



**Raiffeisen Bank  
International**

Member of RBL Group

## **Annual Regulatory Disclosure Report 2022**



# Publication details

With this document, Raiffeisen Bank International Aktiengesellschaft (RBI AG) fulfills its disclosure requirements under Part 8 of the Capital Requirements Regulation (CRR, EU 575/2013). Pursuant to Article 11 of the CRR, RBI AG is subject to the CRR provisions not only as an individual credit institution but also a consolidated group.

RBI has opted for the Internet as the medium for publishing its disclosures ([www.rbinternational.com](http://www.rbinternational.com)). The disclosure report as a main document is published once a year in conjunction with the publication of RBI's Annual Report whereby certain information regarding Article 450 CRR will not be available until July 2023 and will be reported at that time. Furthermore, specific information is published more often pursuant to Articles 432(1), 432(2) and 433 CRR and Guidelines EBA/GL/2014/14. Relevant disclosures are either published as separate documents in the section "Regulatory Disclosures" or included in the annual/quarterly reports in the section "Reports" on RBI's homepage.

The information is based on the valid regulations on a consolidated basis for the RBI CRR Group at the time this document was published.

In this report, Raiffeisen Bank International (RBI) refers to the RBI Group, and RBI AG is used wherever statements refer solely to Raiffeisen Bank International AG.

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## Editor

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## Supervisory Authorities

As a credit institution, RBI AG is subject to supervision by the Austrian Federal Ministry of Finance, European Central Bank (ECB), Austrian National Bank (OeNB) and the Austrian Financial Market Authority (FMA) and must comply with pertinent legal regulations, in particular the EU regulations (CRR), Austrian Banking Act (Bankwesengesetz, BWG) and the Austrian Securities Supervision Act (Wertpapieraufsichtsgesetz, WAG).

## Exclusion of liability:

We have taken the utmost care in gathering the data and other information contained in this Report. Nevertheless, we cannot completely rule out the possibility of errors. Statements on future developments are based on information and forecasts which were available to us at the time this Report was published. The latter were also written with care. Notwithstanding the above, there are many factors and developments that can lead to discrepancies. We therefore ask for your understanding that we do not assume liability for data and other information contained in this Report. This Report is based on RBI's current business policy. Changes to this business policy are reserved. If this Report contains rules, these shall apply solely to companies of RBI and their board members and employees. Other parties are not addressed by these rules and are neither authorized nor obligated by them. Nobody may derive or assert any type of claims or other rights arising from or relating to this Report against RBI companies or their board members and employees; any liability of these companies, board members and employees arising from or relating to this Report shall be excluded. This Report has been prepared and the data checked with the greatest possible care. Nonetheless, rounding, transmission, typesetting and printing errors cannot be ruled out. In the summing up of rounded amounts and percentages, rounding-off differences may occur. This Report was prepared in English. This Report is subject to substantive Austrian law. The Bezirksgericht Innere Stadt (Local Court Vienna – Innere Stadt, Austria) is solely responsible for reaching a decision on all possible disputes arising from or relating to this Report. Editorial deadline: 03 March 2023  
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# Article 435 CRR

## Risk management objectives and policies

For a detailed description of RBI's risk strategies and processes, the structure and organization of the relevant risk management functions, as well as risk identification and risk management objectives and policies for each separate category of risk, please refer to the Risk Report in RBI's Annual Report.

### Declaration by the management body on the adequacy of risk management arrangements

We hereby confirm that the risk management systems established at RBI and set out in the Functional Regulation "RBI Risk Strategy and Group Risk Manual – Risk-Oriented Bank Management" and its Supporting Documents are adequate in view of RBI's profile and strategy.

RBI is a universal banking group with international operations that focuses its business activities on Austria and the geographic region Central and Eastern Europe. The regional composition of economic capital, which is one of the main elements of risk steering in RBI, is shown in the table below (by Group unit domicile). This also illustrates the broadly balanced distribution of risk between Austria and the sub-regions in CEE, despite effects resulting from the military confrontation in Ukraine and the sanctions against Russia and Belarus.

in € thousand	2022	Share
Eastern Europe	2,633,572	30%
Austria	2,207,523	26%
Central Europe	1,952,001	23%
Southeastern Europe	1,838,860	21%
<b>Total</b>	<b>8,631,956</b>	<b>100%</b>

RBI's main business activities are within corporate banking, retail banking and other banking services. Investment banking and other market risk taking activities are limited in scope, with a substantial part of market risk stemming from foreign currency denominated equity of subsidiaries. The composition of economic capital by risk type in the table below shows the prevalence of credit risk in the Group's overall risk profile, as well as a balanced distribution between corporate and retail credit risk.

in € thousand	2022	Share
Credit risk corporate customers	1,652,567	19%
Credit risk retail customers	1,610,083	19%
FX risk capital position	1,311,632	15%
Market risk	929,141	11%
Operational risk	799,468	9%
Participation risk	645,742	7%
Credit risk sovereigns	595,182	7%
Credit risk financial institutions	348,093	4%
Owned Property Risk	306,140	4%
CVA risk	22,396	0%
Liquidity risk	467	0%
Risk buffer	411,046	5%
<b>Total</b>	<b>8,631,956</b>	<b>100%</b>

In order to limit the risks taken by the Group, the overall economic capital has to be covered, with a sufficiently large cushion, by internal capital. In compliance with the ICAAP Directive published by the European Central Bank, the additional tier 1 capital (AT1) is not used to calculate the internal capital. Furthermore, on the basis of the climate risk stress test, a Pillar 2 deduction item with respect to climate & physical risk has been introduced in Q1-2022 onwards. Details on ESG exposures, risk and strategies are disclosed in section Art. 449a.

Due to a strong increase in internal capital thanks to the high consolidated profit and despite the impacts from the military confrontation in Ukraine and the sanctions against Russia and Belarus, the utilization of available risk capital (the ratio of economic capital to internal capital) as of year-end 2022 decreased to 58.0 per cent, down from 59.3 per cent as of year-end 2021. In its Group Risk Appetite Framework, RBI has set the risk tolerance threshold for the utilization ratio of internal capital by economic capital at 90 per cent.

## Governance arrangements

### Recruitment policy for the Management Board and Supervisory Board

The aim of the policy is to select members of the Management Board and the Supervisory Board pursuant to the Fit & Proper Policy in such manner as to ensure qualified management, control, supervision, and consultation, which is not only in compliance with the statutory requirements, but also aligned with our internal recruiting and diversity policy. The candidates should be in a position, due to their integrity, motivation, values, independence, and character, to fulfill the tasks of a member of the Management Board or Supervisory Board at RBI and to safeguard the reputation of the company.

In the selection of members, the composition of the relevant management body is considered, and the required expertise and professional experience as well as diversity considerations are taken into account.

### Number of directorships

Annex 1 contains a detailed overview of the number of directorships held by members of the Management Board and Supervisory Board.

### Description of the diversity strategy

RBI is actively committed to ensuring equal opportunities for all employees regardless of age, gender, nationality, sexual orientation, physical or mental ability, religion or world view. This principle applies across all areas of human resource management, from employee selection to salaries all the way to appraisals and career development. The RBI Group diversity and inclusion policy defines RBI's attitude, roles and responsibility with regard to diversity and establishes the principle of implementing a diversity strategy at RBI. All subsidiaries have appointed diversity officers and adopted local strategies. For example, the diversity and inclusion strategy drawn up at head office in 2021 aims to embed the issue throughout the Group, moving away from individual initiatives toward holistic, leadership-driven diversity and inclusion according to the following five principles:

- Our engagement and commitment to diversity and inclusion begins at the very highest level of management
- Our management teams are diverse and aware of the importance of diversity
- We empower all employees to contribute to an inclusive work culture
- We actively integrate diversity and inclusion into HR processes and practices
- We work transparently and on the basis of data

Key focuses for 2022 were gender, LGBTQI+ and people with disabilities.

The key components of the RBI Group diversity and inclusion policy include RBI's diversity vision and mission statement and the daily implementation guidelines: "RBI believes that diversity adds value. Capitalizing on the opportunities of diversity provides long-term benefits to the company and its employees as well as to the economy and society as a whole. RBI is continuing Raiffeisen's 130-year-long success story as it embraces diversity. RBI actively and professionally harnesses the potential of diversity to give clients the best possible service as a strong partner and to position itself as an attractive employer." More information on diversity is available on the RBI website at [www.rbinternational.com](http://www.rbinternational.com) → Sustainability & ESG → Diversity & Inclusion. The RBI Group diversity and inclusion policy defines a strategy for filling Management Board and Supervisory Board positions, whereby hiring must consider both diversity and compliance with statutory requirements. Important diversity aspects include age, gender and geographic origin. The main requirements for holding such a position also include solid educational background and professional experience, preferably in roles related to fintech companies, banks or financial institutions. The formalization of the hiring process (at all levels), the focus placed on women in the internal succession pipeline and the support given to women in their careers facilitate decision-making and the attainment of the targets we have set for ourselves. RBI aims for the boards

to include a wide range of qualifications and expertise in order to obtain the broadest possible variety of experience and diverse opinions, collectively resulting in sound decision-making.

The composition of the Management Board and Supervisory Board should be structured so that the board members' geographic origins reflect the diversity of RBI's markets and its cultural context. With respect to the age structure of the Management Board and Supervisory Board, in order to achieve a good balance, the board members should preferably not have all been born in the same decade. The aim is for women to fill 35 per cent of the positions within the Supervisory Board, Management Board and Tier 2 management of RBI by no later than 2024. Of the six Management Board members of RBI AG, currently four are from Austria, one from Poland, and one from Ukraine. Members of non-Austrian origin therefore constituted 33 per cent of the Management Board at the end of 2022 (2021: 33 per cent). All the Supervisory Board members are of Austrian origin. The ages of the Supervisory Board members range between 48 and 68 (2021: from 47 to 67), and of the Management Board between 44 and 63 (2021: from 43 to 62).

## Measures taken to promote women to the Management Board, the Supervisory Board and into executive positions

RBI is convinced that having leadership teams that are diverse in terms of gender, age, geographic origin, education and professional background is essential to optimize quality of decision making and minimize groupthink. It thus assumes that diversity ultimately contributes positively to the company's performance. While the diversity of the management team is satisfactory in terms of age, geographic origin, education and professional background, RBI aims to further increase the proportion of women in management. The Nomination Committee has therefore set a target for RBI AG of filling 30 per cent of the positions on the Supervisory Board, Management Board and in upper management (Tier 2 and Tier 3 management) with women by 2024. As at 31 December 2022, the corresponding proportion was 27 per cent (2021: 22 per cent). Women held the following proportions of Tier 3 management positions and higher (positions with staff responsibility) at RBI AG:

Supervisory Board, 28 per cent (2021: 28 per cent); Management Board, 0 per cent (2021: 0 per cent); Tier 2 management, 35 per cent (2021: 28 per cent) and Tier 3 management, 26 per cent (2021: 20 per cent). Female employees make up 46 per cent (2021: 46 per cent) of the total workforce. RBI AG therefore meets the legal requirement for the share of women on its Supervisory Board within the calculation parameters of stock corporation law.

The following figures include RBI AG and 12 network banks in CEE and Raiffeisen Bausparkasse Gesellschaft m.b.H., Raiffeisen Kapitalanlage-Gesellschaft m.b.H., Raiffeisen-Leasing Gesellschaft m.b.H., as well as Valida Holding AG and Kathrein Privatbank Aktiengesellschaft. The proportion of women in the Supervisory Board, Management Board and the second tier of management totaled 34 per cent at year-end 2022 (2021: 33 per cent). The target ratio for 2024 is 35 per cent. In the RBI Group, female employees make up 64 per cent (2021: 65 per cent) of the total workforce. Women held 18 per cent of Management Board positions (2021: 16 per cent) and 38 per cent of Tier 2 management positions (2021: 37 per cent). The proportion of women in Supervisory Board positions was 27 per cent (2021: 26 per cent).

Women are underrepresented in management for various reasons based on individual circumstances and the social environment as well as the company. Therefore, a strategy to increase the representation of women must encompass a wide variety of measures; however, it must be acknowledged that certain reasons cannot be addressed by organizational measures. The first set of measures focuses on work culture and aims to achieve a healthy work-life balance as well as a gender-sensitive design of the New World of Work. This includes conducting the work and family audit at RBI AG since 2020, and the promotion of active parental leave management. The work and family audit is a customized certification process for companies that is designed to provide support for the defining, evaluating and planning of family-friendly measures. In addition, this set of measures includes support for women in leadership positions and female talent through networking, coaching and mentoring programs. Examples include RBI's collaboration with women's networks such as the female factor and Fondsfrauen and its sponsoring of memberships in these networks for female RBI employees to give them the opportunity to participate in career training and mentoring programs. The objective is to create a work environment that provides equal career opportunities for men and women and to motivate and support female talent in applying for management roles.

The second set of measures aims to select and develop female talent in order to develop a pipeline of female succession candidates for leadership positions. The Management Board areas have set targets for a gender-balanced succession pipeline and have developed individual strategies for reaching them. These strategies include measures for recruiting new talent and developing internal talent. Best practice examples include the Women Empowerment Circle in the COO/CIO Management Board area and the Women in Risk initiative in the CRO Management Board area, which are employee-driven initiatives supported by the Management Board members associated with them. The Women Empowerment Circle has pursued the objective of institutionalizing networking among women since 2017 and is driven by Group IT Delivery employees. The initiative hosts target group-specific events and promotes the sharing of ideas, knowledge and experience with subsidiaries. Other programs include the Women Empowerment Journey launched in 2021 – a virtual clubhouse or regular panel discussions and participation in the Vienna Daughter's Day.

The Women in Risk initiative is a voluntary network of women in leadership positions in the risk sector. Its mission is to support each other and all women working in the risk sector by providing lectures, workshops and discussions.

Inclusion and unconscious bias have also been incorporated into existing training courses as new topics. For example, unconscious bias was added to the basic leadership training course to support the new managers at head office. In addition, special emphasis was placed on integrating diversity into various other events, such as welcome events for new employees or learning modules for high-potential talent.

The third set of measures relates to the selection of upper management (first and second tier below the Management Board) and is aimed at improving the selection process. It includes establishing an internal office for the Group-wide recruitment of managers in order to achieve multiple aims, including the execution of the diversity and inclusion strategy. The office ensures that selection procedures are clear and transparent, which increases the number of qualified applicants. The measures apply to the entire selection process: including job advertisements (gender-appropriate wording), predefined and clear selection criteria, anonymized testing and focusing on the female talent pool. Structured interviews are conducted for each vacancy. Hiring decisions are based on predefined criteria catalogs. In addition, relevant stakeholders are made aware of candidate lists that are insufficiently diverse. A recruitment agency is brought in if needed. Each recruitment agency is carefully evaluated, including with regard to its diversity and inclusion strategy and its ability to reach a broad, diverse pool of applicants for a vacant position. In addition to the selection process, the measures also focus on raising awareness among managers to take responsibility to increase the percentage of women in management positions. Every management team of a Management Board area has defined its own targets and strategies for increasing the percentage of women in the first and second tier of management below board level. This bundle of measures provides medium- and long-term impetus to bring about cultural change and promote diversity at the company.

## Risk Committee

RBI has established a Risk Committee pursuant to Section 39d of the BWG. The Risk Committee holds at least one meeting per year. On 3 June 2014, the inaugural meeting of the Risk Committee took place. In 2022, four meetings were held.

### Information to management

The consolidated risk development is reported by the Risk Controlling division to the Management Board on a quarterly basis. In addition, the Management Board reports on the risk development at meetings of the Supervisory Board on a quarterly basis, as well as on an ad hoc basis if necessary.

The organizational unit Risk Controlling is responsible for centralized and independent risk controlling pursuant to Section 39 (5) BWG. The head of Risk Controlling reports to the CRO, is a member of the Risk Committee, and reports the results of the unit's activities to the Risk Committee of the Supervisory Board, to the RBI Management Board, and to the responsible division heads.

Regarding the risk strategy and major developments within RBI, the head of the Risk Controlling division reports to the Risk Committee of the Supervisory Board. The Risk Committee of the Supervisory Board advises the Management Board on current and future risk appetite and risk strategy. It supervises the implementation of this strategy in connection with the steering, supervision, and limitation of risks pursuant to the provisions of the BWG, and with respect to capitalization and liquidity.

### Risk Reports

At Group level, the various risk reports address the development of the Group's portfolios and related risks to the risk committees, the Management Board as well as to the Supervisory Board. Risk-type-specific risk reports (i.e., credit risk, market risk, operational risk, liquidity risk, etc.) are complemented by the ICAAP report and the report on the Integrated Stress Test, which aggregate the risk measurements from the various risk types and compare them with the available capital or risk-taking capacity.

The quarterly Supervisory Board Risk Report summarizes the main results and findings of the various risk-type-specific risk reports and the ICAAP report, with a particular focus on the risk developments in the last quarter, as well as the utilization of the Internal Capital in relation to the approved Group Risk Appetite and the Risk Tolerance level. The Risk Report for the Risk Committee of the RBI Supervisory Board goes into further detail and also discusses the Group's risk appetite, its implementation, risk-adequate pricing, and the risk adequacy of the remuneration system. The Risk Report for the Risk Committee of the RBI Supervisory Board also includes the previously stand-alone Group Credit Risk Report, which provides comprehensive information on the development of credit exposures, including foreign currency exposures, defaulted and forborne exposure, and special exposures management. It covers the segments corporate, retail, FI and sovereign. Broken down from the Group level exposure and risk, developments are reported at unit and segment level. This includes also the utilization of portfolio thresholds at country level, the development of customer ratings, average probabilities of default, collateralization, forbearance, credit concentration measures, as well as foreign currency exposures to customers that are considered unhedged. The Risk Report for the Risk Committee of the RBI Supervisory Board is also discussed and acknowledged by the RBI Board of Management.



A dashboard consisting of indicators related to sound risk culture (e.g. number of risk relevant limit breaches, compliance with mandatory trainings, data quality) has been introduced in 2022, and is reported to GRC on quarterly basis. At least on a yearly basis risk culture dashboard is presented to the Risk Committee of the Supervisory Board as a focus topic.

The monthly ICAAP Report provides a monthly analysis to the Group Risk Committee (GRC) and the Management Board of the development of the overall risk situation in the economic perspective (Economic Capital 99.9%, 1 year), the development of Internal Capital, broken down from the Group level to a single unit view, and a comparison of the actual development with the Economic Capital limit. Furthermore, the ICAAP Report also contains forecast calculations on risk and capital figures to identify potential events and developments which can influence the ongoing business.

The monthly Trigger Monitoring Report provides analysis regarding the current development of the Group via several ratios of different areas (e.g., Pillar I ratios, ICAAP figures, NPE ratios, profitability ratios etc.). The ratios and thresholds of these figures are set up within the Recovery Plan of RBI Group (RBI Group Recovery Plan). The monthly presentation takes place in the GRC.

The semi-annual Report on the Results from the Integrated Stress Test provides an analysis to the GRC and the Management Board in particular about the effect of the multi-year stress scenarios on the CET1 ratio in relation to the risk tolerance level. In addition, the maximum provisioning rate and NPE ratio, set in the NPE and Risk Cost Strategy for the Group, are tested, and a stressed Internal Capital utilization is calculated according to the different stress scenarios.

In 2022 a first climate risk stress test was performed covering transition and physical risk over short to long term stress horizons. A climate related stress test is performed at least on a yearly basis, and the results informs the internal capital adequacy process as well as strategic business process within the bank. It is worth mentioning that the methodologies around quantification of climate and environmental risks are emerging, and that a materiality assessment is performed at least on a yearly basis to assure that risks with potential material impact on the banks risk profile are adequately covered in the risk framework.

The quarterly NPE Dashboard, which is presented to the Management Board, provides reports on the fulfillment of the set targets, the reason for deviations and the actions needed to be taken (in case significant deviations are observed) in relation to the Group NPE and Risk Costs Strategy.

The weekly Market Risk Committee (MACO) Report provides the MACO with information on the development of profit and loss, the risks calculated and the limit utilization, as well as the results of scenario analyses and stress tests with respect to market risk.

The ALCO Report and the weekly Liquidity Risk Report provides the members of the Management Board and the members of the Group Asset/Liability Committee with comprehensive information on the liquidity situation, including the LCR and NSFR at Group level, Liquidity Union Vienna, and RBI head office, as well as for selected units such as leasing units. The going concern and time-to-wall analysis are also provided at material currency level. Additionally, an intraday liquidity risk monitoring figure for RBI head office, the development of the asset encumbrance ratio for RBI Group and RBI head office and the ALM on concentration of CBC for RBI Group are reported. Finally, the number of limit violations YTD for each unit's going concern and time-to-wall report for total and material currencies are presented.

# Article 436 CRR

## Scope of application

Pursuant to Article 11 of the CRR, RBI is supervised by the ECB on a consolidated basis and is subject to the CRR provisions not only as an individual credit institution but also as a consolidated group.

The consolidated group is defined as all companies included in the consolidated financial statements. Due to different regulations the following two consolidated groups are distinguished:

- Consolidated group for legal/accounting purposes – IFRS 10
- Consolidated group for prudential/regulatory purposes – Article 30 BWG, Article 18 CRR and Article 19 CRR

## Consolidated group for accounting purposes

All material subsidiaries controlled directly or indirectly by RBI AG are fully consolidated. The Group has control over an entity when it is exposed, or has rights, to variable returns from its involvement with the investee and has the ability to affect those returns through its power over the investee.

Structured entities are entities in which the voting or similar rights are not the dominant factor for determining control, e.g. if the voting rights are solely related to administration activities and the relevant activities are governed by contractual agreements.

As in the case of subsidiaries, consolidation of structured entities is necessary if the Group has control over the entity. In the Group, the need to consolidate structured entities is reviewed as part of the securitization transaction process in which the structured entity is either formed by the Group with or without participation of third parties or in which the Group with or without participation of third parties enters into contractual relationships with existing structured entities.

In order to determine when an entity has to be consolidated, a number of control factors need to be examined:

- The purpose and constitution of the entity
- The relevant activities and how they are determined
- The Group's ability to determine the relevant activity through its rights
- The Group's exposure to risks of or its rights to variable returns
- The Group's ability to use its power over the investee in order to affect the amount of variable returns.

Material interests in associated companies – the Group exerts a significant influence on financial and operating policies of these companies – are valued at equity and reported under investments in associates. Profit or losses occurring in companies valued at equity are shown on a net basis in current income from associates. The rules applicable to companies valued at equity (offsetting acquisition costs against proportional fair net asset value) are the same as those that apply to fully consolidated companies. In principle, IFRS financial statements of associated companies are used. Changes in equity of companies valued at equity are also treated in the consolidated accounts as changes in equity.

Shareholdings in subsidiaries not included in the consolidated financial statements because of their immateriality and shareholdings in companies which have not been valued at equity are shown under financial investments and are measured at amortized cost.

Of the 198 entities in the Group, 108 are domiciled in Austria (2021: 115) and 90 abroad (2021: 94). They comprise 25 banks, 118 financial institutions, 9 companies rendering bank-related ancillary services, 6 financial holding companies and 40 other companies. Due to their insignificance in relation to the Group's assets, financial situation, and earnings, 382 subsidiaries were omitted from consolidation. These are recognized at cost as shares in affiliated companies under securities and equity participations. Total assets of unconsolidated companies account for less than 1 per cent of the Group's total assets.

A list of companies, which includes information on the accounting and the regulatory consolidation method for each entity (EU L13), can be found in Annex 3.

# Consolidated group according to regulatory requirements

There were 159 companies (including branches) in the RBI CRR Group as of 31 December 2022.

The basis for regulatory consolidation is the Capital Requirements Regulation (CRR). This differs from the consolidated group for accounting purposes in that only companies which are specialized in bank and other financial businesses have to be included. This means affiliated companies with non-bank business do not have to be included in the regulatory consolidated group. According to Article 19 CRR, institutions, financial institutions or ancillary services undertakings need not be included in the consolidation where the total amount of assets and off-balance sheet items of the undertaking concerned is less than the smaller of the following two amounts:

- €10 million
- 1 per cent of the total amount of assets and off-balance sheet items of the parent undertaking or the undertaking that holds the participation.

Moreover, competent authorities can permit the exclusion of the following participations on a case-by-case basis:

- The undertaking concerned is situated in a third country where there are legal impediments to the transfer of the necessary information
- The undertaking concerned is of negligible interest only with respect to the objectives of monitoring credit institutions
- The consolidation of the financial situation of the undertaking concerned would be inappropriate or misleading as far as the objectives of the supervision of credit institutions are concerned.

## Fully consolidated subsidiaries

According to Article 18 CRR, RBI is required to carry out a full consolidation of all subsidiaries that are institutions and financial institutions. Article 19 CRR applies to the regulatory consolidated group. Each unit not exceeding a balance sheet total of € 10 million is not included. This applies to 165 units of minor importance.

## Proportional consolidation

According to Article 18 (2) CRR, permission for proportional consolidation may be given by competent authorities on a case-by-case basis. Currently proportional consolidation is not applied in RBI.

## At equity valuation

An associated company is an entity over which the Group has significant influence. Significant influence is the power to participate in the financial and operating policy decisions of an entity in which shares are held. There is no control or joint management of decision-making processes. As a rule, significant influence is assumed if the Group holds 20 to 50 per cent of the voting rights. In the assessment as to whether the Group has the ability to exert a significant influence on another entity, the existence and the effect of potential voting rights which are actually usable, or convertible are taken into account. Examples of further parameters for assessing significant influence are representation on executive committees and supervisory boards (supervisory board in Austrian joint stock companies) of the entity and material business dealings with the entity. Shares in associated companies are valued at equity.

According to Article 18 (7) of Regulation (EU) 2019/876 ('CRR2') an institution shall apply the equity method where an institution has a subsidiary which is an undertaking other than an institution, a financial institution or an ancillary services undertaking or holds a participation in such an undertaking. By way of derogation from the first subparagraph, competent authorities may allow or require institutions to apply a different method to such subsidiaries or participations, including the method required by the applicable accounting framework, provided that:

- The institution does not already apply the equity method on 31 December 2020
- It would be unduly burdensome to apply the equity method, or the equity method does not adequately reflect the risks that the undertaking referred to in the first subparagraph poses to the institution,
- The method applied does not result in full or proportional consolidation of that undertaking.

As a result of Article 18 (7), RBI applies for 46 participations the equity method by 31 December 2022. For the remaining participations, the effect on regulatory capital is negligible and they continued to be valued at cost. Annex 3 contains a list of companies valued at equity.



## Companies deducted from the total capital

According to CRR Article 36 (1) (f-I), direct, indirect, and synthetic holdings in common equity tier 1 capital instruments have to be deducted from common equity tier 1 capital. The deduction amount depends on the threshold calculated according to CRR Article 46 and 48. As RBI does not exceed the threshold, no participations are deducted from common equity tier 1 capital.

## Impediments to the transfer of funds

Western countries have imposed severe sanctions against Russian companies, the Russian Central Bank and the Russian government. At the same time, Russia has placed restrictions on capital flows to so-called unfriendly countries. Both of these restrict the servicing of international debt and of profit distributions, as well as the free allocation of investment capital. At present, earnings for 2022 in the amount of € 2,058 million in Russia, € 97 million in Belarus and € 65 million in Ukraine cannot be distributed in the form of dividends.

## Aggregate amount by which actual funds are less than the required minimum in all subsidiaries not included in the consolidation

There are no material capital deficiencies for subsidiaries not included in the consolidation.

EU LI1	Carrying values as reported in published financial statements	Carrying values under scope of regulatory consolidation	Carrying values of items				
			Subject to the credit risk framework	Subject to the CCR framework	Subject to the securitization framework	Subject to the market risk framework	Not subject to capital requirements or subject to deduction from capital
in € thousand							
<b>Assets</b>	<b>207,057,453</b>	<b>206,682,168</b>	<b>170,410,822</b>	<b>24,408,578</b>	<b>10,138,779</b>	<b>12,760,992</b>	<b>568,393</b>
Cash, cash balances at central banks and other demand deposits	53,682,936	53,672,637	46,171,078	6,963,691	0	0	0
Financial assets - amortized cost	137,430,628	137,218,949	116,541,932	12,111,691	10,085,030	8,619,267	0
Financial assets - fair value through other comprehensive income	3,202,515	3,199,481	3,066,808	0	0	0	0
Non-trading financial assets - mandatorily fair value through profit/loss	756,667	677,586	723,292	0	53,749	0	0
Financial assets - designated fair value through profit/loss	83,996	83,996	83,996	0	0	0	0
Financial assets - held for trading	6,410,641	6,396,864	48,310	4,671,867	0	4,141,726	0
Hedge accounting	661,328	661,328	0	661,328	0	0	0
Investments in subsidiaries, joint ventures and associates	713,089	1,092,886	833,818	0	0	0	0
Tangible fixed assets	1,684,227	1,313,563	1,214,184	0	0	0	16
Intangible fixed assets	902,937	907,240	274,004	0	0	0	565,615
Current tax assets	100,229	100,767	97,338	0	0	0	4
Deferred tax assets	268,999	266,925	266,115	0	0	0	2,757
Non-current assets and disposal groups classified as held for sale	3,039	2,962	2,962	0	0	0	0
Other assets	1,156,222	1,086,984	1,086,984	0	0	0	0

EU LI1	Carrying values as reported in published financial statements	Carrying values under scope of regulatory consolidation	Carrying values of items				
			Subject to the credit risk framework	Subject to the CCR framework	Subject to the securitization framework	Subject to the market risk framework	Not subject to capital requirements or subject to deduction from capital
in € thousand							
<b>Liabilities</b>	<b>207,057,453</b>	<b>206,682,168</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>9,722,575</b>	<b>0</b>
Financial liabilities - amortized cost	175,142,093	175,234,319	0	0	0	2,271,876	0
Financial liabilities - designated fair value through profit/loss	950,097	950,097	0	0	0	0	0
Financial liabilities - held for trading	8,453,025	8,454,755	0	0	0	7,450,699	0
Hedge accounting	836,803	836,803	0	0	0	0	0
Provisions for liabilities and charges	1,478,788	1,409,596	0	0	0	0	0
Current tax liabilities	181,461	182,476	0	0	0	0	0
Deferred tax liabilities	35,683	35,002	0	0	0	0	0
Liabilities included in disposal groups classified as held for sale	0	0	0	0	0	0	0
Other liabilities	1,215,175	780,904	0	0	0	0	0
<b>Equity</b>	<b>18,764,329</b>	<b>18,798,217</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Consolidated equity	16,027,268	16,059,235	0	0	0	0	0
hereof Consolidated profit/loss	3,626,617	3,629,155	0	0	0	0	0
Non-controlling interests	1,126,858	1,128,778	0	0	0	0	0
Additional tier 1	1,610,204	1,610,204	0	0	0	0	0

EU LI2 in € thousand	Total	Items subject to			
		Credit risk framework	Securitisation framework	CCR framework	Market risk framework
Assets carrying value amount under the scope of prudential consolidation (as per template LI1)	206,682,168	170,409,741	10,138,779	24,408,578	12,760,992
Liabilities carrying value amount under the scope of prudential consolidation (as per template LI1)	9,722,575	0	0	0	9,722,575
Total net amount under the scope of prudential consolidation	206,682,168	170,409,741	10,138,779	24,408,578	12,760,992
Off-balance-sheet amounts	51,206,523	50,621,029	0	0	0
Differences in valuations	0	0	0	0	
Differences due to different netting rules, other than those already included in row 2	5,257,294	(12,985,066)	15,313,439	4,421,382	
Differences due to consideration of provisions	(1,248,949)	(1,240,709)	(8,239)	0	
Differences due to the use of credit risk mitigation techniques (CRMs)	(47,038,734)	(26,489,778)	(2,150,993)	(18,397,964)	
Differences due to credit conversion factors	(34,336,667)	(31,718,006)	(2,618,661)	0	
Differences due to Securitisation with risk transfer	0	0	0	0	
Other differences	0	0	0	0	
Exposure amounts considered for regulatory purposes	193,282,626	149,414,232	20,675,390	10,432,012	12,760,992

The calculation of RBI acc. CRR is based on the same application and measurements as will be used in the consolidated financial statements of RBI acc. IFRS as of 31 December 2022. The consolidated financial statements are prepared in accordance with the International Financial Reporting Standards (IFRS) published by the International Accounting Standards Board (IASB) and the international accounting standards adopted by the EU on the basis of IAS Regulation (EC) 1606/2002 including the applicable interpretations of the International Financial Reporting Interpretations Committee (IFRIC/SIC). All standards published by the IASB as International Accounting Standards and adopted by the EU have been applied to the financial statements.

The difference between RBI acc. CRR and RBI acc. IFRS is due to the different scope of consolidation



# Article 437 CRR

## Own Funds

### Composition of regulatory own funds

The following table shows the composition of regulatory own funds as well as capital ratios pursuant to CRR. For better readability lines which are not applicable to RBI are not shown in the table. The column "Reference" contains the CRR article reference.

EU CC1 Line	in € thousand	Reference	31/12/2022 transitional	Phase-out	31/12/2022 fully loaded
Common equity tier 1 capital: instruments and reserves:					
1	Capital instruments and the related share premium accounts	26 (1), 27, 28, 29, EBA list 26 (3)	5,991,218	0	5,991,218
2	Retained earnings	26 (1) (c)	10,482,149	472,722	10,009,427
3	Accumulated other comprehensive income (and any other reserves)	26 (1)	(3,973,898)	0	(3,973,898)
5	Minority interests (amount allowed in consolidated CET1)	84, 479, 480	606,502	0	606,502
5a	Independently reviewed interim profits net of any foreseeable charge or dividend	26 (2)	3,336,508		3,336,508
6	Common equity tier 1 (CET1) capital before regulatory adjustments		16,442,480	472,722	15,969,758
Common equity tier 1 (CET1) capital: regulatory adjustments:					
7	Additional value adjustments (negative amount)	34, 105	(93,410)	0	(93,410)
8	Intangible assets (net of related tax liability)	36 (1) (b), 37, 472 (4)	(605,117)	0	(605,117)
10	Deferred tax assets that rely on future profitability excluding those arising from temporary difference (net of related tax liability where the conditions in Article 38 (3) are met) (negative amount)	36 (1) (c), 38, 472 (5)	(23,356)	0	(23,356)
11	Fair value reserves related to gains or losses on cash flow hedges	33 (a)	51,089	0	51,089
14	Gains or losses on liabilities valued at fair value resulting from changes in own credit standing	33 (1) (b) (c)	(4,481)	0	(4,481)
16	Direct and indirect holdings by an institution of own CET1 instruments (negative amount)	36 (1) (f), 42, 472 (8)	(20,000)	0	(20,000)
20a	Exposure amount of the following items which qualify for a risk weight of 1250%, where the institution opts for the deduction alternative	36 (1) (k)	(30,145)	0	(30,145)
20c	hereof: securitization positions (negative amount)	36 (1) (k) (ii) 243 (1) (b) 244 (1) (b) 258	(30,145)	0	(30,145)
27a	Other regulatory adjustments (including IFRS 9 transitional adjustments when relevant)		(74,033)		(74,033)
28	Total regulatory adjustments to common equity tier 1 (CET1)		(799,453)	0	(799,453)
29	Common equity tier 1 (CET1) capital		15,643,027	472,722	15,170,304

EU CC1 Line	in € thousand	Reference	31/12/2022 transitional	Phase-out	31/12/2022 fully loaded
Additional tier 1 (AT1) capital: instruments					
30	Capital instruments and the related share premium accounts	51, 52	1,674,648		1,674,648
34	Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interest not included in row 5) issued by subsidiaries and held by third parties	85, 86, 480	33,940	0	33,940
36	Additional Tier 1 (AT1) capital before regulatory adjustments		1,708,588	0	1,708,588
Additional Tier 1 (AT1) capital: regulatory adjustments					
37	Direct and indirect holdings by an institution of own AT1 instruments (negative amount)	52 (1) (b), 56 (a), 57, 475 (2)	(33,000)		(33,000)
43	Total regulatory adjustments to Additional Tier 1 (AT1) capital		(33,000)	0	(33,000)
44	Additional Tier 1 (AT1) capital		1,675,588	0	1,675,588
45	Tier 1 capital (T1 = CET1 + AT1)		17,318,615	472,722	16,845,892
Tier 2 (T2) capital: instruments and provisions					
46	Capital instruments and the related share premium accounts	62, 63	2,362,023	0	2,362,023
48	Qualifying own funds instruments included in consolidated T2 capital (including minority interest and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third party	87, 88, 480	50,913	0	50,913
50	Credit risk adjustments	62 (c) & (d)	282,073	0	282,073
51	Tier 2 (T2) capital before regulatory adjustments		2,695,009	0	2,695,009
Tier 2 (T2) capital: regulatory adjustments					
52	Direct and indirect holdings by an institution of own T2 instruments and subordinated loans (negative amount)	63 (b) (i), 66 (a), 67, 477 (2)	(30,000)		(30,000)
56	Regulatory adjustments applied to Tier 2 in respect of amounts subject to pre-CRR treatment and transitional treatments subject to phase out as prescribed in Regulation (EU) No 575/2013 (i.e. CRR residual amounts)		(282,073)	(282,073)	0
57	Total regulatory adjustments to Tier 2 (T2) capital		(312,073)	(282,073)	(30,000)
58	Tier 2 (T2) capital		2,382,936	(282,073)	2,665,009
59	Total capital (TC = T1 + T2)		19,701,551	190,649	19,510,902
59a	Risk-weighted assets in respect of amounts subject to pre-CRR treatment and transitional treatments subject to phase out as prescribed in Regulation (EU) No 575/2013 (i.e. CRR residual amount)		97,680,154	(231,080)	97,449,074
60	Total risk-weighted assets		97,680,154	(231,080)	97,449,074
Capital ratios and buffers					
61	Common Equity Tier 1 (as a percentage of total risk exposure amount)	92 (2) (a), 465	16.01%		15.57%
62	Tier 1 (as a percentage of total risk exposure amount)	92 (2) (b), 465	17.73%		17.29%
63	Total capital (as a percentage of total risk exposure amount)	92 (2) (c)	20.17%		20.02%
64	Institution specific buffer requirement (CET1 requirement in accordance with article 92 (1) (a) plus capital conservation and countercyclical buffer requirements plus a systemic risk buffer, plus systemically important institution buffer expressed as a percentage of total risk exposure amount)	CRD 128, 129, 140	4,809,539	(11,378)	4,798,161
65	hereof: capital conservation buffer requirement		2,442,004	(5,777)	2,436,227
66	hereof: countercyclical buffer requirement		413,932	(979)	412,953
67	hereof: systemic risk buffer requirement		976,802	(2,311)	974,491
67a	hereof: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer	CRD 131	976,802		974,491
68	Common Equity Tier 1 available to meet buffers (as a percentage of risk exposure amount)	CRD 128	4.9%		4.9%

# Reconciliation of regulatory own funds to balance sheet in the audited financial statements

Differences between balance sheet positions in the audited financial statements and the regulatory capital calculation are based on the different consolidation scopes.

EU CC2	
in € thousand	2022
Shareholders' equity according to the group's balance sheet	17,637,471
Differences due to scope of consolidation	96,412
Institutional protection scheme (IPS)	(403,332)
Non-controlling interests	1,128,778
Minority adjustments due to Basel III	(528,862)
Anticipated dividend	(292,646)
AFS Reserve	(40,981)
Regulatory adjustments	(93,270)
IFRS9-Transitional Arrangements	472,722
Goodwill	(57,156)
Deferred tax assets	(23,356)
Intangible assets	(547,961)
Deduction for securitizations	(30,145)
Other adjustments	940
<b>Total tier 1 capital</b>	<b>17,318,615</b>
Tier 2 instruments	2,362,023
Net provisions for reported IRB credit exposure	282,073
Other adjustments	(261,160)
<b>Total tier 2 capital</b>	<b>2,382,936</b>
<b>Total capital base</b>	<b>19,701,551</b>

## Statement of financial position

Assets in € thousand	IFRS scope 2022	Effects - scope of consolidation	Regulatory scope 2022	Reference to IFRS Financial Report Notes
Cash, cash balances at central banks and other demand deposits	53,682,936	10,299	53,672,637	[12, 38]
Financial assets - amortized cost	137,430,628	211,679	137,218,949	[13, 38]
Financial assets - fair value through other comprehensive income	3,202,515	3,034	3,199,481	[17, 38]
Non-trading financial assets - mandatorily fair value through profit/loss	756,667	79,082	677,586	[18, 38]
Financial assets - designated fair value through profit/loss	83,996	0	83,996	[19, 38]
Financial assets - held for trading	6,410,641	13,777	6,396,864	[20, 38]
Hedge accounting	661,328	0	661,328	[22, 38]
Investments in subsidiaries, joint ventures and associates	713,089	(379,797)	1,092,886	[24, 38]
Tangible fixed assets	1,684,227	370,663	1,313,563	[25, 38]
Intangible fixed assets	902,937	(4,303)	907,240	[25, 38]
Current tax assets	100,229	(538)	100,767	[11, 38]
Deferred tax assets	268,999	2,074	266,925	[11, 38]
Non-current assets and disposal groups classified as held for sale	3,039	77	2,962	[26]
Other assets	1,156,222	69,238	1,086,984	[27, 38]
<b>Total assets</b>	<b>207,057,453</b>	<b>375,285</b>	<b>206,682,168</b>	



Liabilities and equity in € thousand	IFRS scope 2022	Effects - scope of consolidation	Regulatory scope 2022	Reference to IFRS Financial Report Notes
Financial liabilities - amortized cost	175,142,093	(92,226)	175,234,319	[15, 38]
Financial liabilities - designated fair value through profit/loss	950,097	0	950,097	[19, 38]
Financial liabilities - held for trading	8,453,025	(1,730)	8,454,755	[21, 38]
Hedge accounting	836,803	0	836,803	[22, 38]
Provisions for liabilities and charges	1,478,788	69,192	1,409,596	[28, 38]
Current tax liabilities	181,461	(1,015)	182,476	[11, 38]
Deferred tax liabilities	35,683	681	35,002	[11, 38]
Liabilities included in disposal groups classified as held for sale	0	0	0	
Other liabilities	1,215,175	434,271	780,904	[29, 38]
Equity	18,764,329	(33,888)	18,798,217	[30, 38]
Consolidated equity	16,027,268	(31,967)	16,059,235	
Non-controlling interests	1,126,858	(1,920)	1,128,778	
Additional tier 1	1,610,204	0	1,610,204	
<b>Total equity and liabilities</b>	<b>207,057,453</b>	<b>375,285</b>	<b>206,682,168</b>	

## Summary of the main features of regulatory capital items

Common equity tier 1 (CET1) after deductions amounted to € 15,643 million, representing an increase of € 3,831 million compared to the 2021 year-end figure. The main drivers of the increase were the inclusion of the result for the period after deducting any dividends and positive foreign exchange effects. A dividend of € 0.80 per share was deducted for the 2022 financial year. Tier 1 capital after deductions increased € 3,859 million to € 17,319 million, primarily as a result of the effects in CET1. Tier 2 capital increased € 292 million to € 2,695 million due to a new issue of € 500 million. On the other hand, there was a reduction in the eligible IRB surplus and the regulatory maturing of outstanding tier 2 instruments. Total capital amounted to € 19,702 million, representing an increase of € 3,895 million compared to the 2021 year-end figure.

Total risk-weighted assets (RWA) increased € 7,752 million overall from the end of 2021 to € 97,680 million. This increase was mainly driven by foreign currency effects, organic growth and credit rating downgrades for Russia, Belarus and Ukraine. In contrast, the RWA decreased due to the sale of the Bulgarian Group units. Operational risk in the advanced measurement approach (AMA) saw increases of up to € 3,252 million in the course the year as a result of additional expenses for credit-linked and portfolio-based provisions for litigation and annulments in Poland. However, the AMA was retired as of December 1, 2022, as a result of which RWA increased € 1,500 million at Group level above compared to the requirements under the standardized approach (STA). Market risk also increased € 1,936 million, mainly due to a new calculation methodology in the structural open foreign exchange position.

Including the annual results, this resulted in a (transitional) CET1 ratio of 16.0 per cent (up 2.9 percentage points), a (transitional) tier 1 ratio of 17.7 per cent (up 2.8 percentage points) and a (transitional) total capital ratio of 20.2 per cent (up 2.6 percentage points). The capital ratios based on the full application of all CRR criteria (fully loaded) are 15.6 per cent (CET1 ratio), 17.3 per cent (tier 1 ratio) and 20.0 per cent (total capital ratio).

### Common equity tier 1 capital

Common equity tier 1 capital (CET1) includes the components of tier 1 capital, after applying phasing in rules, which are provided in CRR to adapt to the new requirements in the European Union, and deductions from CET1 after applying the threshold exemptions according to Article 36 and 48 CRR. Paid-in capital comprises subscribed capital and capital reserves of RBI. The subscribed capital and disclosed reserves are available over the lifespan of the company. All included instruments are fully eligible under Article 28 CRR. For information on changes in equity in the reporting period, please refer to the table "Statement of changes in equity" in the consolidated financial statements contained in the RBI Annual Report 2022.

### Tier 1 capital

Tier 1 capital comprises CET1 capital plus Additional Tier 1 capital (AT1) less deductions from AT1 capital.

### Tier 2 capital

The total tier 2 capital mainly consists of subordinated capital. Moreover, any excess of loan loss provisions over the amount of calculated expected losses for portfolios included under the IRB approach, up to a maximum of 0.6 per cent of the credit risk-weighted assets covered by the IRB approach, is included.

# Article 438 CRR

## Own funds requirements and risk-weighted exposure amounts

### Overview of risk weighted exposure amounts

EU OV1 in € thousand	Total risk exposure amounts (TREA)		Total own funds requirements
	31/12/2022	30/09/2022	31/12/2022
Credit risk (excluding CCR)	74,716,569	82,543,002	5,977,326
Of which the standardised approach	28,732,547	31,069,166	2,298,604
Of which the foundation IRB (FIRB) approach	34,446,776	39,575,315	2,755,742
Of which: slotting approach	3,826,579	3,883,003	306,126
Of which: equities under the simple risk weight approach	5	5	0
Of which the advanced IRB (AIRB) approach	7,301,744	7,582,303	584,140
Counterparty credit risk - CCR	1,771,693	2,833,847	141,735
Of which the standardised approach	731,659	1,219,475	58,533
Of which internal model method (IMM)	0	0	0
Of which exposures to a CCP	10,596	37,251	848
Of which credit valuation adjustment - CVA	279,952	436,389	22,396
Of which other CCR	749,486	1,140,731	59,959
Settlement risk	18,517	85,642	1,481
Securitisation exposures in the non-trading book (after the cap)	2,102,565	1,976,547	168,205
Of which SEC-IRBA approach	1,143,415	982,747	91,473
Of which SEC-ERBA (including IAA)	91,108	77,101	7,289
Of which SEC-SA approach	383,198	410,568	30,656
Of which 1250% / deduction	484,844	506,131	38,788
Position, foreign exchange and commodities risks (Market risk)	6,888,583	7,357,155	551,087
Of which the standardised approach	5,633,607	5,434,433	450,689
Of which IMA	1,254,976	1,922,721	100,398
Large exposures	0	0	0
Operational risk	12,667,072	14,205,443	1,013,366
Of which basic indicator approach	0	0	0
Of which standardised approach	12,667,072	3,714,310	1,013,366
Of which advanced measurement approach	0	10,491,132	0
Amounts below the thresholds for deduction (subject to 250% risk weight) (For information)	1,251,777	1,286,128	100,142
<b>Total</b>	<b>98,164,998</b>	<b>109,001,635</b>	<b>7,853,200</b>

The following table provides an overview of the calculation methods that are applied to determine total capital requirements in the subsidiaries:

Unit	Credit risk		Market risk	Operational risk
	Non-Retail	Retail		
Raiffeisen Bank International AG, Vienna (AT)	IRB	STA	Internal model, STA	STA
Raiffeisenbank a.s., Prague (CZ)	IRB	IRB	STA	STA
Raiffeisen Bank Zrt., Budapest (HU)	IRB	IRB	STA	STA
Tatra banka a.s., Bratislava (SK)	IRB	IRB	STA	STA
Raiffeisen Bank S.A., Bucharest (RO)	IRB	IRB	STA	STA
Raiffeisen Bank d.d. Bosna i Hercegovina, Sarajevo (BA)	IRB	IRB	STA	STA
Raiffeisenbank Austria d.d., Zagreb (HR)	IRB	STA	STA	STA
Raiffeisen Banka a.d., Novi Beograd (RS)	IRB	IRB	STA	STA
AO Raiffeisenbank, Moscow (RU)	IRB	STA	STA	STA
Raiffeisen Bank Sh.a., Tirana (AL)	IRB	IRB	STA	STA
Crédit Agricole Srbija AD, Novi Sad (RS)	STA	STA	STA	STA
Kathrein Privatbank Aktiengesellschaft, Vienna(AT)	STA	STA	STA	STA
All other units	STA	STA	STA	STA

Internal Model: Only for risk of open currency positions and general interest rate risk in the trading book

## Specialised lending and equity exposures under the simple riskweighted approach

EU CR10 in € thousand		Specialised lending: Project finance					
Regulatory categories	Remaining maturity	On-balancesheet exposure	Off-balancesheet exposure	Risk weight	Exposure value	Risk weighted exposure amount	Expected loss amount
Category 1	Less than 2.5 years	1,034,493	276,696	50%	1,092,859	489,691	0
	Equal to or more than 2.5 years	1,816,168	545,018	70%	1,876,494	1,190,217	7,506
Category 2	Less than 2.5 years	1,201,184	328,240	70%	1,310,941	852,211	5,244
	Equal to or more than 2.5 years	1,008,439	201,564	90%	1,110,925	911,563	8,887
Category 3	Less than 2.5 years	121,478	4,774	115%	121,543	129,466	3,403
	Equal to or more than 2.5 years	216,467	9,408	115%	218,478	220,560	6,117
Category 4	Less than 2.5 years	13,357	0	250%	13,357	32,871	1,069
	Equal to or more than 2.5 years	0	10	250%	0	0	0
Category 5	Less than 2.5 years	149,945	1,224	-	150,111	0	75,055
	Equal to or more than 2.5 years	86,116	19	-	86,130	0	43,065
Total	Less than 2.5 years	2,520,457	610,933		2,688,810	1,504,239	84,771
	Equal to or more than 2.5 years	3,127,191	756,019		3,292,028	2,322,340	65,576

EU CR10.5 in € thousand		Equity exposures under the simple risk-weighted approach					
Categories		On-balancesheet exposure	Off-balancesheet exposure	Risk weight	Exposure value	Risk weighted exposure amount	Expected loss amount
Private equity exposures		0	0	190%	0	0	0
Exchange-traded equity exposures		0	0	290%	0	0	0
Other equity exposures		1	0	370%	1	5	0

## Non-deducted participations in insurance undertakings

EU INS1 in EUR thousand	Exposure value	Risk exposure amount
Own fund instruments held in insurance or re-insurance undertakings or insurance holding company not deducted from own funds	217,153	542,882

## Internal Capital Adequacy Assessment Process (ICAAP)

The ICAAP forms a part of the Pillar 2 requirements according to CRR. Maintaining an adequate level of capital is a core objective of the Group. Capital requirements are monitored regularly based on the actual risk level as measured by internal models, and the materiality of risks is taken into account in the selection of appropriate models. For the institution's approach to assessing the adequacy of its internal capital to support current and future activities, please refer to the Risk Report in RBI's Annual Report.

The European Central Bank, as the competent authority, has not stipulated that the result of the institution's internal capital adequacy assessment process - including the composition of the additional total capital requirements based on the supervisory review process as referred to in point (a) of Article 104 (1) CRR - be disclosed.

# Article 439 CRR

## Exposures to counterparty credit risk

### Methodology used to assign internal capital according to Article 39a BWG and credit limits for counterparty credit exposures

If a counterparty in a derivative, repurchase, securities or commodities lending or borrowing transaction defaults, then losses can arise from reestablishing the contract with another counterparty. At RBI, this risk is measured using the mark-to-market approach for current exposure and a predefined method for estimating potential future changes in the exposure. For internal management purposes, potential price changes, which can affect the fair value of an instrument, are calculated specifically for different contract types based on historical market price changes. For FX and IR derivatives, the measurement methodology is based on the potential future exposure calculated using a full path dependent Monte Carlo simulation. The potential future exposure is then used as utilization of the limit. For all other products, haircuts are estimated from historical changes in their price. For Security Finance products, RBI applies, on a daily basis, an independent price verification approach (observable inputs according to IFRS 9 accounting categories) by using predefined price sources for the measurement of the exposure. For derivative contracts, the standard limit approval process applies, where the same risk classification, limitation, and monitoring process is used as for traditional lending. In doing so, the weighted nominal exposure of derivative contracts is added to the customers' total exposure in the limit application and monitoring process as well as in the calculation and allocation of internal capital.

### Policies for securing collateral and establishing credit reserves

An important strategy for reducing counterparty credit risk is the employment of credit risk mitigation techniques such as netting agreements and collateralization.

Master agreements have to be executed for repurchase transactions, securities lending transactions and OTC derivatives transactions. The majority of these agreements are based on widely used industry standards provided by market associations like ISDA or ICMA. Credit risk mitigation techniques are strictly subject to independent legal opinions which affirm the enforceability of the applied master agreement.

For OTC derivatives, RBI strives to establish standardized ISDA master agreements or similar industry standard agreements with all counterparties in order to perform close-out netting. With financial counterparties, RBI enters into credit support annexes (CSA) for full risk coverage for positive fair values on a daily basis.

As of 1 March 2017, the exchange of collateral for non-centrally cleared OTC derivatives between financial counterparties became mandatory according to the European Markets Infrastructure Regulation (EMIR) EU 648/2012. Starting on 1<sup>st</sup> September 2021, RBI is also subject to the exchange of initial margin for uncleared OTC derivatives under this regulation and uses an internal model (ISDA-SIMM) to determine initial margin requirements. RBI makes use of the exemption to reduce initial margin requirements according to Article 29 of Commission Delegated Regulation (EU) 2016/2251 by EUR 50 million for each group of counterparties. Therefore, no initial margin has been exchanged so far.



# Regulations for correlation risks

Correlation risks between exposure and collaterals relating to repurchase transactions, securities lending transactions and collateralized lending are restricted by comprehensive risk limits. Limits are established to restrict correlations of collaterals with the following risks:

- Counterparty risk
- Country risk
- Issuer risk in the case of securities collateral

Correspondent limits exist on the counterparty level and on the overall volume of accepted collaterals.

Correlation risks between derivative transactions and assets received to cover credit exposure are limited by a restrictive list of eligible collaterals. For this business line, only cash collateral denominated in EUR, USD and GBP as well as AAA-rated government bonds issued by countries of the European Union and the United States of America are accepted. Correlation between these assets and the underlying derivatives is negligible.

RBI has identified securities finance (i.e., repo, reverse repo, sell & buy back, buy & sell back, and securities lending) as the main field of business operations where wrong-way risks can arise, either general or specific wrong-way risks. Several restrictions are in place and have been implemented in the respective IT systems. They are monitored and controlled on a daily basis by an independent controlling unit.

- Specific wrong-way risk is forbidden in general, meaning risks related to collateral provided under GMRA and GMSLA agreements must not be identical to the credit risk of the concluding counterparty or a group of connected clients the counterparty belongs to. An exception to this general rule is only allowed for covered bonds, entitling the segregation of claims in case of bankruptcy; these covered bonds must be bonds according to CRR 575/2013 Article 129.
- For general wrong-way risks, RBI has identified specific countries where the correlation between government debt and the financial sector holding such government debt is considered to be high. For these countries, an overlap regulation has been established limiting counterparties, collateral and the total gross amount of business volume to be undertaken.

An additional field of important business operations is undertaken in derivatives which are secured by CSA. As only cash is accepted as collateral, wrong-way risks are not considered to be an issue in this business field. For unsecured derivatives transactions with corporates the strategy is to permit only hedging transactions without general wrong-way risk attached.

## CRR rating downgrade

After the entry into force of Commission Delegated Regulation (EU) 2016/2251 dealing risk mitigation techniques for non-centrally cleared derivatives in January 2017, credit support agreements between financial counterparties must not include rating-dependent thresholds.

A deterioration in credit quality could affect collateral posted under client clearing agreements which entitle the clearing member to increase initial margin requirements above the amount required by the central counterparty. In view of the volume of RBI's centrally cleared derivatives business, the good relationship with RBI's clearing members and the rating as of 31 December 2022 of A- (Standard & Poor's) and A2 (Moody's), RBI's estimates of the maximum amount of additional collateral are shown in the table below:

Rating grade	S&P	Moody's	Max. additional collateral requirement in € thousand
1	AAA	Aaa	0
2	AA+	Aa1	0
3	AA	Aa2	0
4	AA-	Aa3	0
5	A+	A1	0
6	A	A2	0
7	A-	A3	0
8	BBB+	Baa1	0
9	BBB	Baa2	37,500
10	BBB-	Baa3	75,000
11	BB+	Ba1	75,000
12	BB and below	Ba2 and below	75,000

# Quantitative disclosure on counterparty credit risk

The counterparty credit risk is measured by the mark-to-market approach. The exposure is calculated from the current market value for each transaction plus a general add-on in order to capture the potential future credit exposure.

## Analysis of CCR exposure by approach

EU CCR1 in € thousand	Replace- ment cost (RC)	Potential future exposure (PFE)	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre- CRM	Exposure value post- CRM	Exposure value	RWEA
EU - Original Exposure Method (for derivatives)	0	0		1.4	0	0	0	0
EU - Simplified SA-CCR (for derivatives)	0	0		1.4	0	0	0	0
SA-CCR (for derivatives)	469,968	755,124		1.4	3,664,962	1,715,129	1,684,774	731,659
IMM (for derivatives and SFTs)			0	0	0	0	0	0
Of which securities financing transactions netting sets			0		0	0	0	0
Of which derivatives and long settlement transactions netting sets			0		0	0	0	0
Of which from contractual cross-product netting sets			0		0	0	0	0
Financial collateral simple method (for SFTs)					0	0	0	0
Financial collateral comprehensive method (for SFTs)					12,228,618	8,651,918	8,651,918	749,486
VaR for SFTs					0	0	0	0
<b>Total</b>					<b>15,893,581</b>	<b>10,367,047</b>	<b>10,336,692</b>	<b>1,481,146</b>

## Transactions subject to own funds requirements for CVA risk

EU CCR2 in € thousand	Exposure value	RWEA
Total transactions subject to the Advanced method	0	0
(i) VaR component (including the 3× multiplier)		0
(ii) stressed VaR component (including the 3× multiplier)		0
Transactions subject to the Standardised method	662,660	279,952
Transactions subject to the Alternative approach (Based on the Original Exposure Method)	0	0
<b>Total transactions subject to own funds requirements for CVA risk</b>	<b>662,660</b>	<b>279,952</b>

## Composition of collateral for CCR exposure

The tables below provide a breakdown of all types of collateral (cash, sovereign debt, corporate bonds, etc.) posted or received to support or reduce CCR exposures related to derivative transactions.

Collateral used in derivative transactions:

EU CCR5 in € thousand Collateral type	Fair value of collateral received		Fair value of posted collateral	
	Segregated	Unsegregated	Segregated	Unsegregated
Cash – domestic currency	0	1,381,202	236,107	882,853
Cash – other currencies	0	189,547	0	662,531
Domestic sovereign debt	0	0	0	32,363
Other sovereign debt	0	0	0	0
Government agency debt	0	0	0	0
Corporate bonds	0	9,573	0	22,612
Equity securities	0	0	0	0
Other collateral	0	0	0	0
<b>Total</b>	<b>0</b>	<b>1,580,323</b>	<b>236,107</b>	<b>1,600,359</b>

Collateral used in SFTs:

EU CCR5 in € thousand Collateral type	Fair value of collateral received		Fair value of posted collateral	
	Segregated	Unsegregated	Segregated	Unsegregated
Cash – domestic currency	0	51,919	0	0
Cash – other currencies	0	289,099	0	0
Domestic sovereign debt	0	2,874,221	0	0
Other sovereign debt	0	150,562	0	0
Government agency debt	0	0	0	0
Corporate bonds	0	96,086	0	0
Equity securities	0	84,804	0	0
Other collateral	0	8,681,927	0	0
<b>Total</b>	<b>0</b>	<b>12,228,618</b>	<b>0</b>	<b>0</b>

## Credit derivatives exposures

EU CCR6 in € thousand	Protection bought	Protection sold
<b>Notionals</b>		
Single-name credit default swaps	142,739	126,939
Index credit default swaps	591,933	609,933
Total return swaps	0	0
Credit options	0	0
Other credit derivatives	0	0
<b>Total notionals</b>	<b>734,672</b>	<b>736,872</b>
<b>Fair values</b>		
Positive fair value (asset)	3,566	8,124
Negative fair value (liability)	(7,679)	(2,246)

## RWEA flow statements of CCR exposures under the IMM

As IMM (internal model method) for derivatives and SFTs is not applied, template EU CCR7 is not disclosed.

# Exposures to CCPs

The table below provides a breakdown of the exposure by qualifying and non-qualifying CCPs:

EU CCR8 in € thousand	Exposure value	RWEA
<b>Exposures to QCCPs (total)</b>		<b>10,596</b>
Exposures for trades at QCCPs (excluding initial margin and default fund contributions); of which	95,320	10,596
(i) OTC derivatives	94,390	10,577
(ii) Exchange-traded derivatives	930	19
(iii) SFTs	0	0
(iv) Netting sets where cross-product netting has been approved	0	0
Segregated initial margin	0	
Non-segregated initial margin	0	0
Prefunded default fund contributions	0	0
Unfunded default fund contributions	0	0
<b>Exposures to non-QCCPs (total)</b>		<b>0</b>
Exposures for trades at non-QCCPs (excluding initial margin and default fund contributions); of which	0	0
(i) OTC derivatives	0	0
(ii) Exchange-traded derivatives	0	0
(iii) SFTs	0	0
(iv) Netting sets where cross-product netting has been approved	0	0
Segregated initial margin	0	
Non-segregated initial margin	0	0
Prefunded default fund contributions	0	0
Unfunded default fund contributions	0	0

# Article 440 CRR

## Countercyclical capital buffers

The following tables show the geographical distribution of credit exposures relevant for the calculation of the RBI countercyclical capital buffer referred to in Title VII, Chapter 4 CRR. Only a small number of jurisdictions where RBI Group has exposure applied countercyclical buffer rates of more than 0 per cent and are shown separately in the table below, amounting to an institution-specific countercyclical capital buffer rate for RBI Group of 0.42 per cent as of 31 December 2022.

EU CCyB1 in € thousand	General Credit exposures		Relevant credit exposures – Market risk		Securitisation exposures Exposure value for non- trading book	Total exposure value
Breakdown by Country	Exposure value under the standardised approach	Exposure value under the IRB approach	Sum of long and short positions of trading book exposures for SA	Value of trading book exposures for internal models		
Bulgaria	3,391	84,516	9,223	0	0	97,129
Czech Republic	6,064,327	11,700,103	39,599	0	1,108,644	18,912,673
Denmark	3,937	136,485	2	0	14,884	155,309
Estonia	294	1,229	0	0	0	1,524
United Kingdom	122,288	1,906,819	6,647	0	0	2,035,754
Hongkong	1,896	68,337	0	0	0	70,234
Iceland	0	351	0	0	0	351
Luxemburg	1,082	3,438,788	29	0	0	3,439,899
Norway	163	36,878	0	0	0	37,041
Romania	533,684	8,319,608	2,256	0	354,995	9,210,542
Sweden	17,673	381,707	3	0	0	399,383
Slovakia	2,095,974	11,579,919	14,451	0	0	13,690,345
Countries with 0% and no CCB	26,620,649	43,349,761	530,076	0	9,184,564	79,685,051
<b>Total</b>	<b>35,465,358</b>	<b>81,004,503</b>	<b>602,285</b>	<b>0</b>	<b>10,663,087</b>	<b>127,735,233</b>

EU CCyB1 in € thousand	Own fund requirements			Risk-weighted exposure amounts	Own fund requirements weights (%)	Countercyclical buffer rate (%)	
Breakdown by Country	Relevant credit risk exposures - Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book	Total			
Bulgaria	3,813	151	0	3,964	49,552	0.07%	1.00%
Czech Republic	728,226	822	13,157	742,205	9,277,562	13.34%	1.50%
Denmark	5,648	0	216	5,864	73,301	0.11%	2.00%
Estonia	44	0	0	44	547	0.00%	1.00%
United Kingdom	99,672	1,782	0	101,454	1,268,170	1.82%	1.00%
Hongkong	3,932	0	0	3,932	49,145	0.07%	1.00%
Iceland	351	0	0	351	4,384	0.01%	2.00%
Luxemburg	148,321	2	0	148,323	1,854,043	2.67%	0.50%
Norway	2,252	0	0	2,252	28,148	0.04%	2.00%
Romania	414,170	183	4,181	418,534	5,231,679	7.52%	0.50%
Sweden	16,776	0	0	16,776	209,706	0.30%	1.00%
Slovakia	445,140	231	0	445,371	5,567,139	8.00%	1.00%
Countries with 0% and no CCB	3,524,166	40,033	111,863	3,676,062	45,950,772	66.05%	0.00%
Total	5,392,510	43,204	129,418	5,565,132	69,564,146	100.00%	

EU CCyB2 in € thousand	31/12/2022
<b>Total risk exposure amount</b>	<b>97,680,154</b>
Institution specific countercyclical capital buffer rate	0.36%
Institution specific countercyclical capital buffer requirement	348,448



# Article 441 CRR

## Indicators of global systemic importance

RBI is not identified as a global systemically important institution (G-SII). Therefore, the disclosure referred to in Article 441 CRR does not apply.

# Article 442 CRR

## Exposures to credit risk and dilution risk

### Definition of the terms "past due" and "impaired" for accounting purposes

#### Past due exposures

A financial asset is past due when a counterparty has failed to make a payment when that payment was contractually due.

#### Impaired exposures

A financial asset is credit-impaired when one or more events that have a detrimental impact on the estimated future cash flows of that financial asset have occurred. Evidence that a financial asset is credit-impaired include observable data about the following events:

- Significant financial difficulty of the issuer or the borrower;
- A breach of contract, such as a default or past due event;
- The lender(s) of the borrower, for economic or contractual reasons relating to the borrower's financial difficulty, have granted the borrower a concession(s) that the lender(s) would not otherwise consider;
- It is becoming probable that the borrower will enter bankruptcy or other financial reorganization;
- The disappearance of an active market for that financial asset because of financial difficulties; or
- The purchase or origination of a financial asset at a deep discount that reflects the incurred credit losses.

It may not be possible to identify a single discrete event; instead, the combined effect of several events may have caused financial assets to become credit-impaired.

### Approaches and methods for determining value adjustments and provisions

Troubled loans (where debtors are expected to run into financial difficulties or delayed payment) need special handling. In non-retail divisions, problem loan committees of each Group member review problematic exposures. In case of the need for intensified handling and workout, the troubled loans are assigned either to a designated specialist or to a restructuring unit (workout department), which are both part of the risk or credit risk management divisions. Employees of workout units are specially trained and experienced. They typically handle medium-sized to large cases and are assisted by in-house legal departments and/or by external specialists. Workout units play a decisive role in accounting for, analyzing and booking provisions for impairment losses (write-offs, value adjustments, provisioning). Losses caused by troubled loans may be reduced by their early involvement. Cases in which restructuring, or liquidation take place are analyzed by RBI to determine their causes. Lending processes are then adapted as necessary on the basis of those results.

Default and workout standards in the retail area are defined for the whole restructuring and collection process for private individuals and small enterprises. A restructuring guideline defines the Group's restructuring framework, including the strategy, organization, methods, monitoring and controlling. In the collection process customers are classified into the three categories "Early", "Late" and "Recovery", for which respective standardized customer handling processes are defined.

At each balance sheet date, an assessment is made as to whether there is any objective evidence that a financial asset or group of financial assets is impaired (please see "Impaired exposures").

Credit risk is accounted for by impairment provisions. The IFRS 9 impairment standard is followed, exposures being split into Stage 1 (no significant increase in credit risk), Stage 2 (significant increase in credit risk) and Stage 3 (already impaired assets). The trigger for Stage 3 is equivalent to the default definition used for internal credit risk management purposes. In Stage 1, provisions are calculated as 12-month expected credit losses, while in Stage 2 and 3 lifetime expected credit losses are applied.

In the non-retail business, for credit risks related to loans and advances to customers and banks, provisions are made in the amount of expected loss according to homogeneous Group-wide standards. Risk of loss is deemed to exist if the discounted projected repayment amounts and interest payments are below the carrying value of the loans, taking collateral into account. Portfolio-based impairments are calculated according to valuation models that estimate expected future cash flows for the loans in the respective loan portfolio based on loss experience history. This is carried out regularly having regard to economic conditions.

In the retail business for Stages 1 and 2, ECLs are calculated as the sum of present values of the marginal losses occurring in each month after the reporting date. The marginal losses are derived from individual parameters that estimate exposures and losses in the case of default and the marginal probability of default (PD) for each monthly period. The basis for all retail ECL component parameter estimates (PD, LGD, EAD) are the respective Pillar I/II models developed within the Basel framework, adjusted to comply with IFRS9 requirements. Survival analysis is the approach used for PD modeling for lifetime expected losses estimation. The parameter estimates are additionally overlaid with macro models according to 3 macroeconomic forecast scenarios.

The assignment of retail exposures between Stage 1 and 2 (staging) is performed using both quantitative and qualitative criteria. The quantitative analysis measures whether the remaining lifetime probability of default as of the reporting date minus the corresponding expected conditional PD from the original vintage curve is higher than the specified threshold. The threshold levels are estimated empirically for each separate portfolio, based on observed downgrades of exposures. The qualitative criteria are a set of fixed rules used as a back-stop, including most importantly: more than 30 days past due; forbearance status; holistic approach and other locally specific indicators.

In retail, the method to calculate Stage 3 ECL and provisions uses the Best Estimate of Expected Loss (BEEL) parameter. By definition, this parameter reflects the most probable loss potential for accounts in default which have similar risk and recovery profiles and provides a statistically derived estimated level of loss for such accounts.

Impairment provisions are not netted against corresponding receivables but are stated separately in the statement of financial position.

The entirety of the provision for impairment losses arising from loans reported in the statement of financial position is shown as a separate item on the assets side, below loans and advances to banks and customers. The provision for impairment losses arising from transactions off the statement of financial position is recorded under provisions for liabilities and charges.

## Qualitative disclosure

In the following tables, detailed split of gross credit exposure, specific credit risk adjustments, accumulated write-offs and collaterals are presented, by the significant balance sheet classes, industries, geographical areas and residual maturity.

EU CR1	Gross carrying amount/nominal amount						Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						Accumulated partial write-off	Collaterals 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
	Total	of which:	of which:	Total	of which:	of which:	Total	of which:	of which:	Total	of which:	of which:			
		stage 1	stage 2		stage 2	stage 3		stage 1	stage 2		stage 2	stage 3			
in € thousand	Total	stage 1	stage 2	Total	stage 2	stage 3	Total	stage 1	stage 2	Total	stage 2	of which: stage 3			
Cash balances at central banks and other demand deposits	48,579,448	48,563,263	16,185	2,267	0	2,267	(3,760)	(76)	(3,684)	(760)	0	(760)		6,933,042	0
Loans and advances	118,833,309	97,589,862	20,714,981	3,087,589	0	2,771,027	(1,183,766)	(326,106)	(857,660)	(1,787,757)	0	(1,670,510)	(719,943)	66,005,107	695,498
Central banks	8,813,833	8,675,638	138,195	0	0	0	(210)	(178)	(33)	0	0	0	0	6,849,070	0
General governments	1,788,851	1,337,372	450,669	169,073	0	169,072	(1,641)	(1,049)	(592)	(5,030)	0	(5,030)	0	774,340	59,994
Credit institutions	6,852,946	6,562,295	288,956	4,297	0	4,297	(9,216)	(694)	(8,522)	(3,518)	0	(3,518)	(35,079)	4,700,229	0
Other financial corporations	11,512,710	9,377,314	2,103,877	173,954	0	74,973	(99,539)	(14,973)	(84,566)	(48,568)	0	(33,512)	(5,050)	4,241,900	4,649
Non-financial corporations	48,946,369	38,266,332	10,598,924	1,610,186	0	1,475,753	(602,022)	(164,712)	(437,310)	(1,006,243)	0	(940,212)	(678,743)	21,858,105	388,770
Of which: SMEs	12,258,729	9,202,500	3,009,564	599,209	0	533,063	(183,520)	(73,624)	(109,896)	(407,201)	0	(374,805)	(5,664)	5,286,319	192,008
Households	40,918,600	33,370,910	7,134,359	1,130,078	0	1,046,931	(471,137)	(144,500)	(326,637)	(724,399)	0	(688,238)	(1,070)	27,581,464	242,083
Debt Securities	22,220,956	20,949,253	1,110,071	2,336	0	2,309	(171,578)	(7,210)	(164,369)	(861)	0	(861)	0	703,298	1,098
Central banks	4,172	4,172	0	0	0	0	0	0	0	0	0	0	0	0	0
General governments	16,868,890	16,190,348	633,937	0	0	0	(59,313)	(4,961)	(54,352)	0	0	0	0	209,734	0
Credit institutions	3,314,926	3,226,890	54,361	0	0	0	(1,223)	(477)	(746)	0	0	0	0	261,242	0
Other financial corporations	1,052,322	782,054	208,933	0	0	0	(52,054)	(519)	(51,535)	0	0	0	0	74,088	0
Non-financial corporations	980,646	745,790	212,840	2,336	0	2,309	(58,989)	(1,252)	(57,737)	(861)	0	(861)	0	158,234	1,098
Off-balance sheet exposures	52,026,932	41,508,649	9,471,191	226,686	37	226,645	188,564	64,346	124,217	56,457	0	56,453		4,547,729	71,167
Central banks	35	35	0	0	0	0	0	0	0	0	0	0		3,804	0
General governments	323,159	317,182	5,977	41,438	0	41,438	247	88	159	0	0	0		7,889	39,532
Credit institutions	2,300,273	1,967,126	307,226	9,928	0	9,928	5,027	400	4,628	993	0	993		288,738	0
Other financial corporations	6,613,845	5,373,181	1,235,046	6,918	0	6,918	10,936	4,781	6,155	1,253	0	1,253		346,101	415
Non-financial corporations	35,798,761	27,912,546	6,879,711	152,360	37	152,319	148,764	45,179	103,584	42,616	0	42,613		3,413,784	30,698
Households	6,990,860	5,938,579	1,043,231	16,043	0	16,042	23,590	13,898	9,692	11,594	0	11,594		487,414	523
Total	241,660,645	208,611,027	31,312,428	3,318,878	37	3,002,248	(1,170,540)	(269,045)	(901,495)	(1,732,922)	0	(1,615,677)	(719,943)	78,189,177	767,762

## Maturity of exposures

EU CR1-A in € thousand	On demand	<= 1 year	> 1 year <= 5 years	Net exposure value > 5 years	No stated maturity	Total
Loans and advances	10,113,352	34,047,972	36,870,400	34,978,178	0	116,009,903
Debt securities	71,575	4,516,021	9,800,670	8,616,058	0	23,004,323
<b>Total</b>	<b>10,184,927</b>	<b>38,563,993</b>	<b>46,671,070</b>	<b>43,594,236</b>	<b>0</b>	<b>139,014,226</b>

## Credit quality of loans and advances to non-financial corporations by industry

EU CQ5	a	b	c	d	e	f
		Gross carrying amount			Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures
in € thousand		of which: non-performing	of which: defaulted	of which: loans and advances subject to impairment		
010 Agriculture, forestry and fishing	1,467,921	124,297	124,297	1,466,746	(108,006)	0
020 Mining and quarrying	865,234	106,802	106,802	865,234	(113,278)	0
030 Manufacturing	11,012,617	304,408	304,408	11,007,912	(296,082)	0
040 Electricity, gas, steam and air conditioning supply	1,818,249	50,043	50,043	1,818,249	(59,180)	0
050 Water supply	416,278	2,593	2,593	416,278	(8,239)	0
060 Construction	1,992,704	90,214	90,214	1,987,604	(79,615)	0
070 Wholesale and retail trade	10,084,305	267,026	267,026	10,064,844	(248,989)	0
080 Transport and storage	2,842,638	124,122	124,122	2,842,638	(113,204)	0
090 Accommodation and food service activities	673,238	119,025	119,025	673,141	(43,874)	0
100 Information and communication	2,372,405	26,358	26,358	2,372,405	(116,389)	0
110 Real estate activities	913,829	21,628	21,628	910,368	(37,425)	0
120 Financial and insurance activities	8,832,768	195,289	195,289	8,787,800	(210,906)	0
130 Professional, scientific and technical activities	4,777,942	74,057	74,057	4,776,934	(70,344)	0
140 Administrative and support service activities	1,290,699	14,355	14,355	1,290,699	(25,967)	0
Public administration and defense, compulsory social security	8,480	8	8	8,480	(39)	0
160 Education	56,690	2,019	2,019	56,690	(2,057)	0
170 Human health services and social work activities	828,507	78,430	78,430	828,423	(64,807)	0
180 Arts, entertainment and recreation	143,094	5,700	5,700	143,094	(5,644)	0
190 Other services	158,958	3,812	3,812	158,958	(4,224)	0
<b>200 Total</b>	<b>50,556,556</b>	<b>1,610,186</b>	<b>1,610,186</b>	<b>50,476,496</b>	<b>(1,608,265)</b>	<b>0</b>

## Quality of non-performing exposures by geography

EU CQ4		of which: non-performing		Gross carrying/Nominal amount of which: subject to impairment	Accumulated impairment	Provisions on off-balance sheet commitments and financial guarantee given	Accumulated negative changes in fair value due to credit risk on non-performing exposures
in € thousand			of which: defaulted				
<b>On balance sheet exposures</b>	<b>144,144,190</b>	<b>3,089,925</b>	<b>3,089,925</b>	<b>143,507,621</b>	<b>(3,143,962)</b>		<b>0</b>
Czech Republic	25,296,272	235,296	235,296	25,245,433	(228,148)		0
Austria	22,199,580	211,183	211,183	22,043,774	(114,733)		0
Slovakia	16,086,482	233,292	233,292	16,067,265	(242,816)		0
Russia	13,894,851	379,400	379,400	13,893,720	(549,194)		0
Romania	11,228,048	240,693	240,693	11,197,156	(289,674)		0
Hungary	7,379,134	164,137	164,137	7,066,206	(176,471)		0
Germany	6,685,003	118,979	118,979	6,684,744	(60,658)		0
Croatia	4,302,941	121,980	121,980	4,282,151	(134,387)		0
Serbia	4,303,667	81,167	81,167	4,303,667	(90,939)		0
Ukraine	3,257,605	272,484	272,484	3,257,605	(276,389)		0
Other countries	29,510,607	1,031,315	1,031,315	29,465,900	(980,553)		0
<b>Off balance sheet exposures</b>	<b>52,253,618</b>	<b>226,686</b>	<b>226,686</b>			<b>245,020</b>	
Austria	12,142,940	38,006	38,006			17,711	
Czech Republic	5,862,990	14,193	14,193			20,248	
Russia	4,433,681	26,756	26,756			68,582	
Romania	3,765,983	32,873	32,873			17,464	
Slovakia	3,680,283	3,827	3,827			12,146	
Germany	2,859,369	9,763	9,763			18,959	
Switzerland	2,535,831	0	0			1,230	
Hungary	2,241,279	18,343	18,343			18,373	
Serbia	1,944,505	13,110	13,110			9,468	
Luxembourg	1,396,135	0	0			2,535	
Other countries	11,390,622	69,814	69,814			58,304	
<b>Total</b>	<b>196,397,808</b>	<b>3,316,611</b>	<b>3,316,611</b>	<b>143,507,621</b>	<b>(3,143,962)</b>	<b>245,020</b>	<b>0</b>



## Credit quality of performing and non-performing exposures by past due days

EU CQ3	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 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 year < = 5 years	Past due > 5 year < = 7 years	Past due > 7 years	Of which defaulted
in € thousand	Total			Total								
Cash balances at central banks and other demand deposits	48,579,448	48,579,443	5	2,267	256	0	2,010	0	0	0	1	2,267
Loans and advances	118,833,309	118,722,816	110,493	3,087,589	1,555,077	244,960	321,953	232,925	299,465	127,786	305,424	3,087,589
Central banks	8,813,833	8,813,833	0	0	0	0	0	0	0	0	0	0
General governments	1,788,851	1,788,701	150	169,073	169,045	0	0	0	26	0	2	169,073
Credit institutions	6,852,946	6,852,946	0	4,297	1,304	0	90	0	0	0	2,904	4,297
Other financial corporations	11,512,710	11,512,709	0	173,954	156,851	12	0	17,002	0	3	86	173,954
Non-financial corporations	48,946,369	48,915,745	30,624	1,610,186	764,782	128,370	154,616	74,249	153,328	90,790	244,051	1,610,186
Of which SMEs	12,258,729	12,233,898	24,831	599,209	228,516	102,340	65,317	47,239	100,263	26,009	29,526	599,209
Households	40,918,600	40,838,881	79,718	1,130,078	463,095	116,578	167,247	141,674	146,110	36,993	58,382	1,130,078
Debt Securities	22,220,956	22,220,956	0	2,336	2,336	0	0	0	0	0	0	2,336
Central banks	4,172	4,172	0	0	0	0	0	0	0	0	0	0
General governments	16,868,890	16,868,890	0	0	0	0	0	0	0	0	0	0
Credit institutions	3,314,926	3,314,926	0	0	0	0	0	0	0	0	0	0
Other financial corporations	1,052,322	1,052,322	0	0	0	0	0	0	0	0	0	0
Non-financial corporations	980,646	980,646	0	2,336	2,336	0	0	0	0	0	0	2,336
Off-balance sheet exposures	52,026,932			226,686								226,686
Central banks	35			0								0
General governments	323,159			41,438								41,438
Credit institutions	2,300,273			9,928								9,928
Other financial corporations	6,613,845			6,918								6,918
Non-financial corporations	35,798,761			152,360								152,360
Households	6,990,860			16,043								16,043
<b>Total</b>	<b>241,660,645</b>	<b>189,523,215</b>	<b>110,498</b>	<b>3,318,878</b>	<b>1,557,668</b>	<b>244,960</b>	<b>323,963</b>	<b>232,925</b>	<b>299,465</b>	<b>127,786</b>	<b>305,425</b>	<b>3,318,878</b>

## Credit quality of forborne exposures

EU CQ1	Gross carrying amount/ Nominal amount of exposures with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collaterals received and financial guarantees received on forborne exposures	
	Performing forborne	Total	Non-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	
in € thousand								
Cash balances at central banks and other demand deposits	0	0	0	0	0	0	0	0
Loans and advances	1,844,312	1,346,082	1,346,082	1,341,380	(113,296)	(789,111)	252,119	57,729
Central banks	0	0	0	0	0	0	0	0
General governments	0	0	0	0	0	0	0	0
Credit institutions	0	0	0	0	0	0	0	0
Other financial corporations	117,505	99,960	99,960	99,960	(5,883)	(29,095)	0	0
Non-financial corporations	1,349,396	965,504	965,504	963,022	(81,545)	(597,464)	250,322	57,463
Households	377,411	280,619	280,619	278,399	(25,869)	(162,552)	1,796	266
Debt Securities	0	0	0	0	0	0	0	0
Loan commitments given	68,221	20,369	20,369	12,584	2,801	2,866	5,487	316
<b>Total</b>	<b>1,912,533</b>	<b>1,366,452</b>	<b>1,366,452</b>	<b>1,353,964</b>	<b>(110,495)</b>	<b>(786,245)</b>	<b>257,606</b>	<b>58,045</b>

## Collateral obtained by taking possession and execution processes

EU CQ7 in € thousand	Collateral obtained by taking possession	
	Value at initial recognition	Accumulated negative changes
Property Plant and Equipment (PP&E)	14,726	(9,300)
Other than PP&E	18,340	(8,348)
Residential immovable property	3,378	(442)
Commercial immovable property	12,629	(7,844)
Movable property (auto, shipping, etc.)	168	(8)
Equity and debt instruments	0	0
Other collateral	2,165	(55)
<b>Total</b>	<b>33,066</b>	<b>(17,648)</b>

The following table shows changes in the stock of non-performing loans, excluding off-balance sheet items:

EU CR2 in € thousand	Gross carrying value defaulted exposures
Opening balance	2,949,384
Loans and debt securities that have defaulted or impaired since the last reporting period	1,153,696
Returned to non-defaulted status and recoveries	(637,737)
Amounts written off and NPE sales	(478,495)
Other changes	(136,218)
<b>Closing balance</b>	<b>2,850,630</b>

Other changes include currency effects and changes in scope of consolidation.

The tables EU CQ2, EU CQ6 and EU CQ8 are not disclosed as RBI Group does not meet the 5% gross NPL ratio threshold.

# Article 443 CRR

## Encumbered and unencumbered assets

RBI is a universal bank whose primary activity is the traditional lending and borrowing business. The main types of encumbered assets in RBI are loans and advances followed by debt securities. The largest source of encumbrance is collateralized deposits which encumbers € 11.7 billion of assets. A further € 5.0 billion of assets are encumbered by covered bonds, € 2.8 billion of assets are encumbered by repo transactions and central bank funding and € 2.2 billion of assets are encumbered by derivatives.

The largest volume of unencumbered assets is loans and advances followed by debt securities which are to a large extent central bank eligible. 'Other assets' are the third largest group of unencumbered assets. Levels of collateralization are in line with market practice.

Compared to 2021 the relative and absolute amounts of encumbered assets and central bank eligible assets have risen significantly while the unencumbered assets have risen slightly. Intra-group asset encumbrance is not material.

EU AE1	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	
in € thousand								
Assets of the reporting institution	24,810,257	5,850,017			185,435,974	15,004,615		
Equity instruments	9,788	790	9,788	790	583,012	0	519,124	0
Debt securities	6,711,478	5,849,188	6,227,052	5,511,439	16,187,114	10,928,809	15,915,402	10,955,781
of which: covered bonds	159,392	149,896	156,223	147,366	51,847	0	51,644	0
of which: asset-backed securities	0	0	0	0	0	0	0	0
of which: issued by general governments	5,512,270	5,280,794	5,078,792	4,962,933	12,070,063	9,756,208	12,181,676	9,759,379
of which: issued by financial corporations	996,871	568,394	956,213	548,506	3,137,924	1,095,732	2,862,369	1,030,872
of which: issued by non-financial corporations	80,347	0	73,312	0	962,824	150,512	925,052	156,315
Other assets	17,908,166	0			168,657,941	4,077,127		

EU AE2	Fair value of encumbered collateral received or own debt securities issued of which notionally eligible EHQLA and HQLA		Unencumbered Fair value of collateral received or own debt securities issued available for encumbrance of which EHQLA and HQLA	
in € thousand				
Collateral received by the disclosing institution	5,127,043	902,689	22,238,710	12,052,385
Loans on demand	0	0	2,486	0
Equity instruments	4,617	0	716,122	0
Debt securities	3,759,838	902,689	12,985,736	6,028,295
of which: covered bonds	0	0	0	0
of which: asset-backed securities	0	0	346,799	0
of which: issued by general governments	2,235,223	892,579	3,311,140	1,098,824
of which: issued by financial corporations	536,830	8,440	6,998,993	4,319,874
of which: issued by non-financial corporations	865,803	0	2,454,894	267,494
Loans and advances other than loans on demand	1,387,833	0	7,568,996	5,668,868
Other collateral received	0	0	339,112	0
Own debt securities issued other than own covered bonds or asset-backed securities	0	0	0	0
Own covered bonds and securitisation issued and not yet pledged			5,907,572	2,958,013
TOTAL COLLATERAL RECEIVED AND OWN DEBT SECURITIES ISSUED	29,958,434	7,366,644		

EU AE3	Assets, collateral received and own debt securities issued other than covered bonds and ABSs encumbered	
in € thousand		
Carrying amount of selected financial liabilities	19,107,352	21,656,538

# Article 444 CRR

## Use of the standardized approach

### ECAI (External Credit Assessment Institution)

RBI utilizes the external sovereign ratings from **Standard & Poor's, Moody's and Fitch Ratings** for the calculation under the standardized approach. If available, the issue ratings of securities from Standard & Poor's and Moody's are applied. For all other exposure classes, if available, the ratings of Standard & Poor's are applied.

In the case of security items, external issuer ratings are applied for the equity calculation. If security items are held to mitigate risk, the issue ratings are applied to determine the haircuts.

The external ratings applied are mapped to the credit quality steps (rating notches) defined in the standardized approach for credit risk in accordance with standard mapping pursuant to CRR.

Rating notch	ECAI Rating		
	Standard & Poor's	Moody's	Fitch
1	AAA	Aaa	AAA
1	AA+	Aa1	AA+
1	AA	Aa2	AA
1	AA-	Aa3	AA-
2	A+	A1	A+
2	A	A2	A
2	A-	A3	A-
3	BBB+	Baa1	BBB+
3	BBB	Baa2	BBB
3	BBB-	Baa3	BBB-
4	BB+	Ba1	BB+
4	BB	Ba2	BB
4	BB-	Ba3	BB-
5	B+	B1	B+
5	B	B2	B
5	B-	B3	B-
6	CCC+	Caa1	CCC
6	CCC	Caa2	CC
6	CCC-	Caa3	CC
6	CC	Ca	C
6	C	Ca	C
6	D	C	D
7	NR	NR	NR



# Exposure breakdown

The exposures post conversion factor and post risk mitigation techniques break down as follows:

EU CR5 in € thousand	Risk weight													Total	Of which unrated
Exposure classes	0%	2%	4%	10%	20%	35%	50%	75%	100%	150%	250%	1250%	Others		
Central governments or central banks	47,944,976	0	0	0	109,044	0	0	0	115,552	1,647,940	16,172	0	0	49,833,685	29,022
Regional government or local authorities	1,376,355	0	0	0	405,007	0	0	0	14,807	21,503	0	0	0	1,817,672	0
Public sector entities	620,664	0	0	0	78,947	0	0	0	571	0	0	0	0	700,182	0
Multilateral development banks	2,762,581	0	0	0	0	0	0	0	0	0	0	0	0	2,762,581	1,158,979
International organisations	1,546,120	0	0	0	0	0	0	0	0	0	0	0	0	1,546,120	0
Institutions	292,173	0	0	0	1,088,870	0	19,521	0	11,271	0	0	0	0	1,411,834	344
Corporates	0	0	0	0	818	0	80,616	0	5,073,144	1,600,702	0	0	0	6,755,280	5,060,542
Retail exposures	0	0	0	0	0	0	0	9,462,852	0	0	0	0	0	9,462,852	9,462,852
Exposures secured by mortgages on immovable property	0	0	0	0	0	10,804,864	758,519	0	49,466	1,565,580	0	0	0	13,178,430	12,990,727
Exposures in default	0	0	0	0	0	0	0	0	253,200	254,369	0	0	0	507,569	387,525
Exposures associated with particularly high risk	0	0	0	0	0	0	0	0	0	155,533	0	0	0	155,533	155,458
Covered bonds	0	0	0	39,110	0	0	0	0	0	0	0	0	0	39,110	0
Exposures to institutions and corporates with a short-term credit assessment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Units or shares in collective investment undertakings	0	0	0	26,638	0	0	0	0	4	0	0	2,853	93,486	122,981	122,981
Equity exposures	602	0	0	0	0	0	0	0	658,279	0	351,612	0	0	1,010,493	1,010,493
Other items	772,559	0	0	0	723	0	0	0	2,958,369	0	61,575	0	0	3,793,226	3,783,787
Total	55,316,029	0	0	65,748	1,683,409	10,804,864	858,657	9,462,852	9,134,664	5,245,627	429,359	2,853	93,486	93,097,549	34,162,710

Risk weights 70% and 370% are not applicable in RBI and therefore not shown in the table above.

## EU CCR3 – Standardized approach – CCR exposures by regulatory exposure class and risk weights

The table below shows the CCR exposures post conversion factor and post risk mitigation techniques by type of counterparties and by risk weight:

EU CCR3 in € thousand Exposure classes	Risk weight											Total exposure value
	0%	2%	4%	10%	20%	50%	70%	75%	100%	150%	Others	
Central governments or central banks	6,673,905	0	0	0	0	0	0	0	0	10,846	0	6,684,752
Regional government or local authorities	80	0	0	0	0	0	0	0	0	0	0	80
Public sector entities	172	0	0	0	0	0	0	0	0	0	0	172
Multilateral development banks	29,823	0	0	0	0	0	0	0	0	0	0	29,823
International organisations	0	0	0	0	0	0	0	0	0	0	0	0
Institutions	0	44,929	13,338	0	676	2,452	0	0	0	0	0	61,394
Corporates	0	0	0	0	0	0	0	0	443,373	883	0	444,256
Retail	0	0	0	0	0	0	0	4	0	0	0	4
Institutions and corporates with a short-term credit assessment	0	0	0	0	0	0	0	0	0	0	0	0
Other items	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total exposure value</b>	<b>6,703,981</b>	<b>44,929</b>	<b>13,338</b>	<b>0</b>	<b>676</b>	<b>2,452</b>	<b>0</b>	<b>4</b>	<b>443,373</b>	<b>11,730</b>	<b>0</b>	<b>7,220,481</b>

# Article 445 CRR

## Exposure to market risk

The components of own funds requirements under the standardized approach for market risk as of 31 December 2022 are listed in the following table:

EU MR1	
in € thousand	
	RWEAs
Outright products	
Interest rate risk (general and specific)	961,132
Equity risk (general and specific)	41,826
Foreign exchange risk	4,546,488
Commodity risk	5,440
Options (non-delta risks)	
Simplified approach	0
Delta-plus approach	42,626
Scenario approach	36,095
Securitisation (specific risk)	0
Total	5,633,607

# Article 446 CRR

## Operational risk management

RBI Group currently calculates regulatory capital requirements for operational risks according to Basel II using the standardized approach. The Advanced Measurement Approach (AMA) was retired in the fourth quarter of 2022:

EU OR1 in € thousand Banking activities	Relevant indicator			Own funds requirements	Risk weighted exposure amount
	Year-3	Year-2	Last year		
Banking activities subject to basic indicator approach (BIA)	0	0	0	0	0
Banking activities subject to standardised (TSA) / alternative standardised (ASA) approaches	5,350,703	5,678,320	7,713,798	1,013,366	12,667,072
Subject to TSA:	5,350,703	5,678,320	7,713,798		
Subject to ASA:	0	0	0		
Banking activities subject to advanced measurement approaches AMA	0	0	0	0	0

# Article 447 CRR

## Key Metrics

EU KM1 in € thousand	31/12/2022	30/09/2022	30/06/2022	31/03/2022	31/12/2021
<b>Available own funds (amounts)</b>					
Common Equity Tier 1 (CET1) capital	15,643,027	15,888,042	14,619,926	12,156,337	11,812,244
Tier 1 capital	17,318,615	17,560,977	16,292,495	13,831,902	13,459,611
Total capital	19,701,551	19,966,688	18,253,854	15,988,819	15,806,848
<b>Risk-weighted exposure amounts</b>					
Total risk-weighted exposure amount	97,680,154	108,495,504	109,023,253	104,028,953	89,928,197
<b>Capital ratios (as a percentage of risk-weighted exposure amount)</b>					
Common Equity Tier 1 ratio (%)	16.01%	14.64%	13.41%	11.69%	13.14%
Tier 1 ratio (%)	17.73%	16.19%	14.94%	13.30%	14.97%
Total capital ratio (%)	20.17%	18.40%	16.74%	15.37%	17.58%
<b>Additional own funds requirements based on SREP (as a percentage of risk-weighted exposure amount)</b>					
Additional own funds requirements to address risks other than the risk of excessive leverage (%)	2.20%	2.20%	2.20%	2.20%	2.25%
of which: to be made up of CET1 capital (percentage points)	1.24%	1.24%	1.24%	1.24%	1.27%
of which: to be made up of Tier 1 capital (percentage points)	1.65%	1.65%	1.65%	1.65%	1.69%
Total SREP own funds requirements (%)	10.20%	10.20%	10.20%	10.20%	10.25%
<b>Combined buffer requirement (as a percentage of risk-weighted exposure amount)</b>					
Capital conservation buffer (%)	2.50%	2.50%	2.50%	2.50%	2.50%
Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	0.00%	0.00%	0.00%	0.00%	0.00%
Institution specific countercyclical capital buffer (%)	0.36%	0.27%	0.26%	0.16%	0.17%
Systemic risk buffer (%)	1.00%	1.00%	1.00%	1.00%	1.00%
Global Systemically Important Institution buffer (%)	0.00%	0.00%	0.00%	0.00%	0.00%
Other Systemically Important Institution buffer (%)	1.00%	1.00%	1.00%	1.00%	1.00%
Combined buffer requirement (%)	4.92%	4.77%	4.76%	4.66%	4.67%
Overall capital requirements (%)	15.06%	14.97%	14.96%	14.86%	14.92%
CET1 available after meeting the total SREP own funds requirements (%)	9.97%	8.20%	4.15%	5.17%	7.33%
<b>Leverage ratio</b>					
Leverage ratio total exposure measure	235,639,638	243,879,628	243,991,172	220,078,966	219,173,043
Leverage ratio (%)	7.35%	7.20%	6.68%	6.28%	6.14%
<b>Additional own funds requirements to address risks of excessive leverage (as a percentage of leverage ratio total exposure amount)</b>					
Additional own funds requirements to address the risk of excessive leverage (%)	0.00%	0.00%	0.00%	0.00%	0.00%
of which: to be made up of CET1 capital (percentage points)	0.00%	0.00%	0.00%	0.00%	0.00%
Total SREP leverage ratio requirements (%)	3.00%	-	-	-	-
<b>Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)</b>					
Leverage ratio buffer requirement (%)	0.00%	0.00%	0.00%	0.00%	0.00%
Overall leverage ratio requirements (%)	3.00%	3.00%	3.00%	3.00%	3.00%
<b>Liquidity Coverage Ratio</b>					
Total high-quality liquid assets (HQLA) (Weighted value - average)	41,356,597	40,033,158	39,345,115	38,411,926	39,281,804
Cash outflows - Total weighted value	45,675,959	44,917,550	43,221,595	41,455,296	41,189,333
Cash inflows - Total weighted value	23,819,963	22,286,347	19,473,393	16,880,306	15,524,930
Total net cash outflows (adjusted value)	21,855,996	22,631,203	23,748,202	24,574,989	25,664,403
Liquidity coverage ratio (%)	192.06%	180.70%	167.22%	156.44%	153.06%
<b>Net Stable Funding Ratio</b>					
Total available stable funding	161,545,469	166,780,495	164,923,412	158,165,973	159,005,985
Total required stable funding	119,608,093	124,713,275	131,153,374	122,876,901	119,079,310
NSFR ratio (%)	135.06%	133.73%	125.75%	128.72%	133.53%

# Article 448 CRR

## Exposure to interest rate risk on positions not held in the trading book

Interest rate risk in the banking book arises from differences in maturities and repricing schedules between RBI's assets and liabilities. There are relevant open positions for EUR, USD and CHF as major currencies as well as for local currencies of network banks located in Central and Eastern Europe.

Interest rate risk in the banking book is actively managed by Treasury in accordance with the interest rate strategy approved by the Group Asset Liability Committee (ALCO) and within given market risk limits approved by the Group Market Risk Committee (MACO).

This risk type is hedged by a combination of on- and off-balance sheet transactions. Instruments for hedging include off-balance sheet derivatives (interest rate swaps and – to a smaller extent – interest rate forwards and interest rate options). Hedge accounting according to IAS 39 is applied wherever applicable in order to avoid fluctuations in the income statement caused by the revaluation of derivatives.

The interest rate risk in the banking book is measured and controlled in a dual approach:

In the economic value-based approach all banking book positions are included in RBI's internal market risk model, which is also used for measuring market risk in the trading book. All banking book positions are subject to market risk limits (Basis Point Values and Value at Risk calculated on a daily basis) and included in the Pillar 2 economic capital measurement.

In contrast to the trading book, the interest rate behavior of certain positions has to be modeled in the banking book. In this respect, the modeling of own funds and of administered rate products (i.e., customer products without contractually agreed interest rate behavior such as current accounts or sight deposits) significantly influences the measured overall interest rate risk position. RBI models these banking book positions with a highly prudent approach. Own funds are modeled as overnight positions without interest rate sensitivity in terms of Basis Point Values and Value at Risk and therefore do not artificially offset long-term fixed receiver positions.

The interest rate risk of administered rate products is modeled based on a replicating portfolio methodology. The main idea behind this methodology is to define a replicating portfolio of plain vanilla instruments that are available on the market and mimic the historical interest rate behavior of the administered rate product the best. The structure of the replicating portfolios is used consistently for measuring the interest rate risk (Basis Point Values, Value at Risk) of administered rate positions as well as for internal funds transfer pricing.

The theoretical maximum duration of the replicating portfolio according to the applied model is up to 5 years for retail products and up to 4 years for corporate products. The actual durations for specific administered rate products on RBI's balance sheet vary currently between 2.2 months and 3.92 years for retail products and between 1 month and 1.1 years for corporate products. Semi-annual recalibrations and annual validations are performed in order to test whether the currently applied replicating portfolio models are still valid.

The optionalities present in the retail portfolio that affect the interest rate risk profile of the transactions (i.e. prepayment option, early withdrawal option and replenishment option) are taken into consideration and modeled according to the RBI optionality model. The models are currently applied to fixed rate loans for modelling embedded prepayment options. This model is based on linear regression using the historical development of optionalities as input. If no statistically significant parameters are found in the regression analysis, a moving average concept is applied. Only Raiffeisen Bank Russia has implemented a non-linear model.

Retail term deposits for building societies are modeled as well. During the six-year lifetime of the deposit a certain savings amount is agreed with the customer. In order to determine the targeted deposit volume in the future, a haircut based on a regular and early termination forecast is calculated and applied to the monthly modeled increase in the deposit volume. In order to achieve the agreed volume of the savings account regular (e.g., monthly) payment inflows are modeled. The additional agreed savings amount after application of the haircut is distributed across the remaining lifetime of the existing deposits.

The approach based on economic value is complemented by a future-oriented earnings-based approach in order to identify the main drivers of the bank's interest rate sensitive income statement positions, calculated on a monthly basis. Furthermore, this approach provides information necessary to manage and optimize the risk-return position as well as the structure of the

balance sheet from an earnings-based point of view. The evolution of net interest income and valuation results are simulated under various balance sheet (maturities, margins, etc.) and market scenarios (parallel shift and twists of the yield curve, implied forward scenario, scenario according to market opinion, etc.)

The following table shows the variations in forecasted earnings (Net Interest Income) of RBI's banking book for the horizon of the next 12 months under a sudden parallel shift of +200bps and -200bps as a percentage of total forecasted earnings for a given currency in the scenario with stable interest rates, using the RBI Group model for repricing of administered rate products.

2022 in € thousand	+200 bp shift	(200) bp shift
ALL	1.50%	(1.50)%
BGN	25.00%	(34.80)%
BYN	3.00%	(3.60)%
CHF	85.40%	(99.00)%
CNY	6325.20%	(6565.80)%
CNH	155.80%	(155.70)%
CZK	(2.20)%	(9.80)%
EUR	7.70%	(16.70)%
GBP	(12.50)%	2.00%
HRK	16.40%	(44.00)%
HUF	6.00%	(6.00)%
PLN	36.00%	(35.50)%
RON	4.30%	(8.90)%
RSD	8.60%	(11.10)%
RUB	2.90%	(7.80)%
SGD	7.30%	(7.00)%
UAH	1.80%	(2.70)%
USD	(9.40)%	(2.10)%
Other	(9.00)%	(26.00)%

The following table shows the change in the present value of RBI's banking book given a one basis point interest rate increase for the whole yield curve.

2022 in € thousand	Total	< 3 m	> 3 to 6 m	> 6 to 12 m	> 1 to 2 y	> 2 to 3 y	> 3 to 5 y	> 5 to 7 y	> 7 to 10 y	> 10 to 15 y	> 15 to 20 y	> 20 y
ALL	55	(2)	(4)	(13)	6	19	45	3	5	7	(4)	(8)
BAM	(30)	4	(3)	(5)	(2)	1	(1)	(13)	(11)	0	0	0
BGN	0	0	0	0	0	0	0	0	0	0	0	0
BYN	(2)	(1)	(1)	0	1	2	(1)	(1)	0	0	0	0
CHF	(86)	(53)	(1)	1	3	3	3	(13)	(10)	(11)	(7)	(2)
CNY	(5)	(2)	(1)	(1)	0	0	0	0	0	0	0	0
CZK	(788)	55	(19)	2	(179)	(178)	(274)	(127)	(35)	(32)	0	0
EUR	(911)	72	31	92	(295)	(162)	(325)	(334)	146	(68)	(50)	(19)
GBP	(11)	(2)	0	0	1	(2)	(7)	(1)	0	0	0	0
HRK	182	6	(2)	(9)	9	33	80	(4)	54	15	0	0
HUF	(210)	6	(3)	(20)	(16)	(12)	(58)	(44)	(62)	(2)	1	0
PLN	(20)	(3)	(5)	2	(1)	(3)	(3)	(3)	(4)	0	0	0
RON	(206)	(3)	6	10	(11)	(2)	(10)	(121)	(77)	4	(1)	0
RSD	12	(1)	(3)	1	(2)	(7)	25	(1)	0	0	0	0
RUB	(9)	35	(4)	12	(138)	(30)	35	95	83	(81)	(15)	(2)
SGD	0	0	0	0	0	0	0	0	0	0	0	0
TRY	0	0	0	0	0	0	0	0	0	0	0	0
UAH	6	3	1	(4)	8	6	(7)	0	0	0	0	0
USD	228	57	96	40	16	2	29	10	0	(23)	0	0
Other	(4)	3	0	0	0	0	(1)	0	0	(2)	(3)	0

A more extensive stress scenario is shown in the following table reflecting changes in the present value of RBI's banking book, when the parallel shift factors are increased as follows: The standard stress scenario is based on a sudden parallel downwards and upwards shift of the respective yield curve. Size of the shock follows the Austrian VERA regulation and varies between 100 and 400 basis points per currency. Stress results related to the yield curve are based on a full simulation, dynamic approach.



Changes in the present value of RBI's banking book in € thousand	Parallel shift down	Parallel shift up
ALL yield curve	(18,515)	24,487
BAM yield curve	10,675	(10,736)
BGN yield curve	(5)	5
BYN yield curve	695	(588)
CAD yield curve	27	(25)
CHF yield curve	9,169	(8,325)
CNH yield curve	(1,228)	2,102
CNY yield curve	1,135	(1,126)
CZK yield curve	165,254	(150,668)
DKK yield curve	26	(25)
EUR yield curve	212,229	(156,417)
GBP yield curve	3,153	(2,484)
HKD yield curve	0	0
HRK yield curve	(53,646)	42,093
HUF yield curve	70,724	(57,111)
NOK yield curve	157	(143)
NZD yield curve	(2)	2
PLN yield curve	5,364	(4,670)
RON yield curve	83,642	(62,941)
RSD yield curve	(5,178)	4,188
RUB yield curve	6,807	(2,796)
SEK yield curve	2,738	(1,265)
SGD yield curve	9	(9)
TRY yield curve	11	(11)
UAH yield curve	(2,809)	2,259
USD yield curve	(45,845)	45,294

EU IRRBB1 in € thousand Supervisory shock scenarios	Changes of the economic value of equity		Changes of the net interest income	
	Current period	Last period	Current period	Last period
Parallel up	(396)	(403)	358	207
Parallel down	161	501	(730)	(211)
Steeper	(2)	(12)		
Flatter	(24)	41		
Short rates up	(148)	(126)		
Short rates down	52	240		

# Article 449 CRR

## Exposure to securitization positions

### The goals pursued by RBI's securitization activities

RBI concludes securitization transactions with the aim of:

- Reducing regulatory capital requirements or economic capital or accessing additional funding sources;
- Obtaining interest income while achieving at the same time an attractive risk/return profile;
- Generating fee income.

In the course of dealing with securitization transactions, RBI focuses on the following risks in addition to credit risk:

- Reputation risk
- Liquidity risk
- Counterparty risk
- Country risk
- Currency risk
- Regulatory risk
- Market risk
- Dilution risk and
- Commingling risk

These aspects are addressed by the respective, dedicated internal governance processes. The assessment of these risks (if deemed significant) and their mitigation is included in the internal application and forms part of the decision-making process.

RBI only invests in selected asset classes at a senior level with investment grade ratings or respective insurance wrap or retains tranches of assets originated by RBI or its Group entities at senior or other tranche levels. There is no re-securitization activity within RBI.

### RBI's roles in securitization transactions

RBI engages in securitization transactions as:

- Investor (traditional securitizations)
- Originator (traditional and synthetic securitizations)
- Arranger (traditional and synthetic securitizations)
- Servicer and back-up servicer (acting only for Group entities to meet market requirements)

### The approaches used by RBI to calculate the weighted exposure amount in relation to its securitization activities

A dedicated governance and risk management process is in place to monitor performance and changes in the securitization exposures.

The monitoring of changes in the credit and market risk of securitization exposures comprises three different layers – the originator (credit & collection policy, commingling risk, reputation, etc.), the underlying portfolio (concentrations, correlations, default, and delinquencies, etc.) and the securitization exposure's structural features (seniority, triggers, waterfall, credit enhancement, etc.). The credit process covers approval, review, and stress testing. During the credit process RBI analyzes and records a wide range of data relating to the securitization exposures in order to gain a comprehensive and thorough understanding thereof. In

particular, RBI analyzes and records the retained net economic interest, the risk characteristics of the individual securitization position and of underlying exposure, reputation and loss experience in earlier securitizations, historical performance and structural features that can materially impact the performance of the securitization position. The limits are approved in line with the Credit Approval Authorities regulations of RBI Group.

Retained tranches of transactions where RBI or one of its Group entities acts as originator are related to synthetic transactions of portfolios originated in the ordinary course of business. No hedging instruments are in place related to such retained tranches.

Unfunded protection transactions related to synthetic securitization tranches where RBI or one of its Group entities acts as originator are entered into with multilateral development banks or other highly rated counterparties.

Since the end of October 2019, RBI Group has applied the new securitization framework (according to EU Regulation 2017/2401 and EU Regulation 2017/2402) to the securitization portfolio. Where the conditions set out in Art. 258 of EU Reg. 2017/2401 are met, the SEC-IRBA is applied. The tranche will be either fully deducted from capital (where  $X \leq KIRB$ ) or the tranche will be weighted with a risk weight that is derived using the regulatory formula according to Art. 259, 260 and which amounts to at least 10% for STS transactions and 15% for non-STs.

Where the SEC-IRBA cannot be used, the SEC-SA is applied. The tranche will be either fully deducted from capital (where  $X \leq KA$ ) or the tranche will be weighted with a risk weight that is derived using the regulatory formula according to Art. 261, 262 and which amounts to at least 10% for STS transactions and 15% for non-STs. If SRT is not recognized, the original RWA amount of the underlying assets is applied.

Where the SEC-SA and SEC-IRBA may not be used, SEC-ERBA is applied to all tranches rated by two recognized ECAs (according to EU Directive 462/2013 of the European Parliament and of the Council of 21 May 2013). All tranches which carry a rating below the defined minimum rating, or for which no alternative approach can be used, will be deducted from capital.

The institution will use SEC-ERBA instead of SEC-SA in the cases prescribed by Art. 254(2) of EU Reg. 2017/2401.

Securitization transactions where RBI Group serves as originator do not fulfill the requirements to be treated as STS securitizations under Art. 262 of EU Reg. 2017/2401.

The Internal Assessment Approach is not used for origination positions.

## Accounting policies

For securitization transactions, RBI applies the respective regulations in accordance with International Financial Reporting Standards (IFRS), in particular IFRS 10 together with IAS 27 concerning the possible consolidation of structured entities (SE's) and IFRS 9 for the applicable balance sheet reporting. After a decision on the need for consolidation of the SE has been made, RBI determines whether the derecognition principles according to IFRS 9 are met. If, in the course of a synthetic transaction, the originator of the underlying financial assets is provided with a guarantee for default losses on the transferred assets, the assumptions stated in Appendix B of IFRS 9 prevent the transferred asset from being derecognized. In other words, in the case of synthetic securitizations, the instruments involved are financial guarantees or credit derivatives whereby the respective definitions are included in IFRS 9.

In the reporting period (as in previous years) no assets were assigned to "awaiting securitization" and there were no changes regarding the methods, key assumptions, and inputs from the previous period for valuing securitization positions.

The following applies to securitization transactions:

- To determine whether the structured entity (SE) is to be included in the consolidated IFRS balance sheet, RBI evaluates whether so-called 'effective control' within the meaning of IFRS 10 is fulfilled and if this is the case the respective SE becomes fully consolidated in the Group financial statements.
- As a further consequence, any Group unit which has invested in securitization tranches of portfolios of other Group units reports such tranches as intragroup receivables which are subject to consolidation of intercompany positions (i.e., on the liability side, the Group reports a lower amount of securitization debt);
- The accounting treatment of a received financial guarantee depends on the concrete transaction structure and whether the received guarantee is considered as an integral part of the guaranteed debt instrument or not. If the received guarantee can be considered as an integral part of the loan, the expected credit loss (ECL) of the guaranteed loans also includes the expected cash flows from the financial guarantee to the extent that the expected losses are covered by the guarantee;

- Transactions which have, in substance, the form of a credit derivative need to be reported in the IFRS balance sheet at their respective market values.

## Names of acknowledged rating agencies which are used for securitization transactions

There are no externally rated securitization transactions for which RBI acts as an originator.

Moody's Investors Service, Fitch Ratings, DBRS, Standard & Poor's and Scope Ratings are used from time to time in relation to traditional securitizations where RBI acts as an investor and/or arranger.

## RBI as sponsor

Currently RBI does not act as a sponsor.

## RBI as investor and arranger

RBI also provides a wide range of secured financing solutions to its customers, offering the entire service spectrum – from feasibility and structuring to financing and/or placement. This includes traditional secured funding and securitization techniques as well as bespoke solutions. Selectively, RBI supports customer transactions and/or invests in transactions as described above, i.e. receivables purchase and securitizations of different kinds. As such, RBI as an investor also has exposure to a variety of traditional securitization transactions including to Belvedere Financing S.A. backed by trade receivables originated by third parties.

## RBI as originator

Securitization represents a particular form of either credit risk transfer and/or refinancing of loans or lease agreements on portfolio basis, whereby risks are transferred to, or funding is provided by institutional investors. The objective of the Group's securitization transactions is to optimize risk weighted assets or gain access to additional funding sources.

The following transactions, executed with external contractual parties, qualify as significant risk transfer (SRT) transactions in accordance with the CRR and were active in the reporting year. The stated amounts represent the securitized portfolio, the underlying receivables, as well as the externally placed tranche at financial year end.

in € thousand	Seller of claims or secured party	Date of contract	End of maturity	Maximum volume	Securitized portfolio	Outstanding portfolio (securitized and retained)	Portfolio	Externally placed tranche	Amount of externally placed tranche
Synthetic Transaction ROOF CROATIA 2022	Raiffeisenbank Austria d.d., Zagreb (HR)	December 2022	June 2034	365,654	365,142	658,259	Company loans	Mezzanine	25,596
Synthetic Transaction ROOF HUNGARY 2022	Raiffeisen Bank Zrt, Budapest (HU)	December 2022	March 2035	568,799	564,182	593,876	Mortgage loans	Mezzanine	76,039
Synthetic Transaction ROOF ROMANIA 2022	Raiffeisen Bank S.A., Bukarest (RO)	November 2022	June 2039	307,153	283,104	323,693	Company loans	Mezzanine	24,197
Synthetic Transaction ROOF CORPORATE 2022	Raiffeisen Bank International AG, Vienna (AT)	June 2022	December 2032	1,818,182	1,809,933	9,219,739	Company loans	Mezzanine	100,000
Synthetic Transaction ROOF CORPORATE 2021	Raiffeisen Bank International AG, Vienna (AT)	December 2021	December 2031	4,079,979	4,079,979	9,725,288	Company loans	Mezzanine	216,239
Synthetic Transaction ROOF MORTGAGES 2020	Raiffeisen Bank International AG, Vienna (AT)	December 2020	December 2030	3,331,253	2,367,101	2,498,089	Mortgage loans	Mezzanine	128,890
Synthetic Transaction ROOF CRE 2019	Raiffeisen Bank International AG, Vienna (AT)	October 2019	September 2029	1,262,072	1,218,691	3,796,027	Corporate loans, Project finance	Mezzanine	91,445
Synthetic Transaction EIF Western Balkans EDIF Serbia	Raiffeisen Bank Serbia, Belgrade (RS)	November 2018	December 2028	20,000	3,453	4,986	SME loans	Junior	414
Synthetic Transaction EIF COSME Serbia	Raiffeisen Bank Serbia, Belgrade (RS)	December 2020	June 2034	64,000	23,568	47,147	SME loans	Junior	2,498
Synthetic Transaction State Guarantee Serbia	Raiffeisen Bank Serbia, Belgrade (RS)	May 2020	April 2024	147,000	54,903	68,785	SME loans	Junior	16,471
Synthetic Transaction EIF DCFTA Ukraine	JSC Raiffeisen Bank Aval, Kyiv (UA)	December 2017	December 2031	176,300	34,623	54,832	SME loans	Junior	5,193
Synthetic Transaction EIF JEREMIE Romania	Raiffeisen Bank S.A., Bukarest (RO)	December 2010	December 2025	172,500	31	39	SME loans	Junior	31
Synthetic Transaction EIF JEREMIE Slovakia	Tatra banka a.s., Bratislava (SK)	March 2013	June 2025	60,000	589	842	SME loans	Junior	589
Synthetic Transaction EIF Western Balkans EDIF Albania	Raiffeisen Bank Sh.a., Tirana (AL)	December 2016	June 2028	17,000	4,340	6,346	SME loans	Junior	2,879
Synthetic Transaction EIF Western Balkans EDIF Croatia	Raiffeisenbank Austria d.d., Zagreb (HR)	April 2015	May 2023	20,000	78	112	SME loans	Junior	17
Synthetic Transaction EIF COSME Romania	Raiffeisen Bank S.A., Bukarest (RO)	April 2017	December 2034	434,000	95,554	174,868	SME loans	Junior	16,406
Synthetic Transaction EIF EASI Romania	Raiffeisen Bank S.A., Bukarest (RO)	July 2020	December 2032	65,000	27,046	55,544	SME loans	Junior	10,106

Raiffeisenbank Austria d.d., Zagreb, executed a new synthetic transaction, ROOF CROATIA 2022, which was split into a senior, a mezzanine and a junior tranche. The credit risk of the mezzanine tranche is guaranteed by an institutional investor, while the credit risk of the junior and senior tranches is retained.

Raiffeisen Bank Zrt, Budapest, executed a new synthetic transaction, ROOF HUNGARY 2022, which was split into a senior, a mezzanine and a junior tranche. The credit risk of the mezzanine tranche is guaranteed by institutional investors, while the credit risk of the junior and senior tranches is retained.

Raiffeisen Bank S.A., Bucharest, executed a new synthetic transaction, ROOF ROMANIA 2022, which was split into a senior, a mezzanine and a junior tranche. The credit risk of the mezzanine tranche is guaranteed by an institutional investor, while the credit risk of the junior and senior tranches is retained.

The Group executed a new synthetic transaction, ROOF CORPORATE 2022, which was split into a senior, a mezzanine and a junior tranche. The credit risk of the mezzanine tranche is guaranteed by an institutional investor, while the credit risk of the junior and senior tranches is retained.

The synthetic transaction ROOF CORPORATE 2021 is split into a senior, a mezzanine and a junior tranche. The credit risk of the mezzanine tranche is guaranteed and cash collateralized by institutional investors, while the credit risk of the junior and senior tranches is retained.

The synthetic transaction ROOF MORTGAGES 2020 is split into a senior, a mezzanine and a junior tranche. The credit risk of the mezzanine tranche is guaranteed by institutional investors, while the credit risk of the junior and senior tranches is retained.

The synthetic transaction ROOF CRE 2019 is split into a senior, a mezzanine and a junior tranche. The credit risk of the mezzanine tranche is guaranteed by an institutional investor, while the credit risk of the junior and senior tranches is retained.

As part of the JEREMIE initiative, the participating subsidiaries (Raiffeisenbank S.A., Bucharest, and Tatra banka a.s., Bratislava) have received guarantees from the European Investment Fund (EIF) to support lending to small and medium-sized enterprises. Since 2016 the Slovakian JEREMIE transaction has been converted into a funded credit guarantee via a Slovakian state-owned fund, EIF is no longer part of the transaction.

As part of the Western Balkans Enterprise Development and Innovation Facility, the participating subsidiaries (Raiffeisenbank Sh.a., Tirana, and Raiffeisenbank Austria d.d., Zagreb) each signed a portfolio guarantee agreement which was funded by the EU and which, like the JEREMIE initiatives, is aimed at providing access to finance for small and medium-sized enterprises.

As part of the EaSI initiative, Raiffeisenbank S.A., Bucharest, signed a portfolio guarantee agreement which was funded by the EU and which, like the JEREMIE initiatives, is aimed at providing access to finance for small and medium-sized enterprises.

As part of the COSME initiative, Raiffeisenbank S.A., Bucharest, signed a portfolio guarantee agreement in 2017, which was funded by the EU and which, like the JEREMIE initiatives, is aimed at providing access to finance for small and medium-sized enterprises. Significant risk transfer for this transaction is being recognized from year-end 2020 onwards.

As part of the DCFTA initiative, Raiffeisen Bank JSC, Kiev, signed a portfolio guarantee agreement in 2017, which was funded by the EU and which is aimed at providing access to finance for small and medium-sized enterprises. Significant risk transfer for this transaction is being recognized from year-end 2021 onwards.

As part of a State Guarantee initiative, Raiffeisen Bank Serbia, Belgrade, signed a portfolio guarantee agreement in 2020, which was funded by the Serbian National Bank, and which is aimed at providing support during the COVID-19 crisis. Significant risk transfer for this transaction is being recognized from January 2021 onwards.

As part of the COSME initiative, Raiffeisen Bank Serbia, Belgrade, signed a portfolio guarantee agreement in 2020, which was funded by the EU and which is aimed at providing access to finance for small and medium-sized enterprises. Significant risk transfer for this transaction is being recognized from year-end 2022 onwards.

As part of the Western Balkans Enterprise Development and Innovation Facility, Raiffeisen Bank Serbia, Belgrade, signed a portfolio guarantee agreement which was funded by the EU and which is aimed at providing access to finance for small and medium-sized enterprises. Significant risk transfer for this transaction is being recognized from year-end 2022 onwards.

RBI has no securitization exposures booked in the trading book, therefore template EU SEC2 is not disclosed. The tables below therefore contain only non-trading book exposures. For better readability lines and columns which are not applicable to RBI are not shown in the tables.

## Securitization exposures in the non-trading book

EU-SEC1	Institution acts as originator		Institution acts as investor	
	Synthetic	of which SRT	Traditional	
in € thousand			STS	Non-STS
<b>Total exposures</b>	<b>9,945,736</b>	<b>9,945,736</b>	<b>0</b>	<b>445,435</b>
Retail (total)	71,174	71,174	0	0
residential mortgage	0	0	0	0
credit card	0	0	0	0
other retail exposures	71,174	71,174	0	0
re-securitisation	0	0	0	0
Wholesale (total)	9,874,562	9,874,562	0	445,435
loans to corporates	118,380	118,380	0	0
commercial mortgage	9,756,182	9,756,182	0	0
lease and receivables	0	0	0	0
other wholesale	0	0	0	445,435
re-securitisation	0	0	0	0

## Exposures securitized by the institution - Exposures in default and specific credit risk adjustments

EU-SEC5	Exposures securitised by the institution - Institution acts as originator or as sponsor		
	Total outstanding nominal amount	Of which exposures in default	Total amount of specific credit risk adjustments made during the period
in € thousand			
<b>Total exposures</b>	<b>10,911,457</b>	<b>47,202</b>	<b>0</b>
Retail (total)	201,228	6,475	0
residential mortgage	0	0	0
credit card	0	0	0
other retail exposures	201,228	6,475	0
re-securitisation	0	0	0
Wholesale (total)	10,710,228	40,727	0
loans to corporates	236,388	5,754	0
commercial mortgage	10,473,840	34,973	0
lease and receivables	0	0	0
other wholesale	0	0	0
re-securitisation	0	0	0

## Securitization exposures in the non-trading book and associated regulatory capital requirements - institution acting as originator or as sponsor

EU-SEC3											
in € thousand	Exposure values (by RW bands/deductions)			Exposure values (by regulatory approach)			RWEA (by regulatory approach)		Capital charge after cap		
	≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	SEC-IRBA	SEC-SA	1250% RW/ deductions	SEC-IRBA	SEC-SA	SEC-IRBA	SEC-SA
Total exposures	9,907,808	41	2,747	35,140	7,609,509	2,297,439	77,575	1,143,415	392,493	91,473	30,656
Synthetic transactions	9,907,808	41	2,747	35,140	7,609,509	2,297,439	77,575	1,143,415	392,493	91,473	30,656
Securitisation	9,907,808	41	2,747	35,140	7,609,509	2,297,439	77,575	1,143,415	392,493	91,473	30,656
Retail underlying	63,466	41	0	7,667	34,383	36,791	0	5,157	18,162	413	709
Wholesale	9,844,342	0	2,747	27,473	7,575,126	2,260,648	77,575	1,138,257	374,331	91,061	29,946
Re-securitisation	0	0	0	0	0	0	0	0	0	0	0

## Securitization exposures in the non-trading book and associated regulatory capital requirements - institution acting as investoor

EU-SEC4						
in € thousand	Exposure values (by RW bands/deductions)			Exposure values (by regulatory approach)	RWEA (by regulatory approach)	Capital charge after cap
	≤20% RW	>20% to 50% RW	>100% to <1250% RW	SEC-ERBA (including IAA)	SEC-ERBA (including IAA)	SEC-ERBA (including IAA)
Total exposures	301,618	137,585	6,232	445,435	91,108	7,289
Traditional securitisation	301,618	137,585	6,232	445,435	91,108	7,289
Securitisation	301,618	137,585	6,232	445,435	91,108	7,289
Retail underlying	0	0	0	0	0	0
Wholesale	301,618	137,585	6,232	445,435	91,108	7,289
Re-securitisation	0	0	0	0	0	0



# Article 450 CRR

## Remuneration policy

In compliance with Article 450 CRR the following information regarding the remuneration policy and practices of RBI Group for those categories of staff whose professional activities have a material impact on its risk profile is disclosed:

### Basic characteristics of RBI's remuneration policies and practices

RBI Group's key remuneration principles are as follows:

- RBI Group uses a simple and transparent compensation system which reflects the Group's business strategy, is in line with the regulatory requirements and strives to improve the Group's capital base.
- The compensation principles and policies of RBI Group are consistent with and promote sound and effective risk-taking management practices and avoid incentives for inappropriate risk taking that exceed the tolerated risk of the institution, in particular through KPIs and management processes (e.g., performance management process, bonus pool approach).
- By aligning RBI Group's strategy, the Group's vision and the remuneration system, RBI Group strives to optimize risk on all levels to further promote sound and effective risk management which supports and leads to more accurate cost planning over a multi-year perspective.

RBI Group fosters the development, satisfaction and loyalty of its employees by providing financial stability and by focusing performance management on the development of staff members. The pay mix (proportion of variable compensation to fixed compensation) is well balanced. This provides every employee with an adequate living based on fixed income, thus allowing a fully flexible variable remuneration policy. It includes the possibility of no variable remuneration, while still providing financial security to employees. For functions with a very low or indirect influence on the company's results, there is no variable remuneration.

Both the Group, and the local institutional, performance are considered in the potential bonus in the following way. The potential bonus for RBI Board members depends entirely on the Group performance, while for all other bonus eligible staff at RBI head office the local performance and the Group performance are each assigned weights of 50 per cent. For the bonus pool of the remaining bonus eligible staff, the weight attached to Group performance is 33.3 per cent and the local company performance is assigned a weight of 66.7 per cent. This means that variable remuneration is influenced by the performance of RBI as a whole and the performance of the respective company, and less by factors at the level of the individual employee. Therefore, the probability of inappropriate risk-taking and undue risk assumption at the individual level is minimized.

RBI Group's bonus system differentiates between two categories of staff: Group executives and other bonus eligible staff. Group executives are individuals in top level management functions in RBI Group. This covers functions at RBI head office, selected on the basis of objective criteria, and board members of relevant RBI Group subsidiaries. For this group of employees, the bonus system is adapted in such a way as to further promote teamwork and avoid "silo-thinking" by focusing on overall Group and institutional performance.

The compensation system supports the efforts to maintain a sound capital base and ratios by limiting the influence of the variable portion of total compensation on the Group's capital position, especially in years with good business results. By putting an emphasis and focus on the capital base of RBI, the compensation structure is directly linked to the aforementioned key remuneration principles.

### Decision-making process for the remuneration policy and the Remuneration Committee

RBI AG has established a Remuneration Committee of the Supervisory Board (REMCO) within the meaning of Section 39c of the Austrian Banking Act (BWG).

- REMCO consists of nine Supervisory Board members, three of whom are delegated from the Staff Council.
- The number and members from among the group of equity stakeholders is ascertained by resolution of the Supervisory Board. The Chairman of the Supervisory Board belongs to REMCO. The Supervisory Board members from among the employee representatives shall be entitled to be represented in the Committee by such members designated by them in such

number as is in accordance with sec. 110 of the Labor Constitution Act (Arbeitsverfassungsgesetz, ArbVG), but this does not apply to meetings and votes concerning the legal relationship between the Company and the active or retired members of the Board of Management, with the exception of the granting of options on shares of the Company or of share transfer programs.

- At least one member of REMCO has specific knowledge and practical experience in the area of remuneration policy ("remuneration expert").
- If REMCO employs an advisor, it does not advise the Management Board in remuneration matters.
- The Chairman of REMCO and its Deputies are elected by the Supervisory Board.

REMCO has the following duties and responsibilities:

(a) The preparation of the following resolutions of the Supervisory Board:

- (i) The preparation of the resolutions of the Supervisory Board concerning the principles for the remuneration of the members of the Management Board and the Supervisory Board pursuant to sec. 78a in conjunction with sec. 98a of the AktG ("Remuneration policy for the Management Board and the Supervisory Board" in accordance with 11 of the Bylaws of the Supervisory Board) and the preparation of the remuneration report to be produced by the Supervisory Board pursuant to sec. 78c of the AktG;
- (ii) The preparation of resolutions on compensation, including those affecting risk and risk management, to the extent that such resolutions are to be adopted by the Supervisory Board and are not subject to the approval authority of the Remuneration Committee pursuant to lit. c), with the exception of those resolutions that fall within the competence of the Personnel Committee.

(b) Approval of the following measures:

- (i) Establishing general principles of the remuneration policy and practices of the Company (RBI AG) taking into account the provision of sec. 39b of the BWG (including the annex to sec. 39b BWG), as well as the provisions of the Austrian Corporate Governance Code that are applicable in this respect and identifying the individuals to be regarded as risk personnel within the meaning of sec. 39b BWG;
  - (ii) Establishing general principles of the remuneration policy and practices for group companies of the Company (RBI Group) taking into account the provision of sec. 39b of the BWG (including the annex to sec. 39b BWG), and, in particular, establishing the selection process to be used for determining the extent to which these remuneration principles shall be applied to the individual group companies;
  - (iii) Establishing the performance management principles for the Management Board, taking into account the remuneration policy for the Management Board and the provisions of the Austrian Code of Corporate Governance;
  - (iv) Establishing principles concerning remuneration systems (taking into account the fixed and variable remuneration components and having regard to the principles of the Austrian Corporate Governance Code), which includes establishing principles concerning the granting of shares in profits or in turnover and the making of pension commitments to executives (leitende Angestellte) within the meaning of sec. 80 para. 1 of the Austrian Stock Corporation Act (Aktiengesetz, AktG);
  - (v) Granting options on shares of the Company or granting a program for the preferential transfer of shares of the Company to Management Board members, employees and executives of the Company or any of its affiliates as well as to members of the management boards and supervisory boards of affiliated companies. The possible adoption of a resolution by the shareholders' meeting within the meaning of the Austrian Corporate Governance Code shall not be affected thereby;
  - (vi) Deciding whether a "malus" or a "clawback event" within the meaning of the established remuneration principles has occurred (in a given year) and what consequences such an event shall have in view of the payout of any variable remuneration.
- (b) Monitoring and regular review of the remuneration policy, remuneration practices and remunerative incentive structures, in each case in connection with the control, monitoring and limitation of risks in accordance with the provisions of the BWG, with the equity base and with liquidity, while also taking the long-term interests of shareholders, investors and employees of the Company as well as the interest of the economy in having a functioning banking sector and stable financial markets into consideration;
- (c) Responsibility for monitoring the implementation of the remuneration policy and practices approved by it;
- (d) Direct review of the remuneration of senior risk management executives and senior executives holding compliance functions;
- (e) Preparing other resolutions concerning the topic of remuneration, including resolutions having an effect on risk and risk management, provided they have to be adopted by the Supervisory Board.

REMCO is also entitled at any time to request the Management Board to render report on the matters indicated above and to let the committee inspect any and all documentation that it may require for the proper fulfillment of its duties and responsibilities.

Three REMCO meetings took place in 2022 to decide on and take note of remuneration related topics.

Additionally, based on the requirements as provided by the Shareholder Rights Directive II (Directive (EU) 2017/828, implemented in Austrian law in sections 78a et seq. of the BWG), a remuneration report<sup>1</sup> for Board members as well as the Supervisory Board of RBI has been submitted to the General Assembly of RBI for advisory vote in 2022. This document contains the details about the remuneration received by the Board Members.

On a subsidiary level the compensation policies are structured in compliance with the RBI Group remuneration policy and are subject to approval by the respective local supervisory boards/REMCOs.

RBI AG's REMCO and the local supervisory boards/REMCOs take into account the input provided by all associated corporate functions (e.g., control functions, HR, Legal) about the design, implementation and oversight of the remuneration policies.

The Risk Committee, without prejudice to the duties and responsibilities of REMCO, reviews whether risk, capital, liquidity and the probability and timing of profit realization are appropriately reflected in the incentives offered by the internal remuneration system.

## The design and structure of the remuneration system

As a Group-wide standard, an Identified Staff Assessment approach is used based on the qualitative and quantitative criteria provided for in Commission Delegated Regulation (EU) 2021/923 to determine those staff members whose professional activities have a material impact on RBI Group's and a single institution's risk profile.

For this category of employees ("Identified Staff"), the relevant internal regulations of RBI Group provide for specific rules and consequences concerning their variable remuneration in compliance with regulatory requirements. These internal regulations have been updated regularly since their introduction to reflect and to be in line with the most current developments in the regulation of variable remuneration.

The remuneration rules are coherently applied in RBI Group, unless any applicable local laws require a different procedure. The RBI Group remuneration policy provides that, based on stricter local legal provisions in some EU countries, deviation from the Group standards for payment of variable compensation to Identified Staff is possible (this is the case e.g. in Bulgaria, Czech Republic, Croatia). The points described below apply to those Identified Staff.

### Fixed and variable remuneration

Throughout the RBI Group detailed analysis has been conducted to define the fixed or variable nature of each remuneration element, following the regulatory definitions listed below for fixed compensation elements. Fixed compensation elements:

- are predetermined;
- are non-discretionary;
- are transparent to staff and set in a predefined and objective manner;
- are permanent (meaning maintained over time and tied to a specific role and organizational responsibilities);
- do not provide incentives for risk assumption;
- are non-revocable (without prejudice to local legislation);
- cannot be reduced, suspended or cancelled by the Network Unit (NWU);
- do not depend on performance.

<sup>1</sup> <https://www.rbiinternational.com/de/investoren/corporate-governance.html>

### Ratio between fixed and variable remuneration

The fixed and variable components of the total compensation are appropriately balanced. The target variable compensation amount represents a significant part of total remuneration but without leading to unreasonable volatility in employees' compensation and excessive risk taking.

The target variable compensation does not exceed in any case the mandatory legal or regulatory thresholds (i.e. shall be fully in compliance with any provisions on the maximum permissible amount of the total variable compensation component) and the allocation and payment of variable compensation to Identified Staff is made in compliance with the bonus cap.

The RBI Group remuneration rules establish that the variable component of Identified Staff remuneration shall in principle not exceed 100 per cent of the bonus relevant fixed component of the total remuneration for each individual.

### Variable compensation

- is an important element of a total rewards philosophy and its purpose is to attract, motivate and retain employees.
- is based on clear performance criteria, which must be of both quantitative and qualitative nature and which are linked to risk-adjusted value creation. Any variable compensation program rewards and motivates behavior that drives specific company success and builds shareholder value.

The compensation philosophy actively reinforces the Group strategy to achieve its objectives.

If an employee is granted any variable compensation, it is to be paid for measured performance (Group, NWU, team and individual performance, depending on the respective employee category). Performance means results and behavior – "WHAT" and "HOW" – according to the NWU's/Group performance management system. All variable compensation schemes therefore are linked to performance management or a comparable target-setting system.

A "profit sharing approach" (for example, employee receives a percentage of income/profit/cash collected/money recovered, etc. irrespective of performance) is not supported, as it does not include all necessary elements of variable compensation schemes defined in the remuneration policy.

Variable compensation is reasonable and balanced in comparison to base pay (pay mix) and in line with regular local market practice. Each variable compensation scheme has a defined target for variable pay. Target variable compensation can be either expressed in per cent of base pay or in a local currency amount, and it represents the level of variable compensation for a 100 per cent performance level.

The pay mix (proportion of variable compensation to base pay) is balanced and reflects the impact on risk taking and "compliance" behavior of the employees (how much risk is an employee exposing the company to; is he/she incentivized to any degree to ignore company rules). It varies depending on the employee's position and role (e.g. sales functions or functions higher in the hierarchy may have a higher variable to fixed ratio than service or support functions or functions lower in the hierarchy).

Unethical or non-compliant behavior overrules any good financial performance generated and diminishes the staff member's variable compensation.

The performance management process provides differentiation of individual performance levels (low performer to high performer) and the variable pay-out corresponds to this. Performance differentiation is a necessary element of a performance culture – high performers are differentiated from average and low performers.

At NWU level, financial measures for variable compensation cover risk-adjusted profit and cost management related measures.

The variable compensation systems (with respect to measurement of performance and allocation within the institution) reflect all types of current and future risk, including difficult-to-measure risks such as liquidity risk, reputation risk and operational risk and take into account the cost of the capital and the liquidity required.

Control functions such as Risk Management and Compliance are involved in the process of establishing the appropriate measurements for variable compensation.

As a general principle, all employees can be eligible for variable compensation. There is a difference in variable compensation scheme design and level based on function, relative value of a position (job grades) and hierarchy (e.g., the higher in the hierarchy, the higher the respective bonus amount). The differentiation follows internal standards and local market practice.

## Severance payments

Severance payments are the amounts paid to staff members in connection with the early termination of their employment contract. They are paid either based on mandatory legal requirements (labor law, collective agreements, etc.), mandatorily following a decision of a court or on a voluntary basis (i.e. voluntary severance payments). They do not provide for a disproportionate reward, but for an appropriate compensation of the staff member in cases of early termination of the contract. They reflect performance achieved over time and do not reward failure or misconduct. Severance pay is not awarded where there is an obvious failure which allows for the immediate cancellation of the contract or the dismissal of staff.

Severance payments may include redundancy compensation for loss of office and may be subject to a non-competition clause in the contract.

In the following situations additional payments - made because of the early termination of a contract - are considered as severance payments:

- a) The NWU terminates the contracts of staff because of a failure of the NWU (including the following situations):
  - (i) where the NWU benefits from government intervention or is subject to early intervention or resolution measures in accordance with Directive 2014/59/EU;
  - (ii) where the opening of normal insolvency proceedings of the NWU, as defined in Article 2(1)(47) of Directive 2014/59/EU, has been filed;
  - (iii) where significant losses lead to the situation that the NWU no longer has a sound capital basis and, following this, the business area is sold or the business activity is reduced;
- b) The NWU wants to terminate the contract following a material reduction of the NWU's activities in which the staff member was active or where business areas are acquired by other institutions without the option for staff to stay employed in the acquiring institution;
- c) The NWU and a staff member agree on a settlement in the case of a potential or actual labor dispute, to avoid a decision on a settlement by the courts.

Criteria for allocation of the amounts of severance payments to Identified Staff are defined by each relevant NWU in line with the provisions of remuneration policy, in compliance with the special remuneration provisions for Identified Staff based on EU and local legal provisions. The decision-making process and involvement of control functions is defined in each relevant NWU based on the local governance structure in accordance with local legal requirements.

## Link between pay and performance

Performance is the basis for variable compensation and takes into account:

- individual/unit performance (including compliance with the RBI Group Code of Conduct and the Compliance regulations),
- the Group and subsidiary performance, risk costs, liquidity, and capital.

Individual performance is evaluated in relation to results achieved and behavior/competencies based on both quantitative and qualitative measures, assessed within the performance management process and by taking into account financial and non-financial criteria. Each employee's objectives are derived from the organizational strategic priorities and from the relevant business line, department, and team goals. Thus, they are aligned with the overall business objectives. Each objective is weighted (in per cent of a total of 100 per cent) according to its specific importance and/or to the efforts needed for achieving it.

The scope of staff for whom variable remuneration is foreseen is determined by the functional structure (grade and business area structure) of each company, which is also the basis for all compensation and benefit processes. Group/unit performance is evaluated in relation to results achieved based on quantitative measures following a specific KPI set.

In RBI Group, before any variable compensation may be allocated or paid out, a certain set of pre-defined criteria has to be fulfilled. These criteria in particular take into account the financial situation and capital ratios of RBI AG, RBI Group and its institutions.

For Group executives, one of these pre-conditions is that the individual performance for the respective performance year has to reach the level of at least "fully meets expectations". A bonus payment for Group executives therefore depends on the fulfillment of all the relevant, risk adjusted KPIs contained in the individual performance agreements. The final bonus amount is then determined based on the fulfillment of relevant KPIs on Group level (for 2022: ROE and CIR) for which strategic goals have been

defined on both Group as well as local company level. This measure further enforces the focus on a multi-year approach and the commitment to our shareholders.

For other bonus-eligible staff, variable compensation is based on bonus pools on company level. For this employee category the relevant ROE and CIR strategic goals have been defined on both Group as well as local company level.

Every variable remuneration system has fixed minimum and maximum performance grades and thus defines maximum pay-out values. Bonuses in general are linked to risk-adjusted measures, sustainable profit targets and capital costs of RBI Group and each entity within the Group.

Following a consistent approach for the whole RBI Group, members of the Management Board are also measured against a set of KPIs, either as performance or step-in criteria for bonus allocation. They are reviewed annually and aligned to regulatory requirements. Target numbers are derived from the budget approved by the Supervisory Board.

Besides the qualitative performance criteria, there are quantitative performance criteria which take into account the following factors (among others):

1. The company's business strategy and long-term interests of the credit institution:
  - a. CET 1 ratio (step-in)
  - b. SREP ratio (step-in)
  - c. Mid-term ROE
  - d. Mid-term Cost-Income Ratio
2. Solid risk management and long-term growth:
  - a. Recovery / workout
  - b. Adherence to risk cost budget
3. All current and future risk, cost of capital and cost of liquidity:
  - a. RORAC
  - b. Portfolio quality
  - c. Consolidated profit

The payment of a bonus is linked to the achievement of annually agreed goals from four or five areas based on a balanced scorecard approach. These are weighted financial goals (adjusted to the respective function, e.g., return on risk-adjusted capital, total costs, risk-weighted assets), customer and employee goals, as well as process/efficiency/infrastructure goals and, where necessary, additional goals. The amount of the bonus is determined based on ROE and the cost/income ratio; the targets to be achieved are based on RBI's medium-term return on equity target and thus consider a period spanning several years. Payment of bonuses is deferred as set forth in the BWG and implemented according to internal regulations. Management Board members' contracts specify a maximum bonus. A maximum limit is in place for all variable compensation components. Other remuneration consists of compensation for board-level functions in affiliated companies, payments to pension funds and for reinsurance policies, as well as other insurance and benefits.

### **Control functions**

The performance measures for control functions, such as risk, audit and compliance functions reflect specific requirements for these functions. Objectives for staff engaged in control functions are set in a manner that is independent from the performance of the business areas they oversee and commensurate with their key role in the firm. Individual performance criteria for those employees are not to be directly linked to the NWU's overall results (e.g., NPAT, RORAC).

Employees engaged in control functions are compensated independently of the business unit they supervise, have appropriate authority and their remuneration is determined on the basis of achievement of their organizational objectives linked to their functions, regardless of the results of the business activities they monitor. The mix of fixed and variable remuneration is weighted in favour of fixed remuneration.

### **Guaranteed variable remuneration**

Guaranteed variable remuneration is not consistent with sound risk management or the pay-for-performance principle and is not a part of prospective remuneration plans.

Guaranteed variable compensation is exceptional, can only occur where the NWU has a sound and strong capital base and cannot be granted for longer than the first year of employment. NWUs can only award guaranteed variable compensation once to the same single staff member. These requirements also apply at a consolidated and sub-consolidated level and include situations where staff receive a new contract from the same NWU or another institution within the scope of consolidation of RBI Group.

# Regulatory implications on variable compensation

## Deferral, vesting, retention

The remuneration policy of RBI Group provides for the following specific principles for the allocation, vesting and payment of variable remuneration to the Identified Staff with material risk impact on the risk profile of the respective NWU/the Group:

For RBI Group institutions with a potential impact on the Group risk profile the following principles apply:

- 60 per cent of the total variable remuneration is paid out up-front (50 per cent thereof in cash and 50 per cent in form of RBI phantom shares)
- 40 per cent of the total variable remuneration is subject to deferral and paid out pro rata over a period of at least four (in Austria: five) years; 50 per cent of the deferred variable remuneration is paid in cash and 50 per cent in form of RBI phantom shares.

Furthermore, in the event of a particularly high variable compensation amount, at least 60 per cent of the variable remuneration will be subject to deferral.

For other categories of employees having a less material impact on the company's risk profile, appropriate remuneration principles and risk alignment mechanisms have been implemented.

Due to stricter local legislations defined in some countries, the respective units use different parameters from the above mentioned (eg. Croatia).

## Ex ante and ex post risk adjustment

In RBI Group the variable remuneration (including the deferred part) may only be paid or vest if this is sustainable according to the financial situation of RBI AG and the financial situation of RBI Group or the respective subsidiary, and justified according to the performance of the Group, RBI AG or the subsidiary, the business unit and the individual concerned. A Malus event (as described below) may entail the reduction or forfeiture of outstanding (deferred) variable remuneration. A Clawback event (as described below) entails the loss of all deferred payments and the clawback of all payments made with regard to the variable remuneration.

## Malus

A Malus event may entail the reduction or forfeiture of outstanding (deferred) bonus payments.

In particular, the following events constitute a Malus event:

- If a Clawback event occurs (see below);
- A competent regulator orders a limitation or stop of variable compensation for the Group and/or NWU;
- Evidence of risk relevant misbehavior, serious error, non-compliance with due diligence requirements or serious breaches by the employee (e.g., breach of code of conduct and other internal rules, especially concerning risks) or failure to meet appropriate standards of fitness and propriety;
- RBI Group and/or subsequently the business unit in which the employee works suffers a significant downturn in its financial performance;
- RBI Group and/or the business unit in which the employee works suffers a significant failure of risk management, i.e., a risk adjustment of the assessment of the performance is made because ex-post risk assessment reveals that the original risk assessment was too positive;
- Significant changes in RBI Group's and/or the NWU's economic or regulatory capital base (e.g., RBI Group and/or the NWU is not fulfilling or close to not fulfilling regulatory capital requirements);
- Any regulatory sanctions where the conduct of the Identified Staff member contributed to the sanction;
- Significant contribution to subdued or negative financial performance or other conduct with intent or severe negligence which led to significant losses.

## **Clawback**

A Clawback event entails the loss of all deferred payments and the Clawback of all payments made with regard to the bonus.

Clawback is applied in the case of:

- Fraud, criminal offense or misleading information provided by the employee with high negative impact on the bank's credibility and profitability or
- Allocation or payment of variable compensation in willful violation of the remuneration principles provided for in the internal RBI Group remuneration principles or in willful violation of mandatory banking law provisions.

Each year every NWU conducts a Malus and Clawback check in compliance with the RBI Group Malus & Clawback instructions and other applicable Group standards/instructions and each NWU shall ensure enforceability of the defined Malus and Clawback events under local labor law.

For the avoidance of doubt if any deferred variable compensation payment is reduced or forfeited based on Malus or Clawback the respective amount is irrevocably lost and is not to be paid in later years.

## **Use of phantom shares**

The legal obligation of payment of at least 50 per cent of the variable remuneration in equity instruments is complied with in RBI Group by means of an RBI phantom share plan applicable in all relevant institutions of RBI Group.

50 per cent of the up-front and 50 per cent of the deferred variable remuneration is divided by the average closing price of RBI AG's shares on the Vienna Stock Exchange in the business year the variable remuneration is awarded for, serving as the basis for calculating the bonus. Thereby, a certain amount of RBI phantom shares is determined. This number of RBI phantom shares is fixed for the entire duration of the deferral period. After the expiration of the respective retention period, the amount of specified RBI AG phantom shares is multiplied by RBI AG's average closing share price for the previous financial year.

The RBI phantom shares are subject to a one-year retention period (with the exception of units where the local legislation is stricter).

In countries where the local legislation does not allow the usage of RBI phantom shares, local phantom share values are determined and used (e.g., Czech Republic and Slovakia).



# Quantitative Disclosure

## Remuneration awarded for the financial year

EU REM1 in EUR thousand	MB Supervisory function	MB Management function	Other senior management	Other identified staff
Fixed remuneration				
Number of identified staff	18	6	763	892
Total fixed remuneration	1,128	5,505	164,759	64,149
Of which: cash-based	1,128	5,505	164,759	64,149
Of which: shares or equivalent ownership interests	0	0	0	0
Of which: share-linked instruments or equivalent non-cash instruments	0	0	0	0
Of which: other instruments	0	0	0	0
Of which: other forms	0	0	0	0
Variable remuneration				
Number of identified staff	0	6	680	634
Total variable remuneration	0	4,821	41,361	12,512
Of which: cash-based	0	2,411	27,454	11,502
Of which: deferred	0	1,446	7,741	1,221
Of which: shares or equivalent ownership interests	0	0	717	0
Of which: deferred	0	0	255	0
Of which: share-linked instruments or equivalent non-cash instruments	0	2,411	13,189	1,010
Of which: deferred	0	1,446	6,768	427
Of which: other instruments	0	0	0	0
Of which: deferred	0	0	0	0
Of which: other forms	0	0	0	0
Of which: deferred	0	0	0	0
Total remuneration	1,128	10,327	206,120	76,661

Special payments to staff whose professional activities have a material impact on institutions' risk profile (identified staff)

EU REM2 in EUR thousand	MB Supervisory function	MB Management function	Other senior management	Other identified staff
<b>Guaranteed variable remuneration awards</b>				
Guaranteed variable remuneration awards - Number of identified staff	0	5	24	0
Guaranteed variable remuneration awards -Total amount	0	2	298	0
Of which guaranteed variable remuneration awards paid during the financial year, that are not taken into account in the bonus cap	0	0	39	0
<b>Severance payments awarded in previous periods, that have been paid out during the financial year</b>				
Severance payments awarded in previous periods, that have been paid out during the financial year - Number of identified staff	0	0	0	0
Severance payments awarded in previous periods, that have been paid out during the financial year - Total amount	0	0	0	0
<b>Severance payments awarded during the financial year</b>				
Severance payments awarded during the financial year - Number of identified staff	0	0	21	9
Severance payments awarded during the financial year - Total amount	0	0	1,214	244
Of which paid during the financial year	0	0	1,214	244
Of which deferred	0	0	0	0
Of which severance payments paid during the financial year, that are not taken into account in the bonus cap	0	0	660	31
Of which highest payment that has been awarded to a single person	0	0	636	77

## Deferred remuneration

EU REM3 Deferred and retained remuneration								
in EUR thousand	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
MB Supervisory function	0	0	0	0	0	0	0	0
Cash-based	0	0	0	0	0	0	0	0
Shares or equivalent ownership interests	0	0	0	0	0	0	0	0
Share-linked instruments or equivalent non-cash instruments	0	0	0	0	0	0	0	0
Other instruments	0	0	0	0	0	0	0	0
Other forms	0	0	0	0	0	0	0	0
MB Management function	8,372	2,786	5,585	0	0	(2,664)	2,650	992
Cash-based	3,970	1,261	2,710	0	0	0	1,279	0
Shares or equivalent ownership interests	0	0	0	0	0	0	0	0
Share-linked instruments or equivalent non-cash instruments	4,402	1,526	2,876	0	0	(2,664)	1,371	992
Other instruments	0	0	0	0	0	0	0	0
Other forms	0	0	0	0	0	0	0	0
Other senior management	26,595	10,499	16,096	0	0	(1,800)	10,225	4,791
Cash-based	14,366	5,681	8,685	0	0	0	5,641	0
Shares or equivalent ownership interests	0	0	0	0	0	0	0	0
Share-linked instruments or equivalent non-cash instruments	12,229	4,818	7,410	0	0	(1,800)	4,584	4,791
Other instruments	0	0	0	0	0	0	0	0
Other forms	0	0	0	0	0	0	0	0
Other identified staff	3,788	2,568	1,221	0	0	(400)	1,585	271
Cash-based	2,711	2,040	672	0	0	0	1,099	0
Shares or equivalent ownership interests	0	0	0	0	0	0	0	0
Share-linked instruments or equivalent non-cash instruments	1,077	528	549	0	0	(400)	486	271
Other instruments	0	0	0	0	0	0	0	0
Other forms	0	0	0	0	0	0	0	0
<b>Total amount</b>	<b>38,755</b>	<b>15,853</b>	<b>22,902</b>	<b>0</b>	<b>0</b>	<b>(4,864)</b>	<b>14,460</b>	<b>6,054</b>

## Remuneration of 1 million EUR or more per year

EU REM4	Identified staff that are high earners as set out in Article 450(i) CRR
EUR	
1,000,000 to below 1,500,000	3
1,500,000 to below 2,000,000	5
2,000,000 to below 2,500,000	1
2,500,000 to below 3,000,000	
3,000,000 to below 3,500,000	
3,500,000 to below 4,000,000	
4,000,000 to below 4,500,000	
4,500,000 to below 5,000,000	
5,000,000 to below 6,000,000	
6,000,000 to below 7,000,000	
7,000,000 to below 8,000,000	

## Information on remuneration of staff whose professional activities have a material impact on institutions' risk profile (identified staff)

EU REM5	Management body remuneration			Business areas						
in EUR thousand	Supervisory function	Management function	Total MB	Investment banking	Retail banking	Asset management	Corporate functions	Independent internal control functions	All other	Total
Total number of identified staff										1,679
Of which: members of the MB	18	6	24							
Of which: other senior management				148	168	32	285	124	6	
Of which: other identified staff				169	133	86	85	240	179	
Total remuneration of identified staff	1,128	10,327	11,455	69,343	52,036	22,608	91,541	43,358	3,895	
Of which: variable remuneration	0	4,821	4,821	14,644	8,883	4,753	18,423	7,170	0	
Of which: fixed remuneration	1,128	5,505	6,633	54,699	43,152	17,855	73,118	36,188	3,895	

# Article 451 CRR

## Leverage ratio

Within the framework of CRR and in addition to the Total Capital requirements the leverage ratio was implemented as a new instrument to limit the risk of excessive indebtedness. According to Article 429 CRR, the leverage ratio is the ratio of capital to the leverage exposure. This means Tier 1 capital in relation to unweighted exposure on and off the statement of financial position.

As at 31 December 2022, there is a mandatory quantitative requirement of 3 per cent.

## Description of the processes used to manage the risk of excessive leverage

As part of the recurring internal risk reporting, RBI monitors a comprehensive set of key risk and financial parameters and reports the results to the Asset and Liability Management Committee and the Management Board. Among other matters, this report covers the changes in and value of the leverage ratio according to CRR. The Group recovery plan and its governance rules stipulate that a potential negative development or the breach of internally set thresholds must be examined by the relevant bodies in order to facilitate early initiation of appropriate countermeasures.

## Description of the factors that had an impact on the leverage ratio during the period to which the disclosed leverage ratio refers

As at 31 December 2022 the leverage ratio of RBI amounted to 7.35 per cent on a transitional basis (7.15 per cent on a fully phased-in basis) as compared to 6.1 per cent at year-end 2021. The increase was mainly driven by an increase in Tier 1 capital of € 3,831 million compared to the 2021 year-end figure due to the inclusion of the result for the period and positive foreign exchange effects.

# Summary reconciliation of accounting assets and leverage ratio exposures

The following tables shows the summary reconciliation of accounting assets and leverage ratio exposures of RBI as at 31 December 2022 on a transitional basis:

EU LR1 in € thousand	Applicable amount
Total assets as per published financial statements	207,057,453
Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation	(375,285)
(Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference)	0
(Adjustment for temporary exemption of exposures to central bank (if applicable))	0
(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)	0
Adjustment for regular-way purchases and sales of financial assets subject to trade date accounting	0
Adjustment for eligible cash pooling transactions	0
Adjustments for derivative financial instruments	(4,325,670)
Adjustment for securities financing transactions (SFTs)	23,463,480
Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	13,153,023
(Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital)	0
(Adjustment for exposures excluded from the total exposure measure in accordance with point (c) of Article 429a(1) CRR)	(8,594)
(Adjustment for exposures excluded from the total exposure measure in accordance with point (j) of Article 429a(1) CRR)	0
Other adjustments	(3,324,768)
<b>Total exposure measure</b>	<b>235,639,638</b>

## Leverage ratio common disclosure

EU LR2 in € thousand	CRR leverage ratio exposures	
	31/12/2022	30/06/2022
On-balance sheet exposures (excluding derivatives and SFTs)		
On-balance sheet items (excluding derivatives, SFTs, but including collateral)	201,621,855	208,157,445
Gross-up for derivatives collateral provided where deducted from the balance sheet assets pursuant to the applicable accounting framework	0	0
(Deductions of receivables assets for cash variation margin provided in derivatives transactions)	0	0
(Adjustment for securities received under securities financing transactions that are recognised as an asset)	0	0
(General credit risk adjustments to on-balance sheet items)	0	0
(Asset amounts deducted in determining Tier 1 capital)	(691,617)	(929,173)
<b>Total on-balance sheet exposures (excluding derivatives and SFTs) (sum of lines 1 to 6)</b>	<b>200,930,237</b>	<b>207,228,272</b>

EU LR2 in € thousand	CRR leverage ratio exposures	
	31/12/2022	30/06/2022
Derivative exposures		
Replacement cost associated with SA-CCR derivatives transactions (ie net of eligible cash variation margin)	0	0
Derogation for derivatives: replacement costs contribution under the simplified standardised approach	0	0
Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions	0	0
Derogation for derivatives: Potential future exposure contribution under the simplified standardised approach	0	0
Exposure determined under Original Exposure Method	0	0
(Exempted CCP leg of client-cleared trade exposures) (SA-CCR)	0	0
(Exempted CCP leg of client-cleared trade exposures) (simplified standardised approach)	0	0
(Exempted CCP leg of client-cleared trade exposures) (original exposure method)	0	0
Adjusted effective notional amount of written credit derivatives	734,643	562,725
(Adjusted effective notional offsets and add-on deductions for written credit derivatives)	0	0
<b>Total derivatives exposures (sum of lines 8 to EU-12f)</b>	<b>734,643</b>	<b>562,725</b>
Securities financing transaction (SFT) exposures		
Gross SFT assets (with no recognition of netting), after adjustment for sales accounting transactions	19,257,135	20,338,042
(Netted amounts of cash payables and cash receivables of gross SFT assets)	(2,762,062)	(3,439,025)
Counterparty credit risk exposure for SFT assets	6,968,407	8,009,025
Derogation for SFTs: Counterparty credit risk exposure in accordance with Articles 429e(5) and 222 CRR	0	0
Agent transaction exposures	0	0
(Exempted CCP leg of client-cleared SFT exposure)	0	0
<b>Total securities financing transaction exposures</b>	<b>23,463,480</b>	<b>24,908,042</b>
Other off-balance sheet exposures		
Off-balance sheet exposures at gross notional amount	51,993,917	53,972,056
(Adjustments for conversion to credit equivalent amounts)	(38,840,894)	(39,985,143)
(General provisions deducted in determining Tier 1 capital and specific provisions associated with off-balance sheet exposures)		
<b>Off-balance sheet exposures (sum of lines 17 to 19)</b>	<b>13,153,023</b>	<b>13,986,913</b>
Excluded exposures		
(-) Exposures excluded from the leverage ratio total exposure measure in accordance with Article 429a(1)(c) of CRR	(2,641,744)	(2,694,781)
(-) Exposures exempted in accordance with point (j) of Article 429a(1) CRR (on and off balance sheet)	0	0
(-) Excluded exposures of public development banks (or untis) - Public sector investments	0	0
(-) Excluded exposures of public development banks (or untis) - Promotional loans	0	0
(-) Excluded passing-through promotional loan exposures by non-public development banks (or untis)	0	0
(-) Excluded guaranteed parts of exposures arising from export credits	0	0
(-) Excluded excess collateral deposited at triparty agents	0	0
(-) Excluded CSD related services of CSD/institutions in accordance with Article 429a(o) of the CRR	0	0
(-) Excluded CSD related services of designated institutions in accordance with Article 429a(1)(p) of the CRR	0	0
(-) Reduction of the exposure value of pre-financing or intermediate loans	0	0
(-) Total exempted exposures	(2,641,744)	(2,694,781)
Capital and total exposure measure		
<b>Tier 1 capital (fully phased-in definition)</b>	<b>16,845,892</b>	<b>16,045,662</b>
<b>Total exposure measure</b>	<b>235,639,638</b>	<b>243,991,172</b>

EU LR2 in € thousand	CRR leverage ratio exposures	
	31/12/2022	30/06/2022
Leverage ratio		
<b>Leverage ratio - using a fully phased-in definition of Tier 1 capital</b>	<b>7.15%</b>	<b>6.58%</b>
Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%)	7.15%	6.58%
Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves)	7.15%	6.58%
Regulatory minimum leverage ratio requirement	3.00%	3.00%
Additional own funds requirements to address the risk of excessive leverage (%)	0.00%	0.00%
of which: to be made up of CET1 capital	0.00%	0.00%
Applicable leverage buffers	0.00%	0.00%
Overall leverage ratio requirement (%)	3.00%	3.00%
Choice on transitional arrangements and relevant exposures		
Choice on transitional arrangements for the definition of the capital measure		
Disclosure of mean values		
Mean value of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables	14,610,618	12,417,735
Quarter-end value of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables	16,495,072	16,899,017
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)	233,755,184	239,509,890
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)	233,755,184	239,509,890
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)	7.21%	6.70%
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)	7.21%	6.70%

## Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)

EU LR3 in € thousand	CRR leverage ratio exposures
<b>Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:</b>	<b>189,630,436</b>
Trading book exposures	2,288,074
<b>Banking book exposures, of which:</b>	<b>187,342,362</b>
Covered bonds	39,119
Exposures treated as sovereigns	55,036,664
Exposures to regional governments, MDB, international organisations and PSE not treated as sovereigns	452,485
Institutions	11,110,169
Secured by mortgages of immovable properties	27,013,781
Retail exposures	28,840,051
Corporates	47,926,601
Exposures in default	3,026,583
Other exposures (eg equity, securitisations, and other non-credit obligation assets)	13,896,910



# Article 451a CRR

## Liquidity requirements

### Qualitative information on LCR

#### Explanations regarding the main drivers of LCR results and the evolution of the contribution of inputs to the LCR's calculation over time

Both the average liquid assets and the net outflows increased slightly. In general RBI Group shows a stable LCR result. The LCR consist of a solid retail deposit base in the network with a significant contribution of corporate deposits. The main drivers of volatility are interbank activities and secured financing transactions.

#### Explanations on the changes in the LCR over time

Changes in LCR over time are determined mainly by the development of the major balance sheet drivers like retail and corporate term deposits, or by the dynamics in loans to customers. Month-on-month volatility is mainly determined by the short-term capital markets business. The growth in the liquidity surplus in the previous period, driven by the significantly stronger increase in customer deposits compared to the increase in loans to customers, was reflected in the level of HQLA that resulted in increased LCR of NWBs.

#### Explanations on the actual concentration of funding sources

The LCR only considers outflows within the next 30 days. Therefore, the main contribution to concentration risk comes from unsecured non-operational wholesale funding from corporates, banks and other financial institutions. Internal models ensure that no or a very low liquidity value (stickiness) is applied to concentrated customers. Monitoring of such clients takes place in the internal stress test framework as well as through the Basel 3 Additional Liquidity Monitoring Metrics

#### High-level description of the composition of the institution's liquidity buffer

Half of the liquidity buffer consists of central bank reserves. The remaining part is mainly sovereign exposure.

#### Derivative exposures and potential collateral calls

Changes in LCR over time are determined mainly by the development of the major balance sheet drivers like retail and corporate term deposits, or by the dynamics in loans to customers. Month-on-month volatility is mainly determined by the short-term capital markets business. The growth in the liquidity surplus in the previous period, driven by the significantly stronger increase in customer deposits compared to the increase in loans to customers, was reflected in the level of HQLA that resulted in increased LCR of NWBs.

#### Currency mismatch in the LCR

For RBI the currency denomination of liquid assets is consistent with the distribution by currency of net liquidity outflows. Assets held in a third country where there are restrictions as to their free transferability are only considered to meet liquidity outflows in that third country. Furthermore, restrictions on currency mismatches are set through FX limits in the internal stress testing framework and through open currency position limits.

#### Other items in the LCR calculation not captured in the LCR disclosure template but that the institution considers relevant for its liquidity profile

A description of the degree of centralization of liquidity management and interaction between the Group's units:

For the LCR calculation within RBI, a Group standard is implemented that also covers special requirements of local regulators. The calculation is carried out centrally for all units. Each subsidiary is responsible for fulfilling the LCR and internal stress test requirements on a standalone basis. A monitoring and limit system for the LCR and the internal stress test is implemented both at a single unit level as well as at the overall RBI level. Additionally, RBI is the central institution of Raiffeisen Banking Group. Its main responsibilities as the central institution include the administration and investing of liquidity reserves as well as the reconciliation of liquidity within the Raiffeisen Banking Group. The affiliated banks have to hold a liquidity reserve at RBI under Article 27a Austrian Banking Act and can rely on obtaining liquidity under certain conditions. RBI ensures that the liquidity reserve is available at all times.

## Quantitative information on LCR

EU LIQ1 in € million	Total unweighted value (average)			
Quarter ending on:	31/12/2022	30/09/2022	30/06/2022	31/03/2022
Number of data points used in the calculation of averages	12	12	12	12
<b>HIGH-QUALITY LIQUID ASSETS</b>				
Total high-quality liquid assets (HQLA)				
<b>CASH - OUTFLOWS</b>				
Retail deposits and deposits from small business customers, of which:	60,962	60,922	60,468	58,591
Stable deposits	32,093	32,163	32,301	31,360
Less stable deposits	28,868	28,758	28,167	27,231
Unsecured wholesale funding	62,155	60,379	57,037	53,722
Operational deposits (all counterparties) and deposits in networks of cooperative banks	25,843	25,084	23,859	22,434
Non-operational deposits (all counterparties)	36,311	35,295	33,178	31,288
Unsecured debt	-	-	-	-
Secured wholesale funding				
Additional requirements	17,690	17,631	17,172	16,428
Outflows related to derivative exposures and other collateral requirements	852	745	692	659
Outflows related to loss of funding on debt products	-	-	-	-
Credit and liquidity facilities	16,818	16,867	16,461	15,753
Other contractual funding obligations	-	-	-	-
Other contingent funding obligations	42,065	41,055	39,365	37,149
TOTAL CASH OUTFLOWS				
<b>CASH - INFLOWS</b>				
Secured lending (e.g. reverse repos)	19,054	18,243	17,515	16,751
Inflows from fully performing exposures	16,062	15,009	12,926	11,021
Other cash inflows	962	918	847	731
TOTAL CASH INFLOWS	36,078	34,171	31,288	28,502
Inflows subject to 75% cap	36,078	34,171	31,288	28,502
<b>TOTAL ADJUSTED VALUE</b>				
LIQUIDITY BUFFER				
TOTAL NET CASH OUTFLOWS				
LIQUIDITY COVERAGE RATIO				

EU LIQ1	Total weighted value (average)			
In € millions				
Quarter ending on:	31/12/2022	30/09/2022	30/06/2022	31/03/2022
Number of data points used in the calculation of averages	12	12	12	12
<b>HIGH-QUALITY LIQUID ASSETS</b>				
Total high-quality liquid assets (HQLA)	41,357	40,033	39,345	38,412
<b>CASH - OUTFLOWS</b>				
Retail deposits and deposits from small business customers, of which:	5,587	5,555	5,463	5,269
Stable deposits	1,605	1,608	1,615	1,568
Less stable deposits	3,982	3,947	3,848	3,701
Unsecured wholesale funding	34,325	33,829	32,438	30,981
Operational deposits (all counterparties) and deposits in networks of cooperative banks	14,240	13,973	13,531	13,002
Non-operational deposits (all counterparties)	20,084	19,856	18,907	17,978
Unsecured debt	-	-	-	-
Secured wholesale funding	848	777	765	841
Additional requirements	2,838	2,738	2,642	2,516
Outflows related to derivative exposures and other collateral requirements	852	745	692	659
Outflows related to loss of funding on debt products	-	-	-	-
Credit and liquidity facilities	1,966	1,974	1,931	1,841
Other contractual funding obligations	-	-	-	-
Other contingent funding obligations	1,016	989	959	918
TOTAL CASH OUTFLOWS	45,629	44,869	43,198	41,455
<b>CASH - INFLOWS</b>				
Secured lending (e.g. reverse repos)	9,035	8,604	7,968	7,413
Inflows from fully performing exposures	14,104	13,022	10,887	8,942
Other cash inflows	681	660	618	526
TOTAL CASH INFLOWS	23,820	22,286	19,473	16,880
Inflows subject to 75% cap	23,820	22,286	19,473	16,880
<b>TOTAL ADJUSTED VALUE</b>				
LIQUIDITY BUFFER	41,357	40,033	39,345	38,412
TOTAL NET CASH OUTFLOWS	21,809	22,583	23,724	24,575
LIQUIDITY COVERAGE RATIO	193%	181%	167%	156%

## Net Stable Funding Ratio

The NSFR position is mainly driven by the organic growth in customer loans and customer deposits, which can also generate intraperiod volatility from the short-term loan business and volatile part of deposits. Additionally, wholesale funding activities, capital generation activities and TLTRO refinancing as stable funding sources also affect the development of the NSFR. Mergers and acquisition can from time to time also result in changes to the balance sheet of the Group and thus the NSFR. Nonetheless, the Group's funding structure remains driven by the solid customer deposit base. The increase in liquidity surplus in the previous period, driven by the significantly stronger growth in customer deposits compared to the increase of loans to customers had a positive impact on NSFR of NWBs, with additional contribution of MREL issuances in certain NWBs.

EU LIQ2 In € thousand	Unweighted value by residual maturity 31/12/2022				Weighted value
	No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
Available stable funding (ASF) Items					
Capital items and instruments	17,318,615	-	635,460	1,747,476	19,066,091
Own funds	17,318,615	-	635,460	1,747,476	19,066,091
Other capital instruments		-	-	-	-
Retail deposits		66,407,292	1,123,424	3,832,759	66,501,841
Stable deposits		36,705,452	1,123,270	3,832,617	39,769,903
Less stable deposits		29,701,840	154	143	26,731,938
Wholesale funding:		72,488,017	4,855,683	29,932,126	54,909,040
Operational deposits		13,540,164	0	0	722,634
Other wholesale funding		58,947,853	4,855,683	29,932,126	54,186,406
Interdependent liabilities		18,921	39,783	1,554,111	0
Other liabilities:	539,672	7,948,409	175,161	20,980,917	21,068,498
NSFR derivative liabilities	539,672				
All other liabilities and capital instruments not included in the above categories		7,948,409	175,161	20,980,917	21,068,498
Total available stable funding (ASF)					161,545,469
Required stable funding (RSF) Items					
Total high-quality liquid assets (HQLA)					1,786,530
Performing loans and securities:		-	40	1,520,549	1,292,500
Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		-	-	-	-
Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		36,667,608	8,258,741	83,960,885	83,420,763
Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		4,233,608	-	-	-
With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		17,449,919	905,591	1,922,926	3,726,045
Performing residential mortgages, of which:		13,273,838	6,980,927	70,931,362	70,787,997
With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		-	-	-	-
Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products		161,721	138,187	6,065,200	4,092,334
Interdependent assets		161,721	138,187	6,065,200	4,092,334
Other assets:		1,548,523	234,035	5,041,396	4,814,387
Physical traded commodities				72,044	61,237
Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		880,331	-	-	748,281
NSFR derivative assets		161,787			161,787
NSFR derivative liabilities before deduction of variation margin posted		1,537,103			76,855
All other assets not included in the above categories		12,847,372	264,538	30,544,354	31,130,662
Off-balance sheet items		17,212,442	-	-	929,477
Total RSF					119,608,093
Net Stable Funding Ratio (%)					135%

EU LIQ2 In € thousand	Unweighted value by residual maturity 30/06/2022				Weighted value
	No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
Available stable funding (ASF) Items					
Capital items and instruments	17,560,977	398,095	42,000	1,965,616	19,526,593
Own funds	17,560,977	398,095	42,000	1,965,616	19,526,593
Other capital instruments		-	-	-	-
Retail deposits		67,598,225	783,488	3,754,787	67,117,142
Stable deposits		35,604,090	772,176	3,754,675	38,312,128
Less stable deposits		31,994,135	11,312	112	28,805,014
Wholesale funding:		62,673,632	7,074,824	29,770,177	56,934,367
Operational deposits		15,577,084	6,471	2,317	871,545
Other wholesale funding		47,096,548	7,068,353	29,767,859	56,062,822
Interdependent liabilities		89,502	114,825	1,272,520	0
Other liabilities:	282,511	6,843,854	188,916	23,107,935	23,202,392
NSFR derivative liabilities	282,511				
All other liabilities and capital instruments not included in the above categories		6,843,854	188,916	23,107,935	23,202,392
Total available stable funding (ASF)					166,780,495
Required stable funding (RSF) Items					
Total high-quality liquid assets (HQLA)					2,182,132
Performing loans and securities:		-	30	1,202,263	1,021,949
Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		-	-	-	-
Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		39,876,747	9,238,499	87,142,294	87,710,537
Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		3,912,389	4,775	-	2,387
With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		19,389,559	910,051	2,335,919	4,220,865
Performing residential mortgages, of which:		14,752,165	7,872,155	73,836,238	74,628,519
With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		-	-	-	-
Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products		160,205	149,464	6,167,355	4,176,430
Interdependent assets		160,205	149,464	6,167,355	4,176,430
Other assets:		1,662,429	302,054	4,802,782	4,682,337
Physical traded commodities				34,714	29,507
Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		567,125	-	10,618	491,082
NSFR derivative assets		299,373			299,373
NSFR derivative liabilities before deduction of variation margin posted		1,478,230			73,912
All other assets not included in the above categories		13,859,355	257,755	31,285,603	31,909,226
Off-balance sheet items		18,894,929	-	-	995,558
Total RSF					124,713,275
Net Stable Funding Ratio (%)					134%

# Article 452 CRR

## Use of the IRB approach to credit risk

Approaches or transition arrangements approved by the competent authorities

### Approved approaches

Members of the Credit Institution Group that calculate risk-weighted exposure amounts using the Internal Ratings Based Approach at the consolidated and solo level

- Raiffeisen Bank International AG, Vienna (AT)
- Raiffeisenbank a.s., Prague (CZ)
- Raiffeisen Bank Zrt., Budapest (HU)
- Tatra banka a.s., Bratislava (SK)
- Raiffeisen Bank S.A. (RO)

Members of the Credit Institution Group that calculate risk-weighted exposure amounts using the Internal Ratings Based Approach at the consolidated level

- Raiffeisenbank Austria d.d., Zagreb (HR)
- AO Raiffeisenbank, Moscow (RU)
- Raiffeisen Bank Sh.a., Tirana (AL)
- Raiffeisen Bank d.d. Bosna i Hercegovina, Sarajevo (BA)
- Raiffeisen Banka a.d., Belgrade (RS)

Members of the Credit Institution Group and exposure classes for which permanent partial use has been applied

Exposure classes referred to in points (a) and (b) of Article 147 (2) CRR, where the number of material counterparties is limited and it would be unduly burdensome for the credit institution to implement a rating system for these counterparties – pursuant to points a) and b) of Article 150 (1) CRR.

Exposures in non-significant business units that are immaterial in terms of perceived risk profile as well as exposure classes that are immaterial in terms of size – pursuant to point c) of Article 150 (1) CRR.

That includes the following institutions:

- Subsidiaries of Raiffeisen Leasing International Gesellschaft m.b.H., Vienna (AT)
- Subsidiaries of Raiffeisen-Leasing Gesellschaft m.b.H., Vienna (AT)
- Kathrein & Co. Privatgeschäftsbank Aktiengesellschaft, Vienna (AT)
- Priorbank JSC, Minsk (BY)
- Raiffeisen Bank Kosovo J.S.C., Prishtina (XK)
- Other subsidiaries of RBI Credit Institution Group, which are ancillary services undertakings and immaterial in terms of size or risk profile.

Exposures to central governments, central banks (where it is applicable according to local law), regional and local governments and public sector entities, provided that exposures to central government are assigned a 0 per cent risk-weight under the standardized approach as provided in Article 114 (2) or (4) CRR, in accordance with Article 150 (1) lit d. or in Article 500a (3) CRR.

Exposures of a credit institution to a counterparty which is its parent undertaking, its subsidiary, a subsidiary of its parent undertaking or an undertaking linked by a relationship within the meaning of Article 12 (1) of Directive 83/349/EC established in the same country within the same banking group pursuant to point e) of Article 150 (1) CRR can be assigned a 0 per cent risk-weight under the conditions of Article 113 (6) CRR.

Exposures between institutions which meet the requirements set out in Article 113(7).

Exposures to institutions pursuant to Article 119 (4) CRR in form of minimum reserves with the European Central Bank or a central bank of an EU Member State and fulfilling the requirements of Article 119 (4) CRR.

Equity exposures to entities whose credit obligations qualify for a 0 per cent risk-weight under the standardized approach, in accordance with point g) of Article 150 (1) CRR.

State guarantees and state-reinsured guarantees in accordance with point j) of Article 150 (1) CRR

## Approved temporary partial use

### Members of the Credit Institution Group for which temporary partial use was applied

A stepwise implementation of the IRB approach pursuant to Article 148 CRR is applied for all institutions using the IRB approach at a later stage. Until then, the calculation of the minimum capital requirements is carried out according to the standardized approach for credit risk based on Part Three, Title II, Chapter 2 CRR. For the following institutions the temporary partial use is used:

- Raiffeisen Bank International AG, Vienna (AT)
- Raiffeisen Bank Aval JSC, Kiev (UA)
- Raiffeisen Bausparkasse Gesellschaft m.b.H., Vienna (AT)
- Raiffeisen stavebni sporitelna, a.s; Prague (CZ)

### Asset classes for which the temporary partial use was applied

A stepwise implementation of the IRB approach pursuant to Article 148 CRR is applied for asset classes for which the capital requirements are calculated in the IRB approach at a later stage. With the exception of Tatra banka a.s., Bratislava (SK), Raiffeisen Bank Zrt., Budapest (HU), Raiffeisenbank a.s. Prague (CZ), Raiffeisen Bank S.A. (RO), Raiffeisenbank EAD, Sofia (BG) ), Raiffeisen Bank Sh.a., Tirana (AL), Raiffeisen Bank d.d. Bosna i Hercegovina, Sarajevo (BA), and Raiffeisen Banka a.d., Belgrade (RS), which calculate risk-weighted exposure amounts using the IRB approach, the calculation of the minimum capital requirements is carried out according to the standardized approach for credit risk based on Part Three, Title II, Chapter 2 CRR. For the following asset classes the temporary partial use is used:

- Exposures to retail customers that are secured by residential real estate
- Qualifying revolving retail exposures
- Other exposures to retail customers

## Structure of the internal rating systems

External ratings are applied directly only for securitization items.

For all other items, an already existing external rating does not replace an internal rating and thus does not cancel the general obligation to create an internal rating. External ratings are not used as a model input factor in any rating model; they are solely used for the purpose of comparing them with internal ratings. When a rating is determined, external ratings and their documentation are viewed solely as additional information.

The comparison of external ratings against internal ratings in mapping tables is a central element particularly in the validation of low-default portfolios.

Below is a summary table on the exposure classes and the rating methods used for each:



Exposure Classes	Rating Model									
	PI	Micro SME	CORP	LCO	SMB	SLOT	INS	SOV	FIN	CIU
Retail	X	X								
Central banks and central governments								X		
Public sector entities and non-commercial organizations			X	X				X		
Financial institutions									X	
Corporate			X	X	X		X		X	X
Specialised Lending						X				
Private (non-retail)			X	X						
Equity exposures			X	X			X		X	

PI: Private individuals (retail), Micro SME: Small and medium enterprises, CORP: Corporate/Companies, LCO: Large companies, SMB: Small and medium business, SLOT: Project financing, INS: Insurance companies, SOV: Sovereigns, FIN: Financial institutions, CIU: Collective investment undertakings

## Use of internal estimates

Under the IRB approach, internal risk-parameter estimates are used not only to calculate capital requirements but are an essential part of credit decisions and credit management processes and also determine RBI's standard risk costs, profitability assessment and economic capital (Internal Capital Adequacy Assessment Process (ICAAP)).

## Control mechanism for rating systems

The non-retail rating models are centrally validated at RBI AG for all members of the RBI Credit Institution Group by the Rating Model Validation Unit which is independent of risk origination units and from the Credit Risk Control Unit. The rating systems are reviewed using prescribed validation tests comprising the following methods:

- Assessment of the documentation of the rating models
- Assessment of the assumptions underlying the rating models (model design)
- Assessment of the data used for validation (data quality)
- Assessment of the application of rating results
- Distribution analyses
- Review of the discriminatory power of the final rating
- Assessment of the discriminatory power of the individual rating inputs and in certain sub-portfolios
- Comparison of the predicted and observed default rate (backtesting)
- Assessment of the stability of the rating model
- Calculation of the migration matrices and their analysis
- Review of the relationship between internal and external ratings (benchmarking)

The validation function with regards to the retail models is to a large extent centralized in the RBI head office, with the involvement of the subsidiaries in specific aspects where needed. Since most of the retail models are developed in the subsidiaries, the independence of the development and validation functions is naturally ensured by reporting to different members of the senior management as well as independently from the risk origination unit. To allow for developing some of the models in RBI head office, a separate unit for methodologies and model developments was formed, which reports to a different member of the senior management.

Validation concerning the Basel models differentiates between initial and periodic validations for new (or redeveloped) models and for models already operating. The domains of the validation include the following areas:

- Assessment of the model's performance (stability, discriminatory power, accuracy, and goodness of fit)
- Assessment of the assumptions underlying the rating models (model design)
- Assessment of the environment of the model (data representativeness)
- Assessment of the data quality and related processes
- Assessment of the rating processes and the use test

Group Internal Audit teams as well as local Internal Audit teams regularly assess the processes as described above (model development, validation) as well as the compliance of those processes with internal regulations and regulatory requirements. Changes to the processes are also audited by those teams before they become effective.

# Description of the internal rating process

## General information

A client is assigned to a certain rating method based on the exposure class at the time the rating is determined. This mapping between the client's exposure class and the adequate rating model is a fixed part of the rating databases, which document the individual steps in the creation of a rating along with the rating process itself.

In all RBI models, the strict "four-eyes principle" (dual control) applies to the determination of the rating. Compliance is documented in the rating databases. All individuals and committees involved in the rating process must be recorded in that database.

Clients classified as equity exposures are subject to the same rating model as clients classified as corporate or institutional exposures depending on client type. Risk-weighted exposure amounts are determined for these items using the PD/LGD method.

## Rating corporates

### Scope of application

Corporate clients are either allocated to Large Corporates, Corporates, Corporate purchased receivables or the SMB rating model. The split between the Corporates and the SMB model is based on country specific thresholds for two criteria: "corporate client's turnover" and "exposure to bank". The split between Corporate and Large Corporate customers is based on thresholds for "total revenues" and "total assets", both of which have to be exceeded by Large Corporates. Corporate purchased receivables rating model is used for pools of corporate purchased receivables, i.e. those that are bought "in bulk".

### Development and objective

The Corporates rating model was developed by RBI experts using internal data from all units of the Group and state-of-the-art statistical methods as well as expert opinions of rating analysts from RBI Vienna and several RBI units.

Quantitative and qualitative factors are statistically combined to obtain a comprehensive assessment of the client's creditworthiness.

### Rating model

The Corporates rating model has essentially two components

- Quantitative analysis
- The model is based on the assessment of the corporate client's financial data. The quantitative variables as well as their weights have been estimated statistically in order to maximize discriminatory power over a one-year horizon
- Qualitative analysis

The qualitative model uses a set of key questions, which are answered by the analyst. The questions are operationalized to a large extent to ensure an objective assessment. The qualitative variables and their weights as well as the weights of the answers have been statistically estimated to maximize predictive power over a one-year horizon.

The two module scores are statistically combined to a total score which also include differentiation on industry, region, availability of the quantitative or qualitative information. The quality of financial information, the ownership support, and the recent development and forecast/projections are also considered in the final score.

The corporate client's rating ultimately emerges from the optimal combination of the final score followed by margin of conservatism and possible warning signs. The Corporates rating model differentiates risk depending on the customer's industry sector and country of risk.

### Rating output

The Corporates rating model results in a rating grade on a 25-grade scale which is assigned a certain probability of default.

This client rating is an essential factor in the loan decision and significantly influences the terms granted to the customer. The rating subsequently serves as the basis for determining capital adequacy.

## Rating process

The customer relationship manager obtains the financial data and supplementary information required for the rating. He then forwards those documents to the rating expert along with a request that the expert determine a rating. From that point on, the customer relationship manager has no direct influence on the determination of the rating apart from gathering additional information upon the request of the rating expert.

The input data is recorded and processed in the Corporates rating model solely by the rating expert. The process outcome is the issuance of a rating and thus an assignment of the client to an internal risk class. Ratings created in this manner are then documented in the rating database.

The rating analyst bears final responsibility for the rating and must critically assess the corporate client's financial data as well as relevant soft facts. Where necessary, the rating expert may adjust the rating to ensure a correct and fair assessment of the corporate client's creditworthiness.

## Rating large corporates

### Scope of application

The split between Corporate and Large Corporate customers is based on thresholds for "total revenues" and "total assets", both of which have to be exceeded by Large Corporates.

### Development and objective

The Large Corporates rating model was developed by RBI experts using external rating and balance sheet data, internal data from all units of the Group and state-of-the-art statistical methods as well as expert opinions of rating analysts from RBI Vienna and several RBI units.

Quantitative and qualitative factors are combined to obtain a comprehensive assessment of the client's creditworthiness.

### Rating model

The Large Corporates rating model has essentially three components:

- Quantitative analysis  
The model is based on the assessment of the corporate client's financial data. The quantitative variables as well as their weights have been estimated statistically with the aim to maximize discriminatory power over a one year horizon.
- Qualitative analysis  
The qualitative model uses a set of key questions, which are answered by the analyst. The questions are operationalized to a high extent so as to assure an objective assessment.
- Country risk factor based on rule of law from World Bank.

The module scores including the Rule of Law are combined to a total score. The quality of financial information, the ownership support, and the recent development and forecast/projections are also considered in the final score. The large corporate client's rating ultimately emerges from the optimal combination of the final score then followed by margin of conservatism and possible warning signs. The Large Corporates rating model differentiates risk depending on the industry sector and the country of risk of the customer.

### Rating output

The Large Corporate rating model results in a rating grade on a 25-grade scale, which is assigned a certain probability of default.

This client rating is an essential factor in the loan decision and significantly influences the terms granted to the customer. The rating subsequently serves as the basis for determining capital adequacy.

## Rating process

The customer relationship manager obtains the financial data and supplementary information required for the rating. He then forwards these documents to the rating expert along with a request that the expert determine a rating. From that point on, the customer relationship manager has no direct influence on the determination of the rating apart from gathering additional information upon the request of the rating expert.

The input data is recorded and processed in the Large Corporates rating model solely by the rating expert. The process outcome is the issuance of a rating and thus an assignment of the client to an internal risk class. Ratings created in this manner are then documented in the rating database.

The rating analyst bears final responsibility for the rating and must critically assess the corporate client's financial data as well as relevant soft facts. Where necessary, the rating expert can adjust the rating to ensure a correct and fair assessment of the corporate client's creditworthiness.

## Rating corporate purchased receivables

### Scope of application

Corporate purchased receivables rating model is used for pools of corporate purchased receivables, i.e. those that are bought "in bulk", as long as the purchased receivables fulfil all applicable regulatory requirements.

### Development and objective

The Corporate purchased receivables rating model was developed by RBI Vienna experts from business and risk divisions using mainly internal data.

### Rating model

The rating model is based on the assessment of the protracted loss history of a purchased receivables portfolio of the originator.

### Rating output

To determine the final rating, the calculated probability of default is mapped on the rating model master scale using a 25-grade scale.

This rating is an essential factor in the loan decision and significantly influences the terms granted to the pool of receivables. The rating subsequently serves as the basis for determining capital adequacy.

### Rating process

The product manager obtains the financial data and supplementary information required for the rating. She/he then forwards those documents to the rating expert along with a request that the expert determines a rating. From that point on, the product manager has no direct influence on the determination of the rating apart from gathering additional information upon the request of the rating expert.

The input data is recorded and processed in the Corporate purchased receivables rating model solely by the rating expert. The process outcome is the issuance of a rating and thus an assignment of the pool of receivables to an internal risk class. Ratings created in this manner are then documented in the rating database.

The rating analyst bears final responsibility for the rating and must critically assess the pool of receivables' financial data. Where necessary, the rating expert may adjust the rating to ensure a correct and fair assessment of the pool of receivables' creditworthiness.

## Small and Medium Business (SMB) rating model

### Scope of application

Corporate clients are allocated to either the Corporates or the SMB rating model according to the given country's threshold and based on two criteria: "corporate client's sales turnover" and "exposure to bank".

### Development and objective

The SMB rating model was developed by RBI experts using internal data from all units of the Group and state-of-the-art statistical methods as well as expert opinions of rating analysts from RBI Credit Management Retail. Quantitative, qualitative and behavioral factors are statistically combined to obtain a comprehensive assessment of the client's creditworthiness.

## Rating model

The SMB rating model has three components:

- Quantitative analysis  
This rating model is based on the client's financial data. The quantitative rating is determined from financial ratios selected statistically based on strong predictive power.
- Qualitative analysis  
The qualitative model uses a set of key questions, which are answered by the analyst. The questions are operationalized to a high extent so as to assure an objective assessment. The qualitative variables and their weights as well as the weights of the answers have been statistically estimated to maximize predictive power over a one year horizon.
- Behavioral analysis  
In the behavioral component, information from SMB clients' current accounts, loans and leasing products is evaluated. Data is delivered automatically and in a monthly frequency for rating evaluation.
- The SMB client's rating ultimately emerges from the combination of the behavioral and depending on the availability of a financial statement either the quantitative or qualitative assessments, and allocates the client to the correct rating grade.

## Rating output

The SMB model has a total of 25 rating notches for non-defaulted clients. This client rating is an essential factor in the loan decision and significantly influences the terms granted to the customer.

## Rating process

The SMB client's rating ultimately emerges from the combination of the quantitative and behavioral assessments or - in case of missing financials - qualitative input factors are also considered in the rating assignment. The rating analyst bears final responsibility for correctness and validity of all input data (financials or qualitative factors) used in the rating process.

The streamlined rating process is implemented in the SMB Rating Database (SMB RDB) where all created ratings are stored and documented. The rating assignment can be automated, resulting in a system-approved rating if all necessary financial information is available.

In the manual rating process the calculated rating is confirmed by the risk department of the network unit (NWU) in keeping with the "four-eyes principle" (dual control). Where necessary, the rating expert can adjust the rating to ensure a correct and fair assessment of the SMB client's creditworthiness.

## Sovereign risk rating (country rating)

### Scope of application

The country rating is applied as:

- A counterparty rating for central banks, central governments and public sector entities responsible to central governments
- A country rating to estimate the country risk when country limits are set up for cross-border transactions.
- A country ceiling for the estimation of transfer risks.

If applied as a counterparty rating, the rating is used for local and foreign currency exposures.

### Development and objective

The country rating model was first introduced in December 1999 as a result of the Asia crisis in 1997/98. The model underwent a revision in 2002 to comply with the Basel II requirements. In 2019 the model was further re-developed on a statistical basis, allowing regular maintenance and updating cycle.

The model shadows the rating grades of Standard&Poors (S&P) and provides a stable rating result over time.

The rating model assigns foreign currency (FC) and local currency (LC) ratings to sovereigns (ISO-code) and sovereign counterparts - central governments and public sector entities, as well as generates ratings for central banks.

## Rating model

The development of the model consists of two main steps: the development of the scoring function and the calibration.

The scoring function provides a ranking of the sovereigns via a continuous rating score. The obtained rating score is then subject to modification via negative information, which can lead to rating downgrades.

The estimation of default probabilities on rating grade level is based on a Bayesian approach using sovereign rating data from Standard and Poor's. Default probabilities are estimated starting sequentially from the worst rating grade CCC. For those rating grades for which no defaults are observed the prior weight is determined using sovereign data from Global Credit Data (GCD). The obtained default probabilities are calibrated to the long-term average default rate of Standard and Poor's.

The estimated default probabilities for the rating grades of Standard and Poor's allow to assign default probability to the continuous rating score of the scoring function using linear interpolation. Finally, the resulting default probability is checked against the internal default experience on portfolio level.

Several margins of conservatism are applied, covering the respective regulatory requirements.

The outcome of the calculated rating is the sovereign FC rating.

## Rating process

The rating process for sovereigns is organized centrally. All ratings for sovereigns and sovereign counterparts are done in RBI HO by the department Analysis Countries. The rating is created and archived in an internal rating database and then made available to all Group entities from there. The country rating from this rating database is also automatically used as a country ceiling in a few other rating models.

The calculated sovereign FC rating might be manually adjusted in case it does not adequately reflect certain material risk factors or mitigants.

Under pre-defined circumstances a local currency uplift can be performed to arrive at a sovereign LC rating.

A rating is determined for all countries for which RBI entities have a country limit and thus not only in the case of counterparty exposures to a sovereign or central bank. That means the number of countries is greater than the number of active exposures to sovereigns or central banks.

The client departments initiate country ratings when new country limits are to be set or applications are submitted for new sovereign counterparties.

Ratings are usually determined at least once a year and reviewed constantly by analysts to take into account any possible negative trends.

In all RBI models, the strict "four-eyes" principle (dual control) applies to the determination of the rating. Compliance is documented in the rating databases.

## Banks and financial institutions

### Scope of application

The RBI rating model for banks and bank-like institutions is applied when the creditworthiness of FI counterparties is assessed within RBI. The rating is a central element in the decision on whether or not to grant credit.

### Development and objective

The RBI rating model for banks and bank-like institutions was revised in 2015. The revised rating model received regulatory approval in October 2016 and since November 2016 it is used in all risk management processes.

The RBI rating model for banks and bank-like institutions was statistically developed by RBI experts using internal as well as external data applying the same best practice methodology as was used for developing the corporate rating models. During the development process close cooperation with the rating analysts from RBI was maintained.

The structure of the revised rating model for banks and bank-like institutions was chosen to be consistent with approaches used by external rating agencies. The rating is created in three steps:

The RBI rating model for banks and bank-like institutions was revised in 2015. The revised rating model received regulatory approval in October 2016 and since November 2016 it has been used in all risk management processes.

The RBI rating model for banks and bank-like institutions was statistically developed by RBI experts using internal as well as external data applying the same best practice methodology as was used for developing the corporate rating models. During the development process, close cooperation with the rating analysts from RBI was maintained.

The structure of the revised rating model for banks and bank-like institutions was chosen to be consistent with approaches used by external rating agencies. The rating is created in three steps:

- 1) Viability Rating (i.e., standalone view or rating before consideration of support)  
Quantitative factors (e.g., balance sheet ratios), qualitative factors and the risk of the financial sector are statistically combined in the rating before considering support.
- 2) Final Rating (i.e., rating after consideration of support)  
In the support module, ownership support and/or systemic support are assessed with respect to ability and willingness to provide support. Based on this assessment and following a strict logic, the viability rating can be improved leading to the final rating.
- 3) Country Ceiling  
In order to take into consideration the transfer risk of cross-border transactions, a country ceiling is applied.

## Rating model

The rating model for banks is subdivided into the following modules (or risk functions): quantitative modules, qualitative modules, financial sector risk assessment and support module.

The following aspects are assessed in the quantitative module using ratios derived from the financial statements:

- Profitability
- Asset Quality
- Liquidity
- Balance Sheet Metrics
- Income Structure

The following aspects are assessed in the qualitative module using a questionnaire with standardized possible answers:

- General & Business Position
- Asset Quality
- Funding & Liquidity
- Capitalization
- Profitability
- Outlook

The financial sector risk assessment (FISRA) is designed to assess the riskiness and instability of the business and economic environment the client has to operate in. The FISRA module is based on macro economic inputs.

The quantitative module and the qualitative module together with the FISRA module lead to the viability rating, i.e. the standalone (or before support) assessment of the client's creditworthiness.

In the support module ownership support and/or systemic support are assessed in terms of willingness and ability to support. Depending on the results from the support module and following a fixed logic the viability rating can be improved by some notches or grades to yield the final rating.

In order to take into consideration the transfer risk of cross-border transactions, a country ceiling is applied.

## Rating output

The rating model for banks and bank-like institutions results in a rating grade on a 25-grade scale (the same 25-grade scale as is used for the Corporate rating models) which is assigned a certain probability of default.

During the process of rating the client, the analyst writes an analysis text containing the essential background details, basic information and qualitative assessments of the counterparty.

The rating of the client is an essential factor in the loan decision and significantly influences the terms granted. The rating subsequently serves as the basis for determining capital adequacy.

## Rating process

The ratings for banks and bank-like institutions are created centrally by RBI AG in a specialized analysis department that works completely independently of any front office department. In a final step, the rating is created and archived in an internal rating database and made available to all Group entities from there.

The first rating is determined when a relationship is established with a new client. Every active client is rated once a year and/or after circumstances become known that lead to a rating change.

The rating analyst bears final responsibility for the rating and must critically assess the client's financial data as well as all relevant soft facts. If necessary, the rating expert can adjust the rating to ensure an appropriate assessment of the client's creditworthiness.

## Insurance companies

### Scope of application

The RBI rating model for insurance companies and undertakings similar to them is applied within the entire RBI Group to assess the creditworthiness of these companies and undertakings and is a central element in the decision on whether or not to grant credit.

### Development and objective

The model was developed in-house in 2002 based on the experience gained from the banking model already in use since the mid-1990s. The model is applied uniformly worldwide to all insurance companies and undertakings similar to them.

The quantitative section of the model is based on a benchmark system and qualifies as an expert model.

### Rating model

The rating model for insurance companies is divided into the following sections: the quantitative section, the qualitative section and risk assessment. The ratios applied to life and to non-life insurance differ, as do the weightings. The following parameters are reviewed in the quantitative section:

- Income
- Premium structure
- Capitalization and solvency
- Actuarial provisions
- Liquidity

The qualitative section assesses the company's environment and background information based, for example, on the following parameters:

- Owners and their creditworthiness
- Probability of internal and external support
- Changes in the legal environment
- General economic risk in the local market and in the local insurance market
- The position of the insurance company within the insurance sector

To estimate risk, the risk of the activities conducted by the insurance carrier is assessed based on activity type, the balance sheet and income structure of the activities, and the dependence of the activities on the economic and social environment.

### Rating output

The model has ten notches (nine non-default notches and one default notch). Parallel to scoring, the analyst produces an analysis text containing the essential background details, basic information and qualitative assessments of the client.

## Rating process

The rating for insurance companies is determined centrally by RBI AG in a specialized analysis department that works completely independently of any front office department.

The rating is created and archived in an internal rating database and made available to all Group entities from there.



The first rating is determined when a relationship is established with a new client. Every active client is rated once a year and/or after circumstances that lead to a rating change become known. Neither the analyst nor any other authority in the Group has the power to overrule the final rating.

## Collective Investment Undertakings/Investment Funds (CIUs)

### Scope of application

The rating model for CIUs is applied when the creditworthiness of fund counterparties is assessed within the RBI Group. The rating is a central element in the decision on whether or not to grant credit.

### Development and objective

RZB devised the CIU rating model in 2006. The model is applied uniformly for funds worldwide, taking especially into consideration the special regulations for funds regulated under EU directive (UCITS funds).

The CIU rating developed by RZB is a credit risk rating, not an investment rating. The objective of the rating is to estimate the credit risk of counterparties which are organized in the legal or organizational structure of a Collective Investment Undertaking.

### Rating model

The model has two components: quantitative scoring and qualitative scoring. In quantitative scoring, the scores are automatically calculated for the individual indicators based on benchmarks. The analysts assign qualitative scores manually with the aid of a scoring manual.

### Rating output

The model has ten notches (nine non-default notches and one default notch). Parallel to scoring, the analyst writes an analysis text containing the essential background details, basic information and qualitative assessments of the counterparty.

### Rating process

The ratings for CIUs are created centrally by RBI AG in a specialized analysis department that works completely independently of any front office department. In a final step, the rating is created and archived in an internal rating database and made available to all Group entities from there.

The first rating is determined when a relationship is established with a new client. Every active client is rated once a year and/or after circumstances that lead to a rating change become known.

Neither the analyst nor any other authority in the Group has the power to overrule the final rating.

## Rating Specialized Lending

### Scope of application

The term "specialized lending" as used in the EU Directive refers to structured financing and is a segment in the "Corporates" client class. This segment is differentiated from corporates in the narrower sense using the criteria defined in the EU Directive:

- Financing of assets
- Control over and access to the cash flow generated by the asset
- Control over and access to the asset itself
- The source of repayment of a project loan must be predominantly based on the cash flows generated by the assets (at least 80% over the maximum acceptable loan term), rather than on the cash flows produced by a broadly-operating company.

The model developed by RBI distinguishes between two submodels:

- Real estate finance
- Project finance

### Development and objective

The rating model for specialized lending was developed in-house by RBI experts and incorporates market experience from all RBI markets.

The model applies what is referred to as the “slotting criteria” approach. That means the projects are classified in five risk classes specified under law. These risk classes do not substantively denote probabilities of default but rather a combination of economic performance (PD) and the situation of the bank as regards collateral (LGD).

## Rating model

- Rating model is fully in compliance with regulatory technical standards (RTS) for Specialized lending;
- All required Factors and Sub-factors are implemented in the model and must be answered to calculate the rating;
- Weights assigned to Factors and Sub-factors are compliant with RTS limitations (5%-60%);
- Cash flow projection parameters and financed asset parameters are part of the rating information.

## Rating output

Rating slot is assigned based on answers to the Factors and Sub-factors questions, in compliance with RTS. Weights for each Factor/Sub-factor were set internally.

## Rating process

The product advisor/customer relationship manager/analyst proposes a rating. The “four-eyes principle” (dual control) applies, so the analyst/risk manager with rating responsibility is entitled to confirm the rating suggested by the advisor or to suggest another one. The rating tool shows both suggestions: the product advisor’s and the risk manager’s.

If the product advisor and risk manager suggested different ratings and fail to reach agreement on the rating, the rating suggested by the risk manager applies. However, the product advisor can initiate an “escalation process”, which can culminate in an overruling of the rating by the CRO.

## Private Individual (PI) rating model

### Scope of application

Clients are classified as retail private individuals by their occupational status and assigned and assessed by the retail PI rating method.

### Development and objective

The PI rating model methodology was developed by RBI AG Retail Risk Management and it is primarily based on empirical-statistical modelling techniques. The actual PI rating models are developed by experts in the RBI Credit Institution Group, using local customer databases in order to take into account local specificities for accurate assessment of the client creditworthiness. The PI rating method is applied in the case of applications for financing decisions (e.g. new retail loan applications) and regularly within the monthly update of the customer ratings (account management).

## Rating model

The PI rating model has two main components:

- **Statistical Scorecards**  
Scorecards (application and behavioral), as account-level rating models, assigning scores based on sociodemographic information, account performance data (e.g. days past-due), product attributes as well as external (e.g. credit bureau agency) information. The assessment of existing clients' behavior is performed monthly and provides necessary and essential inputs for timely risk classification.
- **Probability of Default Models**  
The probability of default models employ the statistical scorecards' outputs and statistical calibration techniques in order to arrive at the client's final rating and pool allocation. In certain RBI subsidiaries such as RBI Romania, the calibration is complemented by macroeconomic factors for further accuracy purposes.

## Rating output

The PI rating model has a total of 14 rating grades. Client rating is an essential factor for retail loan decision making and lending terms, as well as serving as the basis for calculation of capital requirements.

## Rating process

Retail PI clients' ratings are calculated monthly by validated statistical models and determined by experienced PI credit risk managers (e.g., for overrides and overrules) and stored historically in retail credit risk databases.

## Micro SME (Small and Medium Enterprises) rating model

### Scope of application

The Micro SME rating model applies to small commercial clients. This retail asset class can differ by RBI subsidiary, according to the given country's threshold that is based on two fundamental criteria: "exposure to bank" and "client's sales revenues".

### Development and objective

The Micro SME rating model methodology was developed by RBI AG Retail Risk Management and it is based on either empirical-statistical or expert modelling techniques, or a combination of the two.

The actual Micro SME rating models are developed by experts in the RBI Credit Institution Group, using local customer data-bases in order to take into account regional specificities and local expert qualitative information for accurate assessment of the client creditworthiness. The Micro SME rating method is applied in the case of applications for financing decisions (e.g. new loan applications) and regularly within the monthly update of the customer ratings (account management).

### Rating model

Like the PI rating model, the Micro SME rating model has two main components:

- **Statistical Scorecards**  
Scorecards (application and behavioral), as account-level rating models, assigning scores based on sociodemographic information, account performance data (e.g. days past-due), product attributes as well as external (e.g. credit bureau agency) information. The assessment of existing clients' behavior is performed monthly and provides necessary and essential inputs for timely risk classification.
- **Probability of Default Models**  
The probability of default models employ the statistical scorecards' outputs and statistical calibration techniques in order to arrive at the client's final rating and pool allocation.

### Rating output

The Micro SME rating model has a total of 14 rating grades. Client rating is an essential factor for retail loan decision making and lending terms, as well as serving as the basis for calculation of capital requirements.

## Rating process

Retail Micro SME clients' ratings are calculated monthly by validated models and determined by experienced Micro SME credit risk managers (e.g. for overrides and overrules) and stored historically in retail credit risk databases.

## Definitions, methods and data for the estimation and validation of Probability of Default (PD)

The probabilities of default (PDs) to be estimated for each rating notch indicate the probability with which clients assigned to a given rating notch will default over the following 12 months.

The PDs are estimated internally for the following retail and non-retail rating models: PI, Micro SME, Corporates, Large Corporates, SMB, Sovereign, Financial Institutions, Insurance Companies and Collective Investment Undertakings (CIU).

The "slotting criteria" approach was selected for the specialized lending segment and covers the economic situation and the collateral situation of the bank. The specialized lending rating model results in an assignment of the client to one of the five risk classes under supervisory law in Article 153 (5) CRR (four non-default categories and one default category).

The PDs refer to a period of 12 months and contain an adequate margin of conservatism.

The estimation of the 12-month PD is based on the RBI definition of default, which is a bank specific implementation of the Basel II definition of default. In November 2019, the RTS 2018/171 under Article 178(6) on the materiality threshold for past due credit obligations, Regulation (EU) 2018/1845 of the European Central Bank and the latest EBA Guideline on Default Definition (EBA/GL/2016/07) (later named "new DoD") including more precise definitions of when a customer/facility is considered to be in default was implemented by RBI Group after thorough assessment by the ECB. The following factual elements of a default apply (areas of increased precision are marked in parenthesis):

- Material obligation being overdue for more than 90 days (updated thresholds) (thresholds were harmonized across the EU leading to an increase of the absolute triggers plus an update of the relative trigger connected by an "AND" instead of "OR" condition and the way days past due are counted)
- Initiation of insolvency proceedings
- Write-off of an exposure
- Call of an exposure
- Distressed restructuring of the loan (more detailed requirements in detection implemented)
- Waiving of interest payments
- Sale of an exposure with loss
- Revocation of banking license (applicable to financial institutions only)
- Payment moratorium (applicable to sovereigns only)
- Expected economic loss
- Cross default on product level (retail specific)

Additionally, the rules regarding curing from default were harmonized by including unified probation periods per default trigger.

The output of the statistical rating models (PI, Micro SME, Corporate, Large Corporate, SMB and FI) is an individual probability of default (PD), on a scale between 0% and 100%, allocated to each customer. These PDs are recalibrated to the long-term average default rates including potential adjustments. Based on the PDs, customers are allocated to a grade on a rating scale. For each rating grade, a lower and upper PD limit is defined. In the consecutive processes (for example for RWA calculation or margins), one representative PD per rating grade is used.

Due to the small number of defaults in the sovereign portfolio, the external data is used for the development and validation of the sovereign probability of default. The S&P sovereign rating grades are used as a target variable in the development of the scoring function. Additionally, the default probabilities are estimated and calibrated based on the S&P portfolio and with the use of the GCD data.

The low-default portfolio Insurance has such a small number of defaults that the default data from Moody's Credit Risk Calculator was applied, beginning with the time series in January 1983 and scaled to a portfolio default rate representative of RBI's default experience, yet still conservative.

For the low-default portfolio CIU the estimation of the one-year default probability is based on internal default analysis. Consistent with Art. 179 (1) (d) and 179 (1) (f) CRR conservative add-ons are applied to the PD estimates.

## Qualitative disclosure

### Scope of the use of IRB and SA approaches

EU CR6-A in € thousand	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 (%)
Central governments or central banks	4,808,940	62,500,221	92.31%	0.00%	7.69%
Of which Regional governments or local authorities		1,426,478	0.00%	0.00%	0.00%
Of which Public sector entities		591,316	80.83%	0.00%	19.17%
Institutions	12,138,167	13,966,468	13.09%	0.00%	86.91%
Corporates	57,357,144	70,310,743	18.42%	0.00%	81.58%
Of which Corporates – Specialised lending, excluding slotting approach		0	0.00%	0.00%	0.00%
Of which Corporates – Specialised lending under slotting approach		5,996,895	0.00%	0.00%	100.00%
Retail	20,687,703	42,588,611	39.85%	11.57%	48.58%
of which Retail – Secured by real estate SMEs		200,715	61.28%	2.34%	36.38%
of which Retail – Secured by real estate non-SMEs		25,902,885	39.71%	6.96%	53.33%
of which Retail – Qualifying revolving		1,448,176	0.00%	0.00%	100.00%
of which Retail – Other SMEs		2,471,344	65.84%	3.93%	30.23%
of which Retail – Other non-SMEs		12,565,491	39.28%	24.07%	36.65%
Equity	258,402	1,269,007	79.64%	0.00%	20.36%
Other non-credit obligation assets	536,240	1,725,065	68.91%	0.00%	31.09%
<b>Total</b>	<b>95,786,595</b>	<b>192,360,115</b>	<b>47.64%</b>	<b>2.56%</b>	<b>49.80%</b>

The following tables show for each exposure class in F-IRB the credit risk exposures and PD (template EU CR6), the back-testing of PD (template EU CR9) and the CCR exposures by PD scale (template EU CCR4).

## Total

EU CR6													
In € thousand													
	On-balance sheet exposures	Off-balance-sheet exposures pre-CCF	Exposure weighted average CCF	Exposure post CCF and CRM	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													
0.00 to <0.15	16,253,561	12,364,473	0.33%	19,954,100	0.07%	3538	44.39%	11	5,253,551	26.33%	6,113	(8,959)	
0.00 to <0.10	12,904,687	7,831,069	0.36%	15,414,293	0.05%	2508	44.53%	12	3,635,960	23.59%	3,699	(3,470)	
0.10 to <0.15	3,348,875	4,533,404	0.28%	4,539,807	0.12%	1030	43.91%	9	1,617,591	35.63%	2,415	(5,489)	
0.15 to <0.25	8,428,901	8,982,890	0.31%	10,136,494	0.18%	2934	43.30%	12	4,257,985	42.01%	7,942	(87,737)	
0.25 to <0.50	7,163,376	6,260,048	0.31%	8,294,200	0.34%	3149	44.34%	12	4,917,849	59.29%	12,442	(68,515)	
0.50 to <0.75	6,230,589	4,147,245	0.24%	6,577,765	0.60%	3798	43.14%	12	4,717,665	71.72%	16,265	(95,544)	
0.75 to <2.50	7,212,905	4,958,824	0.20%	7,477,164	1.34%	6211	43.53%	12	7,010,810	93.76%	43,339	(85,097)	
0.75 to <1.75	4,667,240	3,775,783	0.22%	4,837,592	1.11%	4232	43.29%	12	4,269,646	88.26%	22,974	(67,896)	
1.75 to <2.5	2,545,666	1,183,041	0.17%	2,639,572	1.77%	1979	43.98%	12	2,741,164	103.85%	20,366	(17,201)	
2.50 to <10.00	4,404,261	2,149,810	0.23%	4,595,958	2.98%	4717	41.88%	12	4,610,252	100.31%	55,027	(103,463)	
2.5 to <5	3,626,273	1,836,111	0.23%	3,790,326	2.38%	3737	41.55%	12	3,611,213	95.27%	35,681	(75,915)	
5 to <10	777,987	313,700	0.24%	805,632	5.81%	980	43.46%	12	999,039	124.01%	19,347	(27,548)	
10.00 to <100.00	2,041,729	1,047,245	0.11%	1,728,782	22.22%	9004	43.31%	12	3,182,381	184.08%	165,975	(182,462)	
10 to <20	1,286,879	258,348	0.11%	1,059,112	8.64%	724	44.07%	12	1,750,156	165.25%	39,959	(86,565)	
30 to <30	211,999	46,647	0.00%	164,528	21.87%	233	34.68%	9	295,900	179.85%	11,730	(14,979)	
30.00 to <100.00	542,852	742,250	0.08%	505,142	50.81%	8047	44.52%	12	1,136,325	224.95%	114,286	(80,918)	
100.00 (Default)	1,361,158	159,637	0.25%	1,194,680	98.05%	1617	45.37%	12	5,984	0.50%	531,659	(694,541)	
Subtotal (exposure class)	53,096,480	40,070,172		59,959,143		34,968			33,956,478	56.63%	838,763	(1,326,318)	
Total (all exposures classes)	53,096,480	40,070,172		59,959,143		34,968			33,956,478	56.63%	838,763	(1,326,318)	

EU CR9							
in € thousand							
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 (%)	
0.00 to <0.15	4266	2	0.36%	0.07%	0.09%	0.10%	
0.00 to <0.10	3028	2	0.44%	0.05%	0.07%	0.11%	
0.10 to <0.15	1238	0	0.00%	0.12%	0.16%	0.06%	
0.15 to <0.25	3296	7	15.67%	0.18%	0.21%	3.32%	
0.25 to <0.50	3504	8	2.58%	0.34%	0.34%	1.52%	
0.50 to <0.75	4340	9	0.42%	0.60%	0.65%	0.51%	
0.75 to <2.50	7176	49	18.20%	1.34%	1.42%	8.26%	
0.75 to <1.75	4767	24	26.22%	1.11%	1.20%	10.06%	
1.75 to <2.5	2409	25	1.96%	1.77%	1.87%	1.55%	
2.50 to <10.00	5845	110	4.61%	2.98%	4.12%	3.55%	
2.5 to <5	4444	53	4.10%	2.38%	3.15%	2.77%	
5 to <10	1401	57	6.80%	5.81%	7.21%	6.53%	
10.00 to <100.00	9033	186	25.40%	22.22%	37.06%	11.98%	
10 to <20	721	42	11.59%	8.64%	13.73%	13.87%	
20 to <30	301	34	34.34%	21.87%	22.26%	12.56%	
30.00 to <100.00	8011	110	23.10%	50.81%	39.72%	8.23%	
100.00 (Default)	2007	0	0.00%	98.05%	100.00%	0.00%	

## Exposure to central governments and central banks

EU CR6												
In € thousand												
PD range	On-balance sheet exposures	Off-balance-sheet exposures pre-CCF	Exposure weighted average CCF	Exposure post CCF and post CRM	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
0.00 to <0.15	306,578	0	0.00%	335,830	0.03%	11	45.00%	3	48,933	14.57%	44	(15)
0.00 to <0.10	306,578	0	0.00%	335,830	0.03%	11	45.00%	3	48,933	14.57%	44	(15)
0.10 to <0.15	0	0	0.00%	0	0.00%	0	0.00%	0	0	0.00%	0	0
0.15 to <0.25	113,907	2,885	0.00%	130,615	0.15%	9	45.00%	3	47,490	36.36%	86	(20)
0.25 to <0.50	1,480,283	29,778	0.50%	901,674	0.40%	7	45.00%	3	595,878	66.09%	1,617	(586)
0.50 to <0.75	781,445	0	0.00%	522,775	0.66%	6	45.00%	3	409,279	78.29%	1,541	(684)
0.75 to <2.50	1,480,816	4,441	0.49%	1,227,947	1.74%	22	45.00%	3	1,412,563	115.03%	9,591	(255)
0.75 to <1.75	441,085	194	0.18%	159,259	1.30%	18	45.00%	3	165,543	103.95%	930	(5)
1.75 to <2.5	1,039,731	4,247	0.50%	1,068,688	1.80%	4	45.00%	3	1,247,020	116.69%	8,661	(250)
2.50 to <10.00	28,596	220	0.75%	173,511	0.33%	4	45.00%	3	83,659	48.22%	255	(98)
2.5 to <5	14,147	220	0.00%	151,057	0.35%	1	45.00%	3	77,784	51.49%	236	(95)
5 to <10	14,449	1	0.75%	22,455	0.19%	3	45.00%	3	5,874	26.16%	19	(3)
10.00 to <100.00	38,189	0	0.00%	5,811	0.12%	15	45.00%	3	1,062	18.27%	3	(14)
10 to <20	0	0	0.00%	926	0.56%	0	45.00%	3	491	52.96%	2	(13)
30 to <30	15,194	0	0.00%	0	0.00%	1	0.00%	0	0	0.00%	0	0
30.00 to <100.00	22,996	0	0.00%	4,885	0.04%	14	45.00%	3	571	11.69%	1	0
100.00 (Default)	349,741	41,030	0.50%	183,646	99.98%	5	45.00%	3	27	0.01%	82,622	(9,094)
Subtotal (exposure class)	4,579,557	78,354		3,481,810		79			2,598,890	74.64%	95,759	(10,765)
Total (all exposures classes)	53,096,480	40,070,172		59,959,143		34,968			33,956,478	56.63%	838,763	(1,326,318)



EU CR9 in € thousand							
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 (%)	
0.00 to <0.15	18	0	0.00%	0.03%	0.06%	0.00%	
0.00 to <0.10	17	0	0.00%	0.03%	0.05%	0.00%	
0.10 to <0.15	1	0	0.00%	0.00%	0.12%	0.00%	
0.15 to <0.25	13	2	15.39%	0.15%	0.16%	3.08%	
0.25 to <0.50	8	0	0.00%	0.40%	0.40%	0.00%	
0.50 to <0.75	22	0	0.00%	0.66%	0.62%	0.00%	
0.75 to <2.50	6	1	16.67%	1.74%	1.51%	3.33%	
0.75 to <1.75	4	1	25.00%	1.30%	1.34%	5.00%	
1.75 to <2.5	2	0	0.00%	1.80%	1.86%	0.00%	
2.50 to <10.00	4	0	0.00%	0.33%	4.14%	0.00%	
2.5 to <5	3	0	0.00%	0.35%	3.42%	0.00%	
5 to <10	1	0	0.00%	0.19%	6.30%	0.00%	
10.00 to <100.00	11	2	18.18%	0.12%	36.83%	3.64%	
10 to <20	1	0	0.00%	0.56%	11.60%	0.00%	
20 to <30	0	0	0.00%	0.00%	0.00%	0.00%	
30.00 to <100.00	10	2	20.00%	0.04%	39.35%	4.00%	
100.00 (Default)	0	0	0.00%	99.98%	0.00%	0.00%	

EU CCR4 in € thousand							
PD scale	Exposure value	Exposure weighted average PD (%)	Number of obligors	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	RWEA	Density of risk weighted exposure amount
0.00 to <0.15	31,206	0.02%	1	45.00%	2	3,745	12.00%
0.15 to <0.25	13,281	0.22%	1	2.11%	0	179	1.35%
0.25 to <0.50	145,816	0.40%	1	30.63%	0	42,879	29.41%
0.50 to <0.75	0	0.00%	0	0.00%	0	0	0.00%
0.75 to <2.50	0	0.00%	0	0.00%	0	0	0.00%
2.50 to <10.00	0	0.00%	0	0.00%	0	0	0.00%
10.00 to <100.00	0	0.00%	0	0.00%	0	0	0.00%
100.00 (Default)	0	0.00%	0	0.00%	0	0	0.00%
Sub-total	190,303	0.33%	3	31.00%	0	46,803	24.59%

## Exposure to institutions

EU CR6 PD range	On-balance sheet exposures	Off-balance- sheet exposures pre-CCF	Exposure weighted average CCF	Exposure post CCF and post CRM	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
0.00 to <0.15	8,366,270	1,748,758	0.11%	8,636,652	0.06%	332	42.22%	3	2,163,272	25.05%	2,014	(442)
0.00 to <0.10	7,526,214	1,511,363	0.09%	7,651,432	0.05%	300	42.92%	3	1,796,559	23.48%	1,523	(333)
0.10 to <0.15	840,055	237,395	0.20%	985,220	0.12%	32	36.82%	3	366,713	37.22%	490	(110)
0.15 to <0.25	1,368,733	276,360	0.17%	881,479	0.18%	80	29.63%	3	347,691	39.44%	514	(245)
0.25 to <0.50	53,330	12,165	0.33%	88,395	0.31%	19	0.99%	3	54,956	62.17%	115	(56)
0.50 to <0.75	3,875	11,402	0.21%	52,639	0.16%	7	27.82%	3	13,781	26.18%	30	(8)
0.75 to <2.50	1,667	33,179	0.36%	138,503	0.21%	42	34.54%	3	47,777	34.50%	118	(32)
0.75 to <1.75	1,645	7,171	0.54%	122,790	0.13%	27	33.20%	3	37,549	30.58%	57	(19)
1.75 to <2.5	22	26,009	0.31%	15,713	0.86%	15	45.00%	3	10,228	65.09%	61	(12)
2.50 to <10.00	0	7,101	0.48%	100,322	0.17%	12	44.99%	3	33,279	33.17%	75	(556)
2.5 to <5	0	2,730	0.64%	73,154	0.11%	4	44.99%	3	20,748	28.36%	36	(542)
5 to <10	0	4,371	0.38%	27,168	0.32%	8	45.00%	3	12,530	46.12%	39	(14)
10.00 to <100.00	3,595	88	0.20%	9,446	18.57%	94	45.00%	3	9,837	104.15%	789	(173)
10 to <20	0	88	0.20%	4,328	0.09%	1	45.00%	3	773	17.87%	2	0
30 to <30	0	0	0.00%	1,523	0.16%	0	45.00%	3	629	41.28%	1	(147)
30.00 to <100.00	3,595	0	0.00%	3,595	48.63%	93	45.00%	3	8,435	234.67%	787	(26)
100.00 (Default)	604	10,145	0.21%	17,496	15.09%	4	44.17%	3	2,982	17.04%	1,188	(5,787)
Subtotal (exposure class)	9,798,074	2,099,197		9,924,930		590			2,673,574	26.94%	4,843	(7,300)
Total (all exposures classes)	53,096,480	40,070,172		59,959,143		34,968			33,956,478	56.63%	838,763	(1,326,318)

EU CR9							
in € thousand							
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 (%)	
0.00 to <0.15	318	1	0.31%	0.06%	0.07%	0.06%	
0.00 to <0.10	265	1	0.38%	0.05%	0.06%	0.08%	
0.10 to <0.15	53	0	0.00%	0.12%	0.13%	0.00%	
0.15 to <0.25	87	0	0.00%	0.18%	0.20%	0.00%	
0.25 to <0.50	45	1	2.22%	0.31%	0.37%	1.07%	
0.50 to <0.75	18	0	0.00%	0.16%	0.61%	0.00%	
0.75 to <2.50	36	0	0.00%	0.21%	1.48%	1.11%	
0.75 to <1.75	30	0	0.00%	0.13%	1.36%	1.43%	
1.75 to <2.5	6	0	0.00%	0.86%	2.04%	0.00%	
2.50 to <10.00	21	0	0.00%	0.17%	4.49%	0.00%	
2.5 to <5	9	0	0.00%	0.11%	2.87%	0.00%	
5 to <10	12	0	0.00%	0.32%	5.71%	0.00%	
10.00 to <100.00	89	0	0.00%	18.57%	41.15%	0.00%	
10 to <20	2	0	0.00%	0.09%	12.60%	0.00%	
20 to <30	0	0	0.00%	0.16%	0.00%	0.00%	
30.00 to <100.00	87	0	0.00%	48.63%	41.80%	0.00%	
100.00 (Default)	2	0	0.00%	15.09%	100.00%	0.00%	

EU CCR4							
in € thousand							
PD scale	Exposure value	Exposure weighted average PD (%)	Number of obligors	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	RWEA	Density of risk weighted exposure amount
0.00 to <0.15	1,593,935	0.08%	98	37.87%	1	269,550	16.91%
0.15 to <0.25	510,826	0.19%	17	39.18%	0	164,011	32.11%
0.25 to <0.50	2,837	0.43%	7	45.00%	2	2,042	71.98%
0.50 to <0.75	851	0.61%	1	0.21%	0	3	0.37%
0.75 to <2.50	646	1.48%	6	45.00%	2	801	123.97%
2.50 to <10.00	10,204	2.77%	2	2.75%	0	996	9.76%
10.00 to <100.00	0	0.00%	3	0.00%	0	0	0.00%
100.00 (Default)	0	0.00%	0	0.00%	0	0	0.00%
Sub-total	2,119,299	0.12%	134	38.01%	1	437,404	20.64%

## Exposure to corporates - SME

EU CR6 in € thousand	On-balance sheet exposures	Off-balance- sheet exposures pre-CCF	Exposure weighted average CCF	Exposure post CCF and post CRM	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												
0.00 to <0.15	170,197	250,270	0.10%	148,767	0.08%	2033	43.27%	3	23,526	15.81%	51	(1,073)
0.00 to <0.10	122,243	170,958	0.11%	106,823	0.06%	1453	43.46%	3	14,944	13.99%	30	(691)
0.10 to <0.15	47,954	79,312	0.07%	41,943	0.12%	580	42.77%	3	8,581	20.46%	21	(383)
0.15 to <0.25	378,608	575,208	0.18%	451,476	0.21%	2023	42.68%	3	134,345	29.76%	407	(1,652)
0.25 to <0.50	413,455	548,005	0.10%	393,118	0.36%	2114	43.39%	3	159,304	40.52%	594	(3,677)
0.50 to <0.75	793,426	830,083	0.10%	782,077	0.67%	2662	43.09%	3	416,552	53.26%	2,153	(5,785)
0.75 to <2.50	1,782,171	1,418,787	0.14%	1,761,859	1.43%	4536	42.66%	3	1,235,357	70.12%	10,463	(19,975)
0.75 to <1.75	1,126,566	962,551	0.12%	1,113,347	1.19%	3019	42.59%	3	740,179	66.48%	5,483	(12,270)
1.75 to <2.5	655,605	456,237	0.16%	648,511	1.84%	1517	42.78%	3	495,178	76.36%	4,980	(7,705)
2.50 to <10.00	1,549,928	714,616	0.11%	1,504,002	3.60%	3727	40.16%	3	1,252,447	83.27%	20,809	(26,267)
2.5 to <5	1,321,708	642,188	0.11%	1,283,626	3.11%	2997	39.99%	3	1,036,432	80.74%	15,117	(19,797)
5 to <10	228,220	72,428	0.11%	220,376	6.45%	730	41.18%	3	216,015	98.02%	5,692	(6,469)
10.00 to <100.00	109,648	46,559	0.16%	99,776	20.75%	3025	42.70%	3	141,527	141.84%	8,905	(11,924)
10 to <20	67,830	18,817	0.16%	56,984	12.80%	271	42.11%	3	74,283	130.36%	3,066	(4,270)
30 to <30	29,463	8,314	0.00%	29,734	22.73%	192	43.21%	3	47,265	158.96%	2,917	(5,948)
30.00 to <100.00	12,356	19,428	0.17%	13,058	50.94%	2562	44.09%	3	19,979	153.00%	2,922	(1,707)
100.00 (Default)	204,998	40,375	0.17%	201,771	99.89%	777	43.75%	3	96	0.05%	88,169	(147,442)
Subtotal (exposure class)	5,402,431	4,423,904		5,342,846		20,897			3,363,153	62.95%	131,551	(217,794)
Total (all exposures classes)	53,096,480	40,070,172		59,959,143		34,968			33,956,478	56.63%	838,763	(1,326,318)

EU CR9  
in € thousand

PD range	Number of obligors at the end of previous year	Of which number of		Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
		obligors which defaulted in the year					
0.00 to <0.15	2241	1		0.05%	0.08%	0.08%	0.03%
0.00 to <0.10	1595	1		0.06%	0.06%	0.06%	0.01%
0.10 to <0.15	646	0		0.00%	0.12%	0.12%	0.06%
0.15 to <0.25	2038	4		0.20%	0.21%	0.20%	0.05%
0.25 to <0.50	2135	6		0.28%	0.36%	0.36%	0.12%
0.50 to <0.75	2711	6		0.22%	0.67%	0.65%	0.29%
0.75 to <2.50	4837	38		0.79%	1.43%	1.44%	0.62%
0.75 to <1.75	3118	18		0.58%	1.19%	1.20%	0.47%
1.75 to <2.5	1719	20		1.16%	1.84%	1.87%	0.93%
2.50 to <10.00	4380	91		2.08%	3.60%	4.16%	2.12%
2.5 to <5	3321	40		1.20%	3.11%	3.15%	1.49%
5 to <10	1059	51		4.82%	6.45%	7.35%	4.29%
10.00 to <100.00	2822	102		3.61%	20.75%	44.41%	3.46%
10 to <20	367	30		8.17%	12.80%	13.43%	7.44%
20 to <30	232	28		12.07%	22.73%	22.37%	6.79%
30.00 to <100.00	2223	44		1.98%	50.94%	51.83%	2.95%
100.00 (Default)	796	0		0.00%	99.89%	100.00%	0.00%

## Exposure to corporates - Other

EU CR6 In € thousand PD range	On-balance sheet exposures	Off-balance- sheet exposures pre-CCF	Exposure weighted average CCF	Exposure post CCF and post CRM	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
0.00 to <0.15	7,410,517	10,365,446	0.37%	10,832,851	0.08%	1162	44.75%	3	3,017,820	27.86%	4,004	(7,429)
0.00 to <0.10	4,949,651	6,148,749	0.43%	7,320,208	0.06%	744	44.77%	3	1,775,523	24.26%	2,102	(2,433)
0.10 to <0.15	2,460,866	4,216,697	0.28%	3,512,644	0.12%	418	44.72%	3	1,242,296	35.37%	1,903	(4,996)
0.15 to <0.25	6,567,654	8,128,437	0.32%	8,672,925	0.18%	822	43.67%	3	3,728,459	42.99%	6,936	(85,820)
0.25 to <0.50	5,216,307	5,670,100	0.33%	6,911,013	0.33%	1009	44.45%	3	4,107,712	59.44%	10,116	(64,196)
0.50 to <0.75	4,651,842	3,305,760	0.28%	5,220,274	0.59%	1123	43.11%	3	3,878,053	74.29%	12,541	(89,066)
0.75 to <2.50	3,948,251	3,502,417	0.23%	4,348,855	1.23%	1611	43.66%	3	4,315,113	99.22%	23,167	(64,836)
0.75 to <1.75	3,097,943	2,805,868	0.24%	3,442,195	1.11%	1168	43.67%	3	3,326,376	96.64%	16,504	(55,602)
1.75 to <2.5	850,308	696,549	0.17%	906,660	1.70%	443	43.61%	3	988,737	109.05%	6,664	(9,234)
2.50 to <10.00	2,825,737	1,427,872	0.28%	2,818,123	2.91%	974	42.53%	3	3,240,868	115.00%	33,889	(76,543)
2.5 to <5	2,290,419	1,190,972	0.29%	2,282,490	2.17%	735	42.10%	3	2,476,248	108.49%	20,292	(55,481)
5 to <10	535,318	236,900	0.26%	535,633	6.07%	239	44.35%	3	764,620	142.75%	13,597	(21,063)
10.00 to <100.00	1,890,297	1,000,598	0.11%	1,613,749	22.41%	5870	43.33%	3	3,029,956	187.76%	156,277	(170,351)
10 to <20	1,219,049	239,443	0.11%	996,874	8.45%	452	44.18%	3	1,674,609	167.99%	36,890	(82,282)
30 to <30	167,342	38,334	0.00%	133,271	21.93%	40	32.66%	3	248,007	186.09%	8,811	(8,884)
30.00 to <100.00	503,906	722,821	0.08%	483,604	51.33%	5378	44.52%	3	1,107,340	228.98%	110,576	(79,185)
100.00 (Default)	805,815	68,087	0.33%	791,767	98.96%	831	45.90%	3	2,879	0.36%	359,680	(532,218)
Subtotal (exposure class)	33,316,418	33,468,716		41,209,557		13,402			25,320,860	61.44%	606,610	(1,090,459)
Total (all exposures classes)	53,096,480	40,070,172		59,959,143		34,968			33,956,478	56.63%	838,763	(1,326,318)

EU CR9 in € thousand							
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 (%)	
0.00 to <0.15	1582	0	0.00%	0.08%	0.08%	0.01%	
0.00 to <0.10	1044	0	0.00%	0.06%	0.06%	0.02%	
0.10 to <0.15	538	0	0.00%	0.12%	0.12%	0.00%	
0.15 to <0.25	1095	1	0.09%	0.18%	0.19%	0.07%	
0.25 to <0.50	1243	1	0.08%	0.33%	0.35%	0.08%	
0.50 to <0.75	1476	3	0.20%	0.59%	0.65%	0.22%	
0.75 to <2.50	1943	9	0.46%	1.23%	1.41%	0.52%	
0.75 to <1.75	1316	4	0.30%	1.11%	1.19%	0.48%	
1.75 to <2.5	627	5	0.80%	1.70%	1.87%	0.61%	
2.50 to <10.00	1357	18	1.33%	2.91%	4.03%	1.19%	
2.5 to <5	1054	12	1.14%	2.17%	3.21%	0.93%	
5 to <10	303	6	1.98%	6.07%	6.92%	2.24%	
10.00 to <100.00	6067	81	1.34%	22.41%	33.70%	1.07%	
10 to <20	351	12	3.42%	8.45%	13.93%	3.07%	
20 to <30	25	5	20.00%	21.93%	21.49%	5.32%	
30.00 to <100.00	5691	64	1.13%	51.33%	34.97%	1.28%	
100.00 (Default)	1161	0	0.00%	98.96%	100.00%	0.00%	

EU CCR4 Corporates in € thousand								
PD scale	Exposure value	Exposure weighted average PD (%)	Number of obligors	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	RWEA	Density of risk weighted exposure amount	
0.00 to <0.15	845,439	0.06%	354	44.01%	1	169,528	20.05%	
0.15 to <0.25	245,432	0.20%	132	34.66%	1	82,613	33.66%	
0.25 to <0.50	95,298	0.34%	112	45.00%	2	58,833	61.74%	
0.50 to <0.75	51,088	0.61%	149	45.00%	2	40,245	78.78%	
0.75 to <2.50	44,502	1.44%	163	42.15%	2	45,973	103.31%	
2.50 to <10.00	47,188	5.10%	83	26.11%	1	39,973	84.71%	
10.00 to <100.00	44,060	37.05%	75	45.00%	2	106,779	242.35%	
100.00 (Default)	322	100.00%	1	45.00%	2	0	0.00%	
Sub-total (Exposure class Corporates)	1,373,329	1.55%	1069	41.80%	1	543,944	39.61%	

## Retail exposure

The following tables provide a breakdown of retail credit risk exposures (A-IRB) by exposure class and PD (template EU CR6). The average maturity is not used for the RWA calculation and therefore not shown in the tables below.

### Total

EU CR6 In € thousand	On-balance sheet exposures	Off-balance- sheet exposures pre-CCF	Exposure weighted average CCF	Exposure post CCF and post CRM	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												
0.00 to <0.15	1,116,961	253,313	0.82%	1,322,850	0.11%	140529	26.14%	0	92,074	6.96%	373	(958)
0.00 to <0.10	4,192	83,378	0.73%	64,668	0.08%	55921	52.89%	0	7,698	11.90%	29	(33)
0.10 to <0.15	1,112,770	169,936	0.86%	1,258,183	0.11%	84608	24.77%	0	84,376	6.71%	344	(925)
0.15 to <0.25	3,581,216	642,374	0.76%	4,058,652	0.19%	212504	25.44%	0	395,725	9.75%	1,978	(4,817)
0.25 to <0.50	4,102,751	634,687	0.66%	4,422,019	0.34%	376312	28.64%	0	719,668	16.27%	4,343	(14,177)
0.50 to <0.75	2,781,430	470,647	0.74%	2,941,075	0.64%	385848	36.64%	0	926,584	31.50%	6,722	(15,655)
0.75 to <2.50	4,647,215	587,626	0.60%	4,977,440	1.32%	854797	46.91%	0	2,698,698	54.22%	31,442	(50,093)
0.75 to <1.75	3,529,739	422,392	0.60%	3,772,933	1.07%	578895	44.78%	0	1,844,450	48.89%	17,849	(29,441)
1.75 to <2.5	1,117,477	165,234	0.61%	1,204,507	2.10%	275902	53.59%	0	854,249	70.92%	13,593	(20,652)
2.50 to <10.00	1,545,869	123,160	0.66%	1,606,421	5.18%	455187	52.18%	0	1,463,818	91.12%	44,533	(72,789)
2.5 to <5	942,110	89,203	0.66%	991,248	3.74%	309669	51.40%	0	831,675	83.90%	19,449	(33,413)
5 to <10	603,759	33,957	0.66%	615,173	7.50%	145518	53.44%	0	632,143	102.76%	25,084	(39,376)
10.00 to <100.00	495,855	20,711	0.66%	496,819	25.37%	343735	55.63%	0	772,748	155.54%	71,331	(83,177)
10 to <20	256,890	11,879	0.62%	256,664	14.33%	69031	55.62%	0	363,935	141.79%	20,956	(34,099)
30 to <30	82,734	1,772	0.73%	83,128	26.16%	18179	48.76%	0	133,723	160.86%	10,479	(9,534)
30.00 to <100.00	156,231	7,060	0.72%	157,027	43.01%	256525	59.29%	0	275,091	175.19%	39,896	(39,544)
100.00 (Default)	499,610	5,899	0.66%	497,778	100.00%	85678	66.45%	0	232,429	46.69%	312,403	(300,667)
Subtotal (exposure class)	18,770,909	2,738,416		20,323,053		2,854,590			7,301,744	35.93%	473,125	(542,335)
Total (all exposures classes)	18,770,909	2,738,416		20,323,053		2,855			7,301,744	0	473,125	(542,335)



## Retail – secured by immovable property (Non-SME)

EU CR6												
In € thousand												
PD range	On-balance sheet exposures	Off-balance-sheet exposures pre-CCF	Exposure weighted average CCF	Exposure post CCF and post CRM	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
0.00 to <0.15	1,100,199	68,266	1.00%	1,168,465	0.11%	13576	22.61%	0	70,579	6.04%	285	(848)
0.00 to <0.10	2,189	0	0.00%	2,189	0.07%	148	40.97%	0	161	7.37%	1	(6)
0.10 to <0.15	1,098,010	68,266	1.00%	1,166,275	0.11%	13428	22.58%	0	70,418	6.04%	285	(841)
0.15 to <0.25	3,507,440	332,589	0.91%	3,808,688	0.19%	44624	23.81%	0	368,346	9.67%	1,706	(4,583)
0.25 to <0.50	3,865,906	223,452	0.85%	3,954,367	0.34%	53225	25.85%	0	646,835	16.36%	3,518	(13,287)
0.50 to <0.75	2,295,040	69,693	1.00%	2,198,210	0.66%	54911	31.21%	0	677,797	30.83%	4,437	(13,192)
0.75 to <2.50	1,700,337	101,661	0.63%	1,756,203	1.19%	31236	26.81%	0	691,792	39.39%	5,627	(19,767)
0.75 to <1.75	1,499,115	97,107	0.64%	1,560,795	1.08%	24263	26.35%	0	566,177	36.27%	4,397	(14,152)
1.75 to <2.5	201,222	4,554	0.42%	195,408	2.07%	6973	30.44%	0	125,614	64.28%	1,230	(5,614)
2.50 to <10.00	332,165	13,626	0.94%	333,502	4.35%	11301	28.67%	0	305,357	91.56%	4,261	(17,333)
2.5 to <5	217,713	13,050	0.96%	224,363	3.30%	6821	27.79%	0	173,721	77.43%	2,092	(8,270)
5 to <10	114,452	576	0.60%	109,139	6.50%	4480	30.47%	0	131,636	120.61%	2,169	(9,064)
10.00 to <100.00	113,308	318	0.98%	109,236	20.60%	3239	30.61%	0	183,562	168.04%	6,780	(15,191)
10 to <20	67,647	20	0.96%	64,390	12.27%	2091	32.12%	0	106,608	165.57%	2,567	(8,338)
30 to <30	29,263	123	1.00%	29,385	27.23%	660	26.27%	0	47,674	162.24%	2,106	(3,046)
30.00 to <100.00	16,398	176	0.98%	15,461	42.68%	488	32.59%	0	29,280	189.38%	2,107	(3,807)
100.00 (Default)	193,674	638	0.90%	192,370	100.00%	5770	51.94%	0	112,940	58.71%	90,876	(88,188)
Subtotal (exposure class)	13,108,068	810,242		13,521,042		217,882			3,057,208	22.61%	117,492	(172,388)
Total (all exposures classes)	18,770,909	2,738,416		20,323,053		2,855			7,301,744	0	473,125	(542,335)

## Retail – secured by immovable property (SME)

EU CR6 In € thousand	On-balance sheet exposures	Off-balance- sheet exposures pre-CCF	Exposure weighted average CCF	Exposure post CCF and post CRM	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												
0.00 to <0.15	770	1,954	0.91%	2,550	0.14%	106	50.95%	0	322	12.63%	2	(6)
0.00 to <0.10	0	0	0.00%	0	0.00%	0	0.00%	0	0	0.00%	0	0
0.10 to <0.15	770	1,954	0.91%	2,550	0.14%	106	50.95%	0	322	12.63%	2	(6)
0.15 to <0.25	4,724	1,164	0.90%	5,518	0.24%	203	50.82%	0	1,040	18.85%	7	(14)
0.25 to <0.50	246	0	0.00%	246	0.32%	2	42.23%	0	62	25.06%	0	(3)
0.50 to <0.75	6,660	1,167	0.86%	7,153	0.54%	178	50.63%	0	2,447	34.21%	19	(23)
0.75 to <2.50	28,463	73	0.91%	28,130	1.50%	334	51.23%	0	23,466	83.42%	216	(526)
0.75 to <1.75	26,250	73	0.91%	26,117	1.46%	274	51.29%	0	21,858	83.69%	195	(381)
1.75 to <2.5	2,214	0	0.00%	2,013	2.02%	60	50.50%	0	1,608	79.87%	20	(145)
2.50 to <10.00	22,299	12	0.86%	22,129	4.04%	265	55.01%	0	35,406	160.00%	495	(810)
2.5 to <5	13,433	0	0.00%	13,261	2.77%	138	54.27%	0	17,477	131.79%	199	(406)
5 to <10	8,866	12	0.86%	8,868	5.95%	127	56.12%	0	17,929	202.17%	296	(404)
10.00 to <100.00	3,171	321	1.00%	3,322	28.79%	123	54.63%	0	8,411	253.19%	531	(552)
10 to <20	1,804	0	0.00%	1,697	15.12%	71	54.70%	0	4,298	253.29%	142	(283)
30 to <30	344	0	0.00%	282	27.17%	16	50.89%	0	677	239.88%	39	(44)
30.00 to <100.00	1,022	321	1.00%	1,343	46.41%	36	55.33%	0	3,437	255.85%	350	(225)
100.00 (Default)	2,457	0	0.00%	2,419	100.00%	55	76.40%	0	633	26.19%	1,802	(1,078)
Subtotal (exposure class)	68,790	4,690		71,467		1,266			71,787	100.45%	3,072	(3,011)
Total (all exposures classes)	18,770,909	2,738,416		20,323,053		2,855			7,301,744	0	473,125	(542,335)

## Retail – qualifying revolving

EU CR6 In € thousand	On-balance sheet exposures	Off-balance- sheet exposures pre-CCF	Exposure weighted average CCF	Exposure post CCF and post CRM	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												
0.00 to <0.15	1,020	4,769	0.40%	2,948	0.09%	1817	48.93%	0	87	2.95%	1	(4)
0.00 to <0.10	718	4,076	0.37%	2,224	0.08%	1419	47.16%	0	54	2.43%	1	(2)
0.10 to <0.15	302	694	0.61%	724	0.14%	398	54.38%	0	33	4.56%	1	(2)
0.15 to <0.25	41,813	238,232	0.55%	172,290	0.21%	115935	49.38%	0	9,960	5.78%	178	(97)
0.25 to <0.50	97,548	403,377	0.56%	322,511	0.35%	301871	51.82%	0	30,041	9.31%	595	(661)
0.50 to <0.75	92,549	222,453	0.62%	230,595	0.64%	234747	50.83%	0	33,515	14.53%	747	(703)
0.75 to <2.50	264,601	405,845	0.58%	498,523	1.51%	388101	57.15%	0	155,435	31.18%	4,299	(3,657)
0.75 to <1.75	153,056	259,792	0.56%	298,432	1.10%	238712	56.89%	0	73,524	24.64%	1,854	(1,703)
1.75 to <2.5	111,545	146,053	0.61%	200,090	2.11%	149389	57.55%	0	81,911	40.94%	2,445	(1,954)
2.50 to <10.00	121,719	60,722	0.61%	158,548	5.18%	126713	56.46%	0	116,114	73.24%	4,661	(3,303)
2.5 to <5	77,929	45,157	0.58%	104,128	3.96%	78854	56.24%	0	64,606	62.04%	2,332	(1,807)
5 to <10	43,790	15,565	0.68%	54,420	7.51%	47859	56.88%	0	51,508	94.65%	2,329	(1,496)
10.00 to <100.00	36,804	9,443	0.62%	42,653	25.61%	49599	57.08%	0	68,897	161.53%	6,239	(2,788)
10 to <20	16,261	4,612	0.65%	19,280	14.54%	19729	57.35%	0	26,652	138.24%	1,612	(850)
30 to <30	5,632	979	0.77%	6,385	26.12%	5118	60.24%	0	11,708	183.37%	1,003	(355)
30.00 to <100.00	14,911	3,851	0.54%	16,988	37.97%	24752	55.58%	0	30,537	179.76%	3,624	(1,583)
100.00 (Default)	18,027	3,760	0.55%	20,107	100.00%	20461	79.73%	0	9,080	45.16%	15,305	(14,956)
Subtotal (exposure class)	674,081	1,348,601		1,448,176		1,239,244			423,130	29.22%	32,025	(26,169)
Total (all exposures classes)	18,770,909	2,738,416		20,323,053		2,855			7,301,744	0	473,125	(542,335)

## Retail – Other SME

EU CR6 In € thousand	On-balance sheet exposures	Off-balance- sheet exposures pre-CCF	Exposure weighted average CCF	Exposure post CCF and post CRM	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												
0.00 to <0.15	3,388	11,849	0.91%	13,510	0.14%	1027	50.95%	0	1,758	13.01%	10	(32)
0.00 to <0.10	0	0	0.00%	0	0.00%	0	0.00%	0	0	0.00%	0	0
0.10 to <0.15	3,388	11,849	0.91%	13,510	0.14%	1027	50.95%	0	1,758	13.01%	10	(32)
0.15 to <0.25	25,343	12,335	0.96%	27,090	0.24%	1095	50.95%	0	5,101	18.83%	33	(73)
0.25 to <0.50	2	2	0.74%	3	0.27%	2	44.49%	0	1	22.94%	0	0
0.50 to <0.75	79,565	141,958	0.81%	171,346	0.57%	8184	48.56%	0	61,180	35.71%	475	(625)
0.75 to <2.50	188,467	49,024	0.76%	210,229	1.37%	9080	50.24%	0	115,867	55.11%	1,447	(3,767)
0.75 to <1.75	164,042	41,851	0.75%	185,252	1.28%	7653	50.15%	0	102,669	55.42%	1,193	(1,688)
1.75 to <2.5	24,425	7,172	0.81%	24,977	2.00%	1427	50.94%	0	13,199	52.84%	254	(2,078)
2.50 to <10.00	169,552	22,255	0.75%	177,382	4.69%	9286	52.09%	0	134,753	75.97%	4,366	(6,389)
2.5 to <5	84,069	13,250	0.77%	90,713	2.91%	4381	51.00%	0	63,960	70.51%	1,347	(2,538)
5 to <10	85,483	9,005	0.73%	86,669	6.55%	4905	53.24%	0	70,792	81.68%	3,020	(3,851)
10.00 to <100.00	39,923	7,073	0.73%	36,877	27.45%	24138	54.67%	0	39,881	108.15%	5,639	(4,966)
10 to <20	21,506	4,809	0.65%	20,431	14.94%	10296	54.30%	0	19,445	95.17%	1,659	(2,293)
30 to <30	4,588	498	0.64%	4,071	27.17%	290	54.65%	0	5,096	125.16%	604	(584)
30.00 to <100.00	13,829	1,766	0.97%	12,374	48.20%	13552	55.30%	0	15,341	123.97%	3,376	(2,089)
100.00 (Default)	43,179	882	0.79%	40,067	100.00%	5094	75.01%	0	17,541	43.78%	28,866	(28,459)
Subtotal (exposure class)	549,417	245,377		676,505		57,906			376,082	55.59%	40,836	(44,310)
Total (all exposures classes)	18,770,909	2,738,416		20,323,053		2,855			7,301,744	0	473,125	(542,335)

## Retail – Other non-SME

EU CR6 In € thousand	On-balance sheet exposures	Off-balance- sheet exposures pre-CCF	Exposure weighted average CCF	Exposure post CCF and post CRM	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												
0.00 to <0.15	11,585	166,476	0.74%	135,377	0.10%	124003	53.11%	0	19,328	14.28%	75	(69)
0.00 to <0.10	1,285	79,302	0.74%	60,254	0.08%	54354	53.54%	0	7,482	12.42%	27	(25)
0.10 to <0.15	10,300	87,174	0.74%	75,123	0.12%	69649	52.77%	0	11,846	15.77%	47	(44)
0.15 to <0.25	1,896	58,054	0.74%	45,065	0.23%	50647	53.59%	0	11,277	25.02%	55	(50)
0.25 to <0.50	139,050	7,855	0.74%	144,890	0.30%	21212	53.19%	0	42,730	29.49%	229	(227)
0.50 to <0.75	307,617	35,376	0.74%	333,770	0.56%	87828	56.23%	0	151,645	45.43%	1,044	(1,112)
0.75 to <2.50	2,465,347	31,023	0.61%	2,484,355	1.36%	426046	58.73%	0	1,712,138	68.92%	19,854	(22,377)
0.75 to <1.75	1,687,276	23,569	0.64%	1,702,338	1.02%	307993	58.86%	0	1,080,221	63.46%	10,210	(11,516)
1.75 to <2.5	778,071	7,455	0.53%	782,017	2.11%	118053	58.45%	0	631,916	80.81%	9,643	(10,861)
2.50 to <10.00	900,134	26,545	0.55%	914,860	5.60%	307622	59.96%	0	872,188	95.34%	30,749	(44,955)
2.5 to <5	548,966	17,746	0.55%	558,783	4.03%	219475	59.98%	0	511,910	91.61%	13,478	(20,392)
5 to <10	351,168	8,799	0.56%	356,078	8.07%	88147	59.93%	0	360,277	101.18%	17,270	(24,563)
10.00 to <100.00	302,650	3,556	0.59%	304,730	26.76%	266636	64.53%	0	471,997	154.89%	52,142	(59,680)
10 to <20	149,672	2,438	0.49%	150,866	15.09%	36844	65.62%	0	206,932	137.16%	14,976	(22,335)
30 to <30	42,906	172	0.57%	43,004	25.34%	12095	61.85%	0	68,569	159.45%	6,727	(5,506)
30.00 to <100.00	110,071	946	0.83%	110,860	43.20%	217697	64.08%	0	196,496	177.25%	30,438	(31,839)
100.00 (Default)	242,274	620	0.87%	242,815	100.00%	54298	75.34%	0	92,234	37.99%	175,554	(167,987)
Subtotal (exposure class)	4,370,552	329,506		4,605,864		1,338,292			3,373,536	73.24%	279,700	(296,456)
Total (all exposures classes)	18,770,909	2,738,416		20,323,053		2,855			7,301,744	0	473,125	(542,335)

## RWEA flow statements of credit risk exposures under the IRB approach

EU CR8 in € thousand	Risk weighted exposure amount
Risk weighted exposure amount as at the end of the previous reporting period	53,665,899
Asset size (+/-)	(4,876,585)
Asset quality (+/-)	(1,398,906)
Model updates (+/-)	0
Methodology and policy (+/-)	0
Acquisitions and disposals (+/-)	0
Foreign exchange movements (+/-)	(3,347,747)
Other (+/-)	2,969,512
Risk weighted exposure amount as at the end of the reporting period	47,012,173

# Article 453 CRR

## Use of credit risk mitigation techniques

### Management and recognition of credit risk mitigation

The following section outlines the policies and processes for collateral valuation and management in RBI. Besides the collateral mentioned herein, other types of collateral are recognized for internal risk calculations.

Collateral is only used for credit risk mitigation purposes, if the following conditions are fulfilled:

- the collateral is legally enforceable under the applicable jurisdiction
- there is sustainable market value of the collateral
- possibility of realization and willingness to realize
- there is no significant correlation between the quality of the secured exposure and the value of the collateral, i.e., the collateral value is not linked to the creditworthiness of the borrower

The collateral valuation is carried out by staff members who are independent of the credit decision process. Regular evaluations ensure that collateral is revalued at least once a year. The minimum revaluation frequency for financial collateral is 6 months. If required (e.g., change in market situation), a revaluation is carried out more often. Financial collateral with a market price is revalued automatically at current market prices on a daily basis. A longer revaluation interval leads to higher discounts.

Collateral valuation is based on current market prices, with an amount that can be recovered within a reasonable period taken into account. The methods of calculating the value and the setting of the haircut are specified by Collateral Management.

The following types of collateral are accepted:

- Financial collateral: cash, securities, life insurance
- Real estate
- Guarantees given by sovereigns and public sector entities, financial institutions, corporates (and individuals)
- Receivables
- Movables (for internal risk calculation only)

# Financial collateral

Financial collateral is used for credit risk mitigation purposes, if the minimum requirements according to CRR are fulfilled.

## Type of collateral and valuation

### Cash on deposit

As cash on deposit, all kinds of accounts (fixed deposits, saving accounts, etc.) as well as savings books and cash assimilated instruments such as certificates of deposit are taken into account.

### Cash deposit held by the lending credit institution

The market value is the pledged amount in the relevant currency of the cash deposit. The revaluation is carried out automatically by the collateral management system. No haircut is applied for this collateral type. Any maturity or currency mismatch of the protection is considered automatically when linked to the secured exposure.

### Cash deposit held by a third-party bank

The market value is the pledged amount in the relevant currency of the cash deposit. Up to this pledged amount the borrower's probability of default (PD) is replaced by the PD of the third-party bank. Any maturity or currency mismatch of the protection is considered automatically when linked to the secured exposure.

## Netting

### On-balance sheet netting agreements

In the case of reciprocal balances with a counterparty (e.g., credit balances on some accounts and debit balances on others) and if a netting agreement is in place, the credit balance is used for credit risk mitigation purposes and therefore is linked to the exposure in calculations, if the minimum requirements according to CRR are fulfilled.

### Master netting agreements covering repurchase transactions, securities or commodities lending or borrowing transactions and other capital market driven transactions

Transactions according to Article 196 CRR – especially repo and securities lending transactions – are managed in a department especially responsible for this kind of transaction using a special electronic data processing system. In order to recognize transactions for netting, only standard contracts fulfilling the minimum requirements according to CRR are used. Collateral provided within the scope of such transactions and borrowed securities or commodities have to fulfill the CRR criteria.

## Gold

The market value is the pledged amount in the relevant currency of the cash deposit. Up to this pledged amount the borrower's probability of default (PD) is replaced by the PD of the third-party bank. Any maturity or currency mismatch of the protection is considered automatically when linked to the secured exposure.

## Debt securities

For the purpose of credit risk mitigation debt securities of the following issuers are taken into account:

The market value is the pledged amount in the relevant currency of the cash deposit. Up to this pledged amount the borrower's probability of default (PD) is replaced by the PD of the third-party bank. Any maturity or currency mismatch of the protection is considered automatically when linked to the secured exposure.

The market value is the current market price on the stock exchange, which is updated automatically in the collateral management system. The haircut according to CRR is applied automatically. Any maturity or currency mismatch of the protection is considered automatically when linked to the secured exposure.

## Equities and convertible bonds

Equities and convertible bonds listed on a recognized stock exchange are taken into account for credit risk mitigation purposes.



The market value of equities and convertible bonds is the current market price on the stock exchange. A revaluation is carried out automatically. The volatility adjustment for equities and convertible bonds listed on a recognized stock exchange is not based on external ratings. According to CRR, the eligibility and the haircut depend on being listed on a recognized exchange and being included in a main index. Any maturity or currency mismatch of the protection is considered automatically when linked to the secured exposure.

## Investment funds

Units in collective investment undertakings are recognized as eligible collateral if they have a daily public price quoted and the collective investment undertaking is limited to investments in eligible instruments according to CRR.

If the single positions/investments of the collective investment undertaking are known (through at least monthly delivery of the single positions), the weighted haircut of the single position haircuts (the positions in which the collective investment undertaking is actually invested) is taken. If the single eligible positions/investments of the collective investment undertaking are unknown, the haircut equals the highest haircut of the position in which the collective investment undertaking is allowed to invest (concerning eligible positions).

The market value of equities and convertible bonds is the current market price on the stock exchange. A revaluation is carried out automatically. The volatility adjustment for equities and convertible bonds listed on a recognized stock exchange is not based on external ratings. According to CRR, the eligibility and the haircut depend on being listed on a recognized exchange and being included in a main index. Any maturity or currency mismatch of the protection is considered automatically when linked to the secured exposure.

## Effect on credit risk mitigation

Apart from cash deposits held by a third-party bank, all financial collateral provided as security reduces the LGD (Loss Given Default) to 0 per cent for the respective collateral market value reduced by the haircut according to the aforementioned criteria. For cash deposits held by a third-party bank, the PD (Probability of Default) of the borrower is replaced by the PD of the third party bank.

## Real estate collateral

For the purpose of credit risk mitigation, residential real estate and commercial real estate are used if the criteria and the minimum CRR requirements are fulfilled.

The valuation of real estate is based on the market value, which has to be reduced according to the results of the valuation, the pledged amount in the contract or prior-ranking charges, if necessary. The property valuation is based either on appraisal reports by external independent appraisers or on internal valuations of competent staff members who are independent of the credit decision process. The valuation is carried out according to generally recognized appraisal methods, mostly using the income capitalization approach. If applicable on an individual basis, the valuation is based on the sales comparison approach. Any maturity or currency mismatch of the protection is considered automatically when linked to the secured exposure.

## Receivables

Account receivables are used for credit risk mitigation purposes, if they are linked to a commercial transaction or transactions with an original maturity of less than or equal to one year. Receivables in connection with securitizations, sub-participations or credit derivatives or receivables of affiliated companies are not taken into account. All receivables must fulfill the minimum requirements of CRR.

Market value is the receivables amount derived from the list of receivables submitted by the accounting department of the borrower on a regular basis. These lists of receivables are subject to regular reviews. Any maturity or currency mismatch of the protection is considered automatically when linked to the secured exposure.

## Unfunded Credit Protection

All kinds of guarantees that are given by the below-mentioned protection providers and fulfill the minimum CRR requirements are considered as unfunded credit protection.

For the purpose of credit risk mitigation, liabilities of the following protection providers are taken into account:

- Central governments and central banks
- Regional governments
- Multilateral development banks
- International organizations, claims on which are treated with a risk weight of 0 per cent under the Standardized Approach
- Public sector entities, claims on which are treated as claims on institutions or central governments under the Standardized Approach
- Institutions
- Other corporate entities, including parent companies and subsidiaries as well as affiliated companies.

The most important protection providers in this regard are central governments, institutions and other corporate entities. The value of the unfunded credit protection is the guaranteed amount, in other words, the amount the protection provider has to pay if an event of default occurs. An accurate review of the economic capacity of the protection provider is a precondition for the valuation. Any maturity or currency mismatch of the protection is considered automatically when linked to the secured exposure.

## Unfunded credit protection with a counter guarantee

If an exposure is secured by unfunded credit protection, which itself is counter guaranteed by unfunded credit protection from one of the following protection providers, the PD of the counter guarantor is taken into consideration for the RWA calculation if all requirements of CRR are fulfilled. The same applies to a counter guarantee from another credit protection provider (other than those mentioned below) if this counter guarantee is directly counter guaranteed by one of the following protection providers and the CRR requirements are fulfilled:

- Central governments and central banks
- Regional governments or local authorities
- Multilateral development banks
- International organizations
- Public sector entities, claims on which are treated according to Article 116 CRR

## Credit derivatives

Credit default swaps, total return swaps and credit linked notes (to the extent of their cash funding) and instruments that are composed of such credit derivatives or that are economically effectively similar are recognized as eligible for the purpose of credit risk mitigation if the minimum requirements according to CRR are fulfilled. Counterparties respectively credit protection providers are primarily institutions. The value of the credit derivative is the guaranteed amount, which the counterparty has to pay, if an event of default/credit event occurs. An accurate review of the economic capacity of the protection provider is a precondition for the valuation. Any maturity or currency mismatch of the protection is considered automatically when linked to the secured exposure.

## Main types of guarantors and credit derivative counterparties

At RBI level, the main type of guarantors – in terms of exposure – are corporates and sovereigns, and to a lesser extent financial institutions. With respect to creditworthiness, 75 per cent of exposures are in the first 10 rating classes.

Exposure to credit derivative counterparties is not material. Nonetheless, financial institutions are the main counterparty type for credit derivative transactions, with a residual amount of corporate exposure. With respect to creditworthiness, 100 per cent of exposures are in the first 10 rating classes.

## Market or credit risk concentration in relation to credit risk mitigation

Concentration risk occurs when a large portion of instruments used for credit risk mitigation are concentrated in a limited number of types of credit risk mitigation instruments, are from a limited number of collateral providers or industries, or when a disproportional volume of collaterals is used for risk mitigation. Such concentration risk is managed by the following processes:

In the case of unfunded credit risk mitigation instruments issued by FIs and Sovereigns, secondary credit risk is assigned to the individual protection provider, which must be applied for in individual credit applications and which is reflected and approved as part of the guarantor's total credit exposure. Additionally, approval for potential country risk arising from the credit risk mitigation instrument is obtained separately.

In the case of other unfunded risk mitigation instruments, the value of the risk mitigation is assessed and approved in the approval process for the respective primary counterparty limit. In addition, the extent of the risk mitigation provided by the protection instrument is individually assessed by independent internal risk experts, taking into consideration the total exposure to the protection provider in relation to its individual credit standing before the risk mitigation effect is reflected in the internal collateral systems.

With regard to funded credit risk mitigation instruments, the wide geographical range of activities means there is no relevant concentration risk in terms of asset types, markets or collateral providers.

## CRM techniques overview: Disclosure of the use of credit risk mitigation techniques

EU CR3	Unsecured carrying amount	Secured carrying amount			Of which secured by credit derivatives
		Of which secured by collateral	Of which secured by financial guarantees		
in € thousand					
Loans and advances	100,825,966	66,700,605	57,043,968	9,656,637	63
Debt securities	21,346,457	704,396	0	704,396	
Total	122,172,422	67,405,001	57,043,968	10,361,032	63
Of which non-performing exposures	604,711	696,595	454,540	242,056	0
Of which defaulted	604,711	696,595			

## Credit risk exposure and CRM effects – standardized approach

EU CR4 in € thousand	Exposures before CCF and before CRM		Exposures post CCF and post CRM		RWAs and RWAs density	
	On-balance-sheet exposures	Off-balance-sheet exposures	On-balance-sheet exposures	Off-balance-sheet exposures	RWEA	RWEA density (%)
Central governments or central banks	46,254,395	168	49,671,568	162,116	2,649,703	5.32%
Regional government or local authorities	1,722,467	119,545	1,767,996	49,676	128,063	7.05%
Public sector entities	537,728	79,997	700,182	0	16,137	2.30%
Multilateral development banks	1,081,661	5,600	2,744,172	18,408	0	0.00%
International organisations	1,545,920	1,000	1,545,920	200	0	0.00%
Institutions	1,311,737	24,206	1,406,493	5,342	238,585	16.90%
Corporates	6,775,332	1,761,871	6,493,013	262,267	6,829,131	101.09%
Retail	9,847,589	2,592,345	9,211,080	251,772	6,823,108	72.10%
Secured by mortgages on immovable property	12,971,123	402,696	12,971,123	207,306	6,460,819	49.03%
Exposures in default	512,839	5,152	507,170	400	634,754	125.06%
Exposures associated with particularly high risk	133,957	64,684	130,709	24,823	233,299	150.00%
Covered bonds	39,110	0	39,110	0	3,911	10.00%
Institutions and corporates with a short-term credit assessment	0	0	0	0	0	0.00%
Collective investment undertakings	122,981	0	122,981	0	66,071	53.72%
Equity	1,010,493	0	1,010,493	0	1,537,309	152.13%
Other items	3,793,244	1,301,948	3,793,226	0	3,111,658	82.03%
<b>Total</b>	<b>87,660,575</b>	<b>6,359,211</b>	<b>92,115,238</b>	<b>982,311</b>	<b>28,732,547</b>	<b>30.86%</b>

## Effect on the RWEAs of credit derivatives used as CRM techniques – IRB approach

EU CR7 in € thousand	Pre-credit derivatives risk weighted exposure amount	Actual risk weighted exposure amount
<b>Exposures under FIRB</b>	<b>37,932,224</b>	<b>37,932,224</b>
Central governments and central banks	2,609,880	2,609,880
Institutions	2,673,574	2,673,574
Corporates	32,648,770	32,648,770
of which Corporates - SMEs	3,363,241	3,363,241
of which Corporates - Specialised lending	3,816,494	3,816,494
<b>Exposures under AIRB</b>	<b>7,301,744</b>	<b>7,301,744</b>
Central governments and central banks	0	0
Institutions	0	0
Corporates	(10,085)	0
of which Corporates - SMEs	0	0
of which Corporates - Specialised lending	0	0
Retail	7,301,744	7,301,744
of which Retail – SMEs - Secured by immovable property collateral	71,787	71,787
of which Retail – non-SMEs - Secured by immovable property collateral	3,057,208	3,057,208
of which Retail – Qualifying revolving	423,130	423,130
of which Retail – SMEs - Other	376,082	376,082
of which Retail – Non-SMEs - Other	3,373,536	3,373,536
<b>TOTAL (including FIRB exposures and AIRB exposures)</b>	<b>45,233,968</b>	<b>45,233,968</b>

## CRM techniques overview: Disclosure of the use of credit risk mitigation techniques

EU CR7-A in € thousand		Credit risk Mitigation techniques											Credit risk Mitigation methods in the calculation of RWEAs	
		Funded credit Protection (FCP)							Unfunded credit Protection (UFCP)					
		Part of exposures covered by Financial Collaterals (%)	Part of exposures covered by Other eligible collaterals (%)			Part of exposures covered by Other funded credit protection (%)				Part of exposures covered by Guarantees (%)	Part of exposures covered by Credit Derivatives (%)	RWEA without substitution effects (reduction effects only)	RWEA with substitution effects (both reduction and sustitution effects)	
			Part of exposures covered by Immovable property Collaterals	Part of exposures covered by Receivables	Part of exposures covered by Other physical collateral	Part of exposures covered by Cash on deposit	Part of exposures covered by Life insurance policies	Part of exposures covered by Instruments held by a third party						
F-IRB	Total exposures													
Central governments and central banks	3,498,281	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	(43.63)%	0.00%	3,778,708	2,609,880
Institutions	9,924,930	0.93%	0.46%	0.00%	0.46%	0.00%	0.00%	0.00%	0.00%	0.00%	(8.98)%	0.00%	3,009,013	2,673,574
Corporates	53,034,467	3.78%	19.94%	18.48%	1.46%	0.00%	0.00%	0.00%	0.00%	0.00%	(30.63)%	0.00%	39,104,753	32,648,770
Of which Corporates – SMEs	5,343,442	2.31%	17.04%	16.07%	0.96%	0.00%	0.00%	0.00%	0.00%	0.00%	(15.49)%	0.00%	3,931,990	3,363,241
Of which Corporates – Specialised lending	5,968,586	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	(0.25)%	0.00%	3,826,470	3,816,494
Of which Corporates – Other	41,722,439	1.47%	2.90%	2.40%	0.50%	0.00%	0.00%	0.00%	0.00%	0.00%	(14.89)%	0.00%	31,240,772	25,469,036
Total	66,457,678	1.25%	3.26%	2.80%	0.46%	0.00%	0.00%	0.00%	0.00%	0.00%	(14.25)%	0.00%	45,892,473	37,932,222

EU CR7-A in € thousand		Credit risk Mitigation techniques										Credit risk Mitigation methods in the calculation of RWEAs	
		Funded credit Protection (FCP)					Unfunded credit Protection (UFCP)						
		Part of exposures covered by Other eligible collaterals (%)					Part of exposures covered by Other funded credit protection (%)					RWEA with substitution effects (both reduction and sustitution effects)	
		Part of exposures covered by Financial Collaterals (%)	Part of exposures covered by Immovable property Collaterals	Part of exposures covered by Receivables	Part of exposures covered by Other physical collateral	Part of exposures covered by Cash on deposit	Part of exposures covered by Life insurance policies	Part of exposures covered by Instruments held by a third party	Part of exposures covered by Guarantees (%)	Part of exposures covered by Credit Derivatives (%)	RWEA without substitution effects (reduction effects only)		
A-IRB	Total exposures												
Central governments and central banks	0.00												0.00
Institutions	0.00												0.00
Corporates	0.00												0.00
Of which Corporates – SMEs	0.00												0.00
Of which Corporates – Specialised lending	0.00												0.00
Of which Corporates – Other	0.00												0.00
Retail	20,323,053	0.06%	106.71%	106.71%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	7,452,978	7,301,744
Of which Retail – Immovable property SMEs	71,467	0.06%	248.10%	248.10%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	72,957	71,787
Of which Retail – Immovable property non-SMEs	13,521,042	0.06%	159.09%	159.09%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	3,176,098	3,057,208
Of which Retail – Qualifying revolving	1,448,176	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	423,130	423,130
Of which Retail – Other SMEs	676,505	0.48%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	407,256	376,082
Of which Retail – Other non-SMEs	4,605,864	0.02%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	3,373,536	3,373,536
Total	20,323,053	0.06%	106.71%	106.71%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	7,452,978	7,301,744

# Article 454 CRR

## Use of the advanced measurement approaches to operational risk

Currently all units of RBI Group are in Standardised Approach as the AMA was retired in the fourth quarter of 2022.

# Article 455 CRR

## Use of internal market risk models

### VaR model

#### Scope of permission and characteristics of the model

At RBI an internal model for measuring market risks has been in place since 2010.

The method used is a hybrid simulation (Monte Carlo/historical) with 5,000 scenarios for the following risk factors: FX rates, interest rates (IR), selected equities for managed capital guarantee products (CPPI and OBPI), CDS and bond spreads including treasury basis spreads (BS). For Vega risk the hybrid method is used as well and applied to selected points on the surfaces of implied FX and interest rate volatilities.

Scenario generation is based on a two-year time series: in one simulation, the volatility estimator is influenced 80 per cent by the short-term local volatility and 20 per cent by unweighted long-term volatility, in a parallel simulation no weighting scheme is applied; the worse of the two results is then considered. Vega scenarios (also 5,000) are created separately and are also applied to the positions separately from the simulated changes in basic risk factors (FX, IR, BS). All VaR figures are calculated daily for an overnight time horizon and a confidence level of 99 per cent, i.e. VaR denotes the maximum loss that will statistically not be exceeded with a 99 per cent confidence level on the next day. For regulatory purposes, the 10-day VaR figures are calculated by multiplying the daily VaR result by the square root of 10. Positions in the regulatory trading book are delivered by the front office systems on a daily basis. The positions are repriced by means of a full revaluation.

The internal value-at-risk model was approved for the calculation of the capital requirement for market risks of RBI AG at single-entity level by the Austrian banking regulator for general interest rate risk and foreign-exchange risk including Vega risk.

### Stressed VaR

The stressed VaR is calculated as the application of a historical (equally weighted 1 year) time series of returns to the current portfolio. The historical period is chosen in such a way that it causes the largest VaR (when selected) for the portfolio positions given at present. Generating the scenarios for stressed VaR is not as straightforward as for VaR, because adjustments preserving the standard deviation of the returns and avoiding negative interest rates are necessary in order to apply historical returns to current market values. Total risk calculated by the internal model with significance for the regulatory capital requirements is based on VaR and Stressed VaR for Foreign Exchange (FX), Interest Rates (IR), Basis Spreads (BS) and Vega according to CRR Art. 364.

## Stress testing

A comprehensive stress testing concept complements the internal model VaR and sensitivity risk figures, which also constitute the market risk limit system. The stress tests reflect potential present value changes for predefined scenarios. The results with respect to market risk concentrations shown by these stress tests are reported to the Market Risk Committee on a weekly basis and taken into account when limits are set. Stress test reports for individual portfolios are included in the daily market risk reporting.

The market risk stress tests range from single risk factor changes (relative or absolute shifts, curve steepenings or flattenings, volatility surface deformations like skews, etc.) to simultaneous changes of several risk factors. For example, currencies and interest rate curves are grouped reflecting economic interdependencies of countries potential expected contagion in a crisis, correlations between interest rate curves; credit spread curves are grouped by industry and rating (investment grade vs. speculative grade) and underlying risk factors are stressed in combination with changes to their implied volatilities. Scenarios for basis risks are defined as parallel shifts over all tenor curves which are applied to two basis risk categories, namely FREQ (OIS, forward curves) and FXXC (FX, cross currency); additionally, correlation-based scenarios are calculated. Furthermore, event-driven historical or hypothetical scenarios like government debt crises, oil price shocks, etc., are implemented as needed.

Combinations of risk factors in given stress scenarios:



Stressed risk factors	FX	IR	Credit spreads	Implied Vols (FX, IR)	Equities	Basis Risk (FXXC, FREQ)
FX	X	X	X	X		
IR		X	X	X	X	
Credit spreads			X			
Implied Vols (FX, IR)				X		
Equities					X	
Basis Risk (FXXC, FREQ)						X

## Back-testing and validation approaches

In addition to a qualitative analysis of returns, the risk measurement approaches employed are verified on an ongoing basis through back-testing and statistical validation techniques.

### Risk theoretical and actual back-testing

For back-testing two comparisons are performed:

The “clean” or risk theoretical back-testing is the comparison of VaR figures to the theoretical profit and loss figures showing the hypothetical returns that the bank would have realized due to the actual changes in market parameters on the next day. The back-testing results in the past showed that the internal market risk model quickly reacts to changing market conditions.

The “dirty” or actual back-testing is done using the profit and loss (P&L) results from the front office systems. Due to the fact that the internal model is only approved for a restricted scope of market risks (FX and general interest rate risk including treasury basis spread but not other credit spreads; FX and IR vega risk, but no equity and specific interest rate risk), the hypothetical P&L figures of the internal model differ somewhat from the economic P&L figures, which include components that are not part of the VaR of the regulatory trading book. An automatized separate process has been set up to effectively validate the calculated VaRs with the reported actual P&L figures on a regulatory trading book level as well as broken down into sub-nodes (portfolio) level.

### Annual model validation

The internal model is independently validated by the Model Validation department.

Complementary to the quality assurance in the daily risk management process, an annual validation program is in place to ensure the soundness of the risk figures produced. In 2019, separation of validation between regulatory scope and economic capital scope was introduced.

The annual validation comprises two main parts. The first part verifies the statistical soundness of the risk numbers produced. To this end, the daily forecast of the P&L distribution is validated by different methods. On the one hand, the number of back-testing violations is analyzed. On the other hand, the whole forecast of the P&L distribution is statistically validated. These analyses are performed for a large number of portfolios and lead to an overall validation of the soundness of the model. The economic capital aspect focuses on the quality of the long-term forecasts.

In the second part, various model features are validated. Examples include the delivery of market data, the delivery of transaction data, and the quality of the pricing functions used in the internal model. Furthermore, all changes to the model are validated.

The validation and the development function are completely separated and strict rules for the validation process are defined. Any deficiencies detected are prioritized and the remedies included in the development process for the internal model.

## The regulatory trading book

The scope of the regulatory trading book was defined as part of the regulatory approval process for the internal model for market risk and is the basis for the selection criteria for the positions used in the capital calculation.

Defining criteria for trading book positions are set out in the Market Risk Management Group Regulation as well as in the rulebook of the risk-taking trading department. These criteria influence the department / desk strategies, the range of approved products, and subsequently the associated risk limits.

The procedure ensuring that all FX risk and trading positions are included in the internal model capital calculation is anchored in the set-up of the market risk aggregation and reporting framework. Maintaining and keeping this framework up-to-date with respect to any portfolio and/or organizational changes is part of the daily market risk management tasks, supported by an automated system of checking procedures. The trading rulebook along with standardized as well as user-definable reports and ad-hoc analysis results provided by market risk management to risk takers and senior management allow for timely and active management of trading positions.

## Valuation

The basis for a Group-wide aligned valuation process is provided by the fair value measurement rulebook, containing e.g. the applicable pricing hierarchy and procedures necessary in the event of illiquidity, along with the establishment of a regular valuation meeting at RBI head office. The latter is the decision-making body for RBI responsible for matters such as approvals, reviews and/or changes to valuation procedures, valuation models, and pricing parameters.

The valuation of new products including the treatment of pricing (availability of liquid pricing sources, respectively appropriate pricing parameters) is an integral part of the product approval process.

## Prudent valuation

The requirement to perform a prudent valuation is set out in Article 105 of the CRR (Regulation (EU) 575/2013) and described in more detail in the Regulation (EU) 2016/101. The result of the prudent valuation needs to be used only for the purpose of calculating adjustments to Common Equity Tier 1 capital, where necessary.

RBI has designed and implemented a centralized calculation of additional valuation adjustments (AVAs) arising from prudent valuation with the internal model for market risk as its cornerstone. RBI centrally calculates the AVAs for all members of the RBI Group that are included in the daily market risk calculations. Additionally, RBI head office sets the principles other RBI Group members need to adhere to when performing their own standalone local calculation of AVAs. All results of the standalone local calculation of AVAs need to be reported back to RBI head office in order to properly include them in the overall prudent valuation results for RBI. All methods for the calculation of AVAs, both central and standalone local ones, need to be approved by the RBI MACO and the RBI Management Board.

The prudent valuation performed in RBI covers all 9 AVAs defined in Regulation (EU) 2016/101, whose individual characteristics are briefly summarized in the following table:

AVA	Motivation/description
1. Market price uncertainty (MPU)	<ul style="list-style-type: none"> <li>Market participants quote different bid or ask prices for the same financial instrument.</li> <li>It is unclear which of these is the "true" fair price.</li> </ul>
2. Close-out costs (CoC)	<ul style="list-style-type: none"> <li>Different bid/ask spreads are quoted around "consensus" mid price.</li> <li>Relevant when assessing exit price of positions valued at mid price (RBI derivative positions are valued at mid price).</li> </ul>
3. Concentrated positions (CP)	<ul style="list-style-type: none"> <li>Closing a large position might move the market price away from the one that was used to calculate the fair value of the position.</li> <li>Relevant for bond positions which represent a significant percentage of the outstanding amount.</li> </ul>
4. Unearned credit spreads (CVA)	<ul style="list-style-type: none"> <li>Credit Value Adjustment (CVA) calculations also depend on market quoted parameters.</li> <li>CVA AVA aims to quantify uncertainty contained within these parameters.</li> </ul>
5. Investing and funding costs (FVA)	<ul style="list-style-type: none"> <li>Aimed at quantifying uncertainty in the funding costs used when assessing the exit price.</li> </ul>
6. Model risk (MOR)	<ul style="list-style-type: none"> <li>Quantifying the potential errors when applying a specific model in mark-to-model fair value measurement.</li> <li>By definition set to be equal to 10% of MPU+CoC.</li> </ul>
7. Operational risk (OP)	<ul style="list-style-type: none"> <li>If AMA is applied in capital requirement calculation and it explicitly covers the valuation process, OP AVA can be set to zero (not implemented in RBI's AMA)</li> </ul>
8. Future administrative costs (FAC)	<ul style="list-style-type: none"> <li>Aimed at accounting for the administrative costs of keeping the positions during their unwind/rundown process.</li> <li>Relevant for positions that can not be closed on the market quickly.</li> </ul>
9. Early termination (ET)	<ul style="list-style-type: none"> <li>Aimed at quantifying the potential losses an institution might suffer in non-contractual early terminations of client trades.</li> </ul>

# Quantitative disclosure

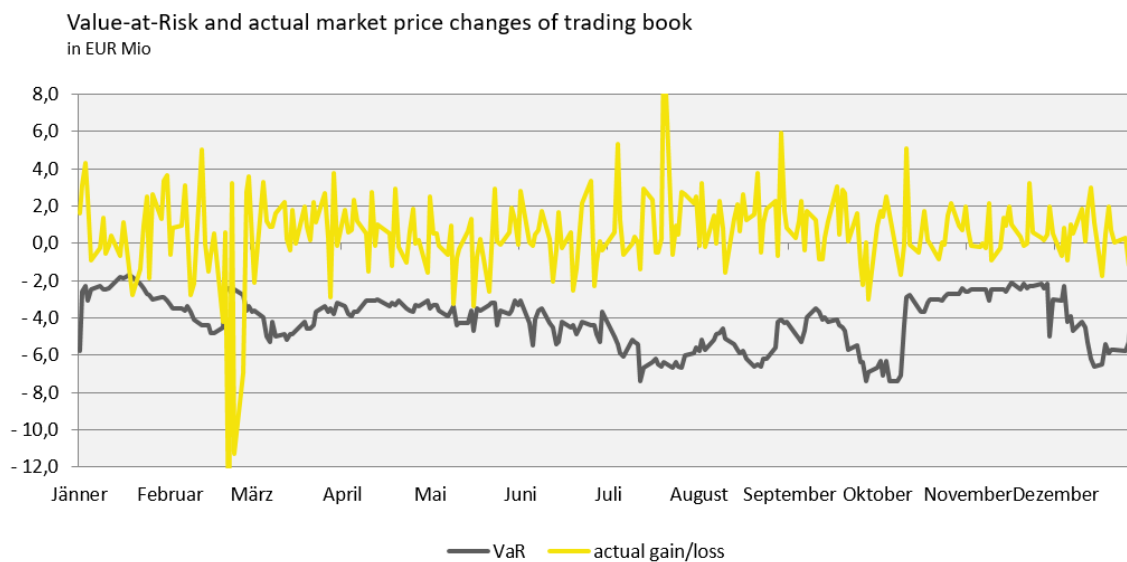
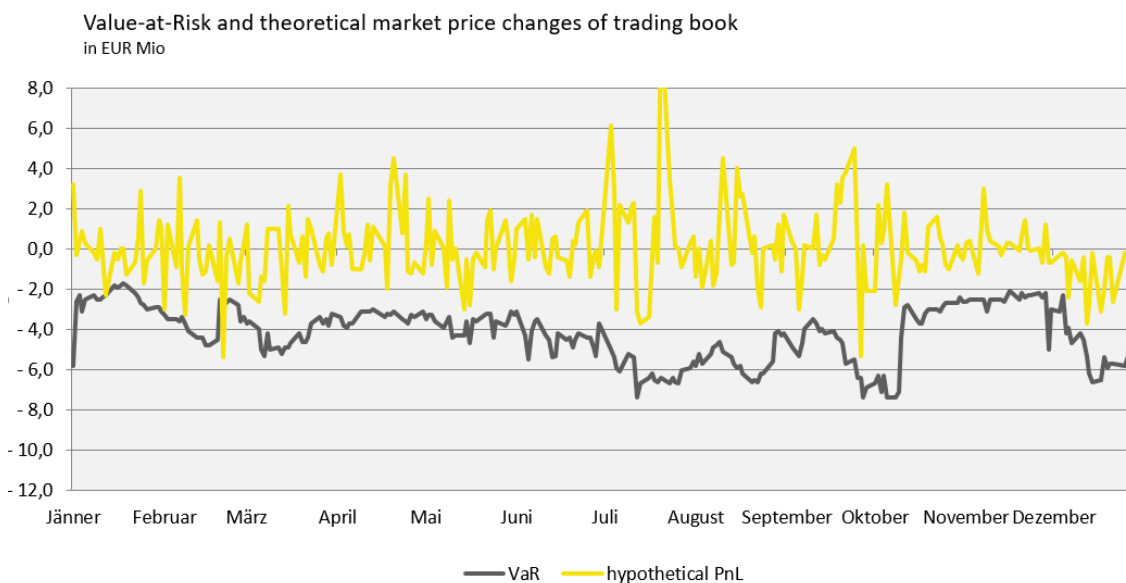
EU PV1 in € thousand						Category level AVA - Valuation uncertainty		Category level post-diversification		
Risk category						Unearned credit spreads AVA	Investment and funding costs AVA	Total	Of which:	Of which:
Category level AVA	Equity	Interest Rates	Foreign exchange	Credit	Commodities				Total core approach in the trading book	Total core approach in the banking book
Market price uncertainty	2,308	29,330	20,132	5,105	0	2,943	1,088	30,453	12,406	18,047
Close-out cost	0	0	0	0	0	0	0	0	0	0
Concentrated positions	0	12,270	0	0	6			12,275	2,879	9,396
Early termination	26	3,797	594	3	0			4,420	0	4,420
Model risk	20,145	4,224	2,886	36	170	3,246	17,904	32,579	20,704	11,875
Operational risk	124	1,570	1,078	273	0			3,045	1,241	1,805
Future administrative costs	6,444	2,255	1,631	306	0			10,636	0	10,636
Total Additional Valuation Adjustments (AVAs)								93,410	37,230	56,180

EU MR3 in € thousand	
VaR (10 day 99%)	
Maximum value	(23,507)
Average value	(13,778)
Minimum value	(5,949)
31/12/2022	(12,494)
SVaR (10 day 99%)	
Maximum value	(39,811)
Average value	(24,342)
Minimum value	(10,646)
31/12/2022	(15,423)
IRC (99.9%)	
Maximum value	N/A
Average value	N/A
Minimum value	N/A
31/12/2022	N/A
Comprehensive risk measure (99.9%)	
Maximum value	N/A
Average value	N/A
Minimum value	N/A
31/12/2022	N/A

EU MR2-A in € thousand	RWEAs	Own funds requirements
VaR (higher of values a and b)	539,217	43,137
Previous day's VaR (VaRt-1)		12,494
Multiplication factor (mc) x average of previous 60 working days (VaRavg)		43,137
SVaR (higher of values a and b)	715,759	57,261
Latest available SVaR (SVaRt-1)		15,423
Multiplication factor (ms) x average of previous 60 working days (sVaRavg)		57,261
IRC (higher of values a and b)	0	0
Most recent IRC measure		0
12 weeks average IRC measure		0
Comprehensive risk measure (higher of values a, b and c)	0	0
Most recent risk measure of comprehensive risk measure		0
12 weeks average of comprehensive risk measure		0
Comprehensive risk measure Floor		0
Other	0	0
<b>Total</b>	<b>1,254,976</b>	<b>100,398</b>

EU MR2-B in € thousand	VaR	SVaR	IRC	Comprehensive risk measure	Other	Total RWAs	Total own funds requirements
<b>RWEAs 30/09/2022</b>	<b>741,692</b>	<b>1,181,029</b>				<b>1,922,721</b>	<b>153,818</b>
Regulatory adjustment	469,262	815,328				1,284,590	102,767
RWEAs at the previous quarter-end (end of the day)	272,430	365,701				638,131	51,050
Movement in risk levels	(204,675)	(470,320)				(674,995)	(54,000)
Model updates/changes	2,200	5,050				7,250	580
Methodology and policy							
Acquisitions and disposals							
Foreign exchange movements							
Other							
RWEAs at the previous quarter-end (end of the day)	156,173	192,783				348,956	27,916
Regulatory adjustment	383,044	522,976				906,021	72,482
<b>RWEAs 31/12/2022</b>	<b>539,217</b>	<b>715,759</b>				<b>1,254,976</b>	<b>100,398</b>

**EU MR4.** The following graphs shows the comparison of the daily value at risk vs. one-day changes of the portfolio's value:



In 2022 RBI observed one risk theoretical and four actual backtesting violations, proving the applied model to be robust, conservative, and quickly reactive.

# Article 473a CRR

## Introduction of IFRS 9

Template IFRS9-FL				
in € thousand				
	31/12/2022	30/06/2022	31/03/2022	
Available capital (amounts)				
Common Equity Tier 1 (CET1) capital	15,643,027	14,619,926	12,156,337	
Common Equity Tier 1 (CET1) capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	15,170,304	14,373,093	11,958,150	
Tier 1 capital	17,318,615	16,292,495	13,831,902	
Tier 1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	16,845,892	16,045,662	13,633,715	
Total capital	19,701,551	18,253,854	15,988,819	
Total capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	19,228,829	18,007,021	15,790,632	
Risk-weighted assets (amounts)				
Total risk-weighted assets	97,680,154	109,023,253	104,028,953	
Total risk-weighted assets as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	97,207,432	108,776,419	103,830,766	
Capital ratios				
Common Equity Tier 1 (as a percentage of risk exposure amount)	16.01%	13.41%	11.69%	
Common Equity Tier 1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	15.57%	13.22%	11.52%	
Tier 1 (as a percentage of risk exposure amount)	17.73%	14.94%	13.30%	
Tier 1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	17.29%	14.75%	13.13%	
Total capital (as a percentage of risk exposure amount)	20.17%	16.74%	15.37%	
Total capital (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	20.02%	16.56%	15.21%	
Leverage ratio				
Leverage ratio total exposure measure	235,640	243,991	220,079	
Leverage ratio	7.35%	6.68%	6.28%	
Leverage ratio as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	7.15%	6.58%	6.19%	

## Rationale for the reversion to the transitional arrangements

RBI follows the ECB's press release announcement of 20th of March 2020, where the ECB encouraged banks to "avoid excessive procyclical effects when applying the IFRS 9 international accounting standard". The main reason is to reduce the procyclicality caused by the introduction of IFRS 9 standards accentuated by the ongoing Covid-19 pandemic.

# Article 449a CRR

## Environmental, social and governance risks (ESG risks)

### Introduction

This chapter consists of qualitative and quantitative information on ESG risks in line with EBA Implementing Technical Standards on prudential disclosures on ESG risks, in accordance with Article 449a CRR. As such, this chapter provides qualitative explanations and complements the quantitative information on environmental risks provided in each template of Annex I, explaining the methods applied by RBI as well as where applicable, RBIs interpretation of the data to be disclosed.

**Environmental risks** are driven by environmental factors. They should be understood as the financial risks posed by the institutions' exposures to counterparties that may both potentially contribute to or be affected by climate change and other forms of environmental degradation (such as air pollution, water pollution, scarcity of fresh water, land contamination, biodiversity loss and deforestation).

**Social risks** arise from the financial impact generated by the misuse of human capital such the rights, well-being and interests of people and communities. This could refer to working conditions, health and safety, employee relations and diversity, employee training, inclusiveness, equality, community pro-grams.

**Governance risks** refer to the governance practices of the institutions' counterparties or own invested assets, including the inclusion of ESG factors in policies and procedures under the governance of the counterparties. This may include, but it is not limited to, executive pay, board diversity and structure, shareholder rights, bribery and corruption, compliance, ethical standards (e.g. Data Ethics), fair tax strategy, etc.

RBI views Environmental, Social and Governance (ESG) risks as cross-dimensional risks that affect all areas of risk management. As such, considerations about ESG risk factors are continuously being embedded in the management of risk types in the already existing risk management framework. The largest focus with respect to risk assessment/measurement and investment in methodologies for scenario analysis and steering is currently on the environmental factors and in particular on climate change.

The climate-related and environmental risk transmitters may affect the credit, market, operational and liquidity risk of a financial institution and as such RBI Group has extended its risk framework to include the climate-related and environmental risk as a potential additional driver of the already existing risk types.

In the Pillar 2 framework of the Internal Capital Adequacy Assessment Process (ICAAP), the climate-related risk is captured by scenario analysis (stress test). Using the results of the scenario analysis, internal capital deduction items have been defined for transition risks (where the customers fail to align with transition to low carbon economy) and physical risks (e.g. collateral damage due to flooding, revenue loss due to extreme heat and drought).

In the operational risk framework including litigation risk, scenarios have been defined to account for forward looking risk triggered by environmental risks. Furthermore, RBI is exposed to potential reputational risk from climate-related and environmental risks which might affect demand for its products (e.g. green bonds, other deposits).

Considering that liquidity risk is triggered by short-term rapid changes, climate and environmental risks is from current perspective expected to have only mild effect liquidity risk profile. The largest effect is expected to be translated from respective credit and market risks realization by decreasing of liquidity inflows from loans and devaluation of liquidity buffer. But still the effect is expected to remain low taking into account mitigating factors such as the well diversified loans portfolio, the portfolio of liquidity buffer bonds and the expected limited effect on Retail exposures.

See also chapter ESG Risks of "RBI Annual Report 2022", page 196 ff.

As further outlined in Annex I (qualitative part), methodologies to quantify ESG risks as well as the underlying data that are used as inputs to these methodologies are evolving. This disclosure reflects current available data, as well as methods developed to be in line with current best practices (e.g., stress test calculated using methodologies and scenarios from ECB 2022 climate stress test exercise) – both points expected to change/improve over the next coming years. We emphasize that lack of

ESG relevant data points is one of the main challenges when it comes to proper ESG risk assessment and further its management:

- The assessment of a counterparty's sustainability level needs to be based on accurate ESG data. Retrieving such data poses major challenges for customers and banks alike. For this purpose, RBI started with a focus of data sourcing from the largest emitters in our corporate loan portfolio, to capture the most relevant sources of GHG emissions as well as industries referenced as important in the regulatory Framework: Oil & Gas (EBA ITS Stand 19, December 2022 || Annex II - Instructions for ESG prudential disclosures templates.pdf (europa.eu), p. 13). Besides meeting regulatory requirements, RBI strives to make data collection as easy and convenient as possible for our customers. For this purpose, ESG data is collected partly from public sources and partly directly from the customers.
- Identifying Mitigating actions and Exclusions for EU Paris-aligned Benchmarks require a systematic and detailed assessment of counterparties. This requires complete data availability on all the criteria specified in Article 12(1), points (d) to (g) and Article 12(2) of Delegated Regulation (EU) 2020/1818, either through publicly available data or engaging and receiving full answers in bilateral exchange with each counterparty which is currently not feasible. A major challenge for mandatory disclosure by year end 2023 is due to the Do No Significant Harm (DNSH) criteria, for which reliable data is currently not available.
- When it comes energy efficiency information, there were multiple difficulties discovered during the year 2022 that explains different fill grades among the CEE countries:
- EPCs are not established in the local legislative (e.g. Belarus, Albania, Kosovo). Kosovo as example does not have certified verifiers to create an EPC.
- EPCs do exist but are not enforced by local law. For clients in those countries EPCs are created on private initiative by the client. RBI run with its CEE subsidiaries a collection initiative to increase level of EPC coverage on the collateral portfolio. For this purpose, all subsidiaries started the collection on multiple levels (e.g. approaching customers directly via yearly reviews, scanning public available data bases for EPC labels already collected). Partially some NWUs approached their clients with incentives to give clients the required motivation to get an EPC and submit it to their subsidiary.
- Another challenge with respect to data collection comes with the physical risk assessment. First, for Non-Financial Corporates (NFCs) the registration address /Head Quarter address of counterparties is used for the physical risk assessment as further information with respect to main operating facilities, value chain etc is not yet available at granular and complete basis. This is an approximation that reduces the significance of the assessment for counterparties whose operations are in different regions. The lack of data did not allow a more refined approach to NFCs "physical risk relevant" location. We further highlight that internal data quality (mainly missing zip codes) as well as not yet complete geographical coverage by our data provider did not allow a physical risk assessment for the entire portfolio in scope.

In assessing a counterparty's ESG data, RBