



# BOV

Bank of Valletta

## Pillar 3 Disclosures

30<sup>th</sup> September 2022

Issued by Bank of Valletta p.l.c., 58, Triq San Żakkarija, Il-Belt Valletta, VLT 1130 – Malta

Bank of Valletta p.l.c. is a public limited company regulated by the MFSA and is licensed to carry out the business of banking and investment services in terms of the Banking Act (Cap.371 of the Laws of Malta) and the Investment Services Act (Cap.370 of the Laws of Malta). Bank of Valletta p.l.c. is an enrolled tied insurance intermediary of MAPFRE MSV Life p.l.c. MAPFRE MSV Life is authorized by the MFSA to carry out long term business of insurance under the Insurance Business Act (Cap.403 of the Laws of Malta). Bank of Valletta p.l.c. is authorized to act as a trustee by the MFSA

## Bank of Valletta at a Glance

Bank of Valletta plc. (hereinafter referred to as 'the Bank' or 'the Group') is one of the Malta's leading banks providing banking, financial, and investment services to private, business, and corporate clients within the domestic market. BOV is licensed to carry out its activity in terms of the Banking Act, 1994 (Chapter 371, Laws of Malta) and the Investment Services Act, 1994 (Chapter 370, Laws of Malta). BOV is headquartered in Santa Venera from where it manages a nationwide branch network and investment centres, servicing the banking needs of residents across Malta and Gozo.

The Bank is the parent institution of a two fully owned subsidiary companies (BOV Asset Management Limited and BOV Fund Services Limited) and two equity-accounted investee companies (MAPFRE Middlesea plc and MAPFRE MSV Life plc.), which together comprise the Bank of Valletta Group. A detailed description of the Group is given in the Annual Report and Financial Statements 2021.

## Contents

<b>1</b>	<b>Introduction</b> .....	<b>3</b>
	1.1 Statement of the Management Body .....	3
<b>2</b>	<b>Risk Measurement and Key Risk Metric</b> .....	<b>4</b>
<b>3</b>	<b>Overview of the Risk Weighted Exposure Amounts (RWA)</b> .....	<b>5</b>
<b>4</b>	<b>Liquidity Risk</b> .....	<b>7</b>
<b>5</b>	<b>Appendices</b> .....	<b>9</b>
	5.1 List of Abbreviations .....	9
	5.2 List of Tables .....	10
	5.3 Qualitative Disclosures.....	11
	5.4 Non-Applicable Disclosures.....	12

# 1 Introduction

The Basel III capital adequacy framework consists of three complementary pillars. Pillar 1 provides a framework for measuring minimum capital requirements for credit, market, and operational risks. Pillar 2 establishes a system of supervisory review aimed at improving banks' internal risk management and capital adequacy assessment in line with their risk profile. Pillar 3 is intended to enhance market discipline and requires banks to publish a range of disclosures aimed at providing further insight on the capital structure, adequacy and risk management practices.

The Pillar 3 Disclosures bearing reference date 30<sup>th</sup> September 2022 comprise both quantitative and qualitative information required under Pillar 3. These disclosures are made in accordance with Part Eight of CRR II and the European Banking Authority's (EBA) guidelines on disclosure requirements. Furthermore, the Pillar 3 Disclosures are compliant with the 'Reporting Framework' issued by the European Banking Authority.

This interim report provides an updated overview of the Group's capital adequacy, risk weighted assets, and liquidity, in accordance with EBA recommended guidelines on disclosure requirements – 'Final draft implementing technical standards on public disclosures by institutions of the information referred to in Titles II and III of Part Eight of Regulation (EU) No 575/2013'.

## 1.1 Statement of the Management Body

The Pillar 3 Disclosures are not subject to external audit. Nonetheless, the report has been subjected to BOV Group's internal verification and validation assessments, to ensure accuracy and compliance of the content with regulatory guidelines. The report has been reviewed and approved by the Internal Control Risk Management Committee (ICRMC), the Executive Committee (ExCo), the Risk Committee (RC), the Audit Committee and the Board of Directors (BoD).

In line with Article 431 (3) CRR and CRR II, the Bank has disclosed all information within the Pillar 3 Disclosures in accordance with the disclosure requirements, formal policies and internal processes, systems, and controls.

## 2 Risk Measurement and Key Risk Metrics

BOV's risk measurement and reporting system is an integral part of the Group's risk management approach. The roles and responsibilities with respect to risk measurement include data collection, data reconciliation, and data quality verification and validation. BOV monitors the residual material risks through the set of risk thresholds included in the Risk Appetite Framework (RAF). In certain instances, a root-cause analysis is carried out to identify the main cause of a breach.

The risk measurement system supports regulatory reporting and external disclosures, as well as internal management reporting. Internal reporting highlights the Group's risk profile position as well as providing insight on particular material risks specific to the Group and/or business divisions. The following table provides a summary of the Group's key metrics and overview of the risk-weighted exposure amounts.

Table 1 EU KM1- Key Metrics

€ millions except where indicated		30 September 2022	30 June 2022	31 March 2022	31 December 2021	30 September 2021
<b>Available own funds (amounts)</b>						
1	Common Equity Tier 1 (CET1) capital	905.22	893.76	981.60	985.44	946.25
2	Tier 1 capital	905.22	893.76	981.60	985.44	946.25
3	Total capital	1,067.94	1,057.00	1,144.30	1,148.68	1,108.97
<b>Risk-weighted exposure amounts</b>						
4	Total risk-weighted exposure amount	4,451.98	4,394.08	4,461.19	4,499.83	4,442.10
<b>Capital ratios (as a percentage of risk-weighted exposure amount)</b>						
5	Common Equity Tier 1 ratio (%)	20.33%	20.34%	22.00%	21.90%	21.30%
6	Tier 1 ratio (%)	20.33%	20.34%	22.00%	21.90%	21.30%
7	Total capital ratio (%)	23.99%	24.06%	25.65%	25.53%	24.97%
<b>Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)</b>						
EU 7a	Additional own funds requirements to address risks other than the risk of excessive leverage (%)	3.00%	3.00%	3.00%	3.25%	3.25%
EU 7b	of which: to be made up of CET1 capital (percentage points)	1.69%	1.69%	1.69%	1.83%	1.83%
EU 7c	of which: to be made up of Tier 1 capital (percentage points)	2.25%	2.25%	2.25%	2.44%	2.44%
EU 7d	Total SREP own funds requirements (%)	11.00%	11.00%	11.00%	11.25%	11.25%
<b>Combined buffer requirement (as a percentage of risk-weighted exposure amount)</b>						
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 (%)	0.00%	0.00%	0.00%	0.00%	-
EU 9a	Systemic risk buffer (%)	-	-	-	-	-
10	Global Systemically Important Institution buffer (%)	-	-	-	-	-
EU 10a	Other Systemically Important Institution buffer (%)	2.00%	2.00%	2.00%	2.00%	2.00%
11	Combined buffer requirement (%)	4.50%	4.50%	4.50%	4.50%	4.50%
EU 11a	Overall capital requirements (%)	15.50%	15.50%	15.50%	15.75%	15.75%
12	CET1 available after meeting the total SREP own funds requirements (%)	12.08%	12.09%	15.67%	15.67%	14.97%
<b>Leverage ratio</b>						
13	Total exposure measure	14,875.49	14,596.64	14,749.30	14,631.99	14,194.40
14	Leverage ratio (%)	6.09%	6.12%	6.66%	6.73%	6.67%
<b>Additional own funds requirements to address the risk of excessive leverage (as a percentage of total exposure measure)</b>						
EU 14a	Additional own funds requirements to address the risk of excessive leverage (%)	-	-	-	-	-
EU 14b	of which: to be made up of CET1 capital (percentage points)	-	-	-	-	-
EU 14c	Total SREP leverage ratio requirements (%)	3.00%	3.00%	3.00%	3.00%	3.00%
<b>Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)</b>						
EU 14d	Leverage ratio buffer requirement (%)	-	-	-	-	-
EU 14e	Overall leverage ratio requirements (%)	3.00%	3.00%	3.00%	3.00%	3.00%
<b>Liquidity Coverage Ratio</b>						
15	Total high-quality liquid assets (HQLA) (weighted value - average)	6,208.12	6,025.67	5,858.69	5,727.37	5,597.67
EU 16a	Cash outflows - Total weighted value	2,121.04	2,064.13	2,013.38	1,978.97	1,947.31
EU 16b	Cash inflows - Total weighted value	750.54	751.16	736.85	723.35	722.89
16	Total net cash outflows (adjusted value)	1,370.50	1,312.97	1,276.53	1,249.62	1,224.42
17	Liquidity coverage ratio (%)	454.18%	459.48%	460.07%	459.26%	458.08%
<b>Net Stable Funding Ratio</b>						
18	Total available stable funding	11,860.30	11,643.54	11,685.16	11,548.82	11,302.60
19	Total required stable funding	5,840.36	5,815.60	6,044.90	6,102.14	6,130.37
20	NSFR ratio (%)	203.07%	200.32%	193.31%	189.26%	184.37%

On 4<sup>th</sup> May 2022, an out-of-court settlement was reached on the longstanding Deiuemar case whereby a final settlement of €182.5 million was agreed, thus closing the Deiuemar litigation. Given that the Bank had set aside €80 million of provisions in case of a negative outcome, the residual impact on profit amounted to €101.2 million. As at end of September 2022, figures indicate that despite this one-time hit, the Bank still maintains a strong capital position and is able to meet all the capital requirements, [including Pillar 2 Requirements, Pillar 2 Guidance, and the combined capital buffer requirements ("CBR")]. This is reflected in the CET1 capital movement.

As at September 2022, CET1 capital improved by €11.46 million when compared to the previous quarter. This was mainly driven by a favourable movement in the Bank's losses over the period.

Moreover, as expounded in Section 3, the Bank is currently taking the necessary steps to address the resultant post-Deiuemar TREA-MREL shortfall with an approved issuance plan to remediate such position by the end of 2023, in line with supervisory expectations.

### 3 Overview of the Risk Weighted Exposure Amounts (RWA)

In accordance with Article 438(c) to (f) of the CRR, Table EU OV1 provides an overview of the total RWA, and the capital requirement for credit risk, as well as capital required for operational risk, foreign exchange risk, and credit valuation adjustment risk. In contrast with previous years, the Bank is also allocating capital under securitization in view of its first securitization portfolio related to the Malta Development Bank (MDB) COVID-19 Assist scheme.

Table EU OV1 shows that the total RWEAs as at 30<sup>th</sup> September 2022 increased by €57.90 million when compared to June 2022. This was mainly driven by an increase in Credit Risk (excluding Counterparty Credit Risk) related to Loans and Advances to Retail and Corporates and Loans Secured by Mortgages on immovable property. Consequently, total own funds requirement as at 30<sup>th</sup> September 2022 increased to €356.16 million.

No capital is allocated for market risk as the Bank does not operate a trading book. Moreover, there is no Pillar 1 capital allocated for settlement risk, commodities risk, position risk, and large exposures. The exposure value is equal to the total on-balance sheet amount and off-balance sheet amount net of value adjustments, together with provisions and post Credit Conversion Factor (CCF). As at 30<sup>th</sup> September 2022, the Deiuemar out-of-court settlement adversely impacted the TREA-MREL requirement, which includes the Capital Buffer Requirement (CBR). In order to ensure continued adherence to regulatory requirements pertaining to MREL, the Bank has obtained approval from the Central Bank of Ireland for a base prospectus towards the establishment of a Euro Medium Note Programme of a maximum amount of €500 million. The notes will be offered in the international debt capital markets through the intermediation of Credit Suisse (Europe) S.A. and UBS Europe SE, acting as joint arrangers and dealers. This issue will also allow the Bank to increase its lending book and expand investment horizons of its treasury operations.

Table 2: EU OV1 - Overview of risk weighted exposure amounts

<i>€ millions</i>				
	Risk weighted exposure amounts (RWEAs)		Total own funds requirements	
	30 September 2022	30 June 2022	30 September 2022	
<b>1</b>	<b>Credit risk (excluding CCR)</b>	<b>3,977.04</b>	<b>3,916.28</b>	<b>318.16</b>
2	<i>Of which the standardised approach</i>	<b>3,977.04</b>	<b>3,916.28</b>	<b>318.16</b>
3	<i>Of which the Foundation IRB (F-IRB) approach</i>	-	-	-
4	<i>Of which: slotting approach</i>	-	-	-
EU 4a	<i>Of which: equities under the simple riskweighted approach</i>	-	-	-
5	<i>Of which the Advanced IRB (A-IRB) approach</i>	-	-	-
<b>6</b>	<b>Counterparty credit risk - CCR</b>	<b>5.83</b>	<b>3.50</b>	<b>0.47</b>
7	<i>Of which the standardised approach</i>	-	-	-
8	<i>Of which internal model method (IMM)</i>	-	-	-
EU 8a	<i>Of which exposures to a CCP</i>	<b>0.13</b>	<b>0.13</b>	<b>0.01</b>
EU 8b	<i>Of which credit valuation adjustment - CVA</i>	<b>1.38</b>	<b>0.71</b>	<b>0.11</b>
9	<i>Of which other CCR</i>	<b>4.33</b>	<b>2.67</b>	<b>0.35</b>
10	<i>Not applicable</i>			
11	<i>Not applicable</i>			
12	<i>Not applicable</i>			
13	<i>Not applicable</i>			
14	<i>Not applicable</i>			
<b>15</b>	<b>Settlement risk</b>	-	-	-
<b>16</b>	<b>Securitisation exposures in the non-trading book (after the cap)</b>	<b>17.29</b>	<b>23.64</b>	<b>1.38</b>
17	<i>Of which SEC-IRBA approach</i>	-	-	-
18	<i>Of which SEC-ERBA (including IAA)</i>	-	-	-
19	<i>Of which SEC-SA approach</i>	<b>17.29</b>	<b>23.64</b>	<b>1.38</b>
EU 19a	<i>Of which 1250%</i>	-	-	-
<b>20</b>	<b>Position, foreign exchange and commodities risks (Market risk)</b>	<b>2.64</b>	<b>1.48</b>	<b>0.21</b>
21	<i>Of which the standardised approach</i>	<b>2.64</b>	<b>1.48</b>	<b>0.21</b>
22	<i>Of which IMA</i>	-	-	-
EU 22a	<i>Large exposures</i>	-	-	-
<b>23</b>	<b>Operational risk</b>	<b>449.17</b>	<b>449.17</b>	<b>35.93</b>
EU 23a	<i>Of which basic indicator approach</i>	<b>449.17</b>	<b>449.17</b>	<b>35.93</b>
EU 23b	<i>Of which standardised approach</i>	-	-	-
EU 23c	<i>Of which advanced measurement approach</i>	-	-	-
<b>24</b>	<b>Amounts below the thresholds for deduction (subject to 250% risk weight) (For information)</b>	<b>337.46</b>	<b>338.28</b>	<b>27.00</b>
25	<i>Not applicable</i>			
26	<i>Not applicable</i>			
27	<i>Not applicable</i>			
28	<i>Not applicable</i>			
<b>29</b>	<b>Total</b>	<b>4,451.98</b>	<b>4,394.08</b>	<b>356.16</b>

## 4 Liquidity Risk

During 2017, the EBA issued a set of guidelines (EBA/GL/2017/01) which aim to harmonize the disclosures in line with the CRR Article 435(1) in relation to liquidity risk.

Liquidity risk is the risk that a bank is unable to meet its current or future payment obligations as they fall due, and/or to replace at reasonable cost, when funds are withdrawn, even when this occurs unexpectedly. Funding liquidity risk arises when a bank is not able to efficiently meet various cash flow and collateral needs, affecting its daily operations and/or financial position. In contrast, market liquidity risk arises when a bank is not able to easily offset or eliminate positions at the market price because of inadequate market depth and/or market disruption. The Bank's objective of its liquidity risk management actions is to ensure that both foreseeable and unpredicted funding commitments can be met when due at a reasonable cost.

Since the implementation of the European regulatory Liquidity Coverage Ratio (LCR) requirement, the Bank has consistently exhibited levels well above the 100% minimum requirement. As at end of September 2022, the Bank was well positioned with an LCR of 418.06% (June 2022, 448.90%).

The absolute quarterly decrease of 30.84% in the LCR (relative 6.87% decrease) is mainly attributable to several elements. On the part of 'Outflows', the main drivers were the increase in: retail deposits, other liabilities, and non-operational deposits. All these items contributed to a 4.84% increase in 'Outflows' when compared to the previous quarter. On the other hand, 'Inflows' exhibited a relative decrease of 7.96% when compared to the last quarter. This decrease is mainly attributed to a decrease in the contracted base of securities falling due within a month of the reporting date (end September 2022) including a decline in amounts due from non-financial institutions and in amounts due from financial customers.

Such movements resulted in an increase of 11.83% in the 'Net Liquidity Outflows' (LCR denominator). This together with a rise of around 4.15% in the 'Liquidity Buffer' (LCR numerator) resulted in the abovementioned LCR decrease when compared to the previous quarter. Nevertheless, the LCR level as at Q3 of this year of 418.06% continued to exhibit a very robust level of over four times the regulatory minimum, attesting to BOV's resilient liquidity risk profile.

Table EU LIQ1 disclosed below provides quantitative LCR information which complements Article 435 (1) (f) of Regulation (EU) No 575/2013. No other factors other than those specified in the template are included in the LCR calculation.



Table 3: EU LIQ1 - Quantitative information of LCR

€ millions		Total unweighted value (average)				Total weighted value (average)			
		30 September 2022	30 June 2022	31 March 2022	31 December 2021	30 September 2022	30 June 2022	31 March 2022	31 December 2021
	Number of data points used in the calculation of averages	12.00	12.00	12.00	12.00	12.00	12.00	12.00	12.00
	<b>High-Quality Liquid Assets</b>								
1	Total high-quality liquid assets (HQLA), after application of haircuts in line with Article 9 of regulation (EU) 2015/61					6,208.12	6,025.67	5,858.69	5,727.37
	<b>Cash - Outflows</b>								
2	Retail deposits and deposits from small business customers, of which:	8,380.63	8,110.88	7,863.90	7,625.17	556.34	537.14	518.89	501.60
3	Stable deposits	5,751.90	5,593.08	5,461.14	5,327.13	387.59	279.65	273.06	266.36
4	Less stable deposits	2,628.73	2,517.79	2,402.76	2,298.03	268.75	257.49	245.83	235.24
5	Unsecured wholesale funding	2,993.85	2,911.64	2,849.27	2,809.44	1,335.02	1,290.86	1,255.81	1,241.36
6	Operational deposits (all counterparties) and deposits in networks of cooperative banks	-	-	-	-	-	-	-	-
7	Non-operational deposits (all counterparties)	2,993.82	2,911.61	2,849.25	2,809.42	1,334.99	1,290.83	1,255.79	1,241.34
8	Unsecured debt	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02
9	Secured wholesale funding	-	-	-	-	3.19	3.08	4.07	6.62
10	Additional requirements	1,838.35	1,872.39	1,901.53	1,927.88	155.45	158.51	159.93	162.05
11	Outflows related to derivative exposures and other collateral requirements	0.94	0.80	0.63	0.71	0.94	0.80	0.63	0.71
12	Outflows related to loss of funding on debt products	-	-	-	-	-	-	-	-
13	Credit and liquidity facilities	1,837.41	1,871.59	1,900.91	1,927.17	154.51	157.72	159.30	161.34
14	Other contractual funding obligations	66.82	70.28	70.18	62.66	64.07	67.60	67.78	60.47
15	Other contingent funding obligations	139.39	138.83	138.04	137.27	6.97	6.94	6.90	6.86
16	<b>Total Cash Outflows</b>					<b>2,121.04</b>	<b>2,064.13</b>	<b>2,013.38</b>	<b>1,978.97</b>
	<b>Cash - Inflows</b>								
17	Secured lending (e.g. reverse repos)	-	-	-	-	-	-	-	-
18	Inflows from fully performing exposures	850.72	844.05	835.30	826.55	628.95	628.03	624.77	616.43
19	Other cash inflows	121.59	123.13	112.08	112.91	121.59	123.13	112.08	112.91
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	<b>Total Cash Inflows</b>	<b>972.31</b>	<b>967.18</b>	<b>947.38</b>	<b>939.47</b>	<b>750.54</b>	<b>751.16</b>	<b>736.85</b>	<b>729.35</b>
EU-20a	Fully exempt inflows	-	-	-	-	-	-	-	-
EU-20b	Inflows subject to 90% cap	-	-	-	-	-	-	-	-
EU-20c	Inflows subject to 75% cap	972.31	967.18	947.38	939.47	750.54	751.16	736.85	729.35
	<b>Total Adjusted Buffer</b>								
21	Liquidity Buffer					6,208.12	6,025.67	5,858.69	5,727.37
22	Total Net Cash Outflows					1,370.50	1,312.97	1,276.53	1,249.62
23	Liquidity Coverage Ratio					454.18%	459.48%	460.07%	459.26%

The Bank's liquidity buffer as at 30<sup>th</sup> September 2022, quoted at post-haircut values, may be segmented into the following High Quality Liquidity Assets (HQLA) classes:

- **Level 1 assets** (99.12%), mainly composed of withdrawable central bank reserves (56.82%), central government assets (31.15%), followed by multilateral development bank and international organizations' assets (10.95%);
- **Level 2A assets** (0.49%), mainly composed of regional government or public sector entity assets with a 20% risk weight (59.35%); and
- **Level 2B assets** (0.39%), composed of corporate debt securities Credit Quality Step 2 or 3.

With regards to derivative exposures, the majority of outflows and other collateral requirements shown in 'Outflows related to derivative exposures and other collateral requirements' (line item 11) which amounts to €0.94 million are in relation to derivative contractual cash outflows that are offset by derivative cash inflows shown in 'Other cash inflows' (line item 19) ultimately amounting to €121.59 million. Furthermore, the Bank has no potential collateral calls.

The LCR is also assessed by currency. Since no other currency other than the domestic currency exceeds the 5% aggregate amount of liabilities to total liabilities, only the euro-denominated LCR was calculated. In fact, 94.63% of total liabilities are euro-denominated. In principle, BOV does not finance its assets in a currency different from that in which the assets are denominated.

The top 10 Bank's deposit names (including groups of connected depositors) comprised 5.88% of total customer deposits whilst the top 20 depositors amounted to 8.18% of total customer deposits. The large, diversified, and relatively stable customer deposit base avoids reliance on wholesale funding from financial customers. In fact, all the other customers individually do not exceed more than circa. 0.19% each of the total customer deposit base. An analysis of concentration by product type demonstrates that retail deposits accounted for 69.96% (of which 66.52% are retail sight deposits and 3.44% are retail term deposits) of total funding, followed by unsecured wholesale funding amounting to 26.33% (of which 20.99% are deposits from non-financial customers and 5.33% are deposits from financial customers). The weighted average residual maturity for retail term accounts not withdrawable within a 30-day time horizon, approximates 9 months.

## 5 Appendices

### 5.1 List of Abbreviations

BoD	Board of Directors	HQLA	High Quality Liquidity Assets
BOV	Bank of Valletta (as Group)	ICRMC	Internal Control Risk Management Committee
BPS	Basis Points	LCR	Liquidity Coverage Ratio
CBR	Combined Buffer Requirement	MDB	Malta Development Bank
CCF	Credit Conversion Factor	MFSA	Malta Financial Services Authority
CCR	Counterparty Credit Risk	MREL	Minimum Requirement for Own Funds and Eligible Liabilities
CET	Common Equity Tier	NSFR	Net Stable Funding Ratio
COVID-19	Coronavirus	RAF	Risk Appetite Framework
CRR	Capital Requirements Regulation	RC	Risk Committee
EBA	European Banking Authority	RWA	Risk Weighted Exposure Amounts
EU	European Union	TREA	Total Risk Exposure Amount
ExCo	Executive Committee		

## 5.2 List of Tables

Table 1 EU KM1- Key Metrics .....	4
Table 2: EU OV1 - Overview of risk weighted exposure amounts .....	6
Table 3: EU LIQ1 - Quantitative information of LCR .....	8

## 5.3 Qualitative Disclosures

	<b>Pillar 3 Disclosures Location</b>
<hr/> <b>EU LIQB: Qualitative information on LCR, which complements template EU LIQ1</b> <hr/>	<hr/> Section 4 <hr/>

## 5.4 Non-Applicable Disclosures

	Reason
<b>EU CR8: RWEA flow statements of credit risk exposures under the IRB approach</b>	The Bank does not utilize the IRB approach.
<b>EU CCR7: RWEA flow statements of CCR exposures under the IMM</b>	The Bank does not utilize the IMM approach.
<b>EU MR2-B: RWA flow statements of market risk exposures under the IMA</b>	The Bank does not utilize the IMA approach.

