39.68%* | *14* | *(17)* |
| *1.75 to <2.5* | *1,532* | *87* | *51.31%* | *1,579* | | *64,492* | | | *865* | *54.80%* | *10* | *(9)* |
| 2.5 to <10 | 2,538 | 141 | 42.98% | 2,594 | | 136,607 | | | 2,114 | 81.52% | 55 | (44) |
| *2.5 to <5* | 1,749 | 100 | 105.64% | 1,787 | | 85,487 | | | 1,349 | 75.50% | 28 | (23) |
| *5 to <10* | 790 | 41 | 44.74% | 806 | | 51,120 | | | 765 | 94.85% | 27 | (22) |
| 10 to <100 | 840 | 40 | 47.08% | 862 | | 119,475 | | | 1,164 | 135.02% | 69 | (42) |
| *10 to <20* | *457* | *22* | *38.41%* | *468* | | *95,486* | | | *632* | *135.05%* | *24* | *(18)* |
| *20 to <30* | *49* | *5* | *40.86%* | *51* | | *8,574* | | | *73* | *144.37%* | *7* | *(6)* |
| *30 to <100* | *334* | *13* | *64.06%* | *343* | | *15,415* | | | *458* | *133.61%* | *38* | *(18)* |
| 100 (Default) | 760 | 36 | 38.81% | 777 | | 37,853 | | | 590 | 75.93% | 247 | (241) |
| **Total Advanced IRB** | **45,900** | **5,887** | **56.09%** | **49,367** | | **1,271,490** | | | **13,601** | **0.00%** | **436** | **(384)** |
| | | | | | | | | | | | | |
| **Secured by real estate property - Non SME** | | | | | | | | | | | | |
| 0.00 to <0.15 | 5,278 | 6 | 102.36% | 5,313 | 0.08% | 28,587 | 32.59% | | 397 | 7.48% | 1 | (3) |
| *0.00 to <0.10* | *5,278* | *6* | *102.36%* | *5,313* | *0.08%* | *28,579* | *32.59%* | | *397* | *7.48%* | *1* | (3) |
| *0.10 to <0.15* | *0* | - | - | *0* | 0.14% | *8* | *0* | | *0* | 13.88% | *0* | (0.0) |
| 0.15 to <0.25 | 13,385 | 58 | 46.86% | 13,468 | 0.19% | 71,997 | 26.42% | | 1,494 | 11.09% | 7 | (10) |
| 0.25 to <0.50 | 3,271 | 30 | 71.01% | 3,309 | 0.34% | 26,980 | 20.36% | | 446 | 13.48% | 2 | (3) |
| 0.50 to <0.75 | 14,250 | 2,590 | 72.42% | 16,177 | 0.60% | 75,117 | 30.20% | | 4,777 | 29.53% | 29 | (10) |
| 0.75 to <2.5 | 4,345 | 179 | 74.31% | 4,495 | 1.32% | 44,909 | 23.98% | | 1,770 | 39.38% | 14 | (10) |
| *0.75 to <1.75* | *3,075* | *161* | *73.95%* | *3,207* | *1.06%* | *29,329* | *24.12%* | | *1,109* | *34.57%* | *8* | *(5)* |
| *1.75 to <2.5* | *1,270* | *18* | *77.60%* | *1,288* | *1.98%* | *15,580* | *23.64%* | | *662* | *51.36%* | *6* | *(4)* |
| 2.5 to <10 | 1,109 | 3 | 87.44% | 1,117 | 4.50% | 13,828 | 24.63% | | 927 | 83.03% | 12 | (11) |
| *2.5 to <5* | 795 | 1 | 59.48% | 799 | 3.69% | 11,032 | 25.11% | | 614 | 76.90% | 7 | (6) |
| *5 to <10* | 314 | 2 | 99.82% | 318 | 6.54% | 2,796 | 23.42% | | 313 | 98.43% | 5 | (5) |
| 10 to <100 | 642 | 7 | 97.31% | 653 | 27.73% | 5,578 | 22.77% | | 892 | 136.73% | 38 | (18) |
| *10 to <20* | *348* | *3* | *91.03%* | *353* | *16.39%* | *2,730* | *24.27%* | | *508* | *144.09%* | *14* | *(9)* |
| *20 to <30* | *9* | *0* | *126.10%* | *9* | *24.20%* | *55* | *23.67%* | | *14* | *152.49%* | *1* | (0.2) |
| *30 to <100* | *285* | *5* | *100.67%* | *291* | *41.61%* | *2,793* | *20.93%* | | *370* | *127.28%* | *24* | *(9)* |
| 100 (Default) | 626 | 3 | 100.79% | 629 | 100.00% | 4,939 | 25.52% | | 500 | 79.47% | 153 | (136) |
| **Total Secured by real estate property - Non SME** | **42,907** | **2,877** | **72.17%** | **45,161** | **2.34%** | **271,935** | **27.70%** | | **11,204** | **24.81%** | **257** | **(202)** |
| | | | | | | | | | | | | |
| **Qualifying revolving** | | | | | | | | | | | | |
| 0.00 to <0.15 | 42 | 587 | 42.50% | 292 | 0.09% | 149,963 | 64.81% | | 11 | 3.69% | 0 | (0.2) |
| *0.00 to <0.10* | *6* | *198* | *49.75%* | *104* | *0.05%* | *48,565* | *72.05%* | | *3* | *2.47%* | *0* | (0.1) |
| *0.10 to <0.15* | *36* | *390* | *38.82%* | *187* | *0.11%* | *101,398* | *60.78%* | | *8* | *4.37%* | *0* | (0.1) |
| 0.15 to <0.25 | 82 | 523 | 36.26% | 271 | 0.19% | 135,402 | 56.68% | | 18 | 6.49% | 0 | (0.3) |
| 0.25 to <0.50 | 96 | 384 | 37.44% | 240 | 0.36% | 107,883 | 55.67% | | 25 | 10.58% | 1 | (1) |
| 0.50 to <0.75 | 67 | 287 | 36.34% | 171 | 0.62% | 87,678 | 55.43% | | 28 | 16.28% | 1 | (1) |
| 0.75 to <2.5 | 159 | 331 | 38.45% | 287 | 1.36% | 135,166 | 55.60% | | 84 | 29.39% | 2 | (2) |
| *0.75 to <1.75* | *120* | *276* | *37.99%* | *225* | *1.14%* | *106,422* | *55.22%* | | *58* | *25.66%* | *1* | *(1)* |
| *1.75 to <2.5* | *39* | *55* | *40.76%* | *62* | *2.17%* | *28,744* | *57.02%* | | *27* | *43.00%* | *1* | *(1)* |
| 2.5 to <10 | 76 | 104 | 36.50% | 114 | 4.90% | 53,843 | 54.29% | | 81 | 70.87% | 3 | (3) |
| *2.5 to <5* | 46 | 72 | 36.45% | 73 | 3.66% | 32,696 | 54.17% | | 43 | 59.16% | 2 | (1) |
| *5 to <10* | 30 | 32 | 36.62% | 41 | 7.10% | 21,147 | 54.50% | | 38 | 91.50% | 2 | (2) |
| 10 to <100 | 40 | 27 | 31.45% | 49 | 27.36% | 97,359 | 55.90% | | 76 | 154.18% | 8 | (6) |
| *10 to <20* | *16* | *16* | *26.71%* | *22* | *13.62%* | *86,005* | *56.18%* | | *29* | *134.43%* | *2* | *(2)* |
| *20 to <30* | *7* | *4* | *36.93%* | *8* | *24.77%* | *4,286* | *55.54%* | | *14* | *173.04%* | *1* | *(1)* |
| *30 to <100* | *17* | *7* | *40.24%* | *19* | *43.69%* | *7,068* | *55.75%* | | *33* | *168.10%* | *5* | *(3)* |
| 100 (Default) | 18 | 28 | 29.82% | 29 | 100.00% | 21,505 | 74.27% | | 19 | 64.58% | 22 | (35) |
| **Total Qualifying revolving** | **580** | **2,272** | **38.28%** | **1,454** | **3.78%** | **788,799** | **57.92%** | | **342** | **23.50%** | **36** | **(48)** |
| | | | | | | | | | | | | |
| **Retail of which SME** | | | | | | | | | | | | |
| 0.00 to <0.15 | 1 | 0 | 19.12% | 1 | 0.09% | 41 | 43.11% | | 0 | 10.96% | 0 | (0.0) |
| *0.00 to <0.10* | *0* | *0* | *52.14%* | *0* | *0.07%* | *15* | *40.47%* | | *0* | *8.66%* | *0* | (0.0) |
| *0.10 to <0.15* | *0* | *0* | *13.63%* | *0* | *0.12%* | *26* | *46.32%* | | *0* | *13.76%* | *0* | (0.0) |
| 0.15 to <0.25 | 7 | 129 | 43.18% | 62 | 0.18% | 11,290 | 40.19% | | 8 | 12.49% | 0 | (0.2) |
| 0.25 to <0.50 | 30 | 364 | 46.81% | 202 | 0.33% | 23,789 | 59.72% | | 57 | 27.96% | 0 | (2) |
| 0.50 to <0.75 | 29 | 82 | 50.12% | 70 | 0.65% | 6,004 | 57.47% | | 29 | 41.73% | 0 | (1) |
| 0.75 to <2.5 | 220 | 119 | 53.10% | 281 | 1.57% | 18,378 | 54.88% | | 161 | 57.22% | 3 | (3) |
| *0.75 to <1.75* | *116* | *104* | *52.29%* | *170* | *1.23%* | *12,877* | *55.54%* | | *93* | *54.75%* | *1* | *(2)* |
| *1.75 to <2.5* | *104* | *15* | *58.61%* | *112* | *2.08%* | *5,501* | *53.87%* | | *68* | *60.97%* | *1* | *(1)* |
| 2.5 to <10 | 965 | 34 | 58.61% | 978 | 4.71% | 33,429 | 53.57% | | 650 | 66.50% | 26 | (18) |
| *2.5 to <5* | 672 | 26 | 57.53% | 683 | 3.63% | 21,229 | 51.94% | | 426 | 62.39% | 14 | (9) |
| *5 to <10* | 293 | 7 | 62.44% | 295 | 7.20% | 12,200 | 57.36% | | 224 | 76.01% | 13 | (9) |
| 10 to <100 | 123 | 6 | 57.35% | 125 | 18.66% | 12,487 | 60.36% | | 130 | 103.92% | 14 | (13) |
| *10 to <20* | *85* | *3* | *57.89%* | *86* | *13.31%* | *5,745* | *61.71%* | | *83* | *97.12%* | *7* | *(7)* |
| *20 to <30* | *23* | *1* | *59.31%* | *23* | *23.28%* | *2,726* | *58.24%* | | *27* | *116.07%* | *3* | *(3)* |
| *30 to <100* | *16* | *2* | *55.55%* | *16* | *40.10%* | *4,016* | *56.29%* | | *20* | *122.27%* | *4* | *(3)* |
| 100 (Default) | 89 | 5 | 54.82% | 91 | 100.00% | 7,063 | 58.51% | | 43 | 46.85% | 53 | (54) |
| **Total Retail of which SME** | **1,463** | **738** | **48.23%** | **1,811** | **9.16%** | **112,481** | **54.87%** | | **1,078** | **59.51%** | **97** | **(90)** |
| | | | | | | | | | | | | |
| **Retail of which other** | | | | | | | | | | | | |
| 0.00 to <0.15 | 0 | - | - | 0 | 0.03% | 7 | 83.87% | | 0 | 8.79% | 0 | (0.0) |
| *0.00 to <0.10* | *0* | - | - | *0* | *0.03%* | *7* | *83.87%* | | *0* | *8.79%* | *0* | (0.0) |
| *0.10 to <0.15* | - | - | - | - | - | - | - | | - | - | - | - |
| 0.15 to <0.25 | 0 | - | - | 0 | 0.23% | 3 | 61.63% | | 0 | 35.32% | 0 | (0.0) |
| 0.25 to <0.50 | 8 | - | - | 8 | 0.31% | 4,599 | 65.12% | | 3 | 37.27% | 0 | (0.1) |
| 0.50 to <0.75 | 0 | - | - | 0 | 0.54% | 6 | 59.01% | | 0 | 33.81% | 0 | (0.0) |
| 0.75 to <2.5 | 490 | - | - | 486 | 1.40% | 49,756 | 71.65% | | 425 | 87.48% | 5 | (10) |
| *0.75 to <1.75* | *371* | - | - | *368* | *1.28%* | *35,089* | *72.16%* | | *316* | *85.82%* | *3* | *(8)* |
| *1.75 to <2.5* | *119* | - | - | *118* | *1.77%* | *14,667* | *70.07%* | | *109* | *92.65%* | *1* | *(2)* |
| 2.5 to <10 | 388 | - | - | 385 | 4.45% | 35,507 | 77.09% | | 456 | 118.42% | 13 | (13) |
| *2.5 to <5* | 235 | - | - | 233 | 3.21% | 20,530 | 76.89% | | 266 | 114.26% | 6 | (7) |
| *5 to <10* | 153 | - | - | 152 | 6.34% | 14,977 | 77.39% | | 190 | 124.80% | 7 | (6) |
| 10 to <100 | 35 | - | - | 35 | 30.18% | 4,051 | 75.01% | | 65 | 187.98% | 8 | (5) |
| *10 to <20* | *8* | - | - | *8* | *12.94%* | *1,006* | *73.64%* | | *12* | *144.30%* | *1* | *(1)* |
| *20 to <30* | *10* | - | - | *10* | *22.01%* | *1,507* | *72.88%* | | *18* | *178.82%* | *2* | *-2* |
| *30 to <100* | *17* | - | - | *17* | *43.51%* | *1,538* | *76.96%* | | *36* | *214.75%* | *6* | *(2)* |
| 100 (Default) | 28 | - | - | 27 | 100.00% | 4,346 | 78.60% | | 28 | 103.32% | 19 | (15) |
| **Total Retail of which other** | **949** | **-** | **-** | **941** | **6.58%** | **98,275** | **74.15%** | | **978** | **103.90%** | **45** | **(44)** |

| Dec-23<br>PD Range<br>a | On-balance sheet exposures<br>€m<br>b | Off-balance sheet exposures pre-CCF<br>€m<br>c | Exposure weighted average CCF<br>%<br>d | EAD post CRM and post CCF<br>€m<br>e | Exposure weighted average PD<br>%<br>f | Number of obligors<br>g | Exposure weighted average LGD<br>%<br>h | Exposure weighted average maturity (years)<br>i | Risk weighted exposure amount after supporting factors<br>€m<br>j | Density of risk weighted exposure amount<br>%<br>k | Expected loss amount<br>€m<br>l | Value adjustments and provisions<br>€m<br>m |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Total Advanced IRB | | | | | | | | | | | | |
| 0.00 to <0.15 | 41 | 625 | 43.65% | 315 | | 148,923 | | | 13 | 4.31% | - | - |
| *0.00 to <0.10* | *6* | *178* | *50.52%* | *96* | | *44,404* | | | *2* | *2.58%* | - | - |
| *0.10 to <0.15* | *35* | *447* | *40.91%* | *219* | | *104,519* | | | *11* | *5.07%* | - | - |
| 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% | - | - |
| *0.00 to <0.10* | *4* | *178* | *50.54%* | *94* | *0.05%* | *44,328* | *73.53%* | | *2* | *2.44%* | - | - |
| *0.10 to <0.15* | *34* | *367* | *40.27%* | *182* | *0.11%* | *97,584* | *61.64%* | | *8* | *4.42%* | - | - |
| 0.15 to <0.25 | 80 | 524 | 36.20% | 270 | 0.20% | 133,050 | 56.72% | | 18 | 6.52% | - | - |
| 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% | - | - |
| *0.00 to <0.10* | *1* | - | *8.30%* | *1* | *0.08%* | *36* | *40.32%* | | - | *8.82%* | - | - |
| *0.10 to <0.15* | - | *80* | *43.87%* | *36* | *0.10%* | *6,893* | *40.00%* | | *3* | *8.10%* | - | - |
| 0.15 to <0.25 | 7 | 83 | 42.47% | 43 | 0.18% | 7,151 | 40.31% | | 5 | 12.85% | - | - |
| 0.25 to <0.50 | 29 | 323 | 47.30% | 184 | 0.33% | 21,378 | 60.69% | | 52 | 28.45% | - | (2) |
| 0.50 to <0.75 | 29 | 89 | 50.05% | 73 | 0.65% | 6,790 | 57.16% | | 30 | 41.17% | - | (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% | | - | 15.37% | - | - |
| *0.00 to <0.10* | *1* | - | - | *1* | *0.05%* | *40* | *78.21%* | | - | *11.23%* | - | - |
| *0.10 to <0.15* | *1* | - | - | *1* | *0.12%* | *42* | *75.70%* | | - | *22.41%* | - | - |
| 0.15 to <0.25 | 1 | - | - | 1 | 0.19% | 60 | 73.88% | | 1 | 30.32% | - | - |
| 0.25 to <0.50 | 8 | - | - | 8 | 0.33% | 4,835 | 65.70% | | 3 | 39.24% | - | - |
| 0.50 to <0.75 | 5 | - | - | 4 | 0.63% | 423 | 74.87% | | 3 | 64.34% | - | - |
| 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* | - | - | *9* | *48.37%* | *1,016* | *77.14%* | | *18* | *212.33%* | *3* | *(2)* |
| 100 (Default) | 44 | - | - | 43 | 100.00% | 6,524 | 80.14% | | 43 | 99.08% | 31 | (28) |
| Total Retail of which other | 877 | - | - | 869 | 8.28% | 99,055 | 73.82% | | 880 | 101.28% | 53 | (47) |

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-24** | | Dec-23 | |
|---|---|---|---|---|---|
| | | **Pre-credit derivatives risk weighted exposure amount €m** | **Actual risk weighted exposure amount €m** | Pre-credit derivatives risk weighted exposure amount €m | Actual risk weighted exposure amount €m |
| | | a | b | a | b |
| 1 | **Exposures under F-IRB** | **17,757** | **17,757** | 16,689 | 16,689 |
| 2 | Central governments and central banks | - | - | - | - |
| 3 | Institutions | 680 | 680 | 609 | 609 |
| 4 | Corporates | 17,077 | 17,077 | 16,080 | 16,080 |
| | of which | | | | |
| 4.1 | Corporates - SMEs | 8,400 | 8,400 | 7,198 | 7,198 |
| 4.2 | Corporates - Specialised lending | 747 | 747 | 502 | 502 |
| 5 | **Exposures under A-IRB** | **13,601** | **13,601** | 12,094 | 12,094 |
| 6 | Central governments and central banks | - | - | - | - |
| 7 | Institutions | - | - | - | - |
| 8 | Corporates | - | - | - | - |
| | of which | | | | |
| 8.1 | Corporates - SMEs | - | - | - | - |
| 8.2 | Corporates - Specialised lending | - | - | - | - |
| 9 | Retail | 13,601 | 13,601 | 12,094 | 12,094 |
| | of which | | | | |
| 9.1 | Retail – SMEs - Secured by immovable property collateral | - | - | - | - |
| 9.2 | Retail – non-SMEs - Secured by immovable property collateral | 11,204 | 11,204 | 9,780 | 9,780 |
| 9.3 | Retail – Qualifying revolving | 342 | 342 | 342 | 342 |
| 9.4 | Retail – SMEs - Other | 1,078 | 1,078 | 1,092 | 1,092 |
| 9.5 | Retail – Non-SMEs- Other | 978 | 978 | 880 | 880 |
| 10 | **TOTAL (including F-IRB exposures and A-IRB exposures)** | **31,358** | **31,358** | 28,783 | 28,783 |

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 – Funded credit Protection (FCP): Part of exposures covered by Financial Collaterals | Funded credit Protection (FCP): Part of exposures covered by Other eligible collaterals | Funded credit Protection (FCP): Part of exposures covered by Immovable property Collaterals (%) | Funded credit Protection (FCP): Part of exposures covered by Receivables | Funded credit Protection (FCP): Part of exposures covered by Other physical collateral | Funded credit Protection (FCP): Part of exposures covered by Other funded credit protection | Funded credit Protection (FCP): Part of exposures covered by Cash on deposit | Funded credit Protection (FCP): Part of exposures covered by Life insurance policies | Funded credit Protection (FCP): Part of exposures covered by Instruments held by a third party | Unfunded credit Protection (UFCP): Part of exposures covered by Guarantees | Unfunded credit Protection (UFCP): Part of exposures covered by Credit Derivatives | Credit risk Mitigation methods in the calculation of RWEAs: RWEA without substitution effects (reduction effects only) | Credit risk Mitigation methods in the calculation of RWEAs: RWEA with substitution effects (both reduction and substitution effects) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | **Dec-24** | **€m** | **%** | **%** | **%** | **%** | **%** | **%** | **%** | **%** | **%** | **%** | **%** | **€m** | **€m** |
| | **Exposures under A-IRB** | a | b | c | d | e | f | g | h | i | j | k | l | m | n |
| 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 | 49,367 | - | 89.16% | 89.16% | - | - | - | - | - | - | - | - | 13,770 | 13,601 |
| | of which | | | | | | | | | | | | | | |
| 4.1 | Retail – SMEs - Secured by immovable property collateral [1] | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 4.2 | Retail – non-SMEs - Secured by immovable property collateral | 45,161 | - | 97.47% | 97.47% | - | - | - | - | - | - | - | - | 11,204 | 11,204 |
| 4.3 | Retail – Qualifying revolving | 1,454 | - | - | - | - | - | - | - | - | - | - | - | 342 | 342 |
| 4.4 | Retail – SMEs - Other | 1,811 | - | - | - | - | - | - | - | - | - | - | - | 1,246 | 1,078 |
| 4.5 | Retail – Non-SMEs- Other | 941 | - | - | - | - | - | - | - | - | - | - | - | 978 | 978 |
| 5 | **Total Advanced IRB** | **49,367** | **-** | **89.16%** | **89.16%** | **-** | **-** | **-** | **-** | **-** | **-** | **-** | **-** | **13,770** | **13,601** |
| | **Exposures under F-IRB** | | | | | | | | | | | | | | |
| 1 | Central governments and central banks | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 2 | Institutions | 4,181 | - | - | - | - | - | - | - | - | - | - | - | 680 | 680 |
| 3 | Corporates | 18,618 | 0.34% | 24.70% | 24.66% | - | 0.04% | - | - | - | - | 0.88% | - | 17,543 | 17,077 |
| | of which | | | | | | | | | | | | | | |
| 3.1 | Corporates – SMEs | 9,897 | 0.02% | 38.33% | 38.28% | - | 0.06% | - | - | - | - | 1.55% | - | 8,561 | 8,400 |
| 3.2 | Corporates – Specialised lending | 769 | 2.57% | - | - | - | - | - | - | - | - | - | - | 747 | 747 |
| 3.3 | Corporates – Other | 7,952 | 0.53% | 10.12% | 10.09% | - | 0.02% | - | - | - | - | 0.12% | - | 8,235 | 7,929 |
| 4 | **Total Foundation IRB** | **22,799** | **0.28%** | **20.17%** | **20.14%** | **-** | **0.03%** | **-** | **-** | **-** | **-** | **0.72%** | **-** | **18,223** | **17,757** |

| | | Total exposures | Credit risk Mitigation techniques – Funded credit: Part of exposures covered by Financial Collaterals | Funded credit: Part of exposures covered by Other eligible collaterals | Funded credit: Part of exposures covered by Immovable property Collaterals (%) | Funded credit: Part of exposures covered by Receivables | Funded credit: Part of exposures covered by Other physical collateral | Funded credit: Part of exposures covered by Other funded credit protection | Funded credit: Part of exposures covered by Cash on deposit | Funded credit: Part of exposures covered by Life insurance policies | Funded credit: Part of exposures covered by Instruments held by a third party | Unfunded credit: Part of exposures covered by Guarantees | Unfunded credit: Part of exposures covered by Credit Derivatives | Credit risk Mitigation methods in the calculation of RWEAs: RWEA without substitution effects (reduction effects only) | Credit risk Mitigation methods in the calculation of RWEAs: RWEA with substitution effects (both reduction and substitution effects) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Dec-23 | €m | % | % | % | % | % | % | % | % | % | % | % | €m | €m |
| | Exposures under A-IRB | a | b | c | d | e | f | g | h | i | j | k | l | m | n |
| 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 | | 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 |

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 '24** | **29,774** |
| 2 | Asset size (+/-)[1] | 1,210 |
| 3 | Asset quality (+/-)[2] | (340) |
| 4 | Model updates (+/-)[3] | - |
| 5 | Methodology and policy (+/-)[4] | 534 |
| 6 | Acquisitions and disposals (+/-)[5] | (60) |
| 7 | Foreign exchange movements (+/-) | 241 |
| 8 | Other (+/-)[6] | - |
| **9** | **Risk weighted exposure amount as at the end of the reporting period - December '24** | **31,358** |

| | | Risk weighted exposure amount €m |
|---|---|---|
| | | a |
| 1 | Risk weighted exposure amount as at the end of the previous reporting period - June '24 | 28,746 |
| 2 | Asset size (+/-)[1] | 1,441 |
| 3 | Asset quality (+/-)[2] | (386) |
| 4 | Model updates (+/-)[3] | - |
| 5 | Methodology and policy (+/-)[4] | - |
| 6 | Acquisitions and disposals (+/-)[5] | - |
| 7 | Foreign exchange movements (+/-) | (26) |
| 8 | Other (+/-)[6] | - |
| 9 | Risk weighted exposure amount as at the end of the reporting period - September '24 | 29,774 |

[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.*

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 (%) |
|---|---|---|---|---|---|---|
| | **Dec-24** | **€m** | **€m** | **%** | **%** | **%** |
| | | a | b | c | d | e |
| **1** | **Central governments or central banks** | | **39,455** | **98.96%** | **1.04%** | **-** |
| | of which; | | | | | |
| 1.1 | Regional governments or local authorities | | 668 | 38.59% | 61.41% | - |
| 1.2 | Public sector entities | | 806 | 49.11% | 50.89% | - |
| **2** | **Institutions** | **4,182** | **5,289** | **0.00%** | **20.94%** | **79.06%** |
| **3** | **Corporates** | **18,825** | **23,077** | **8.72%** | **10.59%** | **80.69%** |
| | of which; | | | | | |
| 3.1 | Corporates - Specialised lending, excluding slotting approach | | 994 | - | - | 100.00% |
| 3.2 | Corporates - Specialised lending under slotting approach | | - | - | - | - |
| **4** | **Retail** | **47,378** | **57,373** | **6.61%** | **11.44%** | **81.95%** |
| | of which; | | | | | |
| 4.1 | Retail – Secured by real estate SMEs | | - | - | - | - |
| 4.2 | Retail – Secured by real estate non-SMEs | | 49,768 | - | 12.82% | 87.18% |
| 4.3 | Retail – Qualifying revolving | | 788 | - | - | 100.00% |
| 4.4 | Retail – Other SMEs | | 3,051 | 36.13% | 0.15% | 63.72% |
| 4.5 | Retail – Other non-SMEs | | 3,767 | 71.44% | 4.76% | 23.80% |
| **5** | **Equity** | | **1,060** | **20.34%** | **79.66%** | **-** |
| **6** | **Other non-credit obligation assets** | | **6,105** | **24.58%** | **75.42%** | **-** |
| **7** | **Total** | **70,385** | **132,358** | **35.18%** | **12.07%** | **52.75%** |

| | | 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 (%) |
|---|---|---|---|---|---|---|
| | Dec-23 | €m | €m | % | % | % |
| | | a | b | c | d | e |
| 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% |

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)**

| | **Number of obligors at the end of previous year** | | **Observed average default rate (%)** | **Exposures weighted average PD (%)** | **Average PD (%)** | **Average historical annual default rate (%)** |
|---|---|---|---|---|---|---|
| **Dec-24** | | of which number of obligors which defaulted in the year | | | | |
| **PD Range** | | | % | % | % | % |
| b | c | d | e | f | g | h |
| **Total Foundation IRB** | | | | | | |
| 0.00 to <0.15 | 295 | 1 | 0.34% | | 0.05% | 0.23% |
| *0.00 to <0.10* | *284* | *1* | *0.35%* | | *0.05%* | *0.23%* |
| *0.10 to <0.15* | *11* | - | - | | *0.13%* | *0.00%* |
| 0.15 to <0.25 | 148 | - | - | | 0.17% | 0.31% |
| 0.25 to <0.50 | 246 | - | - | | 0.35% | 0.47% |
| 0.50 to <0.75 | 329 | - | - | | 0.61% | 0.61% |
| 0.75 to <2.5 | 1,146 | 5 | 0.44% | | 1.52% | 0.93% |
| *0.75 to <1.75* | *1,054* | *4* | *0.38%* | | *1.42%* | *0.95%* |
| *1.75 to <2.5* | *92* | *1* | *1.09%* | | *1.92%* | *0.53%* |
| 2.5 to <10 | 2,631 | 65 | 2.47% | | 3.88% | 2.68% |
| *2.5 to <5* | *2,573* | *61* | *2.37%* | | *3.62%* | *2.60%* |
| *5 to <10* | *58* | *4* | *6.90%* | | *7.56%* | *8.11%* |
| 10 to <100 | 654 | 57 | 8.72% | | 17.43% | 9.89% |
| *10 to <20* | *369* | *31* | *8.40%* | | *11.06%* | *8.35%* |
| *20 to <30* | *97* | *7* | *7.22%* | | *20.00%* | *10.90%* |
| *30 to <100* | *188* | *19* | *10.11%* | | *40.00%* | *17.02%* |
| 100 (Default) | 314 | - | - | | 100.00% | - |
| **Institutions** | | | | | | |
| 0.00 to <0.15 | 110 | - | - | 0.05% | 0.05% | - |
| *0.00 to <0.10* | *101* | - | - | *0.05%* | *0.05%* | - |
| *0.10 to <0.15* | *9* | - | - | *0.13%* | *0.13%* | - |
| 0.15 to <0.25 | 5 | - | - | 0.20% | 0.20% | - |
| 0.25 to <0.50 | 4 | - | - | 0.36% | 0.36% | - |
| 0.50 to <0.75 | 3 | - | - | 0.59% | 0.59% | - |
| 0.75 to <2.5 | 4 | - | - | 1.55% | 1.11% | - |
| *0.75 to <1.75* | *4* | - | - | *1.11%* | *1.11%* | - |
| *1.75 to <2.5* | - | - | - | *2.09%* | *0.00%* | - |
| 2.5 to <10 | - | - | - | - | - | - |
| *2.5 to <5* | - | - | - | - | - | - |
| *5 to <10* | - | - | - | - | - | - |
| 10 to <100 | 4 | - | - | 27.23% | 14.54% | - |
| *10 to <20* | *3* | - | - | *13.75%* | *13.75%* | - |
| *20 to <30* | - | - | - | - | - | - |
| *30 to <100* | *1* | - | - | *46.26%* | *46.26%* | - |
| 100 (Default) | - | - | - | - | - | - |
| **Corporates of which SME** | | | | | | |
| 0.00 to <0.15 | 85 | 1 | 1.18% | 0.07% | 0.07% | 0.31% |
| *0.00 to <0.10* | *85* | *1* | *1.18%* | *0.06%* | *0.07%* | *0.31%* |
| *0.10 to <0.15* | - | - | - | *0.11%* | *0.11%* | *0.00%* |
| 0.15 to <0.25 | 68 | - | - | 0.18% | 0.17% | 0.39% |
| 0.25 to <0.50 | 130 | - | - | 0.35% | 0.35% | 0.47% |
| 0.50 to <0.75 | 230 | - | - | 0.60% | 0.60% | 0.54% |
| 0.75 to <2.5 | 917 | 2 | 0.22% | 1.55% | 1.52% | 0.98% |
| *0.75 to <1.75* | *901* | *2* | *0.22%* | *1.51%* | *1.51%* | *0.98%* |
| *1.75 to <2.5* | *16* | - | - | *2.26%* | *1.91%* | *1.10%* |
| 2.5 to <10 | 2,393 | 61 | 2.55% | 3.75% | 3.89% | 2.63% |
| *2.5 to <5* | *2,360* | *60* | *2.54%* | *3.67%* | *3.74%* | *2.60%* |
| *5 to <10* | *33* | *1* | *3.03%* | *6.99%* | *8.54%* | *4.48%* |
| 10 to <100 | 594 | 55 | 9.26% | 18.82% | 17.72% | 10.01% |
| *10 to <20* | *325* | *29* | *8.92%* | *10.16%* | *10.01%* | *8.41%* |
| *20 to <30* | *90* | *7* | *7.78%* | *20.03%* | *20.00%* | *11.00%* |
| *30 to <100* | *179* | *19* | *10.61%* | *40.26%* | *40.00%* | *17.74%* |
| 100 (Default) | 259 | - | - | 100.00% | 100.00% | - |
| **Corporates of which specialised lending** | | | | | | |
| 0.00 to <0.15 | - | - | - | - | - | - |
| *0.00 to <0.10* | - | - | - | - | - | - |
| *0.10 to <0.15* | - | - | - | - | - | - |
| 0.15 to <0.25 | 4 | - | - | 0.17% | 0.17% | - |
| 0.25 to <0.50 | 6 | - | - | 0.35% | 0.35% | - |
| 0.50 to <0.75 | 11 | - | - | 0.60% | 0.60% | - |
| 0.75 to <2.5 | 23 | - | - | 1.45% | 1.42% | - |
| *0.75 to <1.75* | *23* | - | - | *1.45%* | *1.42%* | - |
| *1.75 to <2.5* | - | - | - | *1.94%* | - | - |
| 2.5 to <10 | 10 | - | - | 3.67% | 3.42% | 4.00% |
| *2.5 to <5* | *10* | - | - | *3.67%* | *3.42%* | *4.00%* |
| *5 to <10* | - | - | - | - | - | - |
| 10 to <100 | 1 | - | - | 10.00% | 10.00% | 20.00% |
| *10 to <20* | *1* | - | - | *10.00%* | *10.00%* | *20.00%* |
| *20 to <30* | - | - | - | - | - | - |
| *30 to <100* | - | - | - | - | - | - |
| 100 (Default) | 2 | - | - | 100.00% | 100.00% | - |
| **Corporates of which other** | | | | | | |
| 0.00 to <0.15 | 100 | - | - | 0.08% | 0.06% | 0.37% |
| *0.00 to <0.10* | *98* | - | - | *0.07%* | *0.06%* | *0.37%* |
| *0.10 to <0.15* | *2* | - | - | *0.11%* | *0.14%* | *0.00%* |
| 0.15 to <0.25 | 71 | - | - | 0.22% | 0.17% | 0.27% |
| 0.25 to <0.50 | 106 | - | - | 0.36% | 0.35% | 0.55% |
| 0.50 to <0.75 | 85 | - | - | 0.58% | 0.62% | 1.01% |
| 0.75 to <2.5 | 202 | 3 | 1.49% | 1.38% | 1.52% | 0.77% |
| *0.75 to <1.75* | *126* | *2* | *1.59%* | *1.22%* | *1.20%* | *0.87%* |
| *1.75 to <2.5* | *76* | *1* | *1.32%* | *1.93%* | *1.92%* | *0.36%* |
| 2.5 to <10 | 228 | 4 | 1.75% | 4.18% | 3.90% | 3.12% |
| *2.5 to <5* | *203* | *1* | *0.49%* | *3.49%* | *3.42%* | *2.48%* |
| *5 to <10* | *25* | *3* | *12.00%* | *6.38%* | *7.21%* | *13.64%* |
| 10 to <100 | 55 | 2 | 3.64% | 15.84% | 16.08% | 8.80% |
| *10 to <20* | *40* | *2* | *5.00%* | *13.85%* | *14.99%* | *7.83%* |
| *20 to <30* | *7* | *0* | - | *20.00%* | *20.00%* | *10.34%* |
| *30 to <100* | *8* | - | - | *40.00%* | *40.00%* | *7.46%* |
| 100 (Default) | 53 | - | - | 100.00% | 100.00% | - |

| Dec-23<br>PD Range | 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 (%) |
|---|---|---|---|---|---|---|
| | | | % | % | % | % |
| b | c | d | e | f | g | h |
| Total Foundation IRB | | | | | | |
| 0.00 to <0.15 | 297 | - | - | | 0.06% | 0.20% |
| *0.00 to <0.10* | *286* | *-* | *-* | | *0.05%* | *0.20%* |
| *0.10 to <0.15* | *11* | *-* | *-* | | *0.13%* | *-* |
| 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* | *-* | *-* | | *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 | - | - | | 100.00% | - |
| Institutions | | | | | | |
| 0.00 to <0.15 | 111 | - | - | 0.05% | 0.05% | - |
| *0.00 to <0.10* | *101* | *-* | *-* | *0.05%* | *0.05%* | *-* |
| *0.10 to <0.15* | *10* | *-* | *-* | *0.13%* | *0.13%* | *-* |
| 0.15 to <0.25 | 8 | - | - | 0.20% | 0.20% | - |
| 0.25 to <0.50 | 5 | - | - | 0.36% | 0.36% | - |
| 0.50 to <0.75 | 1 | - | - | 0.59% | 0.59% | - |
| 0.75 to <2.5 | 6 | - | - | 1.11% | 1.20% | - |
| *0.75 to <1.75* | *4* | *-* | *-* | *1.11%* | *1.11%* | *-* |
| *1.75 to <2.5* | *2* | *-* | *-* | *-* | *2.09%* | *-* |
| 2.5 to <10 | - | - | - | - | - | - |
| *2.5 to <5* | *-* | *-* | *-* | *-* | *-* | *-* |
| *5 to <10* | *-* | *-* | *-* | *-* | *-* | *-* |
| 10 to <100 | 5 | - | - | 14.54% | 13.89% | - |
| *10 to <20* | *4* | *-* | *-* | *13.75%* | *13.75%* | *-* |
| *20 to <30* | *1* | *-* | *-* | *-* | *25.42%* | *-* |
| *30 to <100* | *-* | *-* | *-* | *46.26%* | *-* | *-* |
| 100 (Default) | - | - | - | - | - | - |
| Corporates of which SME | | | | | | |
| 0.00 to <0.15 | 87 | - | - | 0.07% | 0.07% | 0.28% |
| *0.00 to <0.10* | *87* | *-* | *-* | *0.07%* | *0.07%* | *0.28%* |
| *0.10 to <0.15* | *0* | *-* | *0.00%* | *0.11%* | *-* | *-* |
| 0.15 to <0.25 | 88 | 1 | 1.14% | 0.17% | 0.17% | 0.35% |
| 0.25 to <0.50 | 133 | - | - | 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* | *-* | *-* | *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* | *-* | *-* | *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 | - | - | 100.00% | 100.00% | - |
| Corporates of which specialised lending | | | | | | |
| 0.00 to <0.15 | - | - | - | - | - | - |
| *0.00 to <0.10* | *-* | *-* | *-* | *-* | *-* | *-* |
| *0.10 to <0.15* | *-* | *-* | *-* | *-* | *-* | *-* |
| 0.15 to <0.25 | 5 | - | - | 0.17% | 0.17% | - |
| 0.25 to <0.50 | 5 | - | - | 0.35% | 0.35% | - |
| 0.50 to <0.75 | 11 | - | - | 0.60% | 0.60% | - |
| 0.75 to <2.5 | 24 | - | - | 1.42% | 1.40% | - |
| *0.75 to <1.75* | *24* | *-* | *-* | *1.42%* | *1.40%* | *-* |
| *1.75 to <2.5* | *-* | *-* | *-* | *2.00%* | *0.00%* | *-* |
| 2.5 to <10 | 10 | - | - | 3.42% | 3.30% | 3.85% |
| *2.5 to <5* | *10* | *-* | *-* | *3.42%* | *3.30%* | *3.85%* |
| *5 to <10* | *-* | *-* | *-* | *-* | *-* | *-* |
| 10 to <100 | 1 | - | - | 10.00% | 10.00% | 20.00% |
| *10 to <20* | *1* | *-* | *-* | *10.00%* | *10.00%* | *20.00%* |
| *20 to <30* | *-* | *-* | *-* | *-* | *-* | *-* |
| *30 to <100* | *-* | *-* | *-* | *-* | *-* | *-* |
| 100 (Default) | 2 | - | - | 100.00% | 100.00% | - |
| Corporates of which other | | | | | | |
| 0.00 to <0.15 | 99 | - | - | 0.06% | 0.06% | 0.35% |
| *0.00 to <0.10* | *98* | *-* | *-* | *0.06%* | *0.06%* | *0.35%* |
| *0.10 to <0.15* | *1* | *-* | *-* | *0.14%* | *0.14%* | *-* |
| 0.15 to <0.25 | 63 | - | - | 0.17% | 0.17% | 0.25% |
| 0.25 to <0.50 | 114 | - | - | 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* | *-* | *-* | *40.00%* | *40.00%* | *6.85%* |
| 100 (Default) | 81 | - | - | 100.00% | 100.00% | - |

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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-24 | 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 (%) |
|---|---|---|---|---|---|---|
| **PD Range** | | | % | % | % | % |
| b | c | d | e | f | g | h |
| **Total advanced IRB** | | | | | | |
| 0.00 to <0.15 | 146,915 | 135 | 0.09% | | 0.09% | 0.12% |
| *0.00 to <0.10* | *44,404* | *29* | *0.07%* | | *0.05%* | *0.11%* |
| *0.10 to <0.15* | *102,511* | *106* | *0.10%* | | *0.11%* | *0.13%* |
| 0.15 to <0.25 | 219,512 | 261 | 0.12% | | 0.18% | 0.17% |
| 0.25 to <0.50 | 187,231 | 355 | 0.19% | | 0.33% | 0.18% |
| 0.50 to <0.75 | 158,360 | 440 | 0.28% | | 0.61% | 1.17% |
| 0.75 to <2.5 | 268,784 | 1,936 | 0.72% | | 1.28% | 0.80% |
| *0.75 to <1.75* | *198,346* | *1,116* | *0.56%* | | *1.05%* | *0.63%* |
| *1.75 to <2.5* | *70,438* | *820* | *1.16%* | | *1.93%* | *1.31%* |
| 2.5 to <10 | 133,933 | 4,186 | 3.13% | | 4.87% | 2.94% |
| *2.5 to <5* | *82,536* | *1,749* | *2.12%* | | *3.60%* | *2.08%* |
| *5 to <10* | *51,397* | *2,437* | *4.74%* | | *6.77%* | *4.56%* |
| 10 to <100 | 109,581 | 8,873 | 8.10% | | 27.57% | 11.65% |
| *10 to <20* | *84,400* | *2,882* | *3.41%* | | *14.48%* | *5.92%* |
| *20 to <30* | *9,970* | *2,046* | *20.52%* | | *23.86%* | *11.78%* |
| *30 to <100* | *15,211* | *3,945* | *25.94%* | | *39.45%* | *28.39%* |
| 100 (Default) | 51,512 | - | - | | 100.00% | - |
| **Secured by real estate property - Non SME** | | | | | | |
| 0.00 to <0.15 | - | - | - | 0.08% | - | 0.10% |
| *0.00 to <0.10* | - | - | - | *0.08%* | - | *0.09%* |
| *0.10 to <0.15* | - | - | - | *0.14%* | - | *2.78%* |
| 0.15 to <0.25 | 79,251 | 110 | 0.14% | 0.19% | 0.18% | 0.22% |
| 0.25 to <0.50 | 41,487 | 124 | 0.30% | 0.34% | 0.33% | 0.41% |
| 0.50 to <0.75 | 67,410 | 172 | 0.26% | 0.60% | 0.61% | 0.63% |
| 0.75 to <2.5 | 58,909 | 467 | 0.79% | 1.32% | 1.25% | 0.98% |
| *0.75 to <1.75* | *40,404* | *237* | *0.59%* | *1.06%* | *1.03%* | *0.76%* |
| *1.75 to <2.5* | *18,505* | *230* | *1.24%* | *1.98%* | *1.91%* | *1.60%* |
| 2.5 to <10 | 15,234 | 378 | 2.48% | 4.50% | 5.08% | 4.73% |
| *2.5 to <5* | *10,505* | *156* | *1.49%* | *3.69%* | *3.71%* | *3.25%* |
| *5 to <10* | *4,729* | *222* | *4.69%* | *6.54%* | *6.59%* | *6.44%* |
| 10 to <100 | 5,352 | 1,114 | 20.81% | 27.73% | 29.80% | 27.06% |
| *10 to <20* | *1,641* | *162* | *9.87%* | *16.39%* | *15.24%* | *19.08%* |
| *20 to <30* | *436* | *93* | *21.33%* | *24.20%* | *24.05%* | *25.40%* |
| *30 to <100* | *3,275* | *859* | *26.23%* | *41.61%* | *38.85%* | *35.51%* |
| 100 (Default) | 5,451 | - | - | 100.00% | 100.00% | - |
| **Qualifying revolving** | | | | | | |
| 0.00 to <0.15 | 139,904 | 128 | 0.09% | 0.09% | 0.09% | 0.11% |
| *0.00 to <0.10* | *44,328* | *29* | *0.07%* | *0.05%* | *0.05%* | *0.08%* |
| *0.10 to <0.15* | *95,576* | *99* | *0.10%* | *0.11%* | *0.11%* | *0.12%* |
| 0.15 to <0.25 | 133,050 | 138 | 0.10% | 0.19% | 0.20% | 0.10% |
| 0.25 to <0.50 | 119,528 | 163 | 0.14% | 0.36% | 0.36% | 0.08% |
| 0.50 to <0.75 | 83,736 | 217 | 0.26% | 0.62% | 0.62% | 1.34% |
| 0.75 to <2.5 | 141,762 | 721 | 0.51% | 1.36% | 1.36% | 0.56% |
| *0.75 to <1.75* | *111,627* | *443* | *0.40%* | *1.14%* | *1.14%* | *0.46%* |
| *1.75 to <2.5* | *30,135* | *278* | *0.92%* | *2.17%* | *2.18%* | *1.05%* |
| 2.5 to <10 | 54,270 | 1,650 | 3.04% | 4.90% | 4.96% | 2.90% |
| *2.5 to <5* | *32,901* | *713* | *2.17%* | *3.66%* | *3.65%* | *2.20%* |
| *5 to <10* | *21,369* | *937* | *4.38%* | *7.10%* | *7.11%* | *4.13%* |
| 10 to <100 | 87,035 | 4,884 | 5.61% | 27.36% | 27.19% | 8.02% |
| *10 to <20* | *74,606* | *1,984* | *2.66%* | *13.62%* | *13.62%* | *4.29%* |
| *20 to <30* | *5,156* | *1,223* | *23.72%* | *24.77%* | *25.19%* | *8.83%* |
| *30 to <100* | *7,273* | *1,677* | *23.06%* | *43.69%* | *44.13%* | *23.77%* |
| 100 (Default) | 28,825 | - | - | 100.00% | 100.00% | - |
| **Retail of which SME** | | | | | | |
| 0.00 to <0.15 | 82 | - | - | 0.09% | 0.07% | - |
| *0.00 to <0.10* | *40* | - | - | *0.07%* | *0.05%* | - |
| *0.10 to <0.15* | *42* | - | - | *0.12%* | *0.12%* | - |
| 0.15 to <0.25 | 60 | - | - | 0.18% | 0.19% | - |
| 0.25 to <0.50 | 4,835 | 8 | 0.17% | 0.33% | 0.33% | 0.23% |
| 0.50 to <0.75 | 423 | 5 | 1.18% | 0.65% | 0.63% | 0.53% |
| 0.75 to <2.5 | 49,773 | 523 | 1.05% | 1.57% | 1.41% | 0.86% |
| *0.75 to <1.75* | *33,575* | *300* | *0.89%* | *1.23%* | *1.26%* | *0.78%* |
| *1.75 to <2.5* | *16,198* | *223* | *1.38%* | *2.08%* | *1.82%* | *0.97%* |
| 2.5 to <10 | 32,493 | 1,251 | 3.85% | 4.71% | 4.43% | 2.26% |
| *2.5 to <5* | *19,606* | *479* | *2.44%* | *3.63%* | *3.17%* | *1.55%* |
| *5 to <10* | *12,887* | *772* | *5.99%* | *7.20%* | *6.39%* | *4.25%* |
| 10 to <100 | 4,865 | 1,365 | 28.06% | 18.66% | 25.77% | 26.97% |
| *10 to <20* | *2,415* | *324* | *13.42%* | *13.31%* | *13.35%* | *11.77%* |
| *20 to <30* | *1,434* | *433* | *30.20%* | *23.28%* | *22.03%* | *28.71%* |
| *30 to <100* | *1,016* | *608* | *59.84%* | *40.10%* | *48.37%* | *56.03%* |
| 100 (Default) | 6,524 | - | - | 100.00% | 100.00% | - |
| **Retail of which other** | | | | | | |
| 0.00 to <0.15 | 6,929 | 7 | 0.10% | 0.03% | 0.10% | 0.29% |
| *0.00 to <0.10* | *36* | - | - | *0.03%* | *0.08%* | *0.35%* |
| *0.10 to <0.15* | *6,893* | *7* | *0.10%* | *0.00%* | *0.10%* | *0.26%* |
| 0.15 to <0.25 | 7,151 | 13 | 0.18% | 0.23% | 0.18% | 0.31% |
| 0.25 to <0.50 | 21,381 | 60 | 0.28% | 0.31% | 0.33% | 0.37% |
| 0.50 to <0.75 | 6,791 | 46 | 0.68% | 0.54% | 0.65% | 0.88% |
| 0.75 to <2.5 | 18,340 | 225 | 1.23% | 1.40% | 1.59% | 1.80% |
| *0.75 to <1.75* | *12,740* | *136* | *1.07%* | *1.28%* | *1.24%* | *1.54%* |
| *1.75 to <2.5* | *5,600* | *89* | *1.59%* | *1.77%* | *2.08%* | *2.26%* |
| 2.5 to <10 | 31,936 | 907 | 2.84% | 4.45% | 4.75% | 3.14% |
| *2.5 to <5* | *19,524* | *401* | *2.05%* | *3.21%* | *3.62%* | *2.36%* |
| *5 to <10* | *12,412* | *506* | *4.08%* | *6.34%* | *7.19%* | *4.42%* |
| 10 to <100 | 12,329 | 1,510 | 12.25% | 30.18% | 18.51% | 15.38% |
| *10 to <20* | *5,738* | *412* | *7.18%* | *12.94%* | *13.36%* | *9.05%* |
| *20 to <30* | *2,944* | *297* | *10.09%* | *22.01%* | *23.56%* | *15.55%* |
| *30 to <100* | *3,647* | *801* | *21.96%* | *43.51%* | *41.35%* | *23.31%* |
| 100 (Default) | 10,712 | - | - | 100.00% | 100.00% | - |

| Dec-23 | 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 (%) |
|---|---|---|---|---|---|---|
| PD Range | | | % | % | % | % |
| b | c | d | e | f | g | h |
| 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 | - | - | | 100.00% | - |
| Secured by real estate property - Non SME | | | | | | |
| 0.00 to <0.15 | 18,681 | 20 | 0.11% | - | 0.09% | 0.09% |
| *0.00 to <0.10* | *18,664* | *19* | *0.10%* | - | *0.09%* | *0.08%* |
| *0.10 to <0.15* | *17* | *1* | *5.88%* | - | *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 | - | - | 100.00% | 100.00% | - |
| 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 | - | - | 100.00% | 100.00% | - |
| Retail of which SME | | | | | | |
| 0.00 to <0.15 | 129 | - | - | 0.10% | 0.11% | - |
| *0.00 to <0.10* | *49* | - | - | *0.08%* | *0.07%* | - |
| *0.10 to <0.15* | *80* | - | - | *0.10%* | *0.12%* | - |
| 0.15 to <0.25 | 125 | - | - | 0.18% | 0.19% | - |
| 0.25 to <0.50 | 456 | - | - | 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 | - | - | 100.00% | 100.00% | - |
| 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* | - | - | *0.05%* | *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 | - | - | 100.00% | 100.00% | - |

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 2.2% at December 2024 (3.05% December 2023).

**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-24** | **€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** | **32,235** | *32,235* | *0* | **-** | *-* | - | **(5)** | *(5)* | (0.0) | **-** | *-* | *-* | **-** | *-* | - |
| 10 | **Loans and advances** | **83,822** | *72,868* | *10,579* | **1,885** | *11* | *1,770* | **(512)** | *(169)* | *(354)* | **(516)** | *(1)* | *(513)* | **(637)** | *62,456* | *991* |
| 20 | Central banks | 976 | *976* | - | - | - | - | (0.2) | (0.2) | - | - | - | - | - | - | - |
| 30 | General governments | 48 | *38* | *10* | 0 | *0* | *0* | (1) | (0.3) | *(1)* | (0.0) | (0.0) | (0.0) | - | *1* | - |
| 40 | Credit institutions | 810 | *810* | - | - | - | - | (0.2) | (0.2) | - | - | - | - | - | *0* | - |
| 50 | Other financial corporations | 1,014 | *755* | *98* | 1 | *0* | *1* | (4) | *(2)* | *(2)* | (1) | (0.0) | *(1)* | (0.1) | *33* | *0* |
| 60 | Non-financial corporations *of which;* | 26,023 | *18,327* | *7,696* | 915 | *9* | *907* | (376) | *(99)* | *(277)* | (343) | *(1)* | *(342)* | (634) | *10,047* | *229* |
| 70 | *SME* | 14,984 | 11,007 | 3,977 | 537 | 8 | 529 | (229) | *(71)* | *(158)* | (169) | *(1)* | *(169)* | *(150)* | 7,699 | 219 |
| 80 | Households | 54,950 | 51,962 | 2,775 | 969 | 2 | 862 | (131) | *(67)* | *(74)* | (172) | (0.2) | *(171)* | (2) | 52,375 | 762 |
| 90 | **Debt securities** | **9,897** | *9,839* | *0* | **-** | - | - | **(2)** | *(2)* | *()* | **-** | - | - | **-** | - | - |
| 100 | Central banks | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 110 | General governments | 5,082 | *5,082* | - | - | - | - | (1) | *(1)* | - | - | - | - | - | - | - |
| 120 | Credit institutions | 4,198 | *4,198* | - | - | - | - | (1) | *(1)* | - | - | - | - | - | - | - |
| 130 | Other financial corporations | 575 | *560* | *0* | - | - | - | (0.2) | (0.1) | (0.0) | - | - | - | - | - | - |
| 140 | Non-financial corporations | 43 | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 150 | **Off-balance-sheet exposures** | **18,604** | *16,721* | *1,716* | **140** | - | *139* | **75** | *36* | *39* | **5** | - | *5* | | - | - |
| 160 | Central banks | - | - | - | - | - | - | - | - | - | - | - | - | | - | - |
| 170 | General governments | 125 | *100* | *25* | - | - | - | 1 | *0* | *0* | - | - | - | | - | - |
| 180 | Credit institutions | 286 | *286* | - | - | - | - | 0 | *0* | - | - | - | - | | - | - |
| 190 | Other financial corporations | 1,256 | *1,096* | *16* | 0 | - | *0* | 2 | *1* | *0* | 0 | - | *0* | | - | - |
| 200 | Non-financial corporations | 11,201 | *9,547* | *1,630* | 106 | - | *106* | 66 | *29* | *37* | 4 | - | *4* | | - | - |
| 210 | Households | 5,736 | *5,692* | *44* | 34 | - | *34* | 7 | *5* | *1* | 1 | - | *1* | | - | - |
| 220 | **Total** | **144,557** | *131,663* | *12,295* | **2,025** | *11* | *1,910* | **(590)** | *(207)* | *(393)* | **(521)** | *(1)* | *(518)* | **(637)** | *62,456* | *991* |

| | | 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 | | | | | | Accumulated partial write-off | Collateral and financial | |
| | | 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-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* |

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-24** | On demand | <=1 year | >1 year <= 5 years | >5 years | No stated maturity | **Total** |
| 1 Loans and advances | 1,724 | 13,036 | 30,744 | 39,044 | 131 | **84,679** |
| 2 Debt securities | - | 767 | 6,169 | 2,937 | 22 | **9,895** |
| **3 Total** | **1,724** | **13,803** | **36,913** | **41,982** | **152** | **94,574** |

| | 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 |

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 2024 is 2.2% (31 December 2023 3.05%).

**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 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | **Gross carrying amount/nominal amount** | | | | | | | | | | | |
| | | **Performing exposures** | | | **Non-performing exposures** | | | | | | | | |
| | | | *Not past due or past due ≤ 30 days* | *Past due > 30 days ≤ 90 days* | | *Unlikely to pay that are not past due or are past due ≤ 90 days* | *Past due > 90 days ≤ 180 days* | *Past due > 180 days ≤ 1 year* | *Past due > 1 year ≤ 2 years* | *Past due > 2 years ≤ 5 years* | *Past due > 5 years ≤ 7 years* | *Past due > 7 years* | *Of which defaulted* |
| | **Dec-24** | **€m** | **€m** | **€m** | **€m** | **€m** | **€m** | **€m** | **€m** | **€m** | **€m** | **€m** | **€m** |
| 5 | **Cash balances at central banks and other demand deposits** | **32,235** | *32,235* | - | - | - | - | - | - | - | - | - | - |
| 10 | **Loans and advances** | **83,822** | *83,554* | *267* | **1,885** | *1,210* | *161* | *200* | *165* | *75* | *22* | *53* | *1,874* |
| 20 | Central banks | 976 | *976* | - | - | - | - | - | - | - | - | - | - |
| 30 | General governments | 48 | *48* | *0* | 0 | *0* | - | - | - | - | - | - | *0* |
| 40 | Credit institutions | 810 | *810* | - | - | - | - | - | - | - | - | - | - |
| 50 | Other financial corporations | 1,014 | *1,014* | *0* | 1 | *1* | - | *0* | *0* | *0* | *0* | *0* | *1* |
| 60 | Non-financial corporations | 26,023 | *25,927* | *96* | 915 | *752* | *31* | *43* | *42* | *31* | *7* | *10* | *907* |
| | *of which;* | | | | | | | | | | | | |
| 70 | *SME* | *14,984* | *14,893* | *91* | *537* | *397* | *22* | *40* | *38* | *27* | *5* | *8* | *529* |
| 80 | Households | *54,950* | *54,779* | *172* | 969 | *457* | *131* | *157* | *123* | *44* | *15* | *43* | *967* |
| 90 | **Debt securities** | **9,897** | *9,897* | - | - | - | - | - | - | - | - | - | - |
| 100 | Central banks | - | - | - | - | - | - | - | - | - | - | - | - |
| 110 | General governments | *5,082* | *5,082* | - | - | - | - | - | - | - | - | - | - |
| 120 | Credit institutions | *4,198* | *4,198* | - | - | - | - | - | - | - | - | - | - |
| 130 | Other financial corporations | *575* | *575* | - | - | - | - | - | - | - | - | - | - |
| 140 | Non-financial corporations | *43* | *43* | - | - | - | - | - | - | - | - | - | - |
| 150 | **Off-balance-sheet exposures** | **18,604** | | | **140** | | | | | | | | *140* |
| 160 | Central banks | - | | | - | | | | | | | | - |
| 170 | General governments | *125* | | | - | | | | | | | | - |
| 180 | Credit institutions | *286* | | | - | | | | | | | | - |
| 190 | Other financial corporations | *1,256* | | | *0* | | | | | | | | *0* |
| 200 | Non-financial corporations | *11,201* | | | *106* | | | | | | | | *106* |
| 210 | Households | *5,736* | | | *34* | | | | | | | | *34* |
| 220 | **Total** | **144,557** | *125,686* | *267* | **2,025** | *1,210* | *161* | *200* | *165* | *75* | *22* | *53* | *2,014* |

| | | a | b | c | d | e | f | g | h | i | j | k | l |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Gross carrying amount/nominal amount | | | | | | | | | | | |
| | | Performing exposures | | | Non-performing exposures | | | | | | | | |
| | | | *Not past due or past due ≤ 30 days* | *Past due > 30 days ≤ 90 days* | | *Unlikely to pay that are not past due or are past due ≤ 90 days* | *Past due > 90 days ≤ 180 days* | *Past due > 180 days ≤ 1 year* | *Past due > 1 year ≤ 2 years* | *Past due > 2 years ≤ 5 years* | *Past due > 5 years ≤ 7 years* | *Past due > 7 years* | *Of which defaulted* |
| | Dec-23 | €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 | - | - | - | - | - | - | - | - | - | - |
| 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* |

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-24** | Dec-23 |
|---|---|---|---|
| | | a | a |
| | | **Gross carrying amount** | Gross carrying amount |
| | | **€m** | €m |
| 10 | **Initial stock of non-performing loans and advances** | 2,537 | 2,640 |
| 20 | Inflows to non-performing portfolios | 1,034 | 1,620 |
| 30 | Outflows from non-performing portfolios | (1,687) | (1,723) |
| 40 | Outflows due to write-offs | (358) | (575) |
| 50 | Outflow due to other situations | (1,328) | (1,148) |
| 60 | **Final stock of non-performing loans and advances** | **1,885** | 2,537 |

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As per Article 442 point (c), Table 4.15 below presents the gross carrying amount (including accrued interest) of forborne 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 forborne exposures**

| | | a | b | c | d | e | f | g | h |
|---|---|---|---|---|---|---|---|---|---|
| | | **Gross carrying amount/nominal amount of exposures with forbearance measures** | | | | **Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions** | | **Collateral received and financial guarantees received on forborne exposures** | |
| | | | **Non-performing forborne** | | | | | | |
| | | **Performing forborne** | | *Of which defaulted* | *Of which impaired* | **On performing forborne exposures** | **On non-performing forborne exposures** | | *Of which collateral and financial guarantees received on non-performing exposures with forbearance measures* |
| | **Dec-24** | **€m** | **€m** | **€m** | **€m** | **€m** | **€m** | **€m** | **€m** |
| 5 | **Cash balances at central banks and other demand deposits** | **-** | **-** | - | - | **-** | **-** | **-** | **-** |
| 10 | **Loans and advances** | **2,390** | **941** | *938* | *920* | **(105)** | **(299)** | **1,571** | **395** |
| 20 | Central banks | - | - | - | - | - | - | - | - |
| 30 | General governments | - | 0 | *0* | *0* | - | (0.0) | - | - |
| 40 | Credit institutions | - | - | - | - | - | - | - | - |
| 50 | Other financial corporations | 0 | 0 | *0* | *0* | (0.0) | (0.1) | - | - |
| 60 | Non-financial corporations | 2,170 | 645 | *643* | *625* | (102) | (251) | 1,116 | 154 |
| 70 | Households | 219 | 296 | *295* | *295* | (4) | (49) | 454 | 241 |
| 80 | **Debt Securities** | **-** | **-** | - | - | **-** | **-** | **-** | **-** |
| 90 | **Loan commitments given** | **258** | **44** | *44* | *43* | **2** | **2** | **-** | **-** |
| 100 | **Total** | **2,647** | **986** | *981* | *963* | **(108)** | **(301)** | **1,571** | **395** |

| | | 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 forborne exposures | |
| | | | Non-performing forborne | | | | | | |
| | | Performing forborne | | *Of which defaulted* | *Of which impaired* | On performing forborne exposures | On non-performing forborne exposures | | *Of which collateral and financial guarantees received on non-performing exposures with forbearance measures* |
| | Dec-23 | €m | €m | €m | €m | €m | €m | €m | €m |
| 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 |

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 |
|---|---|---|---|---|---|---|---|---|
| | | **Gross carrying/nominal amount** | | | | **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** | | **Of which subject to impairment** | | | |
| | | | | Of which defaulted | | | | |
| | **Dec-24** | **€m** | **€m** | **€m** | **€m** | **€m** | **€m** | **€m** |
| 10 | **On-balance-sheet exposures Total** | **95,604** | | **1,874** | | **(1,030)** | | - |
| 20 | Ireland | 57,696 | | 956 | | (564) | | - |
| 30 | United Kingdom | 26,451 | | 569 | | (220) | | - |
| 70 | Other countries[1] | 11,457 | | 349 | | (246) | | - |
| 80 | **Off-balance-sheet exposures Total** | **18,744** | | **140** | | | **80** | |
| 90 | Ireland | 13,178 | | 68 | | | 46 | |
| 100 | United Kingdom | 3,541 | | 69 | | | 25 | |
| 140 | Other countries[1] | 2,024 | | 3 | | | 9 | |
| 150 | **Total** | **114,348** | | **2,014** | | **(1,030)** | **80** | **-** |

| | | a | b [2] | c | d [2] | e | f | g |
|---|---|---|---|---|---|---|---|---|
| | | Gross carrying/nominal amount | | | | Accumulated impairment | Provisions on off-balance-sheet commitments and financial guarantees | Accumulated negative changes in fair value due to credit risk on non-performing exposures |
| | | | Of which non-performing | | Of which subject to impairment | | | |
| | | | | Of which defaulted | | | | |
| | Dec-23 | €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 | - |

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.

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 |
|---|---|---|---|---|---|---|---|
| | | **Gross carrying amount** | | | | **Accumulated impairment** | **Accumulated negative changes in fair value due to credit risk on non-performing exposures** |
| | | | **Of which non-performing** | | **Of which loans and advances subject to impairment** | | |
| | | | | Of which defaulted | | | |
| | **Dec-24** | **€m** | **€m** | **€m** | **€m** | **€m** | **€m** |
| 10 | Agriculture, forestry and fishing | 1,788 | | 53 | | (40) | - |
| 20 | Mining and quarrying | 119 | | 1 | | (2) | - |
| 30 | Manufacturing | 4,242 | | 218 | | (135) | - |
| 40 | Electricity, gas, steam and air conditioning supply | 521 | | 1 | | (15) | - |
| 50 | Water supply | 97 | | - | | (2) | - |
| 60 | Construction | 349 | | 13 | | (9) | - |
| 70 | Wholesale and retail trade | 2,323 | | 43 | | (43) | - |
| 80 | Transport and storage | 844 | | 71 | | (40) | - |
| 90 | Accommodation and food service activities | 1,581 | | 23 | | (22) | - |
| 100 | Information and communication | 352 | | 28 | | (20) | - |
| 110 | Financial and insurance activities | 52 | | *0* | | (0.3) | - |
| 120 | Real estate activities | 7,883 | | 311 | | (239) | - |
| 130 | Professional, scientific and technical activities | 747 | | 39 | | (30) | - |
| 140 | Administrative and support service activities | 3,068 | | 56 | | (66) | - |
| 150 | Public administration and defence, compulsory social security | - | | - | | - | - |
| 160 | Education | 402 | | *0* | | (8) | - |
| 170 | Human health services and social work activities | 1,358 | | 24 | | (27) | - |
| 180 | Arts, entertainment and recreation | 336 | | 13 | | (9) | - |
| 190 | Other services | 876 | | 13 | | (11) | - |
| 200 | **Total** | **26,938** | | **907** | | **(719)** | **-** |

| | | a | b [1] | c | d [1] | e | f |
|---|---|---|---|---|---|---|---|
| | | Gross carrying amount | | | | Accumulated impairment | Accumulated negative changes in fair value due to credit risk on non-performing exposures |
| | | | Of which non-performing | | Of which loans and advances subject to impairment | | |
| | | | | Of which defaulted | | | |
| | 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) | - |

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.

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.

**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* | |
| | | | | | | *of which: secured by credit derivatives* |
| | | a | b | c | d | e |
| | **Dec-24** | **€m** | **€m** | *€m* | *€m* | *€m* |
| 1 | Loans and advances | 53,463 | 63,447 | *62,196* | *1,251* | *629* |
| 2 | Debt securities | 9,895 | - | - | - | - |
| 3 | Total exposures | **63,357** | **63,447** | *62,196* | *1,251* | *629* |
| | *Of which;* | | | | | |
| 4 | *non-performing exposures* | 379 | 991 | *956* | *35* | - |
| EU-5 | *defaulted* | 368 | *991* | *956* | *35* | - |

| | | Unsecured carrying amount | Secured - carrying amount | | | |
|---|---|---|---|---|---|---|
| | | | | *of which: secured by collateral* | *of which: secured by financial guarantees* | |
| | | | | | | *of which: secured by credit derivatives* |
| | | a | b | c | d | e |
| | Dec-23 | €m | €m | *€m* | *€m* | *€m* |
| 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* | - |

***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. BoI'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 appliable asset class and BOI's appetite for this risk. BoI 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 BoI 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 2024 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.

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 |
|---|---|---|---|---|---|---|---|---|---|
| **Dec-24** | | **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** |
| EU1 | EU - Original Exposure Method (for derivatives) | - | 0 | | 1.4 | 1 | 1 | 1 | 0 |
| EU2 | EU - Simplified SA-CCR (for derivatives) | - | - | | 1.4 | - | - | - | - |
| 1 | SA-CCR (for derivatives) | 211 | 499 | | 1.4 | 1,918 | 994 | 988 | 616 |
| 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) | | | | | 130 | 123 | 123 | 46 |
| 5 | VaR for SFTs | | | | | - | - | - | - |
| 6 | **Total** | | | | | **2,048** | **1,117** | **1,111** | **662** |

| | | a | b | c | d | e | f | g | h |
|---|---|---|---|---|---|---|---|---|---|
| Dec-23 | | 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 |
| 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 |

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-24 | a | b | c | d | e | f | g | h | i | j | k | l |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Risk Weight | | | | | | | | | | | |
| | **EAD (€m)** | **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 | - | 1 | - | - | 48 | 64 | - | - | - | - | - | 113 |
| 7 | Corporates | - | - | - | - | - | - | - | - | 80 | - | - | 80 |
| 8 | Retail | - | - | - | - | - | - | - | - | - | - | - | - |
| 9 | Institutions and corporates with a short-term credit assessment | - | - | - | - | - | - | - | - | - | - | - | - |
| 10 | Other items | - | - | - | - | - | - | - | - | - | - | - | - |
| 11 | **Total** | **-** | **1** | **-** | **-** | **48** | **64** | **-** | **-** | **80** | **-** | **-** | **193** |

| | Dec-23 | a | b | c | d | e | f | g | h | i | j | k | l |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Risk Weight | | | | | | | | | | | |
| | EAD (€m) | 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 |

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 |
|---|---|---|---|---|---|---|---|---|
| | **Dec-24**<br>**PD Scale** | **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 %** |
| | **Total FIRB** | | | | | | | |
| 1 | 0.00 to 0.15 | 479 | 0.05% | 52 | 45.00% | 2.5 | 132 | 27.62% |
| 2 | 0.15 to <0.25 | 66 | 0.21% | 22 | 45.00% | 2.5 | 33 | 49.41% |
| 3 | 0.25 to <0.50 | 77 | 0.35% | 37 | 45.00% | 2.5 | 41 | 53.70% |
| 4 | 0.50 to <0.75 | 60 | 0.59% | 33 | 45.00% | 2.5 | 47 | 78.65% |
| 5 | 0.75 to <2.50 | 102 | 1.27% | 77 | 45.00% | 2.5 | 104 | 102.08% |
| 6 | 2.50 to <10.00 | 123 | 3.87% | 41 | 45.00% | 2.5 | 179 | 145.42% |
| 7 | 10.00 to <100.00 | 8 | 10.62% | 8 | 45.00% | 2.5 | 17 | 206.38% |
| 8 | 100.00 (Default) | 4 | 100.00% | 6 | 45.00% | 2.5 | - | - |
| | **Total foundation IRB** | **918** | **1.17%** | **276** | **45.00%** | **2.5** | **553** | **60.24%** |
| | **Institutions** | | | | | | | |
| 1 | 0.00 to 0.15 | 456 | 0.05% | 34 | 45.00% | 2.5 | 125 | 27.54% |
| 2 | 0.15 to <0.25 | 9 | 0.20% | 1 | 45.00% | 2.5 | 5 | 62.50% |
| 3 | 0.25 to <0.50 | 10 | 0.36% | 1 | 45.00% | 2.5 | 4 | 39.85% |
| 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** | **474** | **0.06%** | **36** | **45.00%** | **2.5** | **135** | **28.44%** |
| | **Corporates**<br>**of which SME** | | | | | | | |
| 1 | 0.00 to 0.15 | 0 | 0.10% | 5 | 45.00% | 2.5 | 0 | 23.24% |
| 2 | 0.15 to <0.25 | 1 | 0.17% | 5 | 45.00% | 2.5 | 0 | 30.82% |
| 3 | 0.25 to <0.50 | 28 | 0.36% | 6 | 45.00% | 2.5 | 13 | 46.19% |
| 4 | 0.50 to <0.75 | 2 | 0.58% | 10 | 45.00% | 2.5 | 1 | 53.02% |
| 5 | 0.75 to <2.50 | 11 | 1.52% | 32 | 45.00% | 2.5 | 9 | 82.85% |
| 6 | 2.50 to <10.00 | 1 | 3.10% | 13 | 45.00% | 2.5 | 1 | 94.54% |
| 7 | 10.00 to <100.00 | 0 | 18.81% | 5 | 45.00% | 2.5 | 1 | 183.08% |
| 8 | 100.00 (Default) | 0 | 100.00% | 4 | 45.00% | 2.5 | - | - |
| | **Total Corporates of which SME** | **43** | **1.10%** | **80** | **45.00%** | **2.5** | **24** | **56.46%** |
| | **Corporates**<br>**of which specialised lending** | | | | | | | |
| 1 | 0.00 to 0.15 | - | - | - | - | - | - | - |
| 2 | 0.15 to <0.25 | 9 | 0.17% | 1 | 45.00% | 2.5 | 4 | 42.55% |
| 3 | 0.25 to <0.50 | 8 | 0.35% | 3 | 45.00% | 2.5 | 5 | 62.29% |
| 4 | 0.50 to <0.75 | 35 | 0.60% | 10 | 45.00% | 2.5 | 28 | 79.98% |
| 5 | 0.75 to <2.50 | 23 | 1.23% | 12 | 45.00% | 2.5 | 24 | 104.95% |
| 6 | 2.50 to <10.00 | 55 | 3.20% | 3 | 45.00% | 2.5 | 76 | 138.16% |
| 7 | 10.00 to <100.00 | 0 | 10.00% | 1 | 45.00% | 2.5 | 1 | 204.67% |
| 8 | 100.00 (Default) | 3 | 100.00% | 1 | 45.00% | 2.5 | - | - |
| | **Total corporates of which specialised lending** | **134** | **4.29%** | **31** | **45.00%** | **2.5** | **138** | **102.73%** |
| | **Corporates**<br>**of which other** | | | | | | | |
| 1 | 0.00 to 0.15 | 23 | 0.09% | 13 | 45.00% | 2.5 | 7 | 29.25% |
| 2 | 0.15 to <0.25 | 47 | 0.22% | 15 | 45.00% | 2.5 | 23 | 48.85% |
| 3 | 0.25 to <0.50 | 30 | 0.35% | 27 | 45.00% | 0.5 | 19 | 62.88% |
| 4 | 0.50 to <0.75 | 22 | 0.57% | 13 | 45.00% | 2.5 | 18 | 78.96% |
| 5 | 0.75 to <2.50 | 68 | 1.25% | 33 | 45.00% | 2.5 | 71 | 104.13% |
| 6 | 2.50 to <10.00 | 67 | 4.42% | 25 | 45.00% | 2.5 | 102 | 151.77% |
| 7 | 10.00 to <100.00 | 8 | 0 | 2 | 45.00% | 2.5 | 16 | 207.29% |
| 8 | 100.00 (Default) | 0 | 100.00% | 1 | 45.00% | 2.5 | - | - |
| | **Total corporates of which other** | **267** | **1.47%** | **129** | **45.00%** | **1.5** | **256** | **96.05%** |

| | Dec-23<br>PD Range | a<br>Exposure Value<br>€m | b<br>Exposure weighted average PD<br>% | c<br>Number of obligors | d<br>Exposure weighted average LGD<br>% | e<br>Exposure weighted average maturity (years) | f<br>RWEA<br>€m | g<br>Density of risk weighted exposure amounts<br>% |
|---|---|---|---|---|---|---|---|---|
| | 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 | 0 | 0.00% | 0 | 0.00% | 0.0 | 1 | 0.00% |
| 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<br>of which SME | | | | | | | |
| 1 | 0.00 to 0.15 | - | 0.07% | 4 | 45.00% | 3.0 | 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% | 3.0 | - | - |
| | Total Corporates of which SME | 27 | 1.27% | 107 | 45.00% | 2.5 | 16 | 58.00% |
| | | | | | | | | |
| | Corporates<br>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<br>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 | - | 10.00% | 1 | 45.00% | 3.0 | - | 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% |

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** | **RWEA** |
| | **Dec-24** | **€m** | **€m** |
| 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 | 548 | 161 |
| EU4 | Based on the original exposure method | - | - |
| **5** | **Total subject to the CVA capital charge** | **548** | **161** |

| | | Exposure value | RWEA |
|---|---|---|---|
| | Dec-23 | €m | €m |
| 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 |

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**

| | a | b | c | d | e | f | g | h |
|---|---|---|---|---|---|---|---|---|
| | **Collateral used in derivative transactions** | | | | **Collateral used in SFTS** | | | |
| | **Fair value of collateral received** | | **Fair value of posted collateral** | | **Fair value of collateral received** | | **Fair value of posted collateral** | |
| | **Segregated** | **Unsegregated** | **Segregated** | **Unsegregated** | **Segregated** | **Unsegregated** | **Segregated** | **Unsegregated** |
| **Dec-24** | **€m** | **€m** | **€m** | **€m** | **€m** | **€m** | **€m** | **€m** |
| 1 Cash – domestic currency | 88 | 61 | 12 | 168 | - | - | - | - |
| 2 Cash – other currencies | 6 | 5 | 145 | 216 | - | - | - | - |
| 3 Domestic sovereign debt | - | - | - | - | - | 6 | - | - |
| 4 Other sovereign debt | - | - | - | 690 | - | - | - | - |
| 5 Government agency debt | - | - | - | - | - | - | - | - |
| 6 Corporate bonds | - | - | - | - | - | - | - | - |
| 7 Equity securities | - | - | - | - | - | - | - | - |
| 8 Other collateral | - | - | - | - | - | - | - | - |
| 9 **Total** | 94 | 66 | 157 | 1,074 | - | 6 | - | - |

| | a | b | c | d | e | f | g | h |
|---|---|---|---|---|---|---|---|---|
| | Collateral used in derivative transactions | | | | Collateral used in SFTS | | | |
| | Fair value of collateral received | | Fair value of posted collateral | | Fair value of collateral received | | Fair value of posted collateral | |
| | Segregated | Unsegregated | Segregated | Unsegregated | Segregated | Unsegregated | Segregated | Unsegregated |
| Dec-23 | €m | €m | €m | €m | €m | €m | €m | €m |
| 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[1] | - | - | - | 803 | - | - | - | - |
| 5 Government agency debt | - | - | - | - | - | - | - | - |
| 6 Corporate bonds | - | - | - | - | - | - | - | - |
| 7 Equity securities | - | - | - | - | - | - | - | - |
| 8 Other collateral | - | - | - | - | - | - | - | - |
| 9 Total | 172 | 250 | 282 | 936 | - | 56 | - | 70 |

[1] Row analysis amended from previously published.

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-24 | | Dec-23 | |
|---|---|---|---|---|---|
| | | 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-24 | | Dec-23 | |
|---|---|---|---|---|---|
| | | a | b | a | b |
| | | Exposure Value | RWEA | Exposure Value | RWEA |
| | | €m | €m | €m | €m |
| 1 | **Exposure to QCCPs (total)** | | **28** | | 28 |
| 2 | Exposures for trades at QCCPs (excluding initial margin and default fund contributions) of which; | 448 | 9 | 551 | 12 |
| 3 | *(i) OTC derivatives* | *447* | *9* | *525* | *11* |
| 4 | *(ii) Exchange-traded derivatives* | *1* | *0* | *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 | 966 | 19 | 803 | 16 |
| 9 | Prefunded default fund contributions | - | - | 5 | 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 | - | - | - | - |

**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 and Luna (the Group's retained securitisation) securitisations. These do not qualify for derecognition under Pillar 1 and the exposures securitised under this structure are included in the credit risk tables in this document. These securitisations are 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. €483m 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 and Luna Securities transactions 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 €483m 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 2024, 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; Bowbell No.3 plc; Temple Quay No.1 plc; Luna Securities DAC.
(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.3 DAC; Bowbell No.3 plc; Temple Quay No.1 plc; Jamestown Residential 2024-1 DAC.
(iv) SSPEs included in the institutions' regulatory scope of consolidation[1]; Bowbell No.3 plc; Mespil Securities DAC No. 2 ; Vale Securities Finance DAC; Vale Securities Finance DAC No. 2 ; Glen Securities Finance DAC; Mespil Securities No.3 DAC; Luna Securities 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.

In the case of SEs, in considering whether it controls the investee, the Group applies judgement around whether it has the ability to direct the relevant activities, has exposure or rights to variable returns from its involvement with the investee and has the ability to use its power to affect the amount of its returns.

Where the group acts as an Originator, all financial assets continue to be held on the Group balance sheet and a liability recognised for the proceeds of the funding transaction, unless:
• the rights to the cash flows have expired or been transferred;
• substantially all the risks and rewards associated with the financial instruments have been transferred outside the Group, in which case the assets are derecognised in full; or
• a significant portion, but not all, of the risks and rewards have been transferred outside the Group. In this case the asset is derecognised entirely if the transferee has the ability to sell the financial asset. Otherwise the asset continues to be recognised only to the extent of the Group's continuing involvement.
Where 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 2024.

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

| | a | b | c | d | e | f | g | h | i | j | k | l | m | n | o |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | **Institution acts as originator** | | | | | | | **Institution acts as sponsor** | | | | **Institution acts as investor** | | | |
| | **Traditional** | | | | **Synthetic** | | | **Traditional** | | | | **Traditional** | | | |
| | **STS** | | **Non-STS** | | | | | | | | | | | | |
| **Dec-24** | | *of which SRT* | | *of which SRT* | | *of which SRT* | **Sub-total** | **STS** | **Non-STS** | **Synthetic** | **Sub-total** | **STS** | **Non-STS** | **Synthetic** | **Sub-total** |
| 1 **Total exposures** | **-** | **-** | **20** | **20** | **4,626** | **4,626** | **4,646** | **-** | **-** | **-** | **-** | **900** | **138** | **-** | **1,038** |
| 2 Retail (total) | - | - | 20 | 20 | 688 | 688 | 708 | - | - | - | - | 900 | 115 | - | 1,015 |
| of which: | | | | | | | | | | | | | | | |
| 3 residential mortgage | - | - | 20 | 20 | 688 | 688 | 708 | - | - | - | - | 900 | 115 | - | 1,015 |
| 4 credit card | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 5 other retail exposures | - | - | - | - | - | - | - | - | - | - | - | - | 0 | - | 0 |
| 6 re-securitisation | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 7 Wholesale (total) | - | - | - | - | 3,938 | 3,938 | 3,938 | - | - | - | - | - | 22 | - | 22 |
| of which: | | | | | | | | | | | | | | | |
| 8 loans to corporates | - | - | - | - | 3,938 | 3,938 | 3,938 | - | - | - | - | - | - | - | - |
| 9 commercial mortgage | - | - | - | - | - | - | - | - | - | - | - | - | 22 | - | 22 |
| 10 lease and receivables | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 11 other wholesale | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 12 re-securitisation | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |

| | a | b | c | d | e | f | g | h | i | j | k | l | m | n | o |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Institution acts as originator | | | | | | | Institution acts as sponsor | | | | Institution acts as investor | | | |
| | Traditional | | | | Synthetic | | | Traditional | | | | Traditional | | | |
| | STS | | Non-STS | | | | | | | | | | | | |
| Dec-23 | | *of which SRT* | | *of which SRT* | | *of which SRT* | Sub-total | STS | Non-STS | Synthetic | Sub-total | STS | Non-STS | Synthetic | Sub-total |
| 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 | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |

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 | b | c | d | e | f | g | h | i | j | k | l | m | n | o | EU-p | EU-q |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | **Exposure values (by RW bands/deductions)** | | | | | **Exposure values (by regulatory approach)** | | | | **RWEA (by regulatory approach)** | | | | **Capital charge after cap** | | | |
| **Dec-24** | | **≤20% RW** | **>20% to 50% RW** | **>50% to 100% RW** | **>100% to <1250% RW** | **1250% RW/ deductions** | **SEC-IRBA** | **SEC-ERBA (including IAA)** | **SEC-SA** | **1250% RW/ deductions** | **SEC-IRBA** | **SEC-ERBA (including IAA)** | **SEC-SA** | **1250% RW** | **SEC-IRBA** | **SEC-ERBA (including IAA)** | **SEC-SA** | **1250% RW** |
| 1 | **Total exposures** | **2,129** | **1,140** | **1,357** | **-** | **21** | **4,625** | **-** | **-** | **21** | **1,707** | **-** | **-** | **-** | **137** | **-** | **-** | **-** |
| 2 | Traditional securitisation | - | - | - | - | 20 | - | - | - | 20 | - | - | - | - | - | - | - | - |
| 3 | Securitisation | - | - | - | - | 20 | - | - | - | 20 | - | - | - | - | - | - | - | - |
| 4 | Retail underlying | - | - | - | - | 20 | - | - | - | 20 | - | - | - | - | - | - | - | - |
| 5 | of which STS | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 6 | Wholesale | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 7 | of which STS | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 8 | Re-securitisation | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 9 | Synthetic securitisation | 2,129 | 1,140 | 1,357 | - | 1 | 4,625 | - | - | 1 | 1,707 | - | - | - | 137 | - | - | - |
| 10 | Securitisation | 2,129 | 1,140 | 1,357 | - | 1 | 4,625 | - | - | 1 | 1,707 | - | - | - | 137 | - | - | - |
| 11 | Retail underlying | 688 | - | - | - | - | 687 | - | - | - | 127 | - | - | - | 10 | - | - | - |
| 12 | Wholesale | 1,440 | 1,140 | 1,357 | - | 1 | 3,938 | - | - | 1 | 1,580 | - | - | - | 126 | - | - | - |
| 13 | Re-securitisation | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |

| | | a | b | c | d | e | f | g | h | i | j | k | l | m | n | o | EU-p | EU-q |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Exposure values (by RW bands/deductions) | | | | | Exposure values (by regulatory approach) | | | | RWEA (by regulatory approach) | | | | Capital charge after cap | | | |
| Dec-23 [1] | | ≤20% RW | >20% to 50% RW | >50% to 100% RW | >100% to <1250% RW | 1250% RW/ deductions | SEC-IRBA | SEC-ERBA (including IAA) | SEC-SA | 1250% RW/ deductions | SEC-IRBA | SEC-ERBA (including IAA) | SEC-SA | 1250% RW | SEC-IRBA | SEC-ERBA (including IAA) | SEC-SA | 1250% RW |
| 1 | Total exposures | 2,558 | 2,470 | - | - | 41 | 5,028 | - | - | 41 | 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 | 2,558 | 2,470 | - | - | 6 | 5,028 | - | - | 6 | 1,499 | - | - | - | 120 | - | - | - |
| 10 | Securitisation | 2,558 | 2,470 | - | - | 6 | 5,028 | - | - | 6 | 1,499 | - | - | - | 120 | - | - | - |
| 11 | Retail underlying | 795 | - | - | - | - | 795 | - | - | - | 143 | - | - | - | 11 | - | - | - |
| 12 | Wholesale | 1,763 | 2,470 | - | - | 6 | 4,233 | - | - | 6 | 1,356 | - | - | - | 109 | - | - | - |
| 13 | Re-securitisation | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |

1 December 2023, row analysis amended from previously published.

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 December 2024.

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

| | | a | b | c | d | e | f | g | h | i | j | k | l | m | n | o | EU-p | EU-q |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | **Exposure values (by RW bands/deductions)** | | | | | **Exposure values (by regulatory approach)** | | | | **RWEA (by regulatory approach)** | | | | **Capital charge after cap** | | | |
| **Dec-24** | | **≤20% RW** | **>20% to 50% RW** | **>50% to 100% RW** | **>100% to <1250% RW** | **1250% RW/ deductions** | **SEC-IRBA** | **SEC-ERBA (including IAA)** | **SEC-SA** | **1250% RW/ deductions** | **SEC-IRBA** | **SEC-ERBA (including IAA)** | **SEC-SA** | **1250% RW** | **SEC-IRBA** | **SEC-ERBA (including IAA)** | **SEC-SA** | **1250% RW** |
| 1 | **Total exposures** | **900** | **115** | **0** | **23** | **-** | **-** | **1,038** | **-** | **-** | **-** | **172** | **-** | **-** | **-** | **14** | **-** | **-** |
| 2 | Traditional securitisation | 900 | 115 | 0 | 23 | - | - | 1,038 | - | - | - | 172 | - | - | - | 14 | - | - |
| 3 | Securitisation | 900 | 115 | 0 | 23 | - | - | 1,038 | - | - | - | 172 | - | - | - | 14 | - | - |
| 4 | Retail underlying | 900 | 115 | 0 | 0 | - | - | 1,015 | - | - | - | 118 | - | - | - | 9 | - | - |
| 5 | of which STS | 900 | - | - | - | - | - | 900 | - | - | - | 90 | - | - | - | 7 | - | - |
| 6 | Wholesale | - | - | - | 22 | - | - | 22 | - | - | - | 54 | - | - | - | 4 | - | - |
| 7 | of which STS | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 8 | Re-securitisation | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 9 | Synthetic securitisation | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 10 | Securitisation | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 11 | Retail underlying | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 12 | Wholesale | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 13 | Re-securitisation | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |

| | | a | b | c | d | e | f | g | h | i | j | k | l | m | n | o | EU-p | EU-q |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Exposure values (by RW bands/deductions) | | | | | Exposure values (by regulatory approach) | | | | RWEA (by regulatory approach) | | | | Capital charge after cap | | | |
| Dec-23 | | ≤20% RW | >20% to 50% RW | >50% to 100% RW | >100% to <1250% RW | 1250% RW/ deductions | SEC-IRBA | SEC-ERBA (including IAA) | SEC-SA | 1250% RW/ deductions | SEC-IRBA | SEC-ERBA (including IAA) | SEC-SA | 1250% RW | SEC-IRBA | SEC-ERBA (including IAA) | SEC-SA | 1250% RW |
| 1 | Total exposures | 1,000 | - | 16 | 27 | - | - | 1,043 | - | - | - | 182 | - | - | - | 15 | - | - |
| 2 | Traditional securitisation | 1,000 | - | 16 | 27 | - | - | 1,043 | - | - | - | 182 | - | - | - | 15 | - | - |
| 3 | Securitisation | 1,000 | - | 16 | 27 | - | - | 1,043 | - | - | - | 182 | - | - | - | 15 | - | - |
| 4 | Retail underlying | 1,000 | - | 16 | 8 | - | - | 1,023 | - | - | - | 135 | - | - | - | 11 | - | - |
| 5 | of which STS | 900 | - | - | - | - | - | 900 | - | - | - | 90 | - | - | - | 7 | - | - |
| 6 | Wholesale | - | - | - | 20 | - | - | 20 | - | - | - | 47 | - | - | - | 4 | - | - |
| 7 | of which STS | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 8 | Re-securitisation | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 9 | Synthetic securitisation | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 10 | Securitisation | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 11 | Retail underlying | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 12 | Wholesale | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 13 | Re-securitisation | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |

As per Article 449 point (l), Table 6.4 below shows for all exposures (including retained securitisations) 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-24** | | **€m** | **€m** | **€m** |
| **1** | **Total exposures** | **20,129** | **622** | **67** |
| **2** | Retail (total) | 15,022 | 441 | 25 |
| **3** | Residential mortgages | 15,022 | 441 | 25 |
| **4** | Credit card | - | - | - |
| **5** | Other retail exposures | - | - | - |
| **6** | Re-securitisation | - | - | - |
| **7** | Wholesale (total) | 5,108 | 181 | 42 |
| **8** | Loans to corporates | 5,108 | 181 | 42 |
| **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-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 | - | - | - |

**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, Capital & Liquidity Risk (GMCLR) 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. GMCLR 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 are managed by the Group Treasury Execution Desk which handle treasury execution for the Group. These market risks are typically hedged as part of the Group's overall risk management strategy, including the use of external markets where necessary.

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).

**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 2024, Davy Capital Markets held a long position of €3 million (2023: €2 million) in listed equities.

Davy Fixed Income team is responsible for the underwriting, distribution and trading of Irish Sovereign Bonds and Irish Corporate Bonds. At 31 December 2024, Davy Capital Markets held a net long position of €10 million (2023: €34 million net short) in Irish Sovereign and Corporate 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 hedge its non-interest bearing current accounts in a portfolio of swaps with a similar 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.

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) 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.

**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 (SONIA), 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. The credit spread risk sensitivity primarily manifests within the portfolio of bonds purchased as liquid assets and classified as at fair value through other comprehensive income (FVOCI), which are held at fair value on the balance sheet. Movements in the credit spreads can result in adverse impacts on the fair value of these holdings.

At 31 December 2024, the Group held €3.4 billion in securities classified as FVOCI (2023: €4.0 billion). A 1% increase in the average credit spread of the book in 2024 would have reduced its value by €87 million (2023: €134 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 2024, NIAC's bond portfolio had a market value of €1.9 billion (2023: €1.7 billion). At 31 December 2024, 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 €92 million negative, while a 1% tightening would have a positive impact of €108 million (2023: €90 million negative and €104 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 2024, a 1% increase in swap and yield rates would have reduced its excess own funds (own funds less solvency capital requirement (SCR)) by €4 million and reduced its IFRS profit by €36 million (2023: €2 million negative and €47 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 €8.1 billion (2023: €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 2024 would have reduced its IFRS profit by €1 million (2023: €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 2024, the estimated sensitivity of the Group's fully loaded CET1 ratio to a 10% depreciation of sterling and dollar combined against the euro was three 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**

| | | Dec-24 | Dec-23 |
|---|---|---|---|
| | | a | |
| | | RWEAs €m | RWEAs €m |
| | **Outright products** | | |
| 1 | Interest rate risk (general and specific) | 194 | 138 |
| 2 | Equity risk (general and specific) | 10 | 7 |
| 3 | Foreign exchange risk | 142 | 85 |
| 4 | Commodity risk | - | - |
| | **Options** | | |
| 5 | Simplified approach | - | - |
| 6 | Delta-plus method | - | - |
| 7 | Scenario approach | - | - |
| 8 | Securitisation (specific risk) | - | - |
| **9** | **Total** | **346** | **230** |

**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 sheet 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, Capital and Liquidity Risk (GMCLR) as part of Group Risk. GMCLR's primary responsibility is to ensure that the Group does not suffer outcomes outside of Risk Appetite. This involves setting and owning risk policies and standards, and ensuring that standards are reliably adhered to. GMCLR independently review, oversee and monitor the performance of the Group's Balance Sheet under regulatory prescribed (and internal) shock scenarios.

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 quaterly 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 GMCLR.

Basis risk, defined as the spread between swap risk of different tenor and cross-currency basis. Nominal basis exposures are calculated by GMCLR 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 200/250bp shock up / parallel 200/250bp 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 Group's 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 BoI 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 asets and liabilities on the balance sheet. The principal non-interest bearing liabilites 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 3%; (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**

| | | **Dec-24** | | Dec-23 | |
|---|---|---|---|---|---|
| | **Supervisory shock scenarios** | **Changes of the Economic Value of Equity €m** | **Changes of the Net Interest Income €m** | Changes of the Economic Value of Equity €m | Changes of the Net Interest Income €m |
| 1 | Parallel up | (495) | 510 | (550) | 375 |
| 2 | Parallel down | 270 | (575) | 305 | (630) |
| 3 | Steepener | 5 | | 15 | |
| 4 | Flattener | (110) | | (130) | |
| 5 | Short rates up | (260) | | (295) | |
| 6 | Short rates down | 126 | | 150 | |

**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, people, physical security, data, model, financial and regulatory reporting, legal (a component being litigation and regulatory proceedings), 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, data, and financial and regulatory reporting 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.

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 2024 is €6.7 billion (31 December 2023: €5.9 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**

| | | a | b | c | d | e |
|---|---|---|---|---|---|---|
| | **Banking activities** | **Relevant indicator** | | | **Own funds requirements** | **Risk Exposure amount** |
| | | **Year-3** | **Year-2** | **Year-1** | | |
| | **Dec-24** | **€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** | **3,260** | **4,231** | **4,246** | **533** | **6,662** |
| 3 | Subject to TSA: | 3,260 | 4,231 | 4,246 | | |
| 4 | Subject to ASA: | - | - | - | | |
| 5 | **Banking activities subject to advanced measurement approaches AMA** | **-** | **-** | **-** | **-** | **-** |

| | | a | b | c | d | e |
|---|---|---|---|---|---|---|
| | Banking activities | Relevant indicator | | | Own funds requirements | Risk Exposure amount |
| | | 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 | - | - | - | - | - |

**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 2024 and at 31 December 2024 maintained a buffer significantly in excess of regulatory liquidity requirements.

BoI (UK) plc is authorised by the PRA and is subject to the regulatory liquidity regime of the PRA. BoI (UK) plc has remained in full compliance with the regulatory liquidity regime in the UK throughout 2024 and at 31 December 2024 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 €9,203 million and €16,685 million respectively (2023: €7,692 million and €15,113 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.

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.

Overall Group customer deposit volumes of €103.1 billion are €2.9 billion higher predominantly driven by higher RoI deposits of €1.8 billion and higher UK deposits of €1.1 billion. The Group's LDR at 31 December 2024 was 80% (2023: 80%)..

Customer deposits do not include €0.7 billion (2023: €0.5 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.€1.0 billion of MREL eligible senior debt and down-streamed it to the Bank in 2024 (2023: €2.3 billion).

**Foreign exchange funding mismatch (unaudited)**
The Group's strategy is to originate all new retail lending in the UK through BoI (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 2024, the stock of sterling denominated assets funded by cross currency derivatives was c.£6.7 billion (2023: c. £6.6 billion) of which c.£1.4 billion relates to funding provided to BoI (UK) plc.

**Funding and liquidity position** *(unaudited)*
During 2024, the BoIG plc senior debt ratings assigned by Standard & Poor's (S&P), Moody's, and Fitch remained unchanged at BBB, A3, and BBB+ respectively. The Governor and Company of the Bank of Ireland (GovCo) senior debt ratings from S&P, Moody's, and Fitch also remained unchanged at A, A1, and A- respectively. During the year, S&P and Fitch revised the outlooks on these ratings to Positive (from Stable), while Moody's maintained its Positive outlook throughout 2024.

**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 2024, €7 billion (2023: €9 billion) of the Group's assets and collateral received were encumbered, primarily through these structures.

The Group's overall encumbrance level was 5% (2023: 6%).

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 BoI Group, but excludes non-banking related institutions such as insurance entities.

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.

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.3% 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 ratio derived from deposit funding.

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 sufficient to meet GBP denominated outflows.

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 | b | c | d | e | f | g | h |
|---|---|---|---|---|---|---|---|---|---|
| | | Total unweighted value (average) | | | | Total weighted value (average) | | | |
| **EU 1a** | **Quarter ending 2024** | **Dec-24** | **Sep-24** | **Jun-24** | **Mar-24** | **Dec-24** | **Sep-24** | **Jun-24** | **Mar-24** |
| | | **€m** | **€m** | **€m** | **€m** | **€m** | **€m** | **€m** | **€m** |
| **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) | | | | | 36,994 | 36,442 | 35,952 | 35,945 |
| | **Cash-outflows** | | | | | | | | |
| 2 | Retail deposits and deposits from small business customers | 73,081 | 72,477 | 72,196 | 72,102 | 5,340 | 5,329 | 5,337 | 5,343 |
| | *of which;* | | | | | | | | |
| 3 | *Stable deposits* | *40,807* | *40,776* | *40,911* | *41,105* | *2,040* | *2,039* | *2,046* | *2,055* |
| 4 | *Less stable deposits* | *26,798* | *26,735* | *26,788* | *26,813* | *3,299* | *3,289* | *3,290* | *3,286* |
| 5 | Unsecured wholesale funding | 26,804 | 26,815 | 27,327 | 27,917 | 11,439 | 11,422 | 11,669 | 11,940 |
| 6 | *Operational deposits (all counterparties) and deposits in networks of cooperative banks* | *5,059* | *4,988* | *5,010* | *5,067* | *1,265* | *1,247* | *1,252* | *1,267* |
| 7 | *Non-operational deposits (all counterparties)* | *21,619* | *21,724* | *22,175* | *22,665* | *10,047* | *10,072* | *10,275* | *10,489* |
| 8 | *Unsecured debt* | *127* | *103* | *142* | *184* | *127* | *103* | *142* | *184* |
| 9 | Secured wholesale funding | | | | | 2 | 2 | 1 | 1 |
| 10 | Additional requirements | 10,381 | 10,390 | 10,297 | 10,122 | 1,919 | 1,923 | 1,905 | 1,864 |
| 11 | *Outflows related to derivative exposures and other collateral requirements* | *653* | *654* | *647* | *632* | *653* | *654* | *647* | *632* |
| 12 | *Outflows related to loss of funding on debt products* | *4* | *4* | *9* | *10* | *4* | *4* | *9* | *10* |
| 13 | *Credit and liquidity facilities* | *9,724* | *9,731* | *9,641* | *9,480* | *1,261* | *1,265* | *1,249* | *1,221* |
| 14 | Other contractual funding obligations | 391 | 386 | 376 | 321 | 216 | 210 | 203 | 151 |
| 15 | Other contingent funding obligations | 8,865 | 8,911 | 8,866 | 8,775 | 588 | 583 | 578 | 584 |
| 16 | **Total cash outflows** | | | | | **19,504** | **19,469** | **19,693** | **19,883** |
| | **Cash-inflows** | | | | | | | | |
| 17 | Secured lending (e.g. reverse repos) | 79 | 92 | 94 | 86 | - | - | - | - |
| 18 | Inflows from fully performing exposures | 914 | 895 | 870 | 843 | 614 | 606 | 589 | 578 |
| 19 | Other cash inflows | 1,179 | 1,139 | 1,155 | 1,229 | 451 | 420 | 425 | 494 |
| EU-19a | (Difference between total weighted inflows and total weighted outflows arising from transactions in third countries where there are transfer restrictions or which are denominated in non-convertible currencies) | | | | | - | - | - | - |
| EU-19b | (Excess inflows from a related specialised credit institution) | | | | | - | - | - | - |
| 20 | **Total cash inflows** | **2,172** | **2,126** | **2,119** | **2,159** | **1,065** | **1,026** | **1,014** | **1,073** |
| EU-20a | Fully exempt inflows | - | - | - | - | - | - | - | - |
| EU-20b | Inflows Subject to 90% Cap | - | - | - | - | - | - | - | - |
| EU-20c | Inflows Subject to 75% Cap | 2,172 | 2,126 | 2,119 | 2,159 | 1,065 | 1,026 | 1,014 | 1,073 |
| 21 | **Liquidity buffer** | | | | | **36,994** | **36,442** | **35,952** | **35,945** |
| 22 | **Total net cash outflows** | | | | | **18,439** | **18,443** | **18,679** | **18,811** |
| 23 | **Liquidity coverage ratio (%)** | | | | | **201%** | **198%** | **193%** | **191%** |

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**

| | a | b | c | d | e |
|---|---|---|---|---|---|
| | Unweighted value by residual maturity | | | | Weighted value |
| | No maturity | < 6 months | 6 months to < 1yr | >= 1 yr | |
| **Dec-24** | **€m** | **€m** | **€m** | **€m** | **€m** |
| **Available stable funding (ASF) Items** | | | | | |
| 1 **Capital items and instruments** | **12,546** | **169** | **300** | **1,853** | **14,549** |
| 2 Own funds | 12,546 | 169 | 300 | 1,853 | 14,549 |
| 3 *Other capital instruments* | | - | - | - | - |
| 4 ***Retail deposits*** | | **70,558** | **1,728** | **2,031** | **69,254** |
| 5 Stable deposits | | 42,347 | 971 | 1,069 | 42,222 |
| 6 *Less stable deposits* | | 28,211 | 757 | 962 | 27,033 |
| 7 ***Wholesale funding:*** | | **31,637** | **1,436** | **7,342** | **20,603** |
| 8 *Operational deposits* | | 5,637 | - | - | 2,818 |
| 9 Other wholesale funding | | 26,001 | 1,436 | 7,342 | 17,784 |
| 10 **Interdependent liabilities** | | **-** | **-** | **-** | **-** |
| 11 **Other liabilities:** | **0** | **2,862** | **-** | **349** | **349** |
| 12 *NSFR derivative liabilities* | 0 | | | | |
| 13 *All other liabilities and capital instruments not included in the above categories* | | 2,862 | - | 349 | 349 |
| 14 **Total available stable funding (ASF)** | | | | | **104,755** |
| **Required stable funding (RSF) Items** | | | | | |
| 15 **Total high-quality liquid assets (HQLA)** | | | | | **499** |
| EU-15a **Assets encumbered for a residual maturity of one year or more in a cover pool** | | **15** | **17** | **795** | **703** |
| 16 **Deposits held at other financial institutions for operational purposes** | | **-** | **-** | **-** | **-** |
| 17 **Performing loans and securities:** | | **3,783** | **5,086** | **72,634** | **57,299** |
| 18 Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut | | 6 | - | - | - |
| 19 Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions | | 304 | 123 | 473 | 565 |
| 20 Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which: | | 2,522 | 3,925 | 24,512 | 24,059 |
| 21 With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk | | - | - | - | - |
| 22 Performing residential mortgages, of which: | | 875 | 976 | 46,695 | 31,774 |
| 23 With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk | | 854 | 953 | 45,572 | 30,792 |
| 24 Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products | | 76 | 61 | 954 | 901 |
| 25 **Interdependent assets** | | **-** | **-** | **-** | **-** |
| 26 **Other assets:** | **-** | **1,653** | **-** | **6,678** | **7,828** |
| 27 Physical traded commodities | | | | - | - |
| 28 Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs | | - | - | - | 578 |
| 29 NSFR derivative assets | | - | | | - |
| 30 NSFR derivative liabilities before deduction of variation margin posted | | 565 | | | 28 |
| 31 All other assets not included in the above categories | | 1,088 | - | 6,678 | 7,222 |
| 32 **Off-balance sheet items** | | **18,538** | **-** | **17** | **1,263** |
| 33 **Total RSF** | | | | | **67,592** |
| 34 **Net Stable Funding Ratio (%)** | | | | | **154.98%** |

| | a | b | c | d | e |
|---|---|---|---|---|---|
| | Unweighted value by residual maturity | | | | Weighted value |
| | No maturity | < 6 months | 6 months to < 1yr | >= 1 yr | |
| Dec-23 | €m | €m | €m | €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 |
| 18 Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut | | 4 | - | - | - |
| 19 Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions | | 306 | 93 | 557 | 634 |
| 20 Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which: | | 2,820 | 3,806 | 24,151 | 23,841 |
| 21 With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk | | - | - | - | - |
| 22 Performing residential mortgages, of which: | | 860 | 860 | 42,532 | 29,459 |
| 23 With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk | | 849 | 849 | 41,974 | 28,962 |
| 24 Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products | | 20 | 4 | 1,039 | 911 |
| 25 Interdependent assets | | - | - | - | - |
| 26 Other assets: | - | 1,765 | - | 6,455 | 7,728 |
| 27 Physical traded commodities | | | | - | - |
| 28 Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs | | - | - | - | 681 |
| 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% |

## Encumbered and unencumbered assets



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-24** | **€m** | €m | **€m** | €m | **€m** | €m | **€m** | €m |
| 10 **Assets** | 8,437 | *955* | | | 127,053 | *8,085* | | |
| 30 Equity instruments | - | - | - | - | 101 | - | *101* | - |
| 40 Debt securities | 962 | *955* | 962 | *955* | 9,101 | *8,085* | 9,117 | *8,101* |
| *of which:* | | | | | | | | |
| 50 *covered bonds* | 90 | *90* | 90 | *90* | 2,688 | *2,688* | 2,689 | *2,689* |
| 60 *securitisations* | - | - | - | - | *569* | *479* | *571* | *481* |
| 70 *issued by general governments* | *688* | *682* | *688* | *682* | *4,759* | *4,643* | *4,779* | *4,658* |
| 80 *issued by financial corporations* | *274* | *273* | *274* | *273* | *4,326* | *3,328* | *4,328* | *3,331* |
| 90 *issued by non-financial corporations* | - | - | - | - | *22* | - | *22* | - |
| 120 Other assets | *7,494* | - | | | *117,873* | - | | |

| | 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 | - | | |

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**

| | | | | Unencumbered | |
|---|---|---|---|---|---|
| | | **Fair value of encumbered collateral received or own debt securities issued** | *of which notionally eligible EHQLA and HQLA* | **Fair value of collateral received or own debt securities issued available for encumbrance** | *of which EHQLA and HQLA* |
| | | 010 | 030 | 040 | 060 |
| | **Dec-24** | €m | *€m* | €m | *€m* |
| **130** | **Collateral received** | **-** | **-** | **101** | **101** |
| 140 | Loans on demand | - | - | - | - |
| 150 | Equity instruments | - | - | - | - |
| 160 | Debt Securities | - | - | 101 | *101* |
| | *of which:* | | | | |
| 170 | *covered bonds* | - | - | - | - |
| 180 | *securitisations* | - | - | - | - |
| 190 | *issued by general governments* | - | - | *101* | *101* |
| 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** | | | **582** | **-** |
| **250** | **Total collateral received and own debt securities issued** | **8,437** | ***955*** | | |

| | | | | Unencumbered | |
|---|---|---|---|---|---|
| | | Fair value of encumbered collateral received or own debt securities issued | *of which notionally eligible EHQLA and HQLA* | Fair value of collateral received or own debt securities issued available for encumbrance | *of which EHQLA and HQLA* |
| | Dec-23 | €m | *€m* | €m | *€m* |
| 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* | | |

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** |
|---|---|---|---|
| | | 10 | 30 |
| | **Dec-24** | **€m** | **€m** |
| 10 | Carrying amount of selected financial liabilities | 5,053 | 6,597 |

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

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 2024, €6.8bn of the Group's assets and collateral received were encumbered, primarily through these structures within GovCo, BOIMB and BOIUK Plc.

Covered bonds are issued through the Group's 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 Group manages liquidity by jurisdiction and monitors asset encumbrance by jurisdiction. At 31 December 2024, €3.3bn of encumbered assets are denominated in GBP, with associated liabilities of €2.7bn, primarily related to drawings under the Bank of England (BOE) Term Funding Scheme and Notes in circulation.

At 31 December 2024, the Group has €129.5bn of unencumbered assets. Included in this amount are assets of €7.2bn 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 2024, the Group has €1.0bn of assets securing retained covered bonds. Of these assets, €0.6bn are encumbered.

The leverage ratio measures the level of Tier 1 capital against both on and off balance sheet exposures. As at 31 December 2024, the leverage ratio was 6.66% on a regulatory basis (31 December 2023: 6.42%).

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 2024 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.

As per Article 451(1) point (b), Table 10.1 below provides a reconciliation of the total assets in BOIG published financial statements under IFRS and the total leverage exposure.

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

| | | Dec-24 | Dec-23 |
|---|---|---|---|
| | | **Applicable amount** | Applicable amount |
| | | a | a |
| | | **€m** | €m |
| **1** | **Total assets as per published financial statements** | **161,813** | 155,708 |
| 2 | Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation | (25,515) | (22,474) |
| 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 | (1,969) | (2,958) |
| 9 | Adjustment for securities financing transactions (SFTs) | 1 | - |
| 10 | Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures) | 5,358 | 6,340 |
| 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 | (2,675) | (2,424) |
| **13** | **Total exposure measure** | **137,013** | 134,192 |

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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-24 | Dec-23 |
|---|---|---|---|
| | | 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) | 133,070 | 129,214 |
| 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) | (442) | (350) |
| 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) | (2,605) | (2,420) |
| **7** | **Total on-balance sheet exposures (excluding derivatives and SFTs)** | **130,024** | 126,444 |
| **Derivative exposures** | | | |
| 8 | Replacement cost associated with SA-CCR derivatives transactions (ie net of eligible cash variation margin) | 561 | 409 |
| 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 | 950 | 986 |
| EU-9a | Derogation for derivatives: Potential future exposure contribution under the simplified standardised approach | - | - |
| EU-9b | Exposure determined under Original Exposure Method | 1 | 5 |
| 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** | **1,512** | 1,400 |
| **Securities financing transaction exposures** | | | |
| 14 | Gross SFT assets (with no recognition of netting), after adjustment for sales accounting transactions | 119 | 8 |
| 15 | (Netted amounts of cash payables and cash receivables of gross SFT assets) | - | - |
| 16 | Counterparty credit risk exposure for SFT assets | 1 | - |
| 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** | **119** | 8 |
| **Other off-balance sheet exposures** | | | |
| 19 | Off-balance sheet exposures at gross notional amount | 18,639 | 19,039 |
| 20 | (Adjustments for conversion to credit equivalent amounts) | (13,281) | (12,699) |
| 21 | (General provisions deducted in determining Tier 1 capital and specific provisions associated associated with off-balance sheet exposures) | - | - |
| **22** | **Off-balance sheet exposures** | **5,358** | 6,340 |
| **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 | **9,124** | 8,611 |
| 24 | Total exposure measure | **137,013** | 134,192 |
| **Leverage ratio** | | | |
| **25** | **Leverage ratio** | **6.66%** | 6.42% |
| EU-25 | Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%) | 6.66% | 6.42% |
| 25a | Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) (%) | 6.66% | 6.42% |
| 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 | 98 | 15 |
| 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 | 119 | 8 |
| 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) | 136,992 | 134,199 |
| 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) | 136,992 | 134,199 |
| 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) | 6.66% | 6.42% |
| 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) | 6.66% | 6.42% |

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)**

| | | **Dec-24** | Dec-23 |
|---|---|---|---|
| | | a | a |
| | | **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:** | **132,628** | 128,864 |
| EU-2 | Trading book exposures | 176 | 81 |
| EU-3 | Banking book exposures | 132,452 | 128,783 |
| EU-4 | *Covered bonds* | *2,792* | *2,564* |
| EU-5 | *Exposures treated as sovereigns* | *39,387* | *39,108* |
| EU-6 | *Exposures to regional governments, MDB, international organisations and PSE not treated as sovereigns* | - | - |
| EU-7 | *Institutions* | *937* | *1,104* |
| EU-8 | *Secured by mortgages of immovable properties* | *48,468* | *45,036* |
| EU-9 | *Retail exposures* | *7,038* | *7,898* |
| EU-10 | *Corporate* | *19,650* | *18,750* |
| EU-11 | *Exposures in default* | *1,098* | *1,615* |
| EU-12 | *Other exposures (e.g. equity, securitisations, and other non-credit obligation assets)* | *13,081* | *12,708* |

**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 8 meetings in 2024.

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 were formally appointed by the GRC as its remuneration advisor in 2020 following a review of potential advisors and reappointed for a further 3 year period in June 2024.

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-approved Controlled Function role holders and Key functio holders are identified as MRTs as well as a number of senior staff whose quantum of 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 with market norms, acknowledging constraints of the Remuneration Restrictions. The following principles are applied:

**Employee focused**

The Group's Reward approach supports and complements the Group's Employee Value Proposition, which includes, learning, development and career progression. 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.

**Motivating**

Colleagues are motivated to deliver in the best interest of Customers, Colleagues, Community and wider Group stakeholders, with variable pay aligned to shareholder experience.

**Simple, Flexible & Cost Effective**

Reward is simple to operate and aims to be transparent and easy for colleagues to understand their own reward package and how reward is determined, Reward (fixed and variable) at BOI is cost effective and flex's to reflect company performance.

**Collective Incentive**

Supports the Group Value of Better Together, with variable pay acting as an incentivisation tool for achieving BOI strategic priorities with the ability to tailor to individual contribution.

**Values & Culture**

Supports the Group Values and aims to be a fair approach for all colleagues to enable participation in Group success. Risk review and minimum performance (and therefore conduct) gateways align to these aspects of BOI values

**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.

**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.

**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 simple combination of "What" objectives and "How" behaviours, inform individual remuneration and provide a clear link between performance and remuneration.

**ESG aligned**

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

**Risk aligned**

The Remuneration 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 Performance 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 Governance, including review of Group Remuneration Policy**

The GRC most recently reviewed and approved the Group Remuneration Policy in October 2024. As part of this review, a number of amendments were made to the section outlining 'Ethos and principles' where the principles have been updated to align with the Reward Strategy principles approved by the Group Remuneration committee in July 2024.

**Group Performance Scheme (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 bonus pool 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.
▪These roles operate independently of the business and corporate functions. The remuneration of independent control functions is predominantly fixed, to reflect their objectivity. Staff of the Independent Control functions, including Senior Officers, participate in the Group Performance 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, 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 Performance scheme was in place for the performance year 2024. The appropriateness of the final bonus pool was 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 in shares 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 Performance 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 bonus pool 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 ⅓ of their total remuneration.
▪142 MRTs benefited from this derogation, with aggregate fixed pay totalling €50.2m and aggregate variable pay totalling €2.6m.

**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

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 | Fixed remuneration | **Number of identified staff** | **10** | **2** | **11** | **119** |
| 2 | | **Total fixed remuneration (€m)** | **1.626** | **2.208** | **8.653** | **37.774** |
| | | of which: | | | | |
| 3 | | cash-based | 1.626 | 1.819 | 7.330 | 37.267 |
| 4 | | (Not applicable in the EU) | | | | |
| EU-4a | | shares or equivalent ownership interests | | 0.388 | 1.320 | 0.161 |
| 5 | | share-linked instruments or equivalent non-cash instruments | | | | |
| EU-5x | | other instruments | | | | |
| 6 | | (Not applicable in the EU) | | | | |
| 7 | | other forms | - | 0.001 | 0.003 | 0.347 |
| 8 | | (Not applicable in the EU) | | | | |
| 9 | Variable remuneration | **Number of identified staff** | **-** | **2** | **10** | **105** |
| 10 | | **Total variable remuneration (€m)** | **-** | **0.040** | **0.482** | **2.061** |
| | | of which: | | | | |
| 11 | | cash-based | - | 0.040 | 0.259 | 2.061 |
| 12 | | deferred | | | | |
| EU-13a | | shares or equivalent ownership interests | | | 0.223 | |
| EU-14a | | deferred | | | | |
| EU-13b | | share-linked instruments or equivalent non-cash instruments | | | | |
| EU-14b | | deferred | | | | |
| EU-14x | | other instruments | | | | |
| EU-14y | | deferred | | | | |
| 15 | | other forms | | | | |
| 16 | | deferred | | | | |
| **17** | **Total remuneration (2 + 10) (€m)** | | **1.626** | **2.248** | **9.135** | **39.835** |

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 | | | | |
| 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 | | | | 4 |
| 7 | Severance payments awarded during the financial year - Total amount (€m) | | | | 0.852 |
| | of which: | | | | |
| 8 | paid during the financial year | | | | 0.852 |
| 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) | | | | 0.402 |

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 of 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 | 0.825 | 0.092 | 0.733 | | | -0.106 | 0.092 | |
| 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 | | | | | | | | |

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<br>**Identified staff that are high earners as set out in Article 450(i) CRR** |
|---|---|---|
| 1 | 1,000,000 to below 1,500,000 | 5 |
| 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** | | | | | | | | | | 142 |
| of which: | | | | | | | | | | |
| 2 members of the MB | 10 | 2 | 12 | | | | | | | |
| 3 other senior management | | | | | 5 | | 5 | 1 | - | |
| 4 other identified staff | | | | | 72 | | 13 | 28 | 6 | |
| 5 **Total remuneration of identified staff (€m)** | 1.626 | 2.248 | 3.874 | | 27.549 | | 8.653 | 9.815 | 2.954 | |
| of which: | | | | | | | | | | |
| 6 variable remuneration (€m) | - | 0.040 | 0.040 | | 1.607 | | 0.258 | 0.297 | 0.381 | |
| 7 fixed remuneration (€m) | 1.626 | 2.208 | 3.834 | | 25.942 | | 8.395 | 9.518 | 2.573 | |

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# Environmental, Social and Governance risks (ESG risks)



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) | **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**<br><br>**Sustainability a core strategic pillar**<br><br>Sustainability is embedded as one of Bank of Ireland Group's three core strategic pillars under 'Sustainable Company'. Sitting below the Group's Sustainable Company pillar is our 'Investing in Tomorrow' Sustainability strategy. This is focused on the Group's material Environmental, Social and Governance (ESG) impacts and opportunities aligning to science and best practice including the UN Sustainable Development Goals (SDGs), the blueprint for a more sustainable future for all. The Group continues to turn sustainability ambitions into action, delivering practical sustainability solutions that make a difference for customers. The Group's Sustainability Strategy has three core pillars: Supporting the Green Transition, Enhancing Financial Wellbeing and Enabling Our Colleagues to Thrive, supported by a number of foundational topics.<br><br>**Strategy**<br>The Group continues to make progress in achieving its objectives under its Sustainability strategy through the application of its Climate Transition Plan for the 'Supporting the Green Transition' strategic pillar. Since launching this strategy, the Group has made significant progress on supporting the move towards a net zero economy. In 2022, the Group became the first Irish bank to have its Science Based Targets (SBTs) on GHG emission reduction validated by the SBTi, covering all the Group's operations and 71% of its FY20 baseline loan book.<br><br>As of FY2024 the Group is on track to meet its 2030 SBTs across RoI mortgages, commercial real estate, electricity generation project finance and its own operations. In addition, the Group reached its 2025 target for 25% of our Corporate lending customer base having their own SBTs.<br><br>The Group has also made significant progress towards achieving its related Sustainable Finance loan targets for customers of c.€15 billion by 2025 and c.€30 billion by 2030.<br><br>For further details on the Group's Climate Transition Plan, please refer to pages 41-47 of the Group's 2024 Annual Report<br><br>**Materiality Assessments**<br>The Group conducts ongoing assessments of climate and other environmental impacts on at least an annual basis in the form of:<br>(a) a climate and other environmental (C&E) risk materiality assessment as part the Internal Capital Adequacy Assessment Process (ICAAP); and<br>(b) a Double Materiality Assessment (DMA) exercise under of the Corporate Sustainability Reporting Directive (CSRD), which is informed by the C&E risk materiality assessment.<br><br>These assessments inform our business plans and strategic approach to sustainable finance, product development, customer engagement and risk management. The 2022 output of these assessments was factored into the Strategic refresh to 2025 announced in March 2023. In 2022, the Group set decarbonisation science-based targets (SBTs), validated by the Science-Based Targets Initiative (SBTi), that cover 71% 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.<br><br>The Group recognises the global economic dependency on nature and ecosystem services and its role in mitigating environmental impacts and supporting a transition to a net zero and regenerative economy. One of the main causes of environmental impacts is climate change, which is being addressed through the Group's Climate Transition plan and its targets. Through the Sustainability strategy the Group aims to address the other drivers of environmental impacts (which are categorised as pollution, water stress, resource scarcity, biodiversity loss) and the transitionary impacts towards more environmentally sustainable economic activities.<br><br>For ICAAP 2025 an enhanced risk materiality assessment and quantification of environmental risk impacts was completed. This enhancement saw other environmental (non-climate) risk drivers assessed at the sub-risk level (such as pollution, water stress and biodiversity loss) across each Principal Risk with a potential risk impact quantified across a short, medium and long-term time horizon.<br><br>While it is not assessed as a material issue for the Group at this point in time, mitigation of other environmental risk is integrated into customer engagement strategies, sectoral strategies and lending procedures as part of the overall Sustainability Strategy, in line with UN Principles for Responsible Banking and ECB Guide on Climate-related Environmental Risks.<br><br>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.<br><br>The management of Climate and Other Environmental Risks in Bank of Ireland<br>The Group defines ESG risk as the risk to the Group that ESG factors (environmental, social or governance matters) could cause a material negative impact on:<br>• the Group's earnings, capital, franchise value, or reputation;<br>• the Group's regulatory standing;<br>• the long-term sustainability of our customer's operations and financial wellbeing; and<br>• the communities and environment in which we and our customers operate.<br><br>Climate and Other Environmental risk is defined in the Group as the risk to the Group of any material negative impact from current or prospective impacts of environmental factors arising from:<br>i) the transition to a low-carbon and more environmentally sustainable economy; and ii) climate-related physical events which could lead to: a) higher business costs, lower revenues, stranded assets and potential financial implications from physical phenomena; and b) associated climate trends which disrupt operations for the Group and its customers, the Group's supply value chains, or damage property.<br><br>The Group defines two key sub-categories of environmental risks that impact our business (in line with the ECB Guide on Climate-related and Environmental risks November 2020). These are the risks associated with the transition to a low carbon economy and from climate-related physical events. In defining these sub-categories, the Group has drawn on the recommendations of the Taskforce on Climate-related Financial Disclosures (TCFD) and the Taskforce on Nature related Financial Disclosures (TNFD).<br><br>The Group's Risk Management Framework (RMF) sets out the risk management, measurement,<br>and reporting requirements for the Group's risks. The Group ESG Risk Management Framework sets out the Group approach to ESG risk management.<br><br>ESG factors represent a common driver across the Group's Principal and Sub risk types. The Group applies a risk lens to ensure that the impact of ESG across the Group's risk types is considered on an ongoing basis and that the aggregate impact arising from ESG risk drivers is given appropriate consideration. While ESG risk management is managed through the Group's Principal and Sub risk types, the Group also has dedicated resources to lead the co-ordination of the Group's approach to ESG risk management, both in 1LOD (Sustainability Team, Group Finance) and in 2LOD (Business, Strategic and ESG Risk Team, Group Risk).<br><br>**Identification and assessment of Climate and Other Environmental Risks**<br><br>Identification and assessment of Climate and Other Environmental Risks<br><br>Guided by the Group's ESG Risk Management Framework, the Group has embedded climate and other environmental risk management into the Group's key risk processes. We continue to improve how we assess climate and other environmental risk drivers taking into account potential impacts, our mitigating actions, and next steps for each risk type.<br><br>In the Group's key ICAAP planning process, the potential impact of climate risk drivers is assessed for each key risk type over the short (< 3 years), medium (3-5 years) and long-term (> 5 years). An annual quantitative assessment for these risks was established in 2022 and is embedded into the Group's ICAAP. For climate-related risk impacts this assessment is disclosed in pages 50-51 of the Group's 2024 Annual Report and can be summarised as follows:<br><br>• 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.<br><br>• 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.<br><br>• 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.<br><br>• Conduct risk: Potential impact if failures in product design, market practice or customer engagement lead to greenwashing claims or poor customer outcomes.<br><br>In 2024 the risk materiality assessment, which feeds into the Group's ICAAP, was enhanced such that other environmental (non-climate) risk drivers were quantitatively assessed across each Principal Risk across a short, medium and long-term time horizon. While it is not assessed as a material risk driver for the Group, at this point in time, mitigation of other environmental risk is integrated into customer engagement strategies, sectoral strategies and lending procedures as part of the overall Sustainability Strategy. |

**Financial Planning and the Internal Capital Adequacy Assessment Process (ICAAP)**

Financial Planning and the Internal Capital Adequacy Assessment Process (ICAAP)
Climate and other environmental risk considerations are being embedded in key processes where investment decisions and associated climate risks are material. The setting of decarbonisation Science Based Targets and (ii) Sustainable Finance targets across key lending portfolios 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.

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 has integrated climate into the ICAAP and its broader scenario analysis framework to assess the impacts of climate across all the principal risk types (e.g. credit, business, operational, conduct and regulatory). This scenario analysis informs climate risk materiality assessments to quantify the potential impacts that is integrated into the Group's ICAAP. This materiality assessment also informs the focus and priority of management action to mitigate climate risk across the Group's risk types as set out in in pages 48-67 of the Group's 2024 Annual Report.

The short-term financial impacts of climate change can be mitigated by holding adequate capital buffers and providing for expected credit losses (ECL) through impairment loss allowances. As the Group's range of models across risk types cannot fully address all emerging climate risk drivers at this time, the Group includes the outcome of the climate risk materiality assessment in its economic capital framework within the ICAAP. It is included as an additional economic capital requirement on top of the capital set aside for the key risk types.

During 2024 the Group has also incorporated climate change into the measurement of credit impairment loss allowances through:
• a climate shock embedded into one of the Downside Scenarios used in the Forward Looking Information (FLI) used to drive credit impairment loss allowances; and
• a Post Model Adjustment (PMA) informed by analysis of the potential impact of physical and transitional climate related risks on asset valuations within the Retail Ireland and UK residential mortgage portfolios.

(b)

**Objectives, targets and limits to assess and address environmental risk in short-, medium-, and long-term, and performance assessment against these objectives, targets and limits, including forward-looking information in the design of business strategy and processes**

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.

The GSC's responsibilities include the following:
- 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.

2024 updates on key targets and limits set as part of the Group's Five-Point Action Climate Plan are as follows:

**Science Based Targets (SBTs)**

In December 2022, the Group's 2030 greenhouse gas emission reduction targets were formally validated by the SBTi and are aligned with decarbonisation goals of the Paris Climate Agreement. Targets validated by SBTi cover the Group's own operations and 71% of its FY20 baseline 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), a 56% reduction in commercial real estate portfolio emissions by 2030, and a 76% reduction in electricity generation project finance portfolio emissions. In addition, 25% of the Group's corporate loan portfolio will have SBTi-validated targets by 2025.

As of FY2024 the Group is on track to meet its 2030 SBTs across RoI mortgages, commercial real estate, electricity generation project finance and its own operations. In addition, the Group reached its 2025 target for 25% of our Corporate lending customer base having their own SBTs.

Science Based Targets Progress Report FY2024

Own operations:
– Absolute Scope 1 & 2 emissions (Green - down 47% 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 14% versus 2030 target reduction of 48%)
(ROI Mortgages Green – down 21%, UK Mortgages Amber – down 3%)
– Commercial Real Estate (Amber - down 28% versus 2030 target reduction of 56%)
– Electricity Generation Project Finance (Green - down 32% versus 2030 target reduction of 76%)

SBT lending coverage:
– % Corporate customer base to have set SBTs when weighted by emissions
(Green – 28% versus 2025 target of 25%)
– % Corporate bonds to have set SBTs when weighted by investment value
(Amber – 6% 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. Progress accelerated in 2024 and we expect to report further progress towards our SBTs as the Group executes its strategy, with the full impact of decarbonisation of the energy grid expected in the back end of the decade.

For further details on progress against each target please refer to pages 68-71 of the Group's 2024 Annual Report.

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 H1 2024 we published our Sustainable Finance Framework to provide transparency to our stakeholders on our approach to Sustainable Financing. Within this framework, we are disclosing the criteria we are using to classify financial commitments and products as sustainable. For the latest information on our product offerings and supports please refer to page 24 of the Group's 2024 Annual Report.

As part of our commitment to the Green Transition, we are constantly reviewing and expanding our range of Sustainable Finance solutions and in 2024 we launched the EcoSaver Mortgage, which is representative of the practical and meaningful product interventions we are taking for our customers across key sectors and highlights the collaborative partnerships central to our ecosystem approach. The EcoSaver Mortgage is available to new customers and also to existing customers who move to the new product from another Bank of Ireland mortgage product. In addition, customers with EcoSaver Mortgage will be rewarded for energy upgrades made to their property, with each EPC (Energy Performance Certificate) improvement bringing a larger discount to the EcoSaver rate. An online hub helps customers understand their current energy rating, as well as the work required and costs to achieve a better EPC. An online retrofitting calculator shows the cost of retrofitting and the potential savings due to lower EcoSaver mortgage rates. Bank of Ireland has partnered with SSE Airtricity to provide EPC assessments to its customers, as well as assessments of works, quotes and home retrofitting services via their one stop shop.

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 – see Section (c) below.

(c)

There are a number of lending controls that are de-risking the portfolio with respect to climate and other environmental risk:
• 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.
• The Group has 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.
• In 2024, climate risk metrics were included into the Group's Risk Appetite Framework to de-risk the lending book, including limits on fossil fuel related activities.

**Integration of Other Environmental Risk into Business Strategy**
In conjunction with the enhanced materiality assessment for environmental risk conducted this year the Group Sustainability Committee and Board Risk Committee endorsed the strategic course of action to address non-climate other environmental risks within the Group's business strategy through integration into our customer engagement strategies, sectoral strategies and lending procedures. See key points of integration below as part of the Group's overall Sustainability Strategy, in line with UN Principles for Responsible Banking and ECB Guidelines on Climate-related and Environmental Risks.

1. Sustainable Finance and Customer Engagement
The Group seeks to steer its loan book in alignment with global goals on climate and the environment, starting with the Corporate and Commercial Banking sectors with the biggest impact. We do this through the choices we make in our financing and the engagement we have with our customers. We offer Sustainable Finance products that incentivise customers to make business decisions that benefit the environment. This includes the EnviroFlex farm loan and the Green CapEx loan products. It also includes Sustainability-linked loans that reward customers for their sustainability performance, which can also relate to positive change for nature and ecosystems.

2. Promoting Environmental Awareness through Thought Leadership and Collaboration
Managing for positive environmental impact is about making sure that environmental factors are adequately understood, addressed and factored into relevant policies and practices, both internally and externally. The Group is building these capabilities in its own organisation through training and development initiatives, external collaboration and by providing thought leadership on key issues. To ensure that our customers benefit from our learnings, customer guidance and advisory supports are available through our Green Hubs.

3. Managing Environmental Risks
Guided by the Group ESG Risk Management Framework the Group works with our customers and suppliers to understand risks and impacts related to environmental matters and ensure these are mitigated. We do this for instance by applying strict environmental exclusion criteria in our lending decisions. We don't finance projects with direct impacts on certain high-value ecosystems and have also excluded certain economic activities that are incompatible with our concern for the environment. We also analyse the environment-related impacts across the industry sectors in our loan book. This information is guiding our strategy on how best to address both the risks and opportunities this collective challenge presents to both the Group and its customer base (see our Food & Farming strategy below).

4. Supporting Ireland's Sustainable Food & Farming Transition (White Paper June 2024)
As the leading lender to Irish agriculture, with over 82,000 farm customers on its books, the Group has prioritised addressing environmental challenges in this key sector of the Irish economy. This paper sets out the Group's strategic approach to supporting the sector in addressing the environmental challenges and opportunities farmers and agri-business face. The Group has a dedicated sustainability and agri team supporting customers through advisory, lending procedures and ongoing collaboration on policy/leadership initiatives, and is providing innovative sustainable finance products like Enviroflex offered in collaboration with co-ops and food processors.

5 Own Operations
The Group also seeks to minimise the environmental impacts that arise from business activities related to our own operations. The mitigation of environmental risks is integrated into the Group's own operations and supply chain in line with the Group's Environmental Policy and Code of Supplier Responsibility. The Environmental Policy is reviewed annually as part of the ISO 14001 Environmental Management System certification process, which the Group is currently certified against.

The Group Code of Supplier Responsibility 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.

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

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. The Group has made significant strides towards these goals and is on track to meet its €15 billion target in early 2025. By the end of 2024, its sustainable finance portfolio grew by c.32%, reaching €14.7 billion.

| Sustainable finance[1] | 2024 GCA €bn | 2023 GCA €bn | YoY Increase %[2] | 2025 target GCA €bn | 2030 target GCA €bn | RAG |
|---|---|---|---|---|---|---|
| Customer lending | 14.7 | 11.1 | 32% | 15.0 | 30.0 | |
| *of which:* | | | | | | |
| *RoI Green Mortgages* | 8.6 | *6.5* | *33%* | | | |
| *UK Green Mortgages* | 1.7 | *1.3* | *30%* | | | |
| *Green CRE* | 2.2 | *1.7* | *24%* | | | |
| *Renewables Project Finance* | 0.4 | *0.3* | *44%* | | | |
| *RoI Electric Vehicles* | 0.2 | *0.1* | *34%* | | | |
| *UK Electric Vehicles[3]* | 0.1 | | | | | |
| *Sustainability-Linked Loans* | 1.5 | *1.2* | *31%* | | | |

[1] *Sustainable Finance Gross Carrying Amount (GCA) volumes classified in line with Eligibility Criteria set out in the Group's Sustainable Finance Framework.*
[2] *Percentages are based on underlying calculation of amounts, rounded off to one decimal place.*
[3] *UK Electric Vehicles incorporated into Sustainable Finance reporting during FY24.*

For further details on progress against these targets please refer to pages 54-55 of the Group's 2024 Annual Report.

The Group has disclosed its EU Taxonomy Green Asset Ratio (GAR) KPIs for the second time in its 2024 Annual Report on pages 82-85. It should be noted that for this second round of disclosures the Group has continued to take a conservative application of the qualifying criteria underpinning the GAR based on the guidance provided to date and currently available data.

(d)

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

Subject to annual approval by the Group Board, the objective of the Group Credit Risk policy is to meet the legitimate credit needs of our customers, and the markets and communities in which the Group operates. The Group does this by serving its customers through delivering appropriate credit decisions that underpin the development of profitable customer relationships. Within the Group's credit procedures ESG factors are included as part of risk mitigation measures such as credit approvals and assessments, loan origination standards, external valuation standards and country risk limit management.

For its commercial lending portfolios credit procedures have been informed by ECB publications on climate and environmental risk management good practices and set out the following steps to mitigate the potential for ESG Risks that may arise in the process of lending and granting credit.

Step 1: Due Diligence – ESG Risk Screening
For corporate and commercial customers, the Group examines climate and environmental considerations as part of its customer onboarding due-diligence process. This process is also conducted on an annual basis for existing customers. The business activity of the company or project will be checked against the list of excluded activities across particularly sensitive sectors which are considered by the Group to cause environmental and/or social harm to society and our communities. If the company or project is involved in the excluded activities it cannot be originated or renewed. Furthermore any cases considered a heightened ESG risk will be subject to enhanced review and consideration by an ESG Risk Forum.

Step 2: ESG Data Collection
Key ESG risk factors for each asset class are captured during the lending process both at loan origination and throughout the credit lifecycle through reviews that take place at least on an annual basis. This can include information on the economic activity of a business and the energy ratings of properties

Step 3: Loan Acceptance Criteria Checks
Each asset class has loan acceptance criteria that must be met and these include ESG criteria such as minimum EPC ratings, flood and subsidence insurance in the case of property lending. 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.

Step 4: Collateral Valuation
The Group Property Collateral Valuations policy (and related Guidelines) require that market valuations should take into account ESG factors including property energy efficiency, environmental risks such as flooding, subsidence and pollution and social factors (infrastructure and amenities)

Step 4: PD (Probability of Default) and Credit Rating
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. Non-retail PD models use a combination of quantitative factors (reflecting the financial characteristics of the counterparty) and qualitative factors. ESG considerations should be considered as part of a Lender's qualitative assessment of PD model inputs. 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. The procedures set out the factors to consider across climate, environmental, social and governance dimensions.

Step 5: ESG Risk Loan Conditions

In cases where ESG Risk is heightened and have been through enhanced review at the ESG Risk Forum, consideration of mitigating actions through additional ESG risk loan conditions should be considered by lenders.

Step 6: Sustainable Financing
For commercial customers the Group offers a range of products that should be considered by lenders when engaging customers on how to support their transition plans to take sustainability action and de-risk their ESG Risk profile.

Credit approval for residential mortgages is subject to the provision of an EPC (Energy Performance Certificate) and insurance for flood and other environmental risks including subsidence.

As the Group continues to further review and update its credit risk policies and procedures, 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.

## Governance

**(e)**

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

**ESG Governance**

**Board Oversight of Sustainability**

**The Board**
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. This responsibility involves regular communication and collaboration with various committees, including the Group Sustainability Committee (GSC) and Board Risk Committee (BRC), to monitor climate and other environmental-related risks and progress against ESG commitments such as Science Based Targets (SBTs) and the UN Principles for Responsible Banking (UNPRB).

**Group Sustainability Committee (GSC)**
On behalf of the Board, the GSC is responsible for guiding the development and direction of the Group's Sustainability Strategy, ensuring it aligns with key stakeholder interests and recommending it to the Board for approval. The GSC also manages the execution of the Sustainability Strategy, reviews key sustainability policies, and ensures alignment with the Group's purpose and long-term success and, together with the Board Risk Committee), oversees related risks, including monitoring the Climate Risk Implementation Plan. Additionally, it supports the Group Audit Committee (GAC) in maintaining the integrity of Corporate Sustainability Reporting Directive (CSRD) disclosures.

**Board Risk Committee (BRC)**

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

**Group Audit Committee (GAC)**
On behalf of the Board, the GAC is responsible for monitoring the quality and integrity of the Group's financial statements, including sustainability disclosures. The level of GAC involvement on sustainability related matters has increased over the course of 2024. This is largely driven by the enhanced disclosure requirements under CSRD.

Terms of reference for the GSC, BRC and GAC are available on the Group website. (https://www.bankofireland.com/about-bank-of-ireland/corporate-governance/court-committees/court-committees-terms-of-reference/)

**Executive Oversight of Sustainability**

**Group Executive Committee (GEC)**
The most senior executive committee in the Group, the Group Executive Committee (GEC), acts in an advisory capacity to the Group 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 delegated to the Chief Sustainability and Investor Relations Officer (CSIRO). Members of the GEC include the CFO, Divisional CEOs and the Chief Risk Officer (CRO). The GEC receives regular updates on the progress against key initiatives from the Sustainability Decision Group (SDG). See below for details on SDG.

**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 ESG risks.
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 three strategic pillars and to provide a discussion and decision-making forum to deliver on the Group's Sustainability Strategy. The SDG is chaired by the CSIRO and regularly updates the GEC on progress against key initiatives

**Divisional and Subsidiary ESG Working Groups**
All materially impacted business divisions and businesses have in place dedicated ESG leads and ESG working groups to ensure ESG strategy and operational aspects are integrated into the Group's business model.

**ESG Risk Working Group**
The Group ESG Risk Management Framework sets out the Group's approach to ESG risk management. Coordinated by Group Risk, the ESG Risk Working Group brings together 2LOD risk management from across the principal risk and sub risk types (with representation from 1LOD Group Sustainability) to ensure there is a coordinated, cohesive and challenging approach to the management of ESG risks within the Group.

At the report date, the Board comprises 10 Directors: two Executive Directors, the Chairman, who was independent on appointment, and seven independent Non-Executive Directors (NEDs). The biographical details of each of the Directors, along with each of their individual dates of appointment, are set out on pages 187 to 189 of the 2024 Annual Report. Page 192 provides further details on the diversity of the Board and its Committees and on the Board members skills and experience. 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.

**(f)**

**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**

The Board monitors the Group's identification and management of climate and other environmental risks. Methods used include our risk identification and assessment processes, integration into the Internal Capital Adequacy Assessment Process (ICAAP) and ESG risk reporting (including climate and other environmental risks). The Group's oversight and management responsibilities in relation to our sustainability commitments and ESG risk in 2024 are outlined on page 19 of the 2024 Annual Report. Page 221 references the BRC submission for approval to the Board of a risk appetite statement for ESG risk, including measures related to climate risk. The BRC recognises that climate risk concerns will grow in importance, and risk mitigation capabilities will evolve as this risk lens is further developed.

The Group has continued to increase its understanding of the risks and opportunities that climate and other environmental change presents to our business strategy. The Group assesses the impact of ESG factors on an ongoing basis. These practices are evolving and continue to be enhanced and embedded in business activities. In parallel with ESG risk identification and assessment activities across the risk types, the Group also carries out material risks assessments annually, across the Group's principal risks. On an annual basis the Group undertakes a Climate and Other Environmental Materiality Risks Assessment which feeds into the Group's ICAAP. The outputs from this assessment also informs the Group's Double Materiality Assessment (DMA) which is also undertaken on an annual basis.

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. The Group recognises ESG factors represent a common risk driver across the Group's Principal and Sub Risk types. The Group ESG Risk Management Framework sets out the approach to the management of ESG risk factors in the Group. Co-ordinated by Group Risk, the ESG Risk Working Group brings together second line of defence risk management from across the Principal and Sub Risk types (with representation from 1LOD Group Sustainability) to ensure that there is a coordinated, cohesive and challenging approach to the management of ESG risks within the Group.

ESG risk factors such as climate and other environmental risks are managed within the framework the Group has in place for its established risk types. Therefore, the Group has integrated the management of climate and other environmental risk into its existing policies, controls, reporting and operating procedures, in accordance with the ECB guidelines on the management of climate-related and environmental risk.

• 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 risk factors.
• Second Line of Defence (2LOD): 2LOD has the responsibility for ensuring that 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.

While ESG risk management is managed through the Group's principal and sub-risk types, the Group also has dedicated resources to lead the coordination of the Group's approach to ESG risk management, both in 1LOD (Sustainability Team, Group Finance) and in 2LOD (Business, Strategic and ESG Risk Team, Group Risk).

**(g)**

**Integration of measures to manage environmental factors and risks in internal governance arrangements, including the role of committees, the allocation of tasks and responsibilities, and the feedback loop from risk management to the management body covering relevant transmission channels**

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.

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 climate and other 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.

During 2024 matters considered jointly by the BRC and GSC included:
(a)a climate and other environmental (C&E) risk materiality assessment as part the Internal Capital Adequacy Assessment Process (ICAAP);
(b)a strategy document detailing how non-climate environmental risks are informing the Group's business strategy; and
(c)a Double Materiality Assessment (DMA) exercise under of the Corporate Sustainability Reporting Directive (CSRD), which is informed by the C&E risk materiality assessment.

(h)

**Lines of reporting and frequency of reporting relating to environmental risk**

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 answer (e) above and page 19-20 in the Group's 2024 Annual Report.

For further details on internal reporting frequency, refer to the Group's answers to (a) and (g) above.

Board and Executive monitoring of climate and other environment related risks
The Group has developed methodologies to allow climate and other environmental risk to be actively measured and monitored by the Group and to track the effectiveness of policies, in a similar manner to other key risk types:

•The Board Risk Report (BRR) is used by the Board to review and monitor the Group's risk profile across all Principal Risks, compliance with Risk Appetite and Risk Policies. ESG risk in the Group is reported through the BRR on a minimum quarterly basis and is the primary source of reporting for the impact of ESG-related risks on the Group's risk profile; and
•Key risk metrics on the lending portfolio are monitored by the GEC and GSC on a quarterly basis and are aligned to Pillar 3 ESG reporting to ensure transparency and comparability. These include:
-Exposure to Transition Climate Risks;
-Credit concentrations to sectors most sensitive to climate change;
-The energy efficiency profile of property lending portfolios;
-Weighted Average Carbon Intensity (WACI);
-Emission reduction progress against Science Based Target pathways; and
-Sustainable Finance Lending Volumes progress against Strategic Targets.
-Exposure to Physical Climate Risks;
-Geographical credit concentrations exposure to physical climate risks; and
-Other Environmental Risks.

During 2024 environmental reporting was enhanced to monitor sectoral concentration metrics with respect to Pollution, Water Stress and Biodiversity impacts using the WWF World (Wildlife Fund) Biodiversity Risk Filter tool. Further external metrics are monitored to inform risk management including the relative global rankings of Ireland and the UK in terms of environmental policy as well as local EPA (Environmental Protection Agency) assessments.

(i)

**Alignment of the remuneration policy with institution's environmental risk-related objectives**

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.

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.

In 2023, 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. 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.

In making the assessment for 2024 the Group Remuneration Committee took into consideration the strong progress against our climate initiatives of increasing green / sustainable financing as well as other ESG factors (customer engagement and employee engagement)

## Risk management

(j)

**Integration of short-, medium- and long-term effects of environmental factors and risks in the risk framework**

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 and other environmental risks. Due to the longer timeframes associated with climate and environmental impacts, a short, medium, and long-term horizon, as referenced in (a) and (e) above, is being applied to the consideration of impacts.

The Group continues to embed climate and other environmental risk considerations into key risk reporting, as referenced in (g) above.

(k)

**Definitions, methodologies and international standards on which the environmental risk management framework is based**

**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 and other environmental (non-climate risk) drivers with regulatory expectations set out in the ECB Guide on Climate-related and Environmental Risks (November 2020). In 2024, the management of ESG risk in the Group continued to develop and expand. The Group has leveraged the requirements of the EU Corporate Sustainability Reporting Directive (CSRD) to expand disclosures in relation to the identification and management of ESG risks.

The Group defines two key sub-categories of environmental risks that impact our business (in line with the ECB Guide on Climate-related and Environmental Risks). These are the risks associated with the transition to a low carbon economy and from climate-related physical events. In defining these sub-categories, the Group has drawn on the recommendations of the Taskforce on Climate-related Financial Disclosures (TCFD) and the Taskforce on Nature- related Financial Disclosures (TNFD).

Our strategic commitment to supporting our customers' green transition is underpinned by our management of the risks associated with climate and other environmental change. We do this by embedding climate and other environmental related impacts in key decision making processes.

Aligning to the ECB Guide on Climate-related and Environmental Risks (November 2020), the Group has progressively embedded climate and other environmental risk considerations in business and risk management processes.

(l)

**Processes to identify, measure and monitor activities and exposures (and collateral where applicable) sensitive to environmental risks, covering relevant transmission channels**

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. 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.

We have integrated climate into the ICAAP and its broader scenario analysis framework to assess the impacts of climate and other environmental risk factors 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).

The Group assesses the impact of ESG factors on an ongoing basis. These practices are evolving and continue to be enhanced and embedded in business activities. In parallel with ESG risk identification and assessment activities across the risk types, the Group also carries out material risks assessments annually, across the Group's principal risks. On an annual basis the Group undertakes a Climate and Other Environmental Materiality Risks Assessment which feeds into the Group's ICAAP. The outputs from this assessment also informs the Group's Double Materiality Assessment (DMA) which is also undertaken on an annual basis

In addition, Climate and Other Environmental 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:

| | |
|---|---|
| (l) | **Exposure to Transition Climate Risks;**<br>• Credit concentrations to sectors most sensitive to climate change;<br>• The energy efficiency profile of property lending portfolios;<br>• Weighted Average Carbon Intensity (WACI);<br>• Emission reduction progress against Science Based Target pathways; and<br>• Sustainable Finance Lending Volumes progress against Strategic Targets.<br>**Exposure to Physical Climate Risks;**<br>• Geographical credit concentrations exposure to physical climate risks; and<br>• Other Environmental Risks – see answer (h) for further details.<br><br>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.74% of our customer lending is in residential and commercial property and car finance.<br><br>The breakdown table on page 57 of the Group's 2024 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 continue to roll out across the sector the innovative Enviroflex loan, a new funding option launched in 2023 for farmers to encourage sustainable farming practices.<br><br>In terms of the Group's property lending portfolios the energy efficiency of the property stock is monitored quarterly – see table on page 57-58 of the Group's 2024 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 58-60 of the Group's 2024 Annual Report. |
| (m) | **Activities, commitments and exposures contributing to mitigate environmental risks**<br><br>The Group's key risk mitigation strategy is as follows:<br>(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<br>(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.<br><br>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.<br><br>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 – see Section (c) above.<br><br>While it is not assessed as a material focus area for the Group at this point in time, environmental risk mitigation is integrated into our customer engagement strategies, sectoral strategies and lending procedures as part of our overall Sustainability Strategy, in line with UN Principles for Responsible Banking and ECB Guide on Climate-related and Environmental Risks. See section (b) above for details.<br><br>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.<br><br>The Group has aligned its lending strategy, which includes the Sustainability Exclusion List, to minimise its exposures to climate and other 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. In 2024, the Board approved a risk appetite statement for ESG risk, including measures related to climate risk.<br><br>The Group continues to develop methodologies to enable climate and other 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).<br><br>The Group assesses the impact of ESG factors on an ongoing basis. These practices are evolving and continue to be enhanced and embedded in business activities. In parallel with ESG risk identification and assessment activities across the risk types, the Group also carries out material risks assessments annually, across the Group's principal risks. On an annual basis the Group undertakes a Climate and Other Environmental Materiality Risks Assessment which feeds into the Group's ICAAP. The outputs from this assessment also informs the Group's Double Materiality Assessment (DMA) which is also undertaken on an annual basis.<br>To progress further action on nature, we participate 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. In 2024, we continued to uphold our voluntary commitments around nature and built on our previous work with the UNEP FI PRB by joining the Pollution Working Group during 2024/25. We will continue to monitor the evolving regulatory and wider stakeholder approach to Nature as we prepare for the upcoming refreshed sustainability strategy in 2026.<br><br>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. 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 . |
| (n) | **Implementation of tools for identification, measurement and management of environmental risks**<br><br>In identifying, measuring and managing environmental risk, the Group uses the following tools:<br><br>•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 continually developing its climate and other environmental scenario analysis capabilities on an iterative basis, leveraging improvements in data and methodologies as they become available. Climate and other environmental scenario analysis is integrated within the ICAAP process in order to increase our understanding and insights into the potential impacts of climate and other environmental risk factors.<br><br>•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.<br><br>•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.<br><br>•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.<br><br>•Supplier Management: 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. |
| (o) | **Results and outcome of the risk tools implemented and the estimated impact of environmental risk on capital and liquidity risk profile**<br><br>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.<br><br>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).<br><br>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.<br><br>As the Group's range of models across risk types cannot fully address all emerging climate risk drivers at this time, the Group includes the outcome of the climate and other environmental risk materiality assessment in its economic capital framework within the ICAAP. It is included as an additional economic capital requirement on top of the capital set aside for the key risk types.<br><br>During 2024 the Group has also incorporated climate change into the measurement of credit impairment loss allowances through:<br>• a climate shock embedded into one of the Downside Scenarios used in the Forward Looking Information used to drive credit impairment loss allowances; and<br>• a Post Model Adjustment (PMA) informed by analysis of the potential impact of physical and transitional climate related risks on asset valuations within the Retail Ireland and UK residential mortgage portfolios.<br><br>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)

**Data availability, quality and accuracy, and efforts to improve these aspects**

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 were 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.

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 other environmental risk drivers.

Data quality is continually tracked and disclosed in annual reporting with the use of PCAF (Partnership for Carbon Accounting Financials) data quality scores used to rate the quality of data used in our science based target and financed emissions reporting. Additionally, the level of actual EPC data used in monitoring transition risk in the property portfolios is disclosed.

**Improving data quality is a high priority and the Group has made significant interventions to improve the quality and coverage of climate and other environmental data in 2024:**
(1) The Group continues to include the full range of Pillar 3 ESG risk metrics used in its internal reporting within the limited assurance scope for its Annual Report under CSRD. This provides internal and external users of the data assurance across the full spectrum of climate metrics.
(2) 2024 saw system implementation of BER data capture (Building Energy Ratings – the Irish equivalent of EPC) and the launch of EcoSaver which incentives ROI Mortgage customers to provide EPC ratings for properties. These actions have seen substantial progress on increasing EPC data coverage on the portfolio during 2024 by c.€5bn, ending FY24 at 14% from 0% end FY23. See page 57 - 58 of the 2024 Annual Report.
(3) The Group reported Financed Emissions across its customer lending portfolio for the first time in the 2024 Annual Report including customer emissions across Scopes 1,2 and 3. The reporting provides a breakout of customer lending by NACE sectors for non-financial corporates and by location (RoI and UK) for residential mortgages and car finance. The Group is leveraging these financed emissions estimates and has introduced a WACI (Weighted Average Capital Intensity) metric to its internal board level reporting to inform portfolio strategies to decarbonise the lending portfolio and mitigate climate-driven credit risk.
(4) During 2024 internal environmental reporting was enhanced to monitor sectoral concentration metrics with respect to Pollution, Water Stress and Biodiversity impacts using the WWF World (Wildlife Fund) Biodiversity Risk Filter tool developed as an industry standard for banks – see answer (h) for further details

(q)

**Description of limits to environmental risks (as drivers of prudential risks) that are set, and triggering escalation and exclusion in the case of breaching these limits**

The Group 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 existing customers ensuring that the Group does not provide new 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 prior to credit review.

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. In 2024, climate risk metrics were included into the Group's Risk Appetite Framework to de-risk the lending book

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.

(r)

**Description of the link (transmission channels) between environmental risks with credit risk, liquidity and funding risk, market risk, operational risk and reputational risk in the risk management framework**

Climate and other environmental risk drivers can intensify risks to the Group, impacting across existing key risk categories including, but not limited to:
• 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.

Climate and other environmental risk can also have reputational impacts if the Group fails to meet investor, customer, community and regulatory expectations.

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 define 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.

The subsequent table details the current position on the mitigation of climate and other environmental risk drivers across the Group's Principal risk types.

| Principal Risk Types | What are we doing to mitigate climate and environmental risk drivers | Mitigates climate Risk drivers | Mitigates other environmental Risk drivers |
|---|---|---|---|
| 1. Credit risk | • **Credit Risk Policy and Procedures:** ESG risks form part of lifecycle credit assessment (both at origination and ongoing review points). | ✓ Exclusion and enhanced review criteria cover climate risk drivers (eg fossil fuels) | ✓ Exclusion and enhanced review criteria cover environmental risk drivers (eg mining activities impacting water and soil quality) |
| | • **Collateral Valuation Procedures**: Consideration of transition and physical risk included in collateral valuation guidance and minimum loan agreement requirements (covering EPC Ratings, Physical risks such as Flood, Subsidence) | ✓ Covers climate risk drivers (eg flood, property energy efficiency) | • Guidance covers (i) natural environmental potential risks such as flooding, subsidence etc. and (ii) non-natural potential risks such as land contamination |
| | • **Limits and Controls:** Credit policy limits on property energy ratings (Commercial Real Estate/Buy to Let); requirements for flood and subsidence insurance. | ✓ Covers climate risk drivers (e.g. excluded activities, EPC ratings, flood cover) | ✓ Covers environmental risk drivers (e.g. excluded activities, flood and subsidence insurance cover) |
| | • **Scenario Analysis:** Climate and Environmental risk scenario analysis for Credit Risk integrated into the Group ICAAP | ✓ Quantified from ICAAP 2023 | ✓ Introduced in ICAAP 2024 |
| | • **Sustainable Finance and Customer Engagement:** Ongoing engagement with customers on sustainability action and ongoing product development of a range of supportive Sustainable Finance (SF) products. | ✓ Sustainable Finance Targets encompass lending products to improve climate impacts (EcoSaver) | ✓ Sustainable Finance Targets encompass lending to improve environmental impacts (Enviroflex) |
| | • **Monitoring and Reporting:** Monitoring by Executive and Board Committees on status versus a range of Sustainability KPIs including climate and environmental risk metrics, | ✓ Sustainability reporting monitors climate risk KRIs | ✓ Sustainability reporting monitors environmental risk KRIs |
| 2. Market risk | • **Scenario Analysis:** Climate and environmental risk scenario analysis for Market risk integrated into the Group ICAAP | ✓ Non-material impacts | ✓ Non-material impacts |
| 3. Funding & Liquidity risk | • **Scenario Analysis:** Climate and environmental risk scenario analysis for Funding & Liquidity risk integrated into the Group's internal liquidity adequacy assessment process (ILAAP) | ✓ Non-material impacts | ✓ Non-material impacts |
| 4. Life Insurance risk | • **Scenario Analysis:** Climate risk scenario analysis for life insurance risk is part of the ORSA (Own Risk & Solvency Assessment) process for the New Ireland entity which manages life insurance risk of the Group | ✓ Non-material impacts | ✓ Non-material impacts |

| Principal Risk Types | What are we doing to mitigate climate and environmental risk drivers | Mitigates climate Risk drivers | Mitigates other environmental Risk drivers |
|---|---|---|---|
| 5. Business & Strategic risk | • **Business and Strategic Risk Policy:** requires ESG risk factors to be reflected in strategic planning and internal and external business environment assessments. | ✓ Climate Risk Assessments have been embedded into Strategy and ICAAP planning since 2023 | ✓ Environmental Risk Assessments have been embedded into Strategy and ICAAP planning since 2024 |
| | • **Group Strategy Implementation:** Sustainable company is a key strategic pillar underpinned by Group Objectives and Key Results (OKRs) (including risk OKRs) | ✓ Sustainable Finance Targets encompass lending products to improve climate impacts (EcoSaver) | ✓ Sustainable Finance Targets encompass lending to improve environmental impacts (Enviroflex) |
| 6. Operational risk | • **Group Environmental Policy :** This policy guides our identification control and reduction of significant environmental impacts associated with our own operations. This policy is reviewed annually as part of certification of the ISO 50001 Energy Management System and ISO 14001 Environmental Management System (EMS). | ✓ Drives reduction in consumption of electricity, gas and oil and associated carbon emissions | ✓ Mitigates the environmental impacts associated with water and paper consumption, waste management and suppliers. |
| | • **Scenario Analysis:** Climate and environmental risk scenario analysis for Operational risk integrated into the Group ICAAP and Business Continuity Mission Critical Services Scenario Analysis | ✓ Material impacts assessed given systemic changes in heat levels and weather patterns | ✓ Non-material impacts based on assessment |
| | • **Third Parties and Outsourcing**: ESG (including climate change) is part of supplier due diligence assessment in line with the Group's Code of Supplier Responsibility | ✓ Suppliers encouraged to have ISO 50001 Energy Management System certification | ✓ For Environmental impacts suppliers are:<br>• expected to have Environmental Sustainability Policy<br>• encouraged to have ISO 14001 Environmental Management System (EMS) certification |
| | • **Data Risk:** Standard group control framework applies to climate data. | ✓ Climate and environmental data used in reporting in line with relevant Group standards and subject to external assurance where applicable | |
| | • **Model Risk**: Climate risk factors to be considered in models including assessing data collection requirements to enable inclusion in models. | ✓ Climate Scenario Analysis Framework (incorporating other environmental risk factors) subject to second line independent validation | |

| Principal Risk Types | What are we doing to mitigate climate and environmental risk drivers | Mitigates climate Risk drivers | Mitigates other environmental Risk drivers |
|---|---|---|---|
| 7. Conduct risk | • **Group Customer Protection Risk Policy** requires mitigation of greenwashing risk. ESG considerations are incorporated in new product approvals and ongoing product lifecycle reviews for all product/service/channel initiatives that are classified or marketed as a Green/ ESG proposition to mitigate potential claims of 'Greenwashing'. | ✓ ESG Risks and objectives in new product approvals and ongoing product lifecycle reviews incorporates climate risk factors | ✓ ESG Risks and objectives in new product approvals and ongoing product lifecycle reviews incorporates environmental risk factors. |
| | • **Sustainability Training:** All colleague training on climate concepts and processes, as well as role specific training on sustainable finance and ESG risk management. | ✓ Sustainability training programme covers climate risk drivers | ✓ Sustainability training content to be iterated for increasing focus on environmental matters. |
| 8. Regulatory risk | • **Upstream Regulatory Change Monitoring:** ongoing horizon scanning with quarterly 1LOD/2LOD meeting to review any developments captured in climate regulation applicable to the Group. | ✓ Ongoing horizon scanning conducted for climate related regulation | ✓ Ongoing horizon scanning conducted for environmental related regulation |
| 9. Capital Adequacy risk | • **ICAAP Integration**: Aggregation into ICAAP quantitative Climate Risk Assessment across principal risk types. | ✓ Integrated into the ICAAP process since 2023 | ✓ Integrated into the ICAAP process since 2024 |

**Table 2 - Qualitative information on Social risk in accordance with Article 449a CRR**

| Row number | Business strategy and processes |
|---|---|
| | **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**<br><br>**Strategy and processes**<br>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.<br><br>The activities below demonstrate the ongoing implementation of the Group's Sustainability strategy to integrate social factors and risks.<br>In FY24, a Double Materiality Assessment (DMA), aligned to the Corporate Sustainability Reporting Directive (CSRD), using the double materiality concept was conducted across ESG (including social) topics. The results 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.<br><br>'Enhancing financial wellbeing':<br>• 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.<br>• 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.<br><br>'Enabling Colleagues to Thrive':<br>• Build a future ready workforce - An essential part of our people strategy is developing growth skills and capabilities.<br>• 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.<br>• 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.<br><br>'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. Housing is also a material topic from a CSRD perspective and so reported here under 'Foundations.<br><br>**Outcomes 2024:** We made significant progress on our social commitments in 2024 with examples of key Group activities under each of our key strategic headings below.<br><br>**Financial Wellbeing**: We continue to be the #1 bank recognised for financial wellbeing in the Irish market and have made the following progress during 2024:<br><br>**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.<br>• Our Vulnerable Customer Unit (VCU) provided enhanced support to colleagues dealing with over 7,000 customers in vulnerable circumstances in 2024. It is fundamental to promoting financial inclusion amongst prioritised groups and provides enhanced expert banking support to customers in vulnerable circumstances or situations;<br>• The Group worked with the Irish Alzheimer's Society to build training and education programmes which were launched in November 2024, so customer facing colleagues can become 'Dementia Friendly' trained by Q1 2025;<br>• We engaged with industry bodies such as the Banking and Payments Federation of Ireland and the Irish Banking Culture Board to ensure prioritised and marginalised groups have equal and effective access to financial products;<br>• A dedicated programme was mobilised to deliver compliance with the European Accessibility Act in 2025, supported by external advisors who are guiding the Group on accessibility standards and how to ensure the Group can offer choice and assisted support across all the Group's customer channels; and<br>• Also in 2024, Bank of Ireland UK onboarded SignVideo to provide sign language interpretation services to customers.<br><br>**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.<br>The Group has partnered with two charities, facilitated by Community Foundation Ireland, whereby the Group will provide funding to develop a pilot financial resilience programme to demonstrate the feasibility of financial education to positively impact the financial lives of marginalised women. This commitment has been approved and funded and will be delivered in 2025, with ambition to scale based on demonstrable impact.<br>• In 2024, the total number of adults (customers, colleagues and the wider community) supported through financial education initiatives was just over 28,000 attendees. The talks covered topics including saving, budgeting, borrowing, cost of living, mortgages, pensions and fraud awareness; and<br>• In the 2023/24 school year more than 13,000 primary and almost 92,000 secondary school students participated in Bank of Ireland's financial literacy programmes. Engagement in both programmes continues to increase year on year.<br><br>**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. The Group has targets in the area of financial resilience under the UNPRB Commitment to Financial Health and Inclusion and are a key component of the Group's Financial Wellbeing Ambition. The Group has committed to the following targets, which apply to all personal customers in RoI:<br>• increase 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-today expense by 2030;<br>• at the end of 2024 this figure was 60% (-2% vs April 2023 baseline) among people who identified Bank of Ireland as their main day-to-day bank;<br>• increase 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; and<br>• at the end of 2024 this figure was 47% (+3% vs April 2023 baseline) among people who identified Bank of Ireland as their main day-to-day bank.<br><br>In 2024, we expanded our Money Worries hub on the Group's website to give customers resources to support them if they are experiencing financial difficulty. The hub features budgeting tools, helpful tips to cope with financial strain, and resources to build financial literacy. It also features dedicated support paths for customers who may be facing financial difficulty or who have experienced an unexpected life event.<br><br>**Fraud Prevention:** In 2024, the Group announced an investment of €50 million on customer fraud prevention and protection. The investment includes €15 million for new fraud prevention technology, along with a range of high-profile consumer awareness campaigns and support for customers who are targeted by fraudsters.<br><br>**Colleague Wellbeing**<br>**Inclusion and Diversity**<br>• 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. Gender imbalance at senior levels is a significant contributor to the gender pay gap at Bank of Ireland. With the introduction of CSRD, we have reported a consolidated Group gender pay gap figure for 2024 of 26%. The gender pay gap shows 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 48% female leadership appointments in 2024 (46% in 2023) with an ongoing commitment to achieve a 50:50 ratio.<br>• In 2024, the Group was included in the **Top 100 Europe's Diversity Leaders List**, published by the Financial Times. The report ranked organisations' approaches to diversity, equity and inclusion, with surveys from over 100,000 employees across the continent making up 70% of the data collected.<br>• The Group has an **'Inclusion Passport'** which helps remove barriers employees may face in the workplace due to their personal circumstances, including health conditions, disabilities and caring responsibilities, among others. The Inclusion Passport is a record of workplace accommodations agreed between employees and people managers.<br>**Neuroinclusion strategy** - In 2024, a key development for us was the roll out of our Neuroinclusion strategy advancing our understanding, enhancing our infrastructure and creating a culture that supports neurodivergent colleagues and candidates. This strategy includes a suite of policies and process improvements to support neurodivergent colleagues with the aim of becoming one of the most neuroinclusive companies on the island of Ireland.<br>**Family Matters** - In 2024, the Group enhanced its existing maternity leave policy to include a new provision enabling women who are undergoing treatment for cancer or other serious illness to postpone commencement of their maternity leave. In the absence of surrogacy leave legislation, this provision also applies to employees on surrogacy leave, as the Group's surrogacy offering mirrors maternity leave entitlements. This is an extension to the launch in 2023 of Family Matters, a suite of employee benefits and existing policy enhancements intended to create a more supportive and inclusive environment for colleagues.<br>**Wellbeing** - The colleague wellbeing proposition includes building wellbeing engagement and connection; mental health supports; helping to connect across hybrid and remote workers; and supporting colleagues in managing wider life-related stress e.g. cost of living etc. The Group is committed to fostering inclusion and diversity, promoting and creating equal opportunities and creating a workforce representative of society. This ambition is supported through inclusive recruitment and hiring manager training, training supports and seven colleague led I&D networks.<br>**Culture Embedding and Engagement -** The Group's Culture Embedding Index was strong in 2024, and at 80% continued to exceed the Global Financial Services Benchmark. The Colleague Engagement Index, at 75%, was up 2 points when compared with 2023 and was the highest level ever achieved.<br><br>**Future Ready Workforce**<br>• Our **Emerging Careers programme** continues to mature, providing people from all backgrounds with opportunities to enter the workforce.<br>• In 2024, we strengthened **hybrid supports** on the back of colleague feedback, delivering an updated colleague handbook, and a guide for people managers, as well as curated people manager training in managing hybrid teams. We continue to invest and strengthen the hybrid working hub network and to align our hybrid and property strategies as we go forward. |

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| (a) | | **Foundational:** In terms of its foundational activities, the Group has made the following progress during 2024:<br>•**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. We focus on providing financial support to local not-for-profit and community groups, and social enterprises who are working to address social issues and make a lasting change in their communities.<br>•**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 the previous value of the fund from €400 million currently to €1 billion. At 31 December 2024, the Group was funding the development of c. 9,500 units for social housing in its overall total of c.21,000 residential units across c.220 sites. This progress is tracked by the Corporate and Commercial specialist banking teams on a quarterly basis.<br>•**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 to bridge the affordability gap between the price of a new home versus a customer's deposit and mortgage. The Group is a leading participant in the scheme, and as of December 2024 had accounted for c.45% of approvals and drawdowns since the scheme's inception in July 2022. The total capacity of the scheme was extended in 2024 by €280 million to €680 million, which included a further capital investment by the Group. This additional capacity will allow the scheme to continue to support first time buyers.<br>•**Begin Together:** In 2024, we provided support to a range of local initiatives aiming to foster inclusion and build capability amongst underserved groups across the island of Ireland. Our Community Fund provided €500,000 in strategic grants to 24 organisations with grant levels ranging from €10,000 to €80,000, and for the first time included four two-year grants. The introduction of multi-year grants was in direct response to the needs of the sector and will enable organisations to undertake far more complex and challenging projects. We focus on helping the most marginalised in society who are typically most impacted by the challenges in our society. Projects focus on groups such as families and individuals living in or at risk of poverty, older people, people with disabilities, migrants and refugees, the Travelling community and more. |
| | | •**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.<br><br>Through the work of our Financial Crime Compliance team, we also continued our significant involvement with the Infinitech Project which began in 2022 as a collaboration between various organisations, including the European Union, IBM, NUI Galway, Stop the Traffik and Bank of Ireland. The scope of the project is to leverage AI technologies and 'big data' to help identify human trafficking typologies, which might be present in large data sets, for the purpose of providing more accurate and useful intelligence for financial crime investigation teams. During 2024, the model that had been developed over the previous two years was initiated within the Group's IT architecture to allow for a 'proof of concept' phase to be completed. This was successfully achieved by Q4 2024, with multiple typologies used to identify various accounts that our subject matter experts in the financial crime function found suspicious, including accounts that had been previously reported to the statutory authorities on suspicion of being linked to modern slavery / human trafficking activity. The project is now progressing to a fully embedded process which will significantly enhance the Group's capabilities in detecting and disrupting human trafficking activity.<br><br>•**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, Group Third Party, Group Human Rights 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. In December 2024, the Group's first Human Rights policy was approved by the Board. The purpose of this policy is to provide information about the Group's commitments and efforts to respect human rights in all its business activities and relationships. The policy describes the governance structure and related policies supporting the commitments. The Group is committed to upholding and promoting human rights in all areas of its operations. Bank of Ireland continued its ongoing commitment in the area of combatting human trafficking in 2024 via the use of innovative technology and the provision of specialised training to our colleagues.<br><br>•**Cyber security:** We continue to invest in our cyber capability across people, process and technology. 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. The Group Operational Risk Information Security and Cyber Risk policy establishes the Group-wide approach to Cyber Risk management and details the risk mitigating requirements for the Cyber Risk sub risk types, such as security design risk and confidentiality risk. These provide the foundations that the business should have in place to meet the objectives of operating within risk appetite. The policy is based on applicable legislation, regulation rules, and best practice guidance including, but not limited to: Central Bank of Ireland, European Banking Authority, Prudential Regulatory Authority and Financial Conduct Authority (FCA) Guidelines and Rulebooks.<br><br>•**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. The Group Data Privacy policy outlines the Group's commitment to ensuring that the privacy rights of all data subjects for whom it processes personal data are upheld. It provides the Group with the foundations and organisational structure for ensuring compliance with legislative data protection and privacy obligations. It sets out the Group's approach to protecting personal data, taking account of the data protection and privacy principles and requirements that must be followed, and defines the standards for effective management of data protection and privacy related risks. The policy outlines the following mitigation requirements which serve to facilitate the Group's efforts in pursuit of this opportunity:<br>• Data protection and privacy is incorporated into the Group's business activities, by design and by default;<br>• Data subjects can exercise their privacy rights regarding personal data processing;<br>• Data protection events including personal data breaches are appropriately managed and reported;<br>• Legal and regulatory requirements are met before personal data is transferred to a third party and / or another jurisdiction; and<br>• External engagement on matters of data protection and privacy are managed effectively and in an appropriate and timely manner.<br>The Group further empowers colleagues through dedicated training and awareness programmes such as mandatory annual training on data protection and privacy applicable Group-wide.<br><br>Further detail on the initiatives delivered under these strategic pillars and foundations is available on pages 14 to 17,19, 20, 21, 112, 116, 117, 123, 124, 127 and 129 of the 2024 Group Annual Report. |
| | | Business environment & model<br>We have been progressively aligning our business model to address social factors and risks informed by the UNPRB across areas including Financial Wellbeing, digitalisation customer service, credit and supplier agreements.<br><br>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 and progress in 2024 are included in the Group's answer to (a) above. These initiatives support and complement the ambitions set out in our Group Sustainability strategy.<br><br>The Group offers a wide range of digital banking services through the mobile app, as well as local counter services a network of 168 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.<br><br>The Group's digital banking offering is core to its purpose - Helping customers, colleagues, shareholders and society to thrive. The Enterprise Digital Strategy is the strategic framework for driving enterprise-wide digital transformation across the Group. The strategic objectives for Digital align with the Group Strategic Pillars of Stronger Relationships, Simpler Business and Sustainable Company. The Strategy is positioned as an 'Enabler' to the overall Group Strategy, recognising the importance of digital transformation to deliver the Group's strategic priorities and support business units. Underpinned by the Enterprise Digital strategy, in 2024 the Group made and pledged several investments to improve a number of services and IT systems, such as:<br>•transformation of contact centre technologies and improved digital customer relationship management;<br>•simplification onto strategic platforms for Finance, Payments, Corporate and Markets and Fraud;<br>•digitisation of commercial lending to create a seamless digital experience for commercial customers; and<br>•deliver digital, analytics and customer insights to support tailored wealth management, retirement planning and insurance propositions to the Irish market.<br>In February 2024, a new Chief Digital and Architecture Officer was appointed. This is a new position which will lead the next phase of delivery of the Group's digital strategy for customers and colleagues. In a period of fast evolving customer expectation and technology, the role will also consider emerging technologies and how these may influence the Group's future investment in technology. |
| | | 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 +25, its highest ever level (an improvement of 11pts), and a 21% reduction in customer complaints in Ireland vs 2023, with 2024 experiencing the lowest volumes seen in the last 10 years. In 2024, we continued to Simplify our Business, achieving growth of 3% in our active digital users.<br><br>The Group has a Code of Supplier Responsibility which outlines its expectations of its 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.<br><br>The Group indicates its consideration for social factors and risks as it has the following policies in place such as the Modern Slavery and Human Trafficking statement; Code of Supplier Responsibility; Group Human Rights policy; 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.<br><br>The Group's Modern Slavery and Human Trafficking statement is approved by the Group Sustainability Committee, a sub-committee of the Group's Board.<br><br>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. |

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| | **Financial planning**<br>The Group's strategic objectives to mitigate social risk as set out above are embedded in the Group's strategic and financial planning ICAAP process, through the following ongoing investments.<br>• CapEx investment and OpEx funding in the initiatives set out in this section across Financial Wellbeing, Colleague Wellbeing and Foundational topics. This includes investment of €50 million on customer fraud prevention and protection.<br>• Increasing the available funding for social and affordable housing from €400 million currently to €1 billion to meet the increasing social need<br>• Supporting the extension of the total capacity of the First Home Scheme in 2024 by €280 million to €680 million, which included a further capital investment by the Group. |
| (b) | **Objectives, targets and limits to assess and address social risk in short-term, medium-term and long-term, and performance assessment against these objectives, targets and limits, including forward-looking information in the design of business strategy and processes**<br><br>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.<br><br>We disclosed a number of metrics in the Group's 2024 CSRD disclosures in the Group Annual Report 2024 (see ESRS S1, S3 and S4 disclosures, and entity specific topic, Housing disclosures), which demonstrate the progress made against our strategic objectives and targets across these areas.<br><br>The Group has continued to target 50:50 gender balance across all senior management appointments, with a 45-55% ratio to be achieved by the end of 2025. The Group achieved a 48% female senior leadership appointments ratio in 2024.<br><br>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 a small number of 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:<br>• 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. At the end of 2024, this figure was 60% (-2% vs April 2023 baseline) among people who identified Bank of Ireland as their main day-to-day bank.<br>• 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. At the end of 2024 this figure was 47% (+3% vs April 2023 baseline) among people who identified Bank of Ireland as their main day-to-day bank.<br><br>Through partnerships, the Group targets to support the financial wellbeing of the communities in which it operates / prioritised groups. The base value for this target as of April 2023 is zero partnerships, with a target of two partnerships by December 2025. The target of two partnerships was set as a test and learn concept as the Group works towards its UNPRB Commitments. The outcome of these partnerships will be used to inform the Group's short to medium term plans to continue with the progression towards meeting the UNPRB targets. This target applies to RoI only. The Group has achieved the target of two partnerships, partnering with two charities, facilitated by the Community Foundation Ireland, see previous section for more detail.<br>The progress against these targets is monitored and reported to the GSC on a quarterly basis.<br><br>These impact targets address a priority in Ireland in line with:<br>• Ireland's National Implementation Plan for the Sustainable Development Goals 2022–24<br>• Adult Literacy for Life Strategy<br>• Education for Sustainable Development—National Strategy<br>• The Financial Wellbeing of adults in Ireland<br>• The Financial Literacy of adults in Ireland<br>• The Financial Resilience of adults in Ireland<br><br>To monitor progress towards achieving its targets, the Bank will periodically track the following:<br>• Number of adults supported through financial education initiatives (just over 28,000 in 2024)<br>• 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<br>• 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<br>• Number of active partnerships to achieve financial health targets, starting from a baseline value of zero in 2023<br><br>Please see response to (a) above for further detail on our objectives with respect to social housing and the First Home Scheme. |
| (c) | **Policies and procedures relating to direct and indirect engagement with new or existing counterparties on their strategies to mitigate and reduce socially harmful activities**<br><br>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 Commercial 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.<br><br>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. This list applies to all new lending and existing customers ensuring that the Group does not provide new financing to customers who are deemed to engage in a defined list of excluded business activities. This list includes companies who have operations in internationally protected conservation areas, those which have been subject to major or sustained environmental or socially related campaigns against them, companies which have been found to abuse human rights and those companies which have incurred a major environmental or social incident or fine. 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 prior to credit review. For further details on this process and its governance arrangements, please refer to the Group's disclosure in Governance Risk Template.<br><br>Please see response to (a) above for further detail on our engagement with respect to social housing and the First Home Scheme. |
| | **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 social risk management covering counterparties' approaches to:**<br>**(i) Activities towards the community and society**<br>**(ii) Employee relationships and labour standards**<br>**(iii) Customer protection and product responsibility**<br>**(iv) Human rights**<br><br>**Responsibilities of the management body**<br>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 ESG commitments and delivery of the Sustainability strategy, which includes social dimensions as indicated in the Group's answers to (a) and (b) above.<br><br>At the report date, the Board comprises 10 Directors: two Executive Directors, the Chairman, who was independent on appointment, and seven independent Non-Executive Directors (NEDs). The biographical details of each of the Directors, along with each of their individual dates of appointment, are set out on pages 187 to 189 of the 2024 Annual Report. Page 192 provides further details on the diversity of the Board and its Committees and on the Board members skills and experience. The Group Nomination & Governance Committee (N&G) 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..<br><br>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<br>- Oversee progress against ESG targets the UN Principles for Responsible Banking Commitment to Financial Health & Inclusion, and other social related targets,<br>- Monitor the execution of the Board approved sustainability strategy, via periodic updates across key dimensions of the strategy including financial wellbeing interventions social topics (diversity and inclusion activity and supply chain).<br>- Review and challenge key sustainability policies of the Group, in the context of the Group's sustainability strategy, to ensure they are aligned to the Group's purpose and values and support the long term success of the Group. This includes approval, on an annual basis, of the Group Modern Slavery and Human Trafficking Statement and the Group Human Rights Policy.<br><br>Please see its terms of reference for further details:<br>https://www.bankofireland.com/app/uploads/assets/GSC-Terms-of-Reference-approved-16-Dec-2024.pdf |

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| (d) | 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 commitment to diversity is set out in the Board Diversity Policy which, following review in 2024 led by N&G, has retained the following specific targets:<br>• maintaining a minimum of 40% female representation on the Board. At the report date female representation on the Board is currently at 30% which falls below the target;<br>• the inclusion of at least one Director that is from an ethnic minority. At the report date this target has been met; and<br>• the appointment of a female to one of the four senior Board roles of CEO, CFO, Chairman and SID. At the report date this target has not yet been met.<br><br>The Group's Board level Group Sustainability Committee receives ongoing updates on Financial Wellbeing and a on UNPRB (United Nations Principles for Responsible Banking) commitments. The GEC sponsor for Financial Wellbeing is the Chief Customer Officer.<br>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.<br><br>On an ongoing basis, through it risk management framework, policies and processes, the Group identifies and assesses risk to which the Group is exposed. The Group's Risk Management Framework (RMF) sets out the risk management, measurement, and reporting requirements for the Group's risks. The Group ESG Risk Management Framework sets out the Group approach to ESG risk management. ESG factors represent a common risk driver across the Group's Principal and Sub risk types and are managed through each of the Group's Principal and Sub risk types. The Group applies a risk lens to ensure that the impact of ESG across the Group's risk types is considered on an ongoing basis and that the aggregate impact arising from ESG risk drivers is given appropriate consideration. While ESG risk management is managed through the Group's Principal and Sub risk types, the Group also has dedicated resources to lead the co-ordination of the Group's approach to ESG risk management, both in 1LOD (Sustainability Team, Group Finance) and in 2LOD (Business, Strategic and ESG Risk Team, Group Risk).<br><br>The Group defines ESG risk as the risk to the Group that ESG factors (environmental, social or governance matters) could cause a material negative impact on:<br>• the Group's earnings, capital, franchise value, or reputation;<br>• the Group's regulatory standing;<br>• the long-term sustainability of our customer's operations and financial wellbeing; and<br>• the communities and environment in which we and our customers operate.<br><br>Social and Governance risk is defined in the Group as the risk to the Group of any material negative impact from current or prospective impacts of social or governance risk factors including, actions by the Group or by the Group's supply chain, which could lead to a negative impact on the rights, well-being and interests of the Group and its customers, colleagues, and wider stakeholders.<br>Social risks, including employee relationships and labour standards, customer protection and product responsibility and human rights are managed through the relevant Group's risk types (Credit Risk, Conduct Risk and Other Operational Risk).<br><br>**Credit Risk:**<br>Regarding counterparty risk, the Group's Credit Risk policies and loan origination standards address social risk factors including customer and employee engagement and protections. For corporate and commercial customers, the Group examines social considerations as part of its customer onboarding due-diligence process. This process is also conducted on an annual basis for existing customers. The business activity of the company or project will be checked against the list of excluded activities across particularly sensitive sectors which are considered by the Group to cause social harm to society and our communities. If the company or project is involved in the excluded activities cannot be originated or renewed. Furthermore any cases considered a heightened ESG risk will be subject to enhanced review and consideration by an ESG Risk Forum. 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. Please see Table 1 Section (d) for further details on the ESG Risk credit procedures.<br><br>**Conduct Risk**<br>•The Group has a Customer Protection Risk Policy which highlights how customers are protected, covering topics of customer engagement, customer error and remediation, and customer complaints. The policy outlines the Product and Service Approval and Governance (PSAG) process which is a four stage control process incorporating different levels of independent review, challenge and approval for any in-scope product or service proposal.<br>•The Group Code of Conduct covers those working in or for the Group and outlines our guiding values and principles. It applies to all employees directly employed by the Group and Independent NEDs. The Code includes an overview of what the Group stands for, the Group's values and purpose, what happens in instances where the Code is breached and how to keep the Group safe against unacceptable behaviour, including bribery and corruption. Employees must complete the Group Code of Conduct training each year as well as other assigned mandatory training.<br>•The purpose of the Group's Speak Up Policy is to detail how all workers can confidentially raise a concern about suspected or actual wrongdoing, without fear of penalisation. The Speak Up & Investigation unit (SUI) reports updates to the Audit Committee at least semi-annually on the number, categorisation and outcome of investigations, any thematic findings and trends which may impact the Group, and KPIs which allow for the monitoring and measurement of the Group's Speak Up arrangements. The Group Audit Committee is responsible for considering, reviewing and evaluating arrangements for dealing with Speak Up concerns arising from the implementation of the Group Speak Up policy.<br>•The Group Data Privacy Policy outlines the Group's commitment to ensuring that the privacy rights of all data subjects for whom it processes personal data are upheld. It provides the Group with the foundations and organisational structure for ensuring compliance with legislative data protection and privacy obligations. It sets out the Group's approach to protecting personal data, taking account of the data protection and privacy principles and requirements that must be followed, and defines the standards for effective management of data protection and privacy related risks.<br><br>**Other Operational Risk**<br>•The Group Third Party Risk Management (TPRM) and Outsourcing policy details the minimum risk mitigating requirements relating to TPRM and Outsourcing risk to which the Group is exposed. The policy requires Group Procurement to establish and maintain a mandatory Onboarding Due Diligence Process for new outsourcing providers that is applied Group-wide. Criteria and/or factors to mitigate and measure ESG risk (including social risks) which may follow from the outsourcing to a supplier is considered as part of the due diligence.<br>•Through its Human Rights Policy the Group aims to ensure that its business operations do not infringe upon the human rights of its employees, customers, suppliers and communities. This policy applies to all employees, contractors, workers in the value chain in the organisations that the Group use as suppliers. Stakeholders include supplier's employees, sub-contractors and other third parties in their supply chain, business partners and stakeholders engaged in the Group's operations across all locations it operates in. It was also informed by relevant legal requirements, internationally agreed standards and external human rights experts.<br>•The Code of Supplier Responsibility applies to all suppliers to the Group. It defines what the Group expects from them in terms of responsible business practice and behaviour, including prohibiting forced labour (slavery) and human trafficking in their supply chains, and to prohibit child labour with reference to the ILO definition. It applies together with the Group's Third-Party policy document and the Group's membership of the Financial Supplier Qualification System (FSQS). The FSQS online portal is used by suppliers to submit information and compliance data about their organisation. |
| (e) | **Integration of measures to manage social factors and risks in internal governance arrangements, including the role of committees, the allocation of tasks and responsibilities, and the feedback loop from risk management to the management body**<br><br>The Group has a reporting line between the BRC, GSC and the Board covering ESG risks. The GSC and BRC receive quarterly updates related to ESG risks and the BRC/GSC holds a joint meeting on at least an annual basis and the Board is updated accordingly on ESG risks.<br>The Board Risk Report (BRR) is used by the Board to review and monitor the Group's risk profile across all Principal Risks, compliance with Risk Appetite and Risk Policies. ESG risk in the Group is reported through the BRR and is the primary source of reporting for the impact of ESG-related risks on the Group's risk profile. The Board receives monthly updates via the Board Risk Report, including social risk related Management Reporting Metrics (MRMs). In 2024, the Board approved a risk appetite statement for ESG risk, including a measure related to environmental and social risks.<br>The Group ESG Risk Management Framework (RMF) sets out the Group approach to ESG risk management and is reviewed and approved by the ERC on a minimum annual basis. 1LOD has the primary responsibility for managing the risk generated by their actions and this includes managing ESG factors. 2LOD has responsibility for ensuring the ESG risk factors are considered when executing second line responsibilities as set out in the Group RMF. While ESG risk management is managed through the Group's Principal and Sub risk types, the Group also has dedicated resources to lead the co-ordination of the Group's approach to ESG risk management, both in 1LOD (Sustainability Team, Group Finance) and in 2LOD (Business, Strategic and ESG Risk Team, Group Risk).<br><br>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. |
| (f) | **Lines of reporting and frequency of reporting relating to social risk**<br><br>The Board Risk Report (BRR) is used by the Board to review and monitor the Group's risk profile across all Principal Risks, compliance with Risk Appetite and Risk Policies. ESG risk in the Group is reported through the BRR and is the primary source of reporting for the impact of ESG-related risks on the Group's risk profile. The Board receives monthly updates via the Board Risk Report, including social risk related Management Reporting Metrics (MRMs). In 2024, the Board approved a risk appetite statement for ESG risk, including a measure related to environmental and social risks.<br>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'. See response to (a) above for further detail. |
| (g) | **Alignment of the remuneration policy in line with institution's social risk-related objectives**<br><br>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.<br><br>In 2023, 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. 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.<br><br>In making the assessment for 2024 the Group Remuneration Committee took into consideration social factors on customer and employee engagement. |
| | **Risk management** |

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| (h) | **Definitions, methodologies and international standards on which the social risk management framework is based**<br><br>**The management of Social Risks in Bank of Ireland**<br><br>The Group defines ESG risk as the risk to the Group that ESG factors (environmental, social or governance matters) could cause a material negative impact on:<br>• the Group's earnings, capital, franchise value, or reputation;<br>• the Group's regulatory standing;<br>• the long-term sustainability of our customer's operations and financial wellbeing; and<br>• the communities and environment in which we and our customers operate.<br><br>Social and Governance risk is defined in the Group as the risk to the Group of any material negative impact from current or prospective impacts of social or governance risk factors including, actions by the Group or by the Group's supply chain, which could lead to a negative impact on the rights, well-being and interests of the Group and its customers, colleagues, and wider stakeholders.<br><br>The Group's Risk Management Framework (RMF) sets out the risk management, measurement,<br>and reporting requirements for the Group's risks. The Group ESG Risk Management Framework sets out the Group approach to ESG risk management.<br><br>ESG factors represent a common driver across the Group's Principal and Sub risk types. The Group applies a risk lens to ensure that the impact of ESG across the Group's risk types is considered on an ongoing basis and that the aggregate impact arising from ESG risk drivers is given appropriate consideration. 1LOD has the primary responsibility for managing the risk generated by their actions and this includes managing ESG<br>factors. 2LOD has responsibility for ensuring the ESG risk factors are considered when executing second line responsibilities as set out in the Group RMF.<br>While ESG risk management is managed through the Group's Principal and Sub risk types, the Group also has dedicated resources to lead the co-ordination of the Group's approach to ESG risk management, both in 1LOD (Sustainability Team, Group Finance) and in 2LOD (Business, Strategic and ESG Risk Team, Group Risk).<br><br>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.<br><br>**Human Rights**<br>The Group does not operate within any countries or geographic areas that are at significant risk of incidents of forced labour, compulsory labour or child labour. Along with the Group's compliance with all applicable local labour laws and regulations for the areas in which it operates, the Group does not recognise any operations to be at significant risk of incidents of forced labour or child labour. The Group operates in an industry where regulation protects workers against such severe human rights violations. At Bank of Ireland Group (the Group), we are committed to upholding and promoting Human Rights in all areas of our operations. This policy draws on the Groups commitment to respecting and promoting Human Rights in accordance with the highest international standards, including the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, OECD guides for Multinational Enterprises, Corporate Sustainability Reporting Directive and International Labor Organisations Declaration on Fundamental Principles and Rights at Work. This policy also aligns with our commitments under, the United Nations Principles for Responsible Banking, United Nations Principles for Responsible Investment and United Nations Principles for Responsible Banking commitment to Financial Health and Inclusion.<br>https://personalbanking.bankofireland.com/app/uploads/Human-Rights-Policy-Clean-GWS.pdf<br>The Group's Modern Slavery and Human Trafficking Statement communicates the Group's commitment to improving practices to combat modern slavery, human trafficking and forced or compulsory labour, as defined in the Modern Slavery Act 2015. While the Group recognises human rights risks associated with modern slavery, the Modern Slavery and Human Trafficking Statement 2024 outlines the Group's actions to prevent human rights abuses, and this is reflected in its commitments under the UNPRB and the UN Principles for Responsible Investment (UNPRI).<br><br>**Code of Conduct**<br>The Group Code of Conduct covers those working in or for the Group and applies to all employees directly employed by the Group and Independent NEDs. Reviewed annually and approved by the Board, the Code defines our guiding values and principles in accordance with:<br>• The Central Bank of Ireland (CBI) Common Conduct Standards;<br>• UK Prudential Regulation Authority (PRA) and Financial Conduct Authority (FCA) Individual Conduct Rules; and<br>• where applicable CBI Additional Conduct Standards, CBI Fitness and Probity (F&P), the Individual Accountability Framework (IAF) or the Senior Managers and Certification Regime (SMCR).<br><br>**Code of Supplier Responsibility**<br>The Code of Supplier Responsibility applies to all suppliers to the Group and defines what the Group expects from them in terms of responsible business practice and behaviour, including prohibiting forced labour (slavery) and human trafficking in their supply chains, and to prohibit child labour. It applies together with the Group's Third-Party policy document and the Group's membership of the Financial Supplier Qualification System (FSQS). The FSQS online portal is used by suppliers to submit information and compliance data about their organisation. The code references relevant social legislation, standards, guidance, and regulations including:<br>• UK Modern Slavery Act,<br>• The Disability Act 2005 (Ireland), Equality Act 2010 (UK) and the European Accessibility Act 2019 (effective 28th June 2025).<br>• ISO 45001, the internationally recognised Occupational Health and Safety Management Standard.<br>These documents are publicly available on the Group's website: Investor Resources - Bank of Ireland. |
| (i) | **Processes to identify, measure and monitor activities and exposures (and collateral where applicable) sensitive to social risk, covering relevant transmission channels**<br><br>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 industry and continues to evolve. Implementation to date, in the Group and industry, has largely focused on climate-related risk and other environmental (non-climate) risk drivers with regulatory expectations set out in the ECB Guide on Climate-related and Environmental Risks (November 2020). In 2024, the management of ESG risk in the Group continued to develop and expand. The Group has leveraged the requirements of the EU Corporate Sustainability Reporting Directive (CSRD) to expand disclosures in relation to the identification and management of ESG risks. In FY24, a Double Materiality Assessment (DMA), using the double materiality concept was conducted across ESG (including social) topics.<br><br>ESG factors (including social factors) represent a common driver across the Group's Principal and Sub risk types. The Group addresses social risk factors through the risk policies attached to the relevant Principal and Sub risks including Conduct Risk, Operational Risk (including Third Party Risk Management & Outsourcing), Business and Strategic Risk, Regulatory Risk and Credit Risk. The Group also 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. |
| (j) | **Activities, commitments and assets contributing to mitigate social risk**<br><br>Please refer to the Group's answer to (d) above with respect to the processes in place to mitigate social risks through the Group's ESG Risk Management Framework.<br><br>Please refer to the Group's answer to (a) - (b) above, for the Group's objectives regarding social factors such as the Financial Wellbeing Programme (FWP) including:<br>- Special assistance for vulnerable customers;<br>- Enhancing learning and development opportunities for customers and colleagues; and<br>- The Group's commitment to achieving 50:50 gender ratio within its management and leadership.<br><br>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. |
| (k) | **Implementation of tools for identification and management of social risk**<br><br>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).<br><br>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.<br><br>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.<br><br>In terms of managing Financial Crime the Infinitech Project to help identify human trafficking typologies for financial crime investigation teams is now progressing to a fully embedded process which will significantly enhance the Group's capabilities in detecting and disrupting human trafficking activity.<br><br>The Group has a Code of Supplier Responsibility which outlines its expectations of its 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. |

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| (l) | **Description of setting limits to social risk and cases to trigger escalation and exclusion in the case of breaching these limits**<br><br>The Group has published a Sustainability Exclusion List that sets out the Group's risk appetite for lending to potential environmentally and socially sensitive sectors which it believes causes environmental and / or social harm to society and communities. This List applies to new lending and existing corporate and commercial customers ensuring that the Group does not provide new financing to customers who are deemed to engage in a defined list of excluded business activities (including specified activities within sectors such as Oil, Gas & Coal, Power & Energy, Mining, Defence and Adult Entertainment).<br>Also, ESG risk factors are used to screen for heightened ESG risk. If there is recent evidence in the public domain (last three years) of direct involvement in a defined list of issues the transaction is subject to an enhanced review. This list includes companies who have operations in internationally protected conservation areas, those which have been subject to major or sustained environmental or socially related campaigns against them, companies which have been found to abuse human rights and those companies which have incurred a major environmental or social incident or fine.<br>Transactions may also be considered as having a heightened ESG risk during initial review which will result in additional formal review by relevant risk forums and committees. This may be due, for example, to material or repeat noncompliance of environmental and social laws or a lack of adequate policies and procedures for managing ESG risks<br>.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.<br><br>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.<br><br>The Board Risk Report (BRR) is used by the Board to review and monitor the Group's risk profile across all Principal Risks, compliance with Risk Appetite and Risk Policies. ESG risk in the Group is reported through the BRR and is the primary source of reporting for the impact of ESG-related risks on the Group's risk profile. The Board receives monthly updates via the Board Risk Report, including social risk related Management Reporting Metrics (MRMs).<br>In 2024, the Board approved a risk appetite statement for ESG risk, including a measure related to environmental and social risks.<br>Key policies and statements addressing social risk factors include:<br><br>• Group Code of Conduct<br>• Speak Up policy<br>• Group Customer Protection Risk policy<br>• Group Social and Financial Inclusion policy<br>• Respect at Work policy<br>• Group Recruitment policy<br>• Corporate Affairs Statement<br>• Group Financial Crime policy<br>• Group Financial Crime Compliance statement<br>• Modern Slavery and Human Trafficking statement<br>• Human Rights policy<br>• Group Third Party Risk Management and Outsourcing Policy<br>• Code of Supplier Responsibility<br>• Group Procurement policy<br>• Group Inclusion and Diversity policy<br>• Group Health and Safety policy<br>• Group Data Privacy Risk policy<br>• Group Learning policy<br>• Group Third Party policy<br>• Responsible and Sustainable Business Sector Statement<br><br>The Group has reporting and escalation processes in place in the event of non-compliance with the risk mitigation requirements in the Group's Risk policies. |
| (m) | **Description of the link (transmission channels) between environmental risks with credit risk, liquidity and funding risk, market risk, operational risk and reputational risk in the risk management framework**<br><br>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 and other environmental (non-climate) risk drivers with regulatory expectations set out in the ECB Guide on Climate-related and Environmental Risks (November 2020). In 2024, the management of ESG risk in the Group continued to develop and expand. The Group has leveraged the requirements of the EU Corporate Sustainability Reporting Directive (CSRD) to expand disclosures in relation to the identification and management of ESG risks. In FY24, a Double Materiality Assessment (DMA), using the double materiality concept was conducted across ESG topics.<br><br>ESG factors represent a common driver across the Group's Principal and Sub risk types. The Group address ESG risk factors through the risk policies attached to the Group's Principal and Sub risk types. The Group has integrated climate-related and other environmental risk into the Group's Credit Risk, Liquidity Risk, Market Risk and Operational Risk Policies. The Group addresses social risk factors in the Group's Conduct Risk, Operational Risk and Credit Risk policies – see Section (d) above for further details. As per the Group's Double Materiality Assessment, undertaken in 2024, the impact of social risk factors has been assessed as having a non-material impact for Liquidity Risk and Market Risk, similar to the non-material impact for Climate and Environmental Risk. |

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**Table 3 - Qualitative information on Governance risk in accordance with Article 449a CRR**

| Row number | Governance |
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| (a) | Institution's integration in their governance arrangements governance performance of the counterparty, including committees of the highest governance body, committees responsible for decision-making on economic, environmental, and social topics<br><br>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. The Group's Credit Risk 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.<br><br>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 factors are likely to impact on a variety of key risk areas, which include but are not limited to;<br>• management & governance, reputation and brand value,<br>• regulatory risk & compliance, country and industry risk; and<br>• competitive position and cash-flows.<br><br>Credit submissions should assess the incorporation of ESG policies into its strategic objectives and the securing of relevant industry accreditations. Management assessment should also consider best practice governance perspectives, which would include board effectiveness, diversity and ESG leadership.<br><br>As part of the Group's 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.<br><br>The Group has in place specific procedures outlined within its Corporate and Commercial 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.<br><br>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.<br><br>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 Forum, prior to consideration by credit risk transaction governance or committees. The ESG Risk 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 and ESG risk assessment procedures. |
| (b) | **Institution's accounting of the counterparty's highest governance body's role in non-financial reporting**<br><br>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 Commercial Banking ESG Risk Lending Procedures. 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. |
| (c) | **Institution's integration in governance arrangements of the governance performance of their counterparties including:**<br><br>**(i) Ethical considerations**<br>**(ii) Strategy and risk management**<br>**(iii) Inclusiveness**<br>**(iv) Transparency**<br>**(v) Management of conflict of interest**<br>**(vi) Internal communication on critical concerns**<br><br>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.<br><br>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.<br><br>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, reviews 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.<br><br>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).<br><br>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.<br><br>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:<br>- Abuses of human rights, including displacement of indigenous peoples, child and forced labour, modern slavery, human trafficking, and exploitation of poverty<br>- Operations in internationally protected conservation areas<br>- Major or sustained environmental or socially related campaigns against the customer<br>- 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. |

With respect to the assessment of general governance arrangements of counterparties as part of due diligence requirements and as part of standard credit rating, the ESG Risk assessment will consider a range of factors. Relevant factors will differ depending on the industry and business activity; however, governance examples include:
i) Ethical considerations: Assessment of a counterparties' code of conduct and company values, anti-bribery and corruption policies
ii) Strategy and risk management: Assessment of a counterparties'
- management & governance, reputation and brand value,
- regulatory risk & compliance, country and industry risk,
- competitive position and cash-flows,
- the incorporation of ESG policies into its strategic objectives, and
- the securing relevant industry accreditations

iii) Inclusiveness: Assessment of a counterparties' policies on diversity and ESG leadership,
iv) Transparency: Assessment of a counterparties' policies on political contributions and lobbying, and remunerations
v) Management of conflict of interest and internal communication on critical concerns: Assessment of a counterparties' Speak Up policy and corporate governance frameworks

Credit submissions should assess the incorporation of ESG policies into its strategic objectives and the securing of relevant industry accreditations. Management assessment should also consider best practice governance perspectives, which would include board effectiveness, diversity and ESG leadership.

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.

## Risk management

(d)

Institution's integration in risk management arrangements the governance performance of their counterparties considering:

**i) Ethical considerations:**
**ii) Strategy and risk management**
**iii) Inclusiveness**
**iv) Transparency**
**v) Management of conflict of interest**
**vi) Internal communication on critical concerns**

On an ongoing basis, through it risk management framework, policies and processes, the Group identifies and assesses risk to which the Group is exposed. The Group's Risk Management Framework (RMF) sets out the risk management, measurement, and reporting requirements for the Group's risks. The Group ESG Risk Management Framework sets out the Group approach to ESG risk management. ESG factors represent a common risk driver across the Group's Principal and Sub risk types and are managed through each of the Group's Principal and Sub risk types. The Group applies a risk lens to ensure that the impact of ESG across the Group's risk types is considered on an ongoing basis and that the aggregate impact arising from ESG risk drivers is given appropriate consideration. While ESG risk management is managed through the Group's Principal and Sub risk types, the Group also has dedicated resources to lead the co-ordination of the Group's approach to ESG risk management, both in 1LOD (Sustainability Team, Group Finance) and in 2LOD (Business, Strategic and ESG Risk Team, Group Risk).

The Group defines ESG risk as the risk to the Group that ESG factors (environmental, social or governance matters) could cause a material negative impact on:

- the Group's earnings, capital, franchise value, or reputation;
- the Group's regulatory standing;
- the long-term sustainability of our customer's operations and financial wellbeing; and
- the communities and environment in which we and our customers operate.

Social and Governance risk is defined in the Group as the risk to the Group of any material negative impact from current or prospective impacts of social or governance risk factors including, actions by the Group or by the Group's supply chain, which could lead to a negative impact on the rights, well-being and interests of the Group and its customers, colleagues, and wider stakeholders.

Co-ordinated by Group Risk, the ESG Risk Working Group brings together second line of defence risk management from across the Principal and Sub Risk types (with representation from first line of defence Group Sustainability) to ensure that there is a co-ordinated, cohesive and challenging approach to the management of ESG risks within the Group.

The ESG Risk 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.

As noted in the Group's answers to (a) and (c) above, the Group's Corporate and Commercial Banking lending strategy is aligned to the ESG Risk screening and assessment process set out above. For more details on ESG Risk credit procedures please see Table 1 section (d). 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.

The Group's comprehensive Financial Crime framework includes, policies, and procedures designed to identify, assess, mitigate and 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.
The Group manages financial crime events through a 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 evaluate Money Laundering Terrorist Financing Risk, Sanctions Risk and Fraud Risk 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's Board. The 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.
In line with the Financial Crime policy, and mandatory procedures, all colleagues are responsible for completing their mandatory training curriculum to understand their obligations in respect of mitigating financial crime risk. Training requirements (mandatory annual web-based training and tailored training) are called out in the Financial Crime policy and cover money laundering risk, sanctions risk and fraud, bribery, corruption and tax evasion risk. Bribery & Corruption web-based training is part of the annual mandatory training which is assigned to all colleagues. Group Financial Crime Compliance (FCC) provide annual AML / countering the financing of terrorism (CFT) training to the Group Board whilst subsidiary MLROs are responsible for providing the training to their respective boards. The latest training to the Group Board was provided by FCC on 23 October 2024.
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.

Table 12.1 shows information on those assets more exposed to the risks that institutions may face from the transition to a low carbon and climate resilient economy.

**Table 12.1 - Template 1 - Banking book- Climate Change transition risk - Credit quality of exposures by sector, emissions and residual maturity**

| | Sector/subsector | a | b | c | d | e | f | g | h | i | j | k | l | m | n | o | p |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Gross carrying amount (Mln EUR) | | | | | Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (Mln EUR) | | | GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent) | | GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting | <= 5 years | > 5 year <= 10 years | > 10 year <= 20 years | > 20 years | Average weighted maturity |
| | | | Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation | Of which environmentally sustainable (CCM) | Of which stage 2 exposures | Of which non-performing exposures | | Of which Stage 2 exposures | Of which non-performing exposures | | Of which Scope 3 financed emissions | | | | | | |
| 1 | **Exposures towards sectors that highly contribute to climate change*** | **19,776** | **214** | **-** | **5,835** | **740** | **(548)** | **(209)** | **(268)** | **10,227,998** | **8,518,232** | **0.56%** | **13,335** | **3,785** | **1,186** | **1,470** | **4** |
| 2 | A - Agriculture, forestry and fishing | 1,788 | - | - | 352 | 55 | (40) | (13) | (17) | 920,459 | 734,199 | 0.00% | 802 | 371 | 472 | 142 | 7 |
| 3 | B - Mining and quarrying | 119 | 1 | | 27 | 1 | (2) | (1) | (0) | 346,392 | 71,290 | 0.00% | 100 | 18 | 1 | 0 | 5 |
| 4 | B.05 - Mining of coal and lignite | - | - | | - | - | - | - | - | | | | - | - | - | - | - |
| 5 | B.06 - Extraction of crude petroleum and natural gas | - | - | | - | - | - | - | - | | | | - | - | - | - | - |
| 6 | B.07 - Mining of metal ores | - | - | | - | - | - | - | - | | | | - | - | - | - | - |
| 7 | B.08 - Other mining and quarrying | 89 | - | | 4 | 1 | (1) | (0) | (0) | 289,553 | 55,362 | 0.00% | 76 | 13 | - | 0 | 5 |
| 8 | B.09 - Mining support service activities | 30 | 1 | | 23 | 0 | (1) | (1) | (0) | 56,839 | 15,928 | 0.00% | 25 | 5 | 1 | 0 | 4 |
| 9 | C - Manufacturing | 4,248 | 40 | - | 1,158 | 218 | (135) | (35) | (88) | 6,469,074 | 5,960,823 | 1.58% | 3,178 | 723 | 43 | 305 | 3 |
| 10 | C.10 - Manufacture of food products | 1,057 | 4 | - | 277 | 38 | (34) | (8) | (23) | 1,206,811 | 1,026,890 | 0.00% | 713 | 156 | 11 | 177 | 3 |
| 11 | C.11 - Manufacture of beverages | 136 | - | | 62 | - | (2) | (1) | - | 48,066 | 44,653 | 6.88% | 109 | 21 | - | 6 | 3 |
| 12 | C.12 - Manufacture of tobacco products | - | - | | - | - | - | - | - | | | | - | - | - | - | - |
| 13 | C.13 - Manufacture of textiles | 49 | - | | 26 | 7 | (5) | (0) | (5) | 25,466 | 15,994 | 0.00% | 49 | 0 | 0 | 0 | 1 |
| 14 | C.14 - Manufacture of wearing apparel | 79 | - | | 20 | 25 | (3) | (1) | (2) | 7,410 | 7,058 | 0.00% | 79 | - | - | - | 4 |
| 15 | C.15 - Manufacture of leather and related products | - | - | | - | - | - | - | - | | | | - | - | - | - | - |
| 16 | C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of st | 94 | - | | 9 | 34 | (13) | (0) | (12) | 124,903 | 112,459 | 0.00% | 73 | 8 | 1 | 13 | 4 |
| 17 | C.17 - Manufacture of pulp, paper and paperboard | 32 | - | | 32 | - | (1) | (1) | - | 39,713 | 35,828 | 0.00% | 32 | - | - | - | 3 |
| 18 | C.18 - Printing and service activities related to printing | 117 | - | | - | 19 | (11) | - | (11) | 30,016 | 28,662 | 21.46% | 76 | 41 | - | - | 4 |
| 19 | C.19 - Manufacture of coke oven products | 3 | 3 | | - | 3 | (1) | - | (1) | 1,214 | 1,038 | 0.00% | 1 | - | - | 2 | 1 |
| 20 | C.20 - Production of chemicals | 210 | - | | 119 | 0 | (2) | (2) | (0) | 343,477 | 257,234 | 0.00% | 190 | 17 | 2 | 0 | 3 |
| 21 | C.21 - Manufacture of pharmaceutical preparations | 183 | - | | 26 | - | (1) | (0) | - | 22,270 | 17,195 | 0.00% | 178 | 6 | - | - | 3 |
| 22 | C.22 - Manufacture of rubber products | 186 | - | | 47 | 38 | (13) | (2) | (10) | 493,670 | 477,632 | 0.00% | 143 | 40 | 3 | 0 | 4 |
| 23 | C.23 - Manufacture of other non-metallic mineral products | 62 | - | | 17 | 6 | (4) | (1) | (3) | 52,094 | 30,297 | 0.00% | 50 | 1 | 2 | 10 | 2 |
| 24 | C.24 - Manufacture of basic metals | 16 | - | | - | - | (0) | - | - | 4,173 | 2,930 | 0.00% | - | 16 | - | - | 7 |
| 25 | C.25 - Manufacture of fabricated metal products, except machinery and equipment | 143 | - | | 55 | - | (2) | (2) | - | 170,613 | 154,037 | 9.12% | 96 | 25 | 4 | 17 | 4 |
| 26 | C.26 - Manufacture of computer, electronic and optical products | 295 | - | | 135 | 0 | (7) | (6) | (0) | 344,082 | 310,719 | 0.00% | 278 | 18 | - | 0 | 4 |
| 27 | C.27 - Manufacture of electrical equipment | 223 | - | | 24 | - | (3) | (2) | - | 502,134 | 497,157 | 12.71% | 143 | 72 | - | 8 | 4 |
| 28 | C.28 - Manufacture of machinery and equipment n.e.c. | 452 | 20 | | 77 | 2 | (4) | (2) | (0) | 2,064,805 | 2,055,711 | 0.00% | 326 | 113 | 3 | 9 | 4 |
| 29 | C.29 - Manufacture of motor vehicles, trailers and semi-trailers | 62 | - | | 18 | 14 | (9) | (0) | (8) | 74,384 | 67,103 | 0.00% | 62 | - | - | - | 3 |
| 30 | C.30 - Manufacture of other transport equipment | 32 | - | | 4 | - | (0) | (0) | - | 24,113 | 23,398 | 0.00% | 29 | - | - | 3 | 1 |
| 31 | C.31 - Manufacture of furniture | 22 | - | | 0 | 0 | (0) | - | - | 7,851 | 7,082 | 0.00% | 6 | 15 | - | 1 | 6 |
| 32 | C.32 - Other manufacturing | 766 | 13 | | 210 | 32 | (20) | (6) | (12) | 846,637 | 756,155 | 0.00% | 531 | 168 | 16 | 51 | 4 |
| 33 | C.33 - Repair and installation of machinery and equipment | 27 | - | | 1 | - | (0) | (0) | - | 35,172 | 31,591 | 0.00% | 13 | 7 | - | 6 | 4 |
| 34 | D - Electricity, gas, steam and air conditioning supply | 521 | 23 | | 143 | 1 | (15) | (13) | (0) | 445,318 | 71,548 | 0.00% | 47 | 165 | 236 | 72 | 10 |
| 35 | D35.1 - Electric power generation, transmission and distribution | 493 | 23 | | 122 | 0 | (14) | (13) | (0) | 426,181 | 71,220 | 0.00% | 22 | 165 | 236 | 70 | 10 |
| 36 | D35.11 - Production of electricity | 475 | 23 | | 121 | 0 | (14) | (13) | (0) | 388,694 | 66,409 | 0.00% | 21 | 165 | 236 | 53 | 11 |
| 37 | D35.2 - Manufacture of gas; distribution of gaseous fuels through mains | 0 | - | | - | 0 | (0) | - | (0) | 110 | 6 | 0.00% | 0 | - | - | - | 14 |
| 38 | D35.3 - Steam and air conditioning supply | 27 | - | | 21 | - | (1) | (1) | - | 19,027 | 322 | 0.00% | 25 | - | - | 2 | 3 |
| 39 | E - Water supply; sewerage, waste management and remediation activities | 97 | - | | 32 | - | (2) | (2) | - | 11,201 | 6,906 | 0.21% | 65 | 32 | - | - | 6 |
| 40 | F - Construction | 349 | - | - | 27 | 13 | (9) | (2) | (5) | 52,425 | 41,615 | 0.00% | 133 | 204 | 4 | 7 | 5 |
| 41 | F.41 - Construction of buildings | 41 | - | - | 2 | 1 | (1) | (0) | (0) | 3,819 | 3,199 | 0.00% | 33 | 8 | 0 | - | 3 |
| 42 | F.42 - Civil engineering | 122 | - | | 0 | 2 | (3) | (0) | (2) | 26,159 | 19,926 | 0.00% | 45 | 76 | - | 1 | 5 |
| 43 | F.43 - Specialised construction activities | 186 | - | | 25 | 10 | (6) | (2) | (3) | 22,447 | 18,490 | 0.00% | 55 | 120 | 4 | 6 | 6 |
| 44 | G - Wholesale and retail trade; repair of motor vehicles and motorcycles | 2,323 | 142 | - | 518 | 44 | (43) | (17) | (15) | 1,215,074 | 1,155,690 | 0.00% | 1,055 | 399 | 120 | 750 | 3 |
| 45 | H - Transportation and storage | 844 | 7 | - | 179 | 71 | (40) | (6) | (31) | 195,280 | 83,840 | 4.74% | 450 | 271 | 87 | 36 | 6 |
| 46 | H.49 - Land transport and transport via pipelines | 215 | - | | 48 | 3 | (4) | (2) | (1) | 71,635 | 31,527 | 0.00% | 123 | 56 | 3 | 32 | 4 |
| 47 | H.50 - Water transport | 42 | 3 | | 3 | 0 | (1) | (0) | (0) | 8,864 | 4,452 | 0.00% | 38 | 1 | 0 | 3 | 4 |
| 48 | H.51 - Air transport | 57 | - | - | 4 | - | (0) | (0) | - | 48,279 | 10,344 | 78.33% | 56 | 1 | - | 0 | 4 |
| 49 | H.52 - Warehousing and support activities for transportation | 530 | 3 | | 124 | 68 | (35) | (3) | (30) | 66,502 | 37,517 | 0.00% | 233 | 213 | 83 | 1 | 6 |
| 50 | H.53 - Postal and courier activities | - | - | | - | - | - | - | - | | | | - | - | - | - | - |
| 51 | I - Accommodation and food service activities | 1,581 | - | | 521 | 24 | (22) | (11) | (7) | 278,243 | 224,468 | 0.00% | 954 | 415 | 78 | 134 | 6 |
| 52 | L - Real estate activities | 7,906 | - | | 2,878 | 312 | (239) | (108) | (104) | 294,532 | 167,853 | 0.00% | 6,550 | 1,187 | 146 | 24 | 3 |
| 53 | **Exposures towards sectors other than those that highly contribute to climate change*** | **7,210** | **-** | | **1,870** | **176** | **(171)** | **(69)** | **(75)** | **685,747** | **593,582** | **0.00%** | **4,829** | **1,471** | **446** | **464** | **5** |
| 54 | K - Financial and insurance activities | 52 | - | | 1 | 0 | (0) | (0) | (0) | 21,759 | 16,125 | 0.00% | 31 | 9 | - | 12 | 3 |
| 55 | Exposures to other sectors (NACE codes J, M - U) | 7,158 | - | | 1,869 | 175 | (171) | (69) | (75) | 663,988 | 577,457 | 0.00% | 4,799 | 1,462 | 446 | 452 | 5 |
| 56 | **TOTAL** | **26,987** | **214** | **-** | **7,705** | **915** | **(719)** | **(278)** | **(343)** | **10,913,745** | **9,111,814** | **0.46%** | **18,164** | **5,257** | **1,632** | **1,934** | **4** |

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

## Template 1: Banking Book - Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity

**Disclosure Basis**

This template provides information on exposures to non-financial counterparties operating in sectors that significantly contribute to climate change, including information on the credit quality and maturity profile of the exposures. The exposure information and classifications presented in the table is aligned to FINREP and may differ to other external reporting by the Group. The disclosure scope for this template includes exposures in the banking book, including loans and advances, debt securities and equity instruments to non-financial corporations, other than those held for trading.

**NACE Sector Classifications**

For this disclosure, the rows of the template breakdown include the gross carrying amount of loans and advances, debt securities and equity instruments to non-financial corporations, other than those held for trading, by sector of economic activities using NACE codes based on the principal activity of the counterparty. This breakdown is reconciled to the equivalent FINREP tables at NACE Classification Level 1 (21 sections identified by alphabetical letters A to U), and incorporates debt securities and equity instruments. For this disclosure, the FINREP NACE breakdown has been extended through a central exercise to NACE Level 2 (further sub-classifications denoted by two-digit numerical codes) for the sectors that highly contribute to climate change. The Group has an exposure of EUR 27 billion, distributed between those sectors identified by the EBA as major climate change contributors (73% – NACE A–I and L) and other, less polluting sectors (27% – NACE K, J, M–U).

**Paris-aligned benchmarks**

For the December 2024 disclosure, the Group has conducted a materiality-based exercise to identify counterparties within relevant sectors that are excluded from the EU Paris-aligned benchmarks as specified in Article 12(1), points (d) to (g) and Article 12(2) of Delegated Regulation (EU) 2020/1818. The criteria as prescribed were applied to corporate banking counterparties which resulted in exposures being identified in column b of Template 1. The Group acknowledges the request from the regulator for this portion of the template to exclude companies that significantly harm one or more of the EU Taxonomy Environmental Objectives, however no significant testing against the DNSH criteria has taken place as of publication of this disclosure. The percentage of lending to non-financial corporates excluded from Paris-aligned benchmarks on this basis is <1%.

**Environmentally Sustainable Exposures (CCM)**

This column reflects NFC exposure identified as Environmentally Sustainable aligned with EU Taxonomy objectives regarding Climate Change Mitigation (CCM) in Template 7 (Table 12.7)

**GHG Emissions**

The Group continues to progress the development of its emissions reporting capabilities and for this disclosure, GHG financed emissions are provided in line with the PCAF Part A Standards on Financed Emissions. This sees the estimates reported in columns (i-j) with the percentage of the portfolio weighted by gross carrying amount (GCA) where the Group has been able to estimate the counterparties scope 1, 2 & 3 financed emissions based on:
(i) information disclosed by the counterparties;
(ii) proxy estimates provided by ICE Sustainable Finance when direct disclosed estimates are not available. These proxy estimates are inferred by ICE based on economic activity (NACE Sector), geographic location and revenue of counterparties (based on available data);
(iii) emissions for the NACE Sector L - Real estate activities and D35.11 - Production of electricity are estimated in line with the Group's emission quantification methods applied for Science Based Targets.

This sees the majority of the estimated emissions generated by the NFC portfolio in the Scope 3 category, and this proportionality is in line with ECB system level emissions studies. However the Group recognises that measurement methodologies and data availability remain at an early stage of development across the industry which means emissions intensity estimates are not necessarily comparable across different financial institutions.

This is a particular consideration for Scope 3 estimation where limitations are noted in the PCAF Standard: "PCAF acknowledges that, to date, the comparability, coverage, transparency, and reliability of Scope 3 data still varies greatly per sector and data source". Due to this we have leveraged ICE's methodologies that infer Scope 3 estimates that accounts for incomplete coverage in reported emissions by counterparties. Furthermore as financial institutions are aggregators of emissions data for NFC counterparties, the potential for double counting of emissions due to overlaps across company supply chains is a further inherent limitation of the current approach.

The Group acknowledges these current limitations and is continuing to develop its methodologies and data coverage in this space. In addition, the level of direct estimates disclosed by counterparties will increase over time in line with the introduction of the Corporate Sustainability Reporting Directive (CSRD) and will reduce current levels of dependence on proxy estimates. In the meantime, variation in emission metrics may not always reflect changes in customers' emissions, but could result from changes in other factors, such as changes in revenue and production for various reasons such as global events, and new data sources and methodologies used to estimate emissions in the absence of externally published customer emissions.

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**

| | | a | b | c | d | e | f | g | h | i | j | k | l | m | n | o | p |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Counterparty sector | Total gross carrying amount (in MEUR) | | | | | | | | | | | | | | | |
| | | | Level of energy efficiency (EP score in kWh/m² of collateral) | | | | | | Level of energy efficiency (EPC label of collateral) | | | | | | | Without EPC label of collateral | |
| | | | 0; <= 100 | > 100; <= 200 | > 200; <= 300 | > 300; <= 400 | > 400; <= 500 | > 500 | A | B | C | D | E | F | G | | energy efficiency (EP score in kWh/m² of collateral) estimated |
| 1 | **Total EU area** | **38,729** | **11,165** | **11,840** | **8,135** | **2,936** | **2,337** | **2,311** | **2,532** | **1,054** | **1,471** | **610** | **308** | **124** | **88** | **32,543** | **100%** |
| 2 | Of which Loans collateralised by commercial immovable property | 4,157 | 339 | 569 | 316 | 598 | 19 | 2,311 | 551 | 357 | 267 | 94 | 40 | 14 | 7 | 2,826 | 100% |
| 3 | Of which Loans collateralised by residential immovable property | 34,573 | 10,825 | 11,271 | 7,819 | 2,339 | 2,318 | - | 1,981 | 696 | 1,204 | 516 | 268 | 111 | 81 | 29,716 | 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/m² of collateral) estimated | 33,868 | 9,104 | 10,382 | 7,257 | 2,634 | 2,229 | 2,263 | - | - | - | - | - | - | - | 32,543 | 100% |
| 6 | **Total non-EU area** | **18,007** | **1,480** | **4,202** | **7,188** | **2,394** | **588** | **252** | **91** | **1,898** | **4,332** | **5,718** | **1,705** | **278** | **54** | **3,930** | **61%** |
| 7 | Of which Loans collateralised by commercial immovable property | 1,903 | - | - | - | - | - | - | 43 | 178 | 85 | 65 | 0 | - | 3 | 1,530 | 0% |
| 8 | Of which Loans collateralised by residential immovable property | 16,103 | 1,480 | 4,202 | 7,188 | 2,394 | 588 | 252 | 49 | 1,719 | 4,247 | 5,654 | 1,705 | 278 | 51 | 2,401 | 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/m² of collateral) estimated | 2,410 | 28 | 361 | 1,553 | 406 | 50 | 12 | - | - | - | - | - | - | - | 2,401 | 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 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**

2024 saw system implementation of BER data capture (Building Energy Ratings – the Irish equivalent of EPC) and the launch of EcoSaver which incentives customers to provide EPC ratings for properties. These actions have seen substantial progress on increasing EPC data coverage on the portfolio during 2024, ending FY24 at 14% from 0% end FY23. 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 FY 2024 disclosure, c.32% 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 this December 2024 disclosure, 85% of the EPC data for the stock of UK mortgages is based on specific EPC labels. Coverage is up 5% year on year driven by higher coverage levels on new lending versus existing loans. 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 2024 disclosure, c.20% of the EPC data for UK and other non-EU 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. Energy Ratings and EP scores and estimates are not currently available for the low volume of commercial properties outside ROI and UK from the Group's data sources for this cohort.

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 | D35.11 - Production of electricity | 270 | 0.106 kgCO2e/kWh | 2024 | 0% | 0.073 kgCO2e/kWh |
| 2 | Fossil fuel combustion | B.06 - Extraction of crude petroleum and natural gas | 0 | | | | |
| 3 | Automotive | C.29 - Manufacture of motor vehicles, trailers and semi-trailers | 62 | | | | |
| 4 | Aviation | H.51 - Air transport | 57 | | | | |
| 5 | Maritime transport | H.50 - Water transport | 42 | | | | |
| 6 | Cement, clinker and lime production | C.23 - Manufacture of other non-metallic mineral products | 62 | | | | |
| 7 | Iron and steel, coke, and metal ore production | C.24 - Manufacture of basic metals | 16 | | | | |
| 8 | Chemicals | C.20 - Production of chemicals | 210 | | | | |
| 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:

In 2022 Bank of Ireland Group set Science based targets (SBTs) to set our portfolios and lending practices on a pathway that is aligned with the Paris Agreement goals.

These independently validated targets guide our emission reduction plans and are contingent on the current Irish and UK governments' Climate Action Plan ambitions and planned actions. The majority of Bank of Ireland emissions stem from our economic lending activities. Achieving our ambitious Scope 3 SBTi targets necessitates significant progress in national climate action plans in both Ireland and the UK. Additionally, the successful realisation of these targets relies on the actions taken by our customers.

Our ambition is to actively assist them in transitioning to more sustainable practices, both in their lifestyles and business operations. Given the integral role of the financial services sector in our economies, we recognise our potential as a key facilitator of the low-carbon transition. By setting SBTi emission reduction targets, we underscore our commitment to facilitating tangible change for our customers and society.

In 2022, we became the first Irish bank to have our Greenhouse gas (GHG) emission reduction targets validated by SBTi, covering all the Group's operations and 71% of our FY2020 baseline loan book. This includes Scope 1 and 2 emissions present in our operations and Scope 3 emissions in our downstream value chain. Having our GHG targets validated by the global gold standard SBTi reinforces the credibility of our commitment to assisting Ireland in achieving its climate targets.

The SBTi validated our target of a 49% reduction in GHG emissions from our own operations (Scope 1 and 2), which supports our broader aim of net zero emissions in our own operations by 2030. Reduction targets have also been set for emissions arising from the Bank's lending activities (Scope 3) which are consistent with levels required to meet the goals that are aligned to the 1.5°C Paris Agreement. Under the SBTi validated sector decarbonisation approach (SDA) targets, we are committing to a 48% reduction in residential mortgage portfolio emissions (Ireland and UK), a 56% reduction in commercial real estate portfolio emissions and a 76% reduction in electricity generation project finance portfolio emissions by 2030. The base year for the reduction targets is 2020. Under the SBTi validated portfolio coverage approach (PCA) targets, 25% of the Bank's corporate loan portfolio and corporate bonds will have SBTi validated targets by 2025.

Regarding the scope of counterparties included in this Template 3, it is important to note that this disclosure focuses on non-financial counterparties, while as a pre-dominantly retail based lender BOI's climate strategy encompasses all counterparties, including lending to households and SBTs on residential mortgages.

The Group's Annual Report (AR) serves as our primary disclosure, where we provide comprehensive updates on our progress in implementing our climate strategy. Individual SBT report cards in our FY2023 Annual Report track our progress against the six target categories. Please refer to pages 68-71 of the Group's 2024 Annual Report. for details on metrics, progress to date, convergence pathways and data quality. Targets have been validated by SBTi with reference to convergence pathways that are denoted in the report cards as follows:
• SBTi 1.5°C: SBTi pathway designed to facilitate limiting warming to 1.5 degrees Celsius above pre-industrial levels.
• ETP B2DS: Beyond 2 Degrees Scenario (B2DS) aims to limit with a 50% chance global temperature rise to 1.75 degrees Celsius above pre-industrial levels.

As of FY2024 the Group is on track to meet its 2030 SBTs across RoI mortgages, commercial real estate, electricity generation project finance and its own operations. In addition, the Group reached its 2025 target for 25% of our Corporate lending customer base having their own SBTs. Progress accelerated in 2024 and we expect to report further progress towards our SBTs as the Group executes its strategy, with the full impact of decarbonisation of the energy grid expected in the back end of the decade.

Template 3 aims to capture the bank's alignment efforts with respect to the objectives of the Paris Agreement for a selected number of sectors with exposure to non-financial counterparties, representing c.3% of the Group's exposure to non-financial counterparties. The details disclosed in Template 3 for the Power Sector are aligned with those currently covered in Bank of Ireland's climate strategy where SDA targets have been set and are tracked in our Annual Report. If the other additional Template 3 NACE sectors come into scope for the Group's climate target setting strategy on a sector decarbonisation approach in the future, details will be included accordingly in this template (given low materiality these sectors are currently incorporated under the corporate lending portfolio coverage target approach).

For the power generation sector, the target scope is on project finance electricity generation activity, where the convergence pathway is SBTi 1.5°C and the choice of the alignment metric is emissions intensity (kg of CO2e/kWh). The basis of preparation utilises power output and associated emissions based on individual counterparty data gathered as part of the project finance customer engagement and credit assessment process.

The project finance electricity generation (Power sector) is primarily comprised of renewable energy assets and is therefore starting at a lower level of intensity of emissions in its 2020 baseline relative to the IEA baseline (0.155 kgCO2/kWh versus 0.438 kgCO2/kWh). BOI's targeted 2030 intensity of 0.058 kgCO2/kWh reflects a 76% reduction versus the BOI baseline and emissions intensity is reducing aligned to a linear path towards this 2030 target. This sees BOI's current carbon intensity below the IEA 2030 target of 0.138 kgCO2/kWh with further reductions planned in the next three years in line with the Group's convergence path to target.

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 2024 disclosure, these top 20 lists were reviewed as at December 2024 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.

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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 | c | d | e | f | g | h | i | j | k | l | m | n | o |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Variable: Geographical area subject to climate change physical risk - acute and chronic events | Gross carrying amount (Mln EUR) | | | | | | | | | | | | | |
| | | | of which exposures sensitive to impact from climate change physical events | | | | | | | | | | | | |
| | | | Breakdown by maturity bucket | | | | | of which exposures sensitive to impact from chronic climate change events | of which exposures sensitive to impact from acute climate change events | of which exposures sensitive to impact both from chronic and acute climate change events | Of which Stage 2 exposures | Of which non-performing exposures | Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions | | |
| | | | <= 5 years | > 5 year <= 10 years | > 10 year <= 20 years | > 20 years | Average weighted maturity | | | | | | | of which Stage 2 exposures | Of which non-performing exposures |
| 1 | A - Agriculture, forestry and fishing | 1,499 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 2 | B - Mining and quarrying | 92 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 3 | C - Manufacturing | 1,462 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 4 | D - Electricity, gas, steam and air conditioning supply | 240 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 5 | E - Water supply; sewerage, waste management and remediation activities | 65 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 6 | F - Construction | 204 | 0 | - | - | - | 3 | - | 0 | - | 0 | - | (0) | (0) | - |
| 7 | G - Wholesale and retail trade; repair of motor vehicles and motorcycles | 1,771 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 8 | H - Transportation and storage | 613 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 9 | L - Real estate activities | 5,813 | 39 | 14 | - | - | 4 | - | 53 | - | 25 | 0 | (1) | (1) | (0) |
| 10 | Loans collateralised by residential immovable property | 34,573 | 11 | 34 | 128 | 267 | 22.0 | - | 441 | - | 17 | 6 | (2) | (0) | (1) |
| 11 | Loans collateralised by commercial immovable property | 4,146 | 296 | 22 | 1 | - | 2.0 | - | 318 | - | 59 | 46 | (24) | (3) | (20) |
| 12 | Repossessed collaterals | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 13 | Other relevant sectors (breakdown below where relevant) | 4,133 | 0 | 0 | - | - | 4 | - | 1 | - | - | - | (0) | - | - |

**Table 12.5.2 - Template 5 - Banking book - Climate change physical risk - Exposures subject to physical risk: UK**

| | a | b | c | d | e | f | g | h | i | j | k | l | m | n | o |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Variable: Geographical area subject to climate change physical risk - acute and chronic events | Gross carrying amount (Mln EUR) | | | | | | | | | | | | | |
| | | | of which exposures sensitive to impact from climate change physical events | | | | | | | | | | | | |
| | | | Breakdown by maturity bucket | | | | | of which exposures sensitive to impact from chronic climate change events | of which exposures sensitive to impact from acute climate change events | of which exposures sensitive to impact both from chronic and acute climate change events | Of which Stage 2 exposures | Of which non-performing exposures | Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions | | |
| | | | <= 5 years | > 5 year <= 10 years | > 10 year <= 20 years | > 20 years | Average weighted maturity | | | | | | | of which Stage 2 exposures | Of which non-performing exposures |
| 1 | A - Agriculture, forestry and fishing | 244 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 2 | B - Mining and quarrying | 10 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 3 | C - Manufacturing | 609 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 4 | D - Electricity, gas, steam and air conditioning supply | 250 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 5 | E - Water supply; sewerage, waste management and remediation activities | 32 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 6 | F - Construction | 23 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 7 | G - Wholesale and retail trade; repair of motor vehicles and motorcycles | 247 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 8 | H - Transportation and storage | 139 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 9 | L - Real estate activities | 1,496 | 0 | - | - | - | 3 | - | 0 | - | 0 | - | (0) | (0) | - |
| 10 | Loans collateralised by residential immovable property | 16,103 | 86 | 119 | 100 | 289 | 18.0 | 194 | 386 | 13 | 44 | 21 | (4) | (1) | (2) |
| 11 | Loans collateralised by commercial immovable property | 1,443 | 0 | - | - | - | 4.0 | - | 0 | - | - | - | (0) | - | - |
| 12 | Repossessed collaterals | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 13 | Other relevant sectors (breakdown below where relevant) | 2,286 | - | - | - | - | - | - | - | - | - | - | - | - | - |

**Table 12.5.3 - Template 5 - Banking book - Climate change physical risk - Exposures subject to physical risk: Other**

| | a | b | c | d | e | f | g | h | i | j | k | l | m | n | o |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Variable: Geographical area subject to climate change physical risk - acute and chronic events | Gross carrying amount (Mln EUR) | | | | | | | | | | | | | |
| | | | of which exposures sensitive to impact from climate change physical events | | | | | | | | | | | | |
| | | | Breakdown by maturity bucket | | | | | of which exposures sensitive to impact from chronic climate change events | of which exposures sensitive to impact from acute climate change events | of which exposures sensitive to impact both from chronic and acute climate change events | Of which Stage 2 exposures | Of which non-performing exposures | Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions | | |
| | | | <= 5 years | > 5 year <= 10 years | > 10 year <= 20 years | > 20 years | Average weighted maturity | | | | | | | of which Stage 2 exposures | Of which non-performing exposures |
| 1 | A - Agriculture, forestry and fishing | 44 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 2 | B - Mining and quarrying | 17 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 3 | C - Manufacturing | 2,177 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 4 | D - Electricity, gas, steam and air conditioning supply | 31 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 5 | E - Water supply; sewerage, waste management and remediation activities | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 6 | F - Construction | 122 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 7 | G - Wholesale and retail trade; repair of motor vehicles and motorcycles | 306 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 8 | H - Transportation and storage | 92 | 4 | - | - | - | 3 | 4 | - | - | 4 | - | (0) | (0) | - |
| 9 | L - Real estate activities | 597 | 0 | 0 | - | - | 6 | 0 | - | - | - | - | (0) | - | - |
| 10 | Loans collateralised by residential immovable property | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 11 | Loans collateralised by commercial immovable property | 471 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 12 | Repossessed collaterals | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 13 | Other relevant sectors (breakdown below where relevant) | 2,372 | - | - | - | - | - | - | - | - | - | - | - | - | - |

## Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk

**Physical Risk Assessment**

The Group has developed 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 chronic 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 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 Previous reporting of flood risk in ROI did not take into account mitigating flood defences. Flood defence data is now being integrated on new properties and reflected in the reported ROI data.

4 Probability based on projected JBA Flood Scores.

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[1]**

| | KPI | | | |
|---|---|---|---|---|
| | Climate change mitigation | Climate change adaptation | Total (Climate change mitigation + Climate change adaptation) | % coverage (over total assets)[2] |
| GAR stock | 3.89 | 0.00 | 3.89 | 70.89 |
| GAR flow | 7.03 | 0.00 | 7.03 | 97.25 |

1 Based on the Turnover KPI of the counterparty.

2 Percentage of assets covered by the KPI over banks´ total assets

**Taxonomy KPIs**

The Group reported on Taxonomy KPIs and green asset ratios (GAR) for the first time for 31 December 2023. The EU Taxonomy disclosures reported here as at 31 December 2024 in Pillar 3 are based on the turnover KPIs for counterparties.

At 31 December 2024, the Group's total GAR based on turnover amounted to 3.9% of total covered assets (FY2023: 2.4%) with taxonomy-aligned activities amounted to €3.8 billion (FY2023: €2.3 billion). Gross carrying amount of total covered assets amounted to €97.3 billion as at 31 December 2024 (FY2023: €94.2 billion).

Total green asset ratio: Taxonomy-aligned activities as a proportion of total covered assets.

Total covered assets: Total assets excluding exposures to sovereigns and trading book. Total assets are defined according to the prudential consolidation of the Group per FINREP.

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 l 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 but is limited in scope at this point in time.

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 | g | h | i | j | k | l | m | n | o | p |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | Disclosure reference date T | | | | | | | | | | | | | | |
| | | | Climate Change Mitigation (CCM) | | | | | Climate Change Adaptation (CCA) | | | | | TOTAL (CCM + CCA) | | | | |
| | Million EUR | Total gross carrying amount | Of which towards taxonomy relevant sectors (Taxonomy- | | | | | Of which towards taxonomy relevant sectors (Taxonomy- | | | | | Of which towards taxonomy relevant sectors (Taxonomy- | | | | |
| | | | | Of which environmentally sustainable (Taxonomy- | | | | | Of which environmentally sustainable (Taxonomy- | | | | | Of which environmentally sustainable (Taxonomy- | | | |
| | | | | | 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 HfT eligible for GAR calculation | 60,824 | 51,682 | 3,787 | 3,727 | 3,787 | - | 53 | 0 | - | - | 0 | 51,736 | 3,787 | 3,727 | 3,787 | 0 |
| 2 | **Financial corporations** | **4,548** | **704** | **60** | **-** | **60** | **-** | **53** | **0** | **-** | **-** | **0** | **757** | **61** | **-** | **60** | 0 |
| 3 | Credit institutions | 3,492 | 704 | 60 | - | 60 | - | 53 | 0 | - | - | 0 | 757 | 61 | - | 60 | 0 |
| 4 | Loans and advances | 484 | 84 | 4 | - | 4 | - | 1 | 0 | - | - | 0 | 85 | 4 | - | 4 | 0 |
| 5 | Debt securities, including UoP | 3,008 | 620 | 56 | - | 56 | - | 53 | 0 | - | - | 0 | 673 | 57 | - | 56 | 0 |
| 6 | Equity instruments | - | - | - | | - | - | - | - | | - | - | - | - | | - | - |
| 7 | Other financial corporations | 1,057 | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 8 | of which investment firms | 19 | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 9 | Loans and advances | 19 | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 10 | Debt securities, including UoP | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 11 | Equity instruments | - | - | - | | - | - | - | - | | - | - | - | - | | - | - |
| 12 | of which  management companies | 20 | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 13 | Loans and advances | 20 | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 14 | Debt securities, including UoP | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 15 | Equity instruments | - | - | - | | - | - | - | - | | - | - | - | - | | - | - |
| 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)** | **315** | **78** | **0** | **-** | **0** | **-** | **-** | **-** | **-** | **-** | **-** | **78** | **0** | **-** | **0** | **-** |
| 21 | Loans and advances | 315 | 78 | 0 | - | 0 | - | - | - | - | - | - | 78 | 0 | - | 0 | - |
| 22 | Debt securities, including UoP | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 23 | Equity instruments | - | - | - | | - | - | - | - | | - | - | - | - | | - | - |
| 24 | **Households** | **55,919** | **50,860** | **3,685** | **3,685** | **3,685** | **-** | | | | | | **50,860** | **3,685** | **3,685** | **3,685** | - |
| 25 | of which loans collateralised by residential immovable property | 50,676 | 50,676 | 3,685 | 3,685 | 3,685 | - | | | | | | 50,676 | 3,685 | 3,685 | 3,685 | - |
| 26 | of which building renovation loans | - | - | - | - | - | - | | | | | | - | - | - | - | - |
| 27 | of which motor vehicle loans | 3,462 | 184 | - | - | - | - | | | | | | 184 | - | - | - | - |
| 28 | **Local governments financing** | **41** | **41** | **41** | **41** | **41** | **-** | **-** | **-** | **-** | **-** | **-** | **41** | **41** | **41** | **41** | - |
| 29 | Housing financing | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 30 | Other local governments financing | 41 | 41 | 41 | 41 | 41 | - | - | - | - | - | - | 41 | 41 | 41 | 41 | - |
| 31 | Collateral obtained by taking possession: residential and commercial immovable properties | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 32 | **TOTAL GAR ASSETS** | **60,824** | **51,682** | **3,787** | **3,727** | **3,787** | **-** | **53** | **0** | **-** | **-** | **0** | **51,736** | **3,787** | **3,727** | **3,787** | **0** |
| | **Assets excluded from the numerator for GAR calculation (covered in the denominator)** | | | | | | | | | | | | | | | | |
| 33 | **EU Non-financial corporations (not subject to NFRD disclosure obligations)** | **17,789** | | | | | | | | | | | | | | | |
| 34 | Loans and advances | 17,785 | | | | | | | | | | | | | | | |
| 35 | Debt securities | - | | | | | | | | | | | | | | | |
| 36 | Equity instruments | 4 | | | | | | | | | | | | | | | |
| 37 | **Non-EU Non-financial corporations (not subject to NFRD disclosure obligations)** | **11,004** | | | | | | | | | | | | | | | |
| 38 | Loans and advances | 9,624 | | | | | | | | | | | | | | | |
| 39 | Debt securities | 1,295 | | | | | | | | | | | | | | | |
| 40 | Equity instruments | 84 | | | | | | | | | | | | | | | |
| 41 | Derivatives | 1,873 | | | | | | | | | | | | | | | |
| 42 | On demand interbank loans | 130 | | | | | | | | | | | | | | | |
| 43 | Cash and cash-related assets | 371 | | | | | | | | | | | | | | | |
| 44 | Other assets (e.g. Goodwill, commodities etc.) | 5,357 | | | | | | | | | | | | | | | |
| 45 | **TOTAL ASSETS IN THE DENOMINATOR (GAR)** | **97,348** | | | | | | | | | | | | | | | |
| | **Other assets excluded from both the numerator and denominator for GAR calculation** | | | | | | | | | | | | | | | | |
| 46 | Sovereigns | 5,130 | | | | | | | | | | | | | | | |
| 47 | Central banks exposure | 33,076 | | | | | | | | | | | | | | | |
| 48 | Trading book | 1,773 | | | | | | | | | | | | | | | |
| 49 | **TOTAL ASSETS EXCLUDED FROM NUMERATOR AND DENOMINATOR** | **39,979** | | | | | | | | | | | | | | | |
| 50 | **TOTAL ASSETS** | **137,327** | | | | | | | | | | | | | | | |

The Group's total GAR based on turnover amounted to 3.89% of total covered assets as at 31 December 2024. The Taxonomy-aligned activities amounted to €3.8billion at 31 December 2024 (FY2023: €2.3 billion). Gross carrying amount of total covered assets amounted to €97.3 billion as at 31 December 2024 (FY2023: €94.2 billion).

Reporting on Taxonomy-aligned activities for FY24 has continued to be 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:
– financial and non-financial undertakings have not yet published data for FY24; consequently, the Taxonomy reporting of eligibility and alignment for non-financial undertakings is based on published data from FY23; and
– exposure to non-financial counterparties in the Group's corporate lending portfolio currently considered taxonomy eligible is limited at c.€78 million (2023: c.€5 million) due to the eligibility criteria requiring counterparties to be large companies publicly listed in the EU. The alignment of this exposure is €nil based on the data reported by the eligible counterparties at FY23.

• one renewable energy project finance exposure 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 have been included in the GAR only where they are not subject to high physical risk of flood and can be aligned to the following criteria:
  – RoI properties built before the end of 2021 belonging to the top 15% low carbon buildings in Ireland (a BER of B2 or better);
  – RoI properties built since 2021 with primary energy demand 10% lower than the Nearly Zero-Energy Buildings (NZEB) standard; or
  – UK properties built before the end of 2021 belonging to the top 15% low carbon buildings in the UK (an EPC Rating of A or B).
  – New data collection processes for residential mortgages implemented during 2024 have had a positive impact on data availability and is reflected in increased recognition of taxonomy aligned assets across stock and flow measures; and
– EV lending exposures originated since the beginning of FY23 of c.€184 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 extend 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 (%)**

| | | a | b | c | d | e | f | g | h | i | j | k | l | m | n | o | p |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Disclosure reference date T: KPIs on stock | | | | | | | | | | | | | | | |
| | | Climate Change Mitigation (CCM) | | | | | Climate Change Adaptation (CCA) | | | | | TOTAL (CCM + CCA) | | | | | |
| | | Proportion of eligible assets funding taxonomy relevant sectors | | | | | Proportion of eligible assets funding taxonomy relevant sectors | | | | | Proportion of eligible assets funding taxonomy relevant sectors | | | | | Proportion of total assets covered |
| | | | Of which environmentally sustainable | | | | | Of which environmentally sustainable | | | | | Of which environmentally sustainable | | | | |
| | % (compared to total covered assets in the denominator) | | | 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 | |
| 1 | **GAR** | **53.09** | **3.89** | **3.83** | **3.89** | **-** | **0.05** | **0.00** | **-** | **-** | **0.00** | **53.15** | **3.89** | **3.83** | **3.89** | **0.00** | **70.89** |
| 2 | Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation | 84.97 | 6.23 | 6.13 | 6.23 | - | 0.09 | 0.00 | - | - | 0.00 | 85.06 | 6.23 | 6.13 | 6.23 | 0.00 | 44.29 |
| 3 | Financial corporations | 15.47 | 1.33 | - | 1.33 | - | 1.17 | 0.01 | - | - | 0.01 | 16.65 | 1.34 | - | 1.33 | 0.01 | 3.31 |
| 4 | Credit institutions | 20.15 | 1.73 | - | 1.73 | - | 1.53 | 0.01 | - | - | 0.01 | 21.68 | 1.74 | - | 1.73 | 0.01 | 2.54 |
| 5 | Other financial corporations | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | 0.77 |
| 6 | of which investment firms | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | 0.01 |
| 7 | of which management companies | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | 0.01 |
| 8 | of which insurance undertakings | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | 0.01 |
| 9 | Non-financial corporations subject to NFRD disclosure obligations | 24.66 | - | - | - | - | - | - | - | - | - | 24.66 | - | - | - | - | 0.23 |
| 10 | Households | 90.95 | 6.59 | 6.59 | 6.59 | - | | | | | | 90.95 | 6.59 | 6.59 | 6.59 | - | 40.72 |
| 11 | of which loans collateralised by residential immovable property | 100.00 | 7.27 | 7.27 | 7.27 | - | | | | | | 100.00 | 7.27 | 7.27 | 7.27 | - | 36.90 |
| 12 | of which building renovation loans | - | - | - | - | - | | | | | | - | - | - | - | - | - |
| 13 | of which motor vehicle loans | 5.31 | - | - | - | - | | | | | | 5.31 | - | - | - | - | 2.52 |
| 14 | Local government financing | 100.00 | 100.00 | 100.00 | 100.00 | - | | | | | | 100.00 | 100.00 | 100.00 | 100.00 | - | 0.03 |
| 15 | Housing financing | - | - | - | - | - | | | | | | - | - | - | - | - | - |
| 16 | Other local governments financing | 100.00 | 100.00 | 100.00 | 100.00 | - | - | - | - | - | - | 100.00 | 100.00 | 100.00 | 100.00 | - | 0.03 |
| 17 | Collateral obtained by taking possession: residential and commercial immovable properties | - | - | - | - | - | | | | | | - | - | - | - | - | - |

| | | q | r | s | t | u | v | w | x | y | z | aa | ab | ac | ad | ae | af |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Disclosure reference date T: KPIs on flows | | | | | | | | | | | | | | | |
| | | Climate Change Mitigation (CCM) | | | | | Climate Change Adaptation (CCA) | | | | | TOTAL (CCM + CCA) | | | | | |
| | | Proportion of new eligible assets funding taxonomy relevant | | | | | Proportion of new eligible assets funding taxonomy relevant sectors | | | | | Proportion of new eligible assets funding taxonomy relevant | | | | | Proportion of total new assets covered |
| | | | Of which environmentally sustainable | | | | | Of which environmentally sustainable | | | | | Of which environmentally sustainable | | | | |
| | % (compared to total covered assets in the denominator) | | | 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** | **49.19** | **7.03** | **7.01** | **7.03** | **-** | **0.00** | **0.00** | **-** | **-** | **0.00** | **49.19** | **7.03** | **7.01** | **7.03** | **0.00** | **97.25** |
| 2 | Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation | 78.88 | 11.27 | 11.25 | 11.27 | - | 0.00 | 0.00 | - | - | 0.00 | 78.88 | 11.27 | 11.25 | 11.27 | 0.00 | 60.64 |
| 3 | Financial corporations | 3.42 | 0.38 | - | 0.38 | - | 0.08 | 0.00 | - | - | 0.00 | 3.50 | 0.38 | - | 0.38 | 0.00 | 3.64 |
| 4 | Credit institutions | 18.29 | 2.06 | - | 2.06 | - | 0.44 | 0.00 | - | - | 0.00 | 18.73 | 2.06 | - | 2.06 | 0.00 | 0.68 |
| 5 | Other financial corporations | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | 2.96 |
| 6 | of which investment firms | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | 0.09 |
| 7 | of which management companies | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | 0.09 |
| 8 | of which insurance undertakings | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 9 | Non-financial corporations subject to NFRD disclosure obligations | 0.54 | - | - | - | - | - | - | - | - | - | 0.54 | - | - | - | - | 0.74 |
| 10 | Households | 84.79 | 12.12 | 12.12 | 12.12 | - | | | | | | 84.79 | 12.12 | 12.12 | 12.12 | - | 56.26 |
| 11 | of which loans collateralised by residential immovable property | 100.00 | 14.47 | 14.47 | 14.47 | - | | | | | | 100.00 | 14.47 | 14.47 | 14.47 | - | 47.12 |
| 12 | of which building renovation loans | - | - | - | - | - | | | | | | - | - | - | - | - | - |
| 13 | of which motor vehicle loans | 6.43 | - | - | - | - | | | | | | 6.43 | - | - | - | - | 9.15 |
| 14 | Local government financing | - | - | - | - | - | | | | | | - | - | - | - | - | - |
| 15 | Housing financing | - | - | - | - | - | | | | | | - | - | - | - | - | - |
| 16 | Other local governments financing | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 17 | Collateral obtained by taking possession: residential and commercial immovable properties | - | - | - | - | - | | | | | | - | - | - | - | - | - |

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 | **Bonds (e.g. green, sustainable, sustainability-linked under standards other than the EU standards)** | Financial corporations | 166 | 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 | 591 | Yes | No | |
| 8 | **Loans (e.g. green, sustainable, sustainability-linked under standards other than the EU standards)** | Financial corporations | - | - | - | Exposures of c.€10.9bn disclosed in this table comprise the non-EU taxonomy-aligned loans within the Group's Sustainable Finance Portfolio. Additionally, exposures of c.€3.8bn of EU taxonomy-aligned loans within the Sustainable Finance Portfolio of €14.7bn at 31 December 2024 are reported in ESG Template 7.<br><br>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. |
| 9 | | Non-financial corporations | 4,074 | Yes | No | |
| 10 | | Of which Loans collateralised by commercial immovable property | 1,962 | Yes | No | |
| 11 | | Households | 6,864 | Yes | No | |
| 12 | | Of which Loans collateralised by residential immovable property | 6,672 | Yes | No | |
| 13 | | Of which building renovation loans | - | - | - | |
| 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 by 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 €4.8 billion in Green Bonds in issue through its Green Bond Framework. For further details on Sustainable Finance please refer to pages 54-55 of the Group's 2024 Annual Report.

For 31 December 2023, the Group first published the disclosures from its EU Taxonomy alignment exercise. The results for 31 December 2024 exercise has been disclosed in ESG Templates 6, 7 and 8. As a result of exercise, exposures of c.€3.8 billion from within the Sustainable Finance Portfolio of €14.7bn at 31 December 2024 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 |
| Annex 3 - Disclosure of risk management objectives and policies | EU OVA | Institution risk management approach | Risk Management, Risk Management Framework, Business risk & Strategic risk, Credit risk, Market risk, Operational risk, Funding and liquidity risk, Life insurance risk, Conduct risk, Regulatory risk and Capital Adequacy Risk tabs. |
| Annex 3 - Disclosure of risk management objectives and policies | EU OVB | Disclosure on governance arrangements | Tab 3.2 |
| Annex 5 - Disclosure of the scope of application | EU LI1 | Differences between the accounting scope and the scope of prudential consolidation and mapping of financial statement categories with regulatory risk categories | Tab 1.5 |
| Annex 5 - Disclosure of the scope of application | EU LI2 | Main sources of differences between regulatory exposure amounts and carrying values in financial statements | Tab 1.6 |
| Annex 5 - Disclosure of the scope of application | EU LI3 | Outline of the differences in the scopes of consolidation (entity by entity) | Appendix III |
| Annex 5 - Disclosure of the scope of application | EU LIA | Explanations of differences between accounting and regulatory exposure amounts | Tab 1.5 |
| Annex 5 - Disclosure of the scope of application | EU LIB | Other qualitative information on the scope of application | Tab 1.5 |
| Annex 5 - Disclosure of the scope of application | EU PV1 | Prudent valuation adjustments (PVA) | Tab 2.5 |
| Annex 6 - Disclosure on MREL and TLAC | EU KM2 | Key metrics - MREL and, where applicable, G-SII requirement for own funds and eligible liabilities | Tab 1.6 |
| Annex 7 - Disclosure of Own Funds | EU CC1 | Composition of regulatory own funds | Tab 2.2 |
| Annex 7 - Disclosure of Own Funds | EU CC2 | Reconciliation of regulatory own funds to balance sheet in the audited financial statements | Tab 2.3 |
| Annex 7 - Disclosure of Own Funds | EU CCA | Main features of regulatory own funds instruments and eligible liabilities instruments | Appendix IV |
| Annex 9 - Disclosure of countercyclical capital buffers | EU CCyB1 | Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer | Tab 2.4 |
| Annex 9 - Disclosure of countercyclical capital buffers | EU CCyB2 | Amount of institution-specific countercyclical capital buffer | Tab 2.4 |
| Annex 11 - Disclosure of the leverage ratio | EU LR1 | LRSum: Summary reconciliation of accounting assets and leverage ratio exposures | Tab 10.1 |
| Annex 11 - Disclosure of the leverage ratio | EU LR2 | LRCom: Leverage ratio common disclosure | Tab 10.2 |
| Annex 11 - Disclosure of the leverage ratio | EU LR3 | LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures) | Tab 10.3 |
| Annex 11 - Disclosure of the leverage ratio | EU LRA | Disclosure of LR qualitative information | Leverage Ratio Tab |
| Annex 13 - Disclosure of liquidity requirements | EU LIQA | Liquidity risk management | Funding and liquidity risk tab |
| Annex 13 - Disclosure of liquidity requirements | EU LIQB | Qualitative information on LCR which complements template EU LIQ1 | Tab 9.1 |
| Annex 13 - Disclosure of liquidity requirements | EU LIQ1 | LCR Disclosures template | Tab 9.2 |
| Annex 13 - Disclosure of liquidity requirements | EU LIQ2 | Net Stable Funding Ratio | Tab 9.3 |
| Annex 15 – Disclosure of credit risk quality | EU CRA | General qualitative information about credit risk | Credit Risk Tab |
| Annex 15 – Disclosure of credit risk quality | EU CRB | Additional disclosure related to the credit quality of assets | Credit Risk Tab |
| Annex 15 – Disclosure of credit risk quality | EU CR1 | Performing and non-performing exposures and related provisions | Tab 4.11 |
| Annex 15 – Disclosure of credit risk quality | EU CR1-A | Maturity of exposures | Tab 4.12 |
| Annex 15 – Disclosure of credit risk quality | EU CR2 | Changes in the stock of non-performing loans and advances | Tab 4.14 |
| Annex 15 – Disclosure of credit risk quality | EU CR2-A | Changes in the stock of non-performing loans and advances and related net accumulated recoveries | not applicable to BOI as NPL below 5% threshold |
| Annex 15 – Disclosure of credit risk quality | EU CQ1 | Credit quality of forborne exposures | Tab 4.15 |
| Annex 15 – Disclosure of credit risk quality | EU CQ2 | Quality of forbearance | not applicable to BOI as NPL below 5% threshold |
| Annex 15 – Disclosure of credit risk quality | EU CQ3 | Credit quality of performing and non-performing exposures by past due days | Tab 4.13 |
| Annex 15 – Disclosure of credit risk quality | EU CQ4 | Quality of non-performing exposures by geography | Tab 4.16 |
| Annex 15 – Disclosure of credit risk quality | EU CQ5 | Credit quality of loans and advances by industry | Tab 4.17 |
| Annex 15 – Disclosure of credit risk quality | EU CQ6 | Collateral valuation - loans and advances | not applicable to BOI as NPL below 5% threshold |
| Annex 15 – Disclosure of credit risk quality | EU CQ7 | Collateral obtained by taking possession and execution processes | not applicable to BOI |
| Annex 15 – Disclosure of credit risk quality | EU CQ8 | Collateral obtained by taking possession and execution processes – vintage breakdown | not applicable to BOI |
| Annex 17 - Disclosure of the use of credit risk mitigation techniques | EU CRC | Qualitative disclosure requirements related to CRM techniques | Tab 4.18 |
| Annex 17 - Disclosure of the use of credit risk mitigation techniques | EU CR3 | CRM techniques overview: Disclosure of the use of credit risk mitigation techniques | Tab 4.18 |
| Annex 19 - Disclosure of the use of the standardised approach | EU CRD | Qualitative disclosure requirements related to standardised model | Standardised Approach Tab |
| Annex 19 - Disclosure of the use of the standardised approach | EU CR4 | Standardised approach – Credit risk exposure and CRM effects | Tab 4.1 |
| Annex 19 - Disclosure of the use of the standardised approach | EU CR5 | Standardised approach | Tab 4.2 |
| Annex 21- Disclosure of the use of the IRB approach to credit risk | EU CRE | Qualitative disclosure requirements related to IRB approach | IRB Approach Tab |
| Annex 21- Disclosure of the use of the IRB approach to credit risk | EU CR6 | IRB approach – Credit risk exposures by exposure class and PD range | Tab 4.3 and Tab 4.4 |
| Annex 21- Disclosure of the use of the IRB approach to credit risk | EU CR6-A | Scope of the use of IRB and SA approaches | Tab 4.8 |
| Annex 21- Disclosure of the use of the IRB approach to credit risk | EU CR7 | IRB approach – Effect on the RWEAs of credit derivatives used as CRM techniques | Tab 4.5 |
| Annex 21- Disclosure of the use of the IRB approach to credit risk | EU CR7-A | IRB approach – Disclosure of the extent of the use of CRM techniques | Tab 4.6 |
| Annex 21- Disclosure of the use of the IRB approach to credit risk | EU CR8 | RWEA flow statements of credit risk exposures under the IRB approach | Tab 4.7 |
| Annex 21- Disclosure of the use of the IRB approach to credit risk | EU CR9 | IRB approach – Back-testing of PD per exposure class (fixed PD scale) | Tab 4.9 and 4.10 |
| Annex 21- Disclosure of the use of the IRB approach to credit risk | 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) | not applicable to BOI |
| Annex 23 - Disclosure of specialised lending | EU CR10 | Specialised lending and equity exposures under the simple risk weighted approach | not applicable to BOI as BOI don't use the simple risk weighted approach |
| Annex 25 - Disclosure of exposures to counterparty credit risk | EU CCRA | Qualitative disclosure related to CCR | Counterparty Credit Risk Tab |
| Annex 25 - Disclosure of exposures to counterparty credit risk | EU CCR1 | Analysis of CCR exposure by approach | Tab 5.1 |
| Annex 25 - Disclosure of exposures to counterparty credit risk | EU CCR2 | Transactions subject to own funds requirements for CVA risk | Tab 5.4 |
| Annex 25 - Disclosure of exposures to counterparty credit risk | EU CCR3 | Standardised approach – CCR exposures by regulatory exposure class and risk weight | Tab 5.2 |
| Annex 25 - Disclosure of exposures to counterparty credit risk | EU CCR4 | IRB approach – CCR exposures by exposure class and PD scale | Tab 5.3 |
| Annex 25 - Disclosure of exposures to counterparty credit risk | EU CCR5 | Composition of collateral for exposures to CCR | Tab 5.5 |
| Annex 25 - Disclosure of exposures to counterparty credit risk | EU CCR6 | Credit derivatives exposures | Tab 5.6 |
| Annex 25 - Disclosure of exposures to counterparty credit risk | EU CCR7 | RWA flow statements of CCR exposures under the IMM | not applicable to BOI as BOI don't use the IMM approach |
| Annex 25 - Disclosure of exposures to counterparty credit risk | EU CCR8 | Exposures to CCPs | Tab 5.7 |
| Annex 27 - Disclosure of exposures to securitisation positions | EU SECA | Qualitative disclosure requirements related to securitisation exposures | Securitisations Tab |
| Annex 27 - Disclosure of exposures to securitisation positions | EU SEC1 | Securitisation exposures in the non-trading book | Tab 6.1 |
| Annex 27 - Disclosure of exposures to securitisation positions | EU SEC2 | Securitisation exposures in the trading book | not applicable to BOI |
| Annex 27 - Disclosure of exposures to securitisation positions | EU SEC3 | Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as originator or as sponsor | Tab 6.2 |
| Annex 27 - Disclosure of exposures to securitisation positions | EU SEC4 | Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as investor | Tab 6.3 |
| Annex 27 - Disclosure of exposures to securitisation positions | EU SEC5 | Exposures securitised by the institution - Exposures in default and specific credit risk adjustments | Tab 6.4 |
| Annex 29 - Disclosure of use of standardized approach and internal model for market risk | EU MRA | Qualitative disclosure requirements related to market risk | Market Risk Tab |
| Annex 29 - Disclosure of use of standardized approach and internal model for market risk | EU MR1 | Market risk under the standardised approach | Tab 7.1 |
| Annex 29 - Disclosure of use of standardized approach and internal model for market risk | EU MRB | Qualitative disclosure requirements for institutions using the internal Market Risk Models | not applicable to BOI as BOI don't use the IMA approach. |
| Annex 29 - Disclosure of use of standardized approach and internal model for market risk | EU MR2-A | Market risk under the internal Model Approach (IMA) | not applicable to BOI as BOI don't use the IMA approach. |
| Annex 29 - Disclosure of use of standardized approach and internal model for market risk | EU MR2-B | RWA flow statements of market risk exposures under the IMA | not applicable to BOI as BOI don't use the IMA approach. |
| Annex 29 - Disclosure of use of standardized approach and internal model for market risk | EU MR3 | IMA values for trading portfolios | not applicable to BOI as BOI don't use the IMA approach. |
| Annex 29 - Disclosure of use of standardized approach and internal model for market risk | EU MR4 | Comparison of VaR estimates with gains/losses | not applicable to BOI |
| Annex 31 - Disclosure of operational risk | EU ORA | Qualitative information on operational risk | Operational Risk Tab |
| Annex 31 - Disclosure of operational risk | EU OR1 | Operational risk own funds requirements and risk-weighted exposure amounts | Tab 8.1 |
| Annex 33 - Disclosure of remuneration policy | EU REMA | Remuneration policy | Remuneration Tab |
| Annex 33 - Disclosure of remuneration policy | EU REM1 | Remuneration awarded for the financial year | Tab 11.1 |
| Annex 33 - Disclosure of remuneration policy | EU REM2 | Special payments to staff whose professional activities have a material impact on institutions' risk profile (identified staff) | Tab 11.2 |
| Annex 33 - Disclosure of remuneration policy | EU REM3 | Deferred remuneration | Tab 11.3 |
| Annex 33 - Disclosure of remuneration policy | EU REM4 | Remuneration of 1 million EUR or more per year | Tab 11.4 |
| Annex 33 - Disclosure of remuneration policy | EU REM5 | Information on remuneration of staff whose professional activities have a material impact on institutions' risk profile (identified staff) | Tab 11.5 |
| Annex 35 - Disclosure of encumbered and unencumbered assets | EU AE1 | Encumbered and unencumbered assets | Tab 9.4 |
| Annex 35 - Disclosure of encumbered and unencumbered assets | EU AE2 | Collateral received and own debt securities issued | Tab 9.5 |
| Annex 35 - Disclosure of encumbered and unencumbered assets | EU AE3 | Sources of encumbrance | Tab 9.6 |
| Annex 35 - Disclosure of encumbered and unencumbered assets | EU AE4 | Accompanying narrative information | Tab 9.6 |
| Annex 37 - IRRBB Disclosure (EBA/CP/2021/20) | EU IRRBBA | Qualitative information on interest rate risks of non-trading book activities | IRRBB Tab |
| Annex 37 - IRRBB Disclosure (EBA/CP/2021/20) | EU IRRBB1 | Interest rate risks of non-trading book activities | Tab 7.2 |
| Guidelines on uniform disclosures under Article 473a of Regulation (EU) No 575/2013 as regards the transitional period for mitigating the impact of the introduction of IFRS 9 on own funds (EBA/GL/2018/01) | IFRS 9-FL | Comparison of institutions' own funds and capital and leverage ratios with and without the application of transitional arrangements for IFRS 9 or analogous ECLs | Tab 1.2 |
| Final Draft Implementing Technical Standards amending the ITS on disclosures and reporting on MREL and TLAC with regard to the disclosures and reporting of information on daisy chains and prior permissions (EBA/Rep/2023/41) | EU KM2 | Key metrics - MREL and, where applicable, G-SII requirement for own funds and eligible liabilities | Tab 1.3 |
| Final Draft Implementing Technical Standards amending the ITS on disclosures and reporting on MREL and TLAC with regard to the disclosures and reporting of information on daisy chains and prior permissions (EBA/Rep/2023/41) | EU TLAC 1 | Composition - MREL and, where applicable, G-SII requirement for own funds and eligible liabilities | Tab 2.6 |
| Final Draft Implementing Technical Standards amending the ITS on disclosures and reporting on MREL and TLAC with regard to the disclosures and reporting of information on daisy chains and prior permissions (EBA/Rep/2023/41) | EU TLAC3b | Creditor ranking - resolution entity | Tab 2.7 |
| Annex XL - Instructions for disclosure of ESG risks | Table 1 | Qualitative information on Environmental risk | Environmental risk tab |
| Annex XL - Instructions for disclosure of ESG risks | Table 2 | Qualitative information on Social risk | Social risk tab |
| Annex XL - Instructions for disclosure of ESG risks | Table 3 | Qualitative information on Governance risk | Governance risk tab |
| Annex XL - Instructions for disclosure of ESG risks | Template 1 | Climate change transition risk: Quality of exposures by sector | Tab 12.1 |
| Annex XL - Instructions for disclosure of ESG risks | Template 2 | Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral | Tab 12.2 |
| Annex XL - Instructions for disclosure of ESG risks | Template 3 | Banking Book – Climate Change Transition Risk: Alignment Metrics | Tab 12.3 |
| Annex XL - Instructions for disclosure of ESG risks | Template 4 | Climate change transition risk: Exposures to top 20 carbon-intensive firms | Tab 12.4 |
| Annex XL - Instructions for disclosure of ESG risks | Template 5 | Climate change physical risk: Exposures subject to physical risk | Tab 12.5 |
| Annex XL - Instructions for disclosure of ESG risks | Template 6 | Summary of GAR KPIs | Tab 12.6 |
| Annex XL - Instructions for disclosure of ESG risks | Template 7 | Mitigating actions: Assets for the calculation of GAR | Tab 12.7 |
| Annex XL - Instructions for disclosure of ESG risks | Template 8 | GAR (%) | Tab 12.8 |
| Annex XL - Instructions for disclosure of ESG risks | Template 9 | Mitigating actions - Assets for the calculation of BTAR | not applicable |
| Annex XL - Instructions for disclosure of ESG risks | Template 10 | Other climate change mitigating actions that are not covered in the EU Taxonomy | Tab 12.9 |

## Appendix II - CRR Roadmap

| CRD IV / CRR Article | General Provisions | Annex | Template | P3 Location |
|---|---|---|---|---|
| CRR 431 - Scope of disclosure requirements | requirements for disclosure and policy | | | BOI complies with required disclosures in compliance with legislation and policy |
| CRR 432 - Non-material, proprietary or confidential information | allowed omission on basis of materiality | | | Introduction Tab |
| CRR 433 – Frequency of disclosure | requirements regarding frequency of disclosure | | | Introduction Tab |
| CRR 434 – Means of disclosures | requirements regarding manner and location of disclosure | | | Introduction Tab |
| **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<br>Annex 13<br>Annex 15<br>Annex 29<br>Annex 31 | EU OVA - Institution risk management approach<br>EU LIQA - Liquidity risk management<br>EU CRA: General qualitative information about credit risk<br>EU MRA: Qualitative disclosure requirements related to market risk<br>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<br>Annex 13<br>Annex 15<br>Annex 29<br>Annex 31 | EU OVA - Institution risk management approach<br>EU LIQA - Liquidity risk management<br>EU CRA: General qualitative information about credit risk<br>EU MRA: Qualitative disclosure requirements related to market risk<br>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<br>Annex 13<br>Annex 15<br>Annex 29<br>Annex 31 | EU OVA - Institution risk management approach<br>EU LIQA - Liquidity risk management<br>EU CRA: General qualitative information about credit risk<br>EU MRA: Qualitative disclosure requirements related to market risk<br>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<br>Annex 13<br>Annex 29<br>Annex 31 | EU OVA - Institution risk management approach<br>EU LIQA - Liquidity risk management<br>EU MRA: Qualitative disclosure requirements related to market risk<br>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<br>Annex 13<br>Annex 15<br>Annex 29<br>Annex 31 | EU OVA - Institution risk management approach<br>EU LIQA - Liquidity risk management<br>EU CRA: General qualitative information about credit risk<br>EU MRA: Qualitative disclosure requirements related to market risk<br>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<br>Annex 13<br>Annex 31 | EU OVA - Institution risk management approach<br>EU LIQA - Liquidity risk management<br>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<br>Annex 13<br>Annex 15<br>Annex 31 | EU OVA - Institution risk management approach<br>EU LIQA - Liquidity risk management<br>EU CRA: General qualitative information about credit risk<br>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<br>Annex 13<br>Annex 15<br>Annex 31 | EU OVA - Institution risk management approach<br>EU LIQA - Liquidity risk management<br>EU CRA: General qualitative information about credit risk<br>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:<br>(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 | EU OVB - Tab 3.2 |
| 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:<br>(a) the name of the institution to which the requirements of this Regulation apply; | Annex 5 | | Forward looking statement Tab |
| 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)<br>EU LIA - Explanations of differences between accounting and regulatory exposure amounts | EU LI3 - Appendix III<br>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:<br>(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; | Annex 7 | EU CC1 - Composition of regulatory own funds<br>EU CC2 - reconciliation of regulatory own funds to balance sheet in the audited financial statements | EU CC1 - Tab 2.2<br>EU CC1 - Tab 2.3 |
| 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:<br>(i) each prudential filter applied pursuant to Articles 32 to 35; | Annex 7 | EU CC1 - Composition of regulatory own funds | EU CC1 - Tab 2.2 |
| 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 |

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|---|---|---|---|---|
| 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:<br>(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 riskweighted 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<br>Annex 25<br>Annex 29 | EU CR8 – RWEA flow statements of credit risk exposures under the IRB approach<br>EU CCR7 – RWEA flow statements of CCR exposures under the IMM<br>EU MR2-B - RWA flow statements of market risk exposures under the IMA | EU CR8 - Tab 4.7<br>EU CCR7 - Not applicable to BOI<br>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:<br>(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<br>EU CCR4 – IRB approach – CCR exposures by exposure class and PD scale | EU CCR3 – Tab 5.2<br>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.<br><br>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 |

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| CRR 442 – exposures to credit risk and dilution risk | (c) information on the amount and quality of performing, non-performing and forborne 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<br>EU CR1: Performing and non-performing exposures and related provisions<br>EU CQ1: Credit quality of forborne exposures<br>EU CQ4: Quality of non-performing exposures by geography<br>EU CQ5: Credit quality of loans and advances by industry<br>EU CQ2: Quality of forbearance<br>EU CR2a: Changes in the stock of non-performing loans and advances and related net accumulated recoveries<br>EU CQ7: Collateral obtained by taking possession and execution processes<br>EU CQ4: Quality of non-performing exposures by geography<br>EU CQ5: Credit quality of loans and advances by industry<br>EU CQ6: Collateral valuation - loans and advances<br>EU CQ8: Collateral obtained by taking possession and execution processes – vintage breakdown | EU CQ3 - Tab 4.13<br>EU CR1 - Tab 4.11<br>EU CQ1 - Tab 4.15<br>EU CQ4 - Tab 4.16<br>EU CQ5 - Tab 4.17<br>EU CQ2 - not applicable to BOI as NPL below 5% threshold<br>EU CR2a - not applicable to BOI as NPL below 5% threshold<br>EU CQ7 - Not applicable to BOI<br>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<br>EU CQ5: Credit quality of loans and advances by industry<br>EU CQ4: Quality of non-performing exposures by geography<br>EU CQ5: Credit quality of loans and advances by industry | EU CQ4 - Tab 4.16<br>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<br>EU CR1: Performing and non-performing exposures and related provisions<br>EU CR2a: Changes in the stock of non-performing loans and advances and related net accumulated recoveries | EU CR2 - Tab 4.14<br>EU CR1 - Tab 4.11<br>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<br>EU AE2 - Collateral received and own debt securities issued<br>EU AE3 - Sources of encumbrance<br>EU AE4 - Accompanying narrative information | EU AE1 - Tab 9.4<br>EU AE2 - Tab 9.5<br>EU AE3 - Tab 9.6<br>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<br>Annex 25 | EU CR4 – standardised approach – Credit risk exposure and CRM effects<br>EU CR5 – standardised approach<br>EU CCR3 – Standardised approach – CCR exposures by regulatory exposure class and risk weights | EU CR4 – Tab 4.1<br>EU CR5 – Tab 4.2<br>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:<br>(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<br>EU OR1 - Operational risk own funds requirements and risk-weighted exposure amounts | EU ORA - Operational Risk Tab<br>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<br>EU OR1 - Operational risk own funds requirements and risk-weighted exposure amounts | EU ORA - Operational Risk Tab<br>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<br>EU OR1 - Operational risk own funds requirements and risk-weighted exposure amounts | EU ORA - Operational Risk Tab<br>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):<br>(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;<br><br>(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;<br><br>(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:<br>(i) the net stable funding ratio at the end of each quarter of the relevant disclosure period;<br>(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 | I1.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: | 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; | IRRBB Disclosures | EU IRRBB1 - Interest rate risks of non-trading book activities | EU IRRBB1 - Tab 7.2 |

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| 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; | 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; | 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; | 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:<br>(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;<br>(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;<br>(iii) a description of the interest rate shock scenarios that institutions use to estimate the interest rate risk;<br>(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);<br>(v) an outline of how often the evaluation of the interest rate risk occurs; | 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 | 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. | 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. | 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:<br>(i) SSPEs which acquire exposures originated by the institutions;<br>(ii) SSPEs sponsored by the institutions;<br>(iii) SSPEs and other legal entities for which the institutions provide securitisation-related services, such as advisory, asset servicing or management services;<br>(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 ECAIs 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<br>EU-SEC2 - Securitisation exposures in the trading book | EU-SEC1 - Tab 6.1<br>EU-SEC2 - Not applicable to BOI |
| CRR 449 – Exposure to securitisation positions | (k) for the non-trading book activities, the following information:<br>(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;<br><br>(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<br>EU-SEC4 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as investor | EU-SEC3 - Tab 6.2<br>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<br>Table 2 - Qualitative information on Social Risk<br>Table 3 - Qualitative information on Governmental risk<br>Template 1: Climate change transition risk: Quality of exposures by sector<br>Template 2: Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral<br>Template 4: Climate change transition risk: Exposures to top 20 carbon-intensive firms<br>Template 5: Climate change physical risk: Exposures subject to physical risk | Table 1 - ESG Risk Tab<br>Table 2 - ESG Risk Tab<br>Table 3 - ESG Risk Tab<br>Template 1 - Tab 12.1<br>Template 2 - Tab 12.2<br>Template 4 - Tab 12.3<br>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 |

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| 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:<br>(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<br>EU LR2 - LRCom: Leverage ratio common disclosure<br>EU LR3 - LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)<br>EU LRA: Free format text boxes for disclosure on qualitative items | EU LR1 - Tab 10.1<br>EU LR2 - Tab 10.2<br>EU LR3 - Tab 10.3<br>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<br>EU LR2 - LRCom: Leverage ratio common disclosure<br>EU LR3 - LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures) | EU LR1 - Tab 10.1<br>EU LR2 - Tab 10.2<br>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<br>EU LIQB on qualitative information on LCR, which complements template EU LIQ1 | EU LIQ1 - Tab 9.2<br>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<br>EU LIQB on qualitative information on LCR, which complements template EU LIQ1 | EU LIQ1 - Tab 9.2<br>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<br>EU LIQB on qualitative information on LCR, which complements template EU LIQ1 | EU LIQ1 - Tab 9.2<br>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<br>EU LIQB on qualitative information on LCR, which complements template EU LIQ1 | EU LIQ1 - Tab 9.2<br>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<br>EU LIQB on qualitative information on LCR, which complements template EU LIQ1 | EU LIQ1 - Tab 9.2<br>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<br>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:<br>(i) the relationship between the risk management function and the internal audit function;<br>(ii) the rating system review;<br>(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;<br>(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:<br>(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;<br>(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;<br>(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:<br>(i) their gross on-balance-sheet exposure;<br>(ii) their off-balance-sheet exposure values prior to the relevant conversion factor;<br>(iii) their exposure after applying the relevant conversion factor and credit risk mitigation;<br>(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;<br>(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<br>Annex 25 | EU CR6 – IRB approach – Credit risk exposures by exposure class and PD range<br>EU CCR4 – IRB approach – CCR exposures by exposure class and PD scale | EU CR6 – Tab 4.3 and Tab 4.4<br>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)<br>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<br>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<br>Annex 21 | EU CR4 – standardised approach – Credit risk exposure and CRM effects<br>EU CR7-A – IRB approach – Disclosure of the extent of the use of CRM techniques | EU CR4 – Tab 4.1<br>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<br>EU OR1 - Operational risk own funds requirements and risk-weighted exposure amounts | EU ORA - Operational Risk Tab<br>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:<br>(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 applied to the sub- | Annex 29 | EU MRB: Qualitative disclosure requirements for institutions using the internal Market Risk Models<br>EU MR2-A - Market risk under the internal Model Approach (IMA)<br>EU MR3 - IMA values for trading portfolios<br>EU MR4 - Comparison of VaR estimates with gains/losses | EU MRB - Not applicable to BOI<br>EU MR2-A - Not applicable to BOI<br>EU MR3 - Not applicable to BOI<br>EU MR4 - Not applicable to BOI |
| CRR 455 - Use of Internal Market Risk Models | (b) the scope of permission by the competent authority; | Annex 29 | EU MRB: Qualitative disclosure requirements for institutions using the internal Market Risk Models<br>EU MR2-A - Market risk under the internal Model Approach (IMA)<br>EU MR3 - IMA values for trading portfolios<br>EU MR4 - Comparison of VaR estimates with gains/losses | EU MRB - Not applicable to BOI<br>EU MR2-A - Not applicable to BOI<br>EU MR3 - Not applicable to BOI<br>EU MR4 - Not applicable to BOI |

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| 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<br>EU MR2-A - Market risk under the internal Model Approach (IMA)<br>EU MR3 - IMA values for trading portfolios<br>EU MR4 - Comparison of VaR estimates with gains/losses | EU MRB - Not applicable to BOI<br>EU MR2-A - Not applicable to BOI<br>EU MR3 - Not applicable to BOI<br>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<br>EU MR2-A - Market risk under the internal Model Approach (IMA)<br>EU MR3 - IMA values for trading portfolios<br>EU MR4 - Comparison of VaR estimates with gains/losses | EU MRB - Not applicable to BOI<br>EU MR2-A - Not applicable to BOI<br>EU MR3 - Not applicable to BOI<br>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<br>EU MR2-A - Market risk under the internal Model Approach (IMA)<br>EU MR3 - IMA values for trading portfolios<br>EU MR4 - Comparison of VaR estimates with gains/losses | EU MRB - Not applicable to BOI<br>EU MR2-A - Not applicable to BOI<br>EU MR3 - Not applicable to BOI<br>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<br>EU MR2-A - Market risk under the internal Model Approach (IMA)<br>EU MR3 - IMA values for trading portfolios<br>EU MR4 - Comparison of VaR estimates with gains/losses | EU MRB - Not applicable to BOI<br>EU MR2-A - Not applicable to BOI<br>EU MR3 - Not applicable to BOI<br>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<br>EU MR2-A - Market risk under the internal Model Approach (IMA)<br>EU MR3 - IMA values for trading portfolios<br>EU MR4 - Comparison of VaR estimates with gains/losses | EU MRB - Not applicable to BOI<br>EU MR2-A - Not applicable to BOI<br>EU MR3 - Not applicable to BOI<br>EU MR4 - Not applicable to BOI |
| **Bank Recovery and Resolution Directive (BRRD) Article** | **Disclosure Requirement** | **Annex** | **Template** | **P3 Location** |
| Bank Recovery and Resolution Directive (BRRD) 2014/59/EU Article 45i (3) - Minimum requirement for own funds and eligible liabilities. | Entities referred to in paragraph 1 shall make the following information publicly available on at least an annual basis: | Annex V - Disclosure on MREL and TLAC | | |
| Article 45i(3)(a) | (a) the amounts of own funds that, where applicable, meet the conditions of point (b) of Article 45f(2) and eligible liabilities; | Annex V - Disclosure on MREL and TLAC | EU KM2: key metrics - MREL and, where applicable, G-SII Requirement for own funds and eligible liabilities metrics - MREL and, where applicable, G-SII Requirement for own funds and eligible liabilities. | EU KM2 - Tab 1.3 |
| Article 45i(3)(b) | (b) the composition of the items referred to in point (a), including their maturity profile and ranking in normal insolvency proceedings; | Annex V - Disclosure on MREL and TLAC | EU TLAC1 - Composition - MREL and, where applicable, the G-SII Requirement for own funds and eligible liabilities.<br>EU TLAC3b: creditor ranking - resolution entity. | EU TLAC1 - Tab 2.6<br>EU TLAC3 - Tab 2.7 |
| Article 45i(3)(c) | (c) the applicable requirement referred to in Article 45e or Article 45f expressed in accordance with Article 45(2). | Annex V - Disclosure on MREL and TLAC | EU KM2: key metrics - MREL and, where applicable, G-SII Requirement for own funds and eligible liabilities metrics - MREL and, where | EU KM2 - Tab 1.3<br>EU TLAC1 - Tab 2.6 |

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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: Full consolidation | Proportional consolidation | Equity Method [1] | Neither consolidated nor deducted | Deducted | Description of the entity |
|---|---|---|---|---|---|---|---|
| BOI Insurance Limited | Full consolidation | | | Y | | | Financial corporations other than credit institutions |
| GD 5&6 Basement Company Limited | Full consolidation | | | Y | | | Financial corporations other than credit institutions |
| General Investment Trust Limited DAC | Full consolidation | | | Y | | | Financial corporations other than credit institutions |
| Leopardstown Offices Management Company Limited by Guarantee | Full consolidation | | | Y | | | Financial corporations other than credit institutions |
| Life Fund Syndication B.V. | Full consolidation | | | Y | | | Financial corporations other than credit institutions |
| New Ireland Assurance Company plc | Full consolidation | | | Y | | | Financial corporations other than credit institutions |
| New Ireland Real Estate France | Full consolidation | | | Y | | | Financial corporations other than credit institutions |
| SCI Immeuble Saint Georges | Full consolidation | | | Y | | | Financial corporations other than credit institutions |
| SCI Jupiter Immeuble | Full consolidation | | | Y | | | Financial corporations other than credit institutions |
| SCI Sang Rouge | Full consolidation | | | Y | | | Financial corporations other than credit institutions |
| Weesperpelin 6 BV | Full consolidation | | | Y | | | Financial corporations other than credit institutions |
| Weesperpelin 6 Holding BV | Full consolidation | | | Y | | | Financial corporations other than credit institutions |

1 Subject to 10/15% threshold which determines capital deduction or RWA

**Template EU CCA: Main features of regulatory own funds instruments and eligible liabilities 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 2024.

**Capital instruments' and main features table of Bank of Ireland Group plc as at 31 December 2024**

| | | Issued by Bank of Ireland Group plc / Subsidiaries not subject restriction in recognition in consolidated Tier 2 | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | Instrument Name | Ordinary Stock | €500m Subordinated Tier 2 Notes due 2034 | £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 | €600m 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 | Bank of Ireland Group plc |
| 2 | Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement) | IE00BD1RP616 | XS2817924660 | XS2528657567 | XS2561182622 | XS2178043530 | XS2226123573 | XS2898168443 | XS2340236327 |
| 2a | Public or private placement | Public | Public | Public | Public | Public | Public | Public | Public |
| 3 | Governing law(s) of the instrument | Irish | 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 | N/A |
| | *Regulatory treatment* | | | | | | | | |
| 4 | Transitional CRR rules | Common equity tier 1 | Tier 2 | Tier 2 | Tier 2 | Additional Tier 1 | 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 | Additional Tier 1 | Tier 2 |
| 6 | Eligible at solo / (sub-)consolidated / solo & (sub-)consolidated | Group | 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 | Perpetual Contingent Temporary Write-Down Securities | Subordinated Debt |
| 8 | Amount recognised in regulatory capital (currency in million, as of most recent reporting date) | €1,003m | €497m | €361m | €498m | €169m | €300m | €600m | €499m |
| 9 | Nominal amount of instrument | €1,003m | €500m | €362m (£300m) | €500m | €675m | €300m | €600m | €500m |
| EU-9a | Issue price | €1.00 each (current issue price) | 99.816 per cent | 100 per cent | 99.715 per cent | 100 per cent | 100 per cent | 100 per cent | 99.951 per cent |
| EU-9b | Redemption price | Non-redeemable. | par | par | par | par | par | par | par |
| 10 | Accounting classification | Shareholders' equity | Liability - amortised cost | Liability - amortised cost | Liability - amortised cost | Shareholders' equity | Shareholders' equity | Shareholders' equity | Liability - amortised cost |
| 11 | Original date of issuance | 07-Jul-17 | 10-May-24 | 06-Sep-22 | 01-Dec-22 | 19-May-20 | 01-Sep-20 | 10-Sep-24 | 11-May-21 |
| 12 | Perpetual or dated | Perpetual | Dated | Dated | Dated | Perpetual | Perpetual | Perpetual | Dated |
| 13 | Original maturity date | No Maturity | 10-Aug-34 | 06-Dec-32 | 01-Mar-33 | No Maturity | No Maturity | No Maturity | 11-Aug-31 |
| 14 | Issuer call subject to prior supervisory approval | N/A | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| 15 | Optional call date, contingent call dates, and redemption amount | N/A | Optional call date is any day falling in the period commencing on (and including) 10 May 2029 and ending on (and including) 10 August 2029. 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 .<br><br>Redemption Amount: €1,000 per Calculation Amount of €1,000 | Optional call date is any date falling in the period commencing on (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 .<br><br>Redemption Amount: £1,000 per Calculation Amount of £1,000 | Optional call date is any date falling in the period commencing on (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 .<br><br>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.<br><br>Regulatory Event: Applicable<br>Tax Event: Applicable<br><br>Redemption Amount: Prevailing Principal Amount<br><br>€506m of the instrument was repurchased on 11 September 2024. | 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.<br><br>Regulatory event call: Yes<br>Tax call: Yes<br><br>Redemption Amount: principal amount | Optional Call date from and including 10 March 2030 (First Call Date) to and including 10 September (First Reset Date) or any Interest Payment Date thereafter. Interest Payment Dates being 10 March/ 10 September.<br><br>Regulatory event call: Yes<br>Tax call: Yes<br><br>Redemption Amount: principal amount | Optional call date is any day falling in the period commencing on (and including) 11 May 2026 and ending on (and including) 11 August 2026.<br>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 .<br><br>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 | See above | N/A |
| | *Coupons / dividends* | | | | | | | | |
| 17 | Fixed or floating dividend/coupon | N/A | Fixed | Fixed | Fixed | Fixed | Fixed | Fixed | Fixed |
| 18 | Coupon rate and any related index | As declared | Fixed with one reset date.<br><br>4.75%; reset to the sum of the Subsequent Reset Reference Rate plus the applicable Reset Margin of 1.85% at Reset Date (10 August 2029) | Fixed with one reset date.<br><br>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.<br><br>6.750%; reset to the sum of teh 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 | 6.375% until 10 September 2030 and thereafter at the relevant Reset Rate of Interest | Fixed with one reset date<br><br>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 | No |
| EU-20a | Fully discretionary, partially discretionary or mandatory (in terms of timing | Fully discretionary | Mandatory | Mandatory | Mandatory | Fully discretionary | 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 | Fully discretionary | Mandatory |
| 21 | Existence of step up or other incentive to redeem | No | No | No | No | No | No | No | No |
| 22 | Noncumulative or cumulative | N/A | Cumulative | Cumulative | Cumulative | Non 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 | Non-Convertible |
| 24 | If convertible, conversion trigger (s) | N/A | 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 | N/A |
| 26 | If convertible, conversion rate | N/A | 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 | N/A |
| 28 | If convertible, specify instrument type convertible into | N/A | 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 | N/A |
| 30 | Write-down features | No | No | No | No | Yes | 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. | 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 | Fully or Partially | N/A |
| 33 | If write-down, permanent or temporary | N/A | N/A | N/A | N/A | Temporary | 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. | 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 | N/A |
| Eu-34b | Ranking of the instrument in normal insolvency proceedings | 1 | 2(b) | 2(b) | 2(b) | 2(a) | 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.<br><br>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.<br><br>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.<br><br>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.<br><br>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.<br><br>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.<br><br>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.<br><br>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. |
| 36 | | 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: Dated Subordinated Notes | Instrument type immediately senior: Senior Preferred Notes |
| 37 | Non-compliant transitioned features | No | 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 | N/A |
| 37a | Link to the full term and conditions of the instrument (signposting) | https://investorrelations.bankofireland.com/capital-instruments/ | | | | | | | |

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Related parties to the Group include the parent company, BoIG plc, subsidiary undertakings, associated undertakings, joint arrangements, post-employment benefits, 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 2024, the total value of this property was €26 million (2023: €27 million). In 2024, the rental income paid to BSPF was €2 million (2023: €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. 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 Loans | Balance as at 1 January 2024 €000 | Balance as at 31 December 2024 €000 | Aggregate maximum amount outstanding during the year ended 31 December 2024 €000 | Repayments during the year ended 31 December 2024 €000 |
|---|---|---|---|---|
| **Directors at 31 December 2024** | | | | |
| **E Bourke** | | | | |
| Credit card total | 6 | 9 | 9 | - |
| **Total** | **6** | **9** | **9** | **-** |
| **P Kennedy** | | | | |
| Credit card total | - | - | 16 | - |
| **Total** | **-** | **-** | **16** | **-** |
| **E Fitzpatrick** | | | | |
| Loan total | 18 | 12 | 18 | 6 |
| **Total** | **18** | **12** | **18** | **6** |
| **M Spain** | | | | |
| Mortgage total | 277 | 255 | 277 | 33 |
| **Total** | **277** | **255** | **277** | **33** |

G Andrews, A Bhargava, I Buchanan, R Goulding, M Greene, M O'Grady, S Pateman and M Sweeney had no loans from the Group in 2024. No advances were made during the year. No amounts were waived during 2024.

None of the loans were credit-impaired at 31 December 2024 or at 31 December 2023. There is no interest which having fallen due on the above loans has not been paid in 2024 (2023: €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. Lending to connected persons on favourable terms, including interest rates and collateral, are similar to those available to staff generally.

In the tables below, 'balances' include principal and interest. The 'maximum amounts outstanding' includes credit card exposures atthe maximum statement balance. While the closing balance includes interest accrued and interest paid, the maximum balance includes interest paid only.

| Loans to connected persons on favourable terms | Balance as at 31 December 2024 €000 | Maximum amounts outstanding during 2024 €000 | Number of persons as at 31 December 2024 | Maximum number of persons during 2024 |
|---|---|---|---|---|
| E Bourke | - | 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 at 31 December 2024 €000 | Maximum amounts outstanding during 2024 | Number of persons as at 31 December 2024 | Maximum number of persons during 2024 |
|---|---|---|---|---|
| Persons connected to P Kennedy | 1,339 | 1,837 | 1 | 1 |

**(iv) Key management personnel - loans and deposits (IAS 24)**

For the purposes of IAS 24 'Related party disclosures', the Group has 26 KMP (2023: 25) 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, Chief Operating Officer, Chief Executive Officer - Retail Ireland, Chief Executive Officer - Davy and Wealth, Chief Executive Officer - Bank of Ireland (UK), Chief Executive Officer - Corporate and Commercial, Chief Risk Officer, Chief Customer Officer and Chief Strategy and Transformation 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 to 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 at 1 January 2024 €000 | Balance as at 31 December 2024 €000 | Maximum amount outstanding during the year ended 31 December 2024 €000 | Total number of relevant KMP as at 1 January 2024 | Total number of relevant KMP as at 31 December 2024 |
|---|---|---|---|---|---|
| Loans | 1,780 | 1,726 | 1,865 | 9 | 11 |
| Deposits | 4,594 | 5,304 | 11,466 | 17 | 21 |

In the tables above, 'balances' include principal and interest. The 'opening balance' includes balances and transactions with KMPs who retired during 2023 and are not related parties during 2024. Therefore these key management personnel are not included in the maximum amounts outstanding. The 'maximum amounts outstanding' include credit card exposures at the maximum statement balance. In all cases key management personnel have not exceeded their approved limits. The maximum approved credit limit on any credit card held by KMP is €22,900 (2023: €25,000). The maximum amount outstanding was calculated using the maximum balance on each account.

The highest maximum outstanding liability for any member of KMP, close family and entities influenced by them did not exceed €1.8 million during 2024 (2023: €1.9 million). In some cases with investment type products (i.e. funds based products, life assurance and other policies) the maximum balance amounts were not available, in which case the greater of the balance at the start of the year and the balance at the end of the year has been included as the maximum balance amount. While the closing balance includes interest accrued and interest paid, the maximum balance includes interest paid.

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 2024 (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 (2023: €nil).

None of the loans were credit-impaired at 31 December 2024 or at 31 December 2023. There is no interest which having fallen due on the above loans has not been paid in 2024 (2023: €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:

'Salaries and other short-term benefits' comprises gross salary, Employer Pay Related Social Insurance contributions, Group Performance Scheme award, fees, cash in lieu of pension, car allowance and other short-term benefits paid in the year.

'Post employment benefits' comprises Employer contributions paid to pension funds.

'Termination benefits' include, inter alia, contractual payments due in lieu of notice periods.

| Remunerations | 2024 €000 |
|---|---|
| Salaries and other short-term benefits | 14,729 |
| Post employment benefits | 933 |
| Termination benefits | 300 |
| Total | 15,962 |
| | |
| Number of KMP | 26 |

| | |
|---|---|
| **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 ECAIs 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** | • *Institutions:* Exposures to Financial Institutions authorised and supervised by the competent authorities and subject to prudential requirements. Includes exposure to Covered Bonds.<br><br>• *Corporates:* 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.<br><br>• *Secured by immovable property collateral:* Residential mortgages.<br><br>• *Qualifying revolving: The exposures (to individuals) are revolving and unsecured. Primarily comprises of credit cards.*<br>• *Securitisation positions:* 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 Weighted Exposure Amounts (RWEA) / Risk Weighted Amount(RWA)** | Risk Weighted Exposure Amount refers to an amount in respect of which capital requirements arise under CRR and is used interchangeably in this document with RWA. RWEA 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 (%)** | Total REA divided by Total EAD post CRM. |
| **Securitisation** | 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 reliquary 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 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** | 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. |
| **Specific Outlier Test (SOT)** | SOTs are a supervisory tool which assess whether exposures to IRRBB have an impact on an institution's economic value of equity or net interest income beyond specific thresholds. |
| **Standardised Exposure Classes** | • *Retail:* 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.<br>• *Public Sector Entities:* Exposures to Public Sector Entities and non-commercial undertakings.<br>• *Corporates:* In general, a corporate exposure is defined as a debt obligation of a corporate, partnership or proprietorship.<br>• *Exposures in default:* Where the exposure is past due more than 90 days or unlikely to pay.<br>• *Exposures associated with particularly high risks:* Exposures associated with particularly high risks such as investments in venture capital firms and private equity investments.<br>• *Institutions Corporates with short-term credit assessment:* Exposures for which a short-term credit assessment by a nominated ECAI is available.<br>• *Other items:* 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. |

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| **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 |
| **B2DS** | Beyond 2 Degrees Scenario |
| **BCBS 239** | The Basel Committee on Banking Supervision, Principles for effective risk data aggregation and risk reporting |
| **BEEL** | Best Estimates of Expected Loss |
| **BER** | Building Energy Rating |
| **BIA** | Basic Indicator Approach |
| **BoE** | Bank of England |
| **BOI** | Bank of Ireland |
| **BoIG** | Bank of Ireland Group plc |
| **BoIGM** | Bank of Ireland Global Markets |
| **BoIMB** | Bank of Ireland Mortgage Bank |
| **bp** | Basis Point |
| **BRC** | Bord Risk Committee |
| **BRR** | Board Risk Report |
| **BRRD** | Bank Recovery and Resolution Directive |
| **BSSRC** | Balance Sheet Structural Risk Committee |
| **BTL** | Buy to Let |
| **C&E** | Climate and other environment |
| **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 |
| **CCY** | Currency |
| **CCyB** | Countercyclical Capital Buffer |
| **CDEAs** | Cleared Derivatives Execution Agreements |
| **CDP** | Carbon Disclosure Project |
| **CEO** | Chief Executive Officer |
| **CET 1** | Common equity tier 1 capital |
| **CFI** | Community Foundation for Ireland |
| **CFO** | Chief Financial Officer |
| **CFT** | Countering the Financing of Terrorism |
| **CMBS** | Commercial Mortgage-Backed Securities |
| **CRD** | Capital Requirements Directive |
| **CRE** | Commercial Real Estate |
| **CRM** | Credit risk mitigation |
| **CRO** | Chief Risk Officer |
| **CRR** | Capital Requirements Regulation |
| **CSA** | Credit support annex |
| **CSIRO** | Chief Sustainability and Investor Relations Officer |
| **CSRD** | Corporate Sustainability Reporting Directive |
| **CVA** | Credit valuation adjustment |
| **DCF** | Discounted Cash Flow |
| **DMA** | Double Materiality Assessment |
| **DNSH** | Do No Significant Harm |
| **DRP** | Directors' Remuneration Policy |
| **EAD** | Exposure at default |
| **EBA** | European Banking Authority |
| **ECAI** | External Credit Assessment Institutions |
| **ECB** | European Central Bank |
| **ECL** | Expected credit loss |
| **EHQLA** | Encumbered High Quality Liquid Asset |
| **EL** | Expected loss |
| **ELBE** | Expected loss best estimate |
| **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 |
| **ESMA** | European Securities and Markets Authority |
| **ETP** | Energy Transition Pathway |
| **EU** | European Union |

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| **EUR** | EURO |
| **EURIBOR** | Euro Inter Bank Offered Rate |
| **EV** | Electric Vehicle |
| **EVE** | Economic Value of Equity |
| **F&P** | Fitness and Probity |
| **FCA** | Financial Conduct Authority |
| **FCC** | Financial Crime Compliance |
| **FCCM** | Financial collateral comprehensive method |
| **FCR** | Forborne collateral realisation |
| **FCs** | Financial Counterparties |
| **FINREP** | Financial Reporting |
| **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 |
| **FX** | Foreign Exchange |
| **FY** | Financial Year |
| **GAC** | Group Audit Committee |
| **GAR** | Green Asset Ratio |
| **GBP** | Pound Sterling |
| **GCRC** | Group Credit Risk Committee |
| **GCTC** | Group Credit Transactions Committee |
| **GEC** | Group Executive Committee |
| **GHG** | Greenhouse gas |
| **GIA** | Group Internal Audit |
| **GMCLR** | Group Market, Capital & Liquidity Risk |
| **GMRA** | Global master repurchase agreement |
| **GORC** | Group Operational Risk Committee |
| **GovCo** | The Governor and Company of the Bank of Ireland |
| **GPS** | Group Performance 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 |
| **GTOC** | Group Transformation Oversight Committee |
| **HLBA** | Historical Look Back Approach |
| **HQLA** | High quality liquid assets |
| **I&D** | Inclusion and Diversity |
| **IAA** | Internal Assessment Approach |
| **IAF** | Individual Accountability Framework |
| **ICAAP** | Internal Capital Adequacy Assessment Process |
| **IEA** | International Energy Agency |
| **IFRS** | International Financial Reporting Standards |
| **ILO** | International Labour Organisation |
| **IMA** | Internal Models Approach |
| **IMM** | Internal Models Method |
| **IRB** | Internal Ratings-Based |
| **IRBA** | Internal Ratings Based Approach |
| **IRRBB** | Interest Rate Risk in Banking Book |
| **IRS** | Interest rate swaps |
| **ISDA** | International Swaps and Derivative Association |
| **ISO** | International Organisation for Standards |
| **IVU** | Independent Valuation Unit |
| **KMP** | Key management personnel |
| **KPI** | Key Performance Indicators |
| **LCR** | Liquidity coverage ratio |
| **LDR** | Loan to Deposit Ratio |
| **LGD** | Loss given default |
| **LR** | Leverage Ratio |
| **MDB** | Multilateral development bank |
| **MEL** | Maximum Exposure Limit Framework |
| **Mi365** | Money Insights 365 |
| **MLRO** | Money Laundering Reporting Officer |
| **MRC** | Model Risk Committee |
| **MREL** | Minimum Requirement for own funds and eligible liabilities. |
| **MRM** | Management Reporting Metrics |
| **MRT** | Material Risk Takers |
| **MTM** | Mark-to-market |
| **N&G** | Nomination & Governance |
| **NACE** | Nomenclature of Economic Activities |
| **NED** | Non-Executive Directorship |
| **NFRD** | Non-Financial Reporting Directive |
| **NIAC** | New Ireland Assurance Company |
| **NPE** | Non-performing exposures |
| **NPL** | Non-Performing Loans |
| **NSFR** | Net Stable Funding Ratio |
| **NZEB** | Nearly Zero-Energy Buildings |

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| **OCI** | Other Comprehensive Income |
| **OECD** | Organisation for Economic Co-operation and Development |
| **ORSA** | Own Risk and Solvency Assessment |
| **O-SII** | Other Systemically Important Institutions |
| **OTC** | Over-the-counter |
| **PBAF** | Partnership for Biodiversity Accounting Financials |
| **PCAF** | Partnership for Carbon Accounting Financials) |
| **PD** | Probability of default |
| **PERC** | Private Equity Risk Committee |
| **PFE** | Potential future exposure |
| **PiT** | Point-in-time |
| **PMA** | Post Model Adjustment |
| **POCI** | Purchased or Originated Credit-impaired |
| **PRA** | Prudential Regulation Authority |
| **PSE** | Public sector entity |
| **PVA** | Prudent valuation adjustment |
| **QCCP** | Qualifying central counterparty |
| **QRRE** | Qualifying revolving retail exposure |
| **RAG** | Red Amber Green |
| **RAROC** | Risk Adjusted Return on Capital |
| **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 |
| **ROI** | Republic of Ireland |
| **RoTe** | Return on Tangible Equity |
| **RPPI** | Residential Property Price Index |
| **RRE** | Residential Real Estate |
| **RSF** | Required Stable Funding |
| **RW** | Risk Weight |
| **RWEA/RWA** | Risk weighted exposure amounts |
| **S&P** | Standard and Poor |
| **SA-CCR** | Credit Counterparty Risk using the Standardised Approach |
| **SBT** | Science Based Targets |
| **SBTi** | Science Based Targets Initiative |
| **SDA** | Sectoral Decarbonisation Approach |
| **SDG** | Sustainable Decision Group |
| **SDGs** | Sustainable Development Goals |
| **SE** | Structured Entity |
| **SEAI** | Sustainable Energy Authority of Ireland |
| **SEAR** | Senior Executive Accountability Regime |
| **SEC-IRBA** | Securitisation Internal Ratings Based Approach |
| **SEC-ERBA** | Securitisation External Ratings Based Approach |
| **SFT** | Securities financing transactions |
| **SID** | Senior Independent Director |
| **SMBPN** | Special Mortgage-Backed euro Promissory Note |
| **SMCR** | Senior Managers and Certification Regime |
| **SME** | Small Medium Enterprise |
| **SONIA** | Sterling Overnight Index Average |
| **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 |
| **TCND** | Taskforce for Nature Related Financial Disclosures |
| **TFCD** | Taskforce for Climate Related Financial Disclosures |
| **TLAC** | Total loss absorbing capacity |
| **TPRM** | Third Party Risk Management |
| **TREA** | Total Risk exposure amounts |
| **TSA/SA** | The Standardised Approach |
| **TtC** | Through-the-cycle |
| **UK** | United Kingdom |
| **UNPRB** | United Nations Principles for Responsible Banking |
| **UNPRI** | United Nations Principles for Responsible Investment |
| **UoP** | Use of Proceeds |
| **USD** | US Dollar |
| **VaR** | Value at risk |
| **WACI** | Weighted Average Carbon Intensity |
| **WWR** | Wrong Way Risk |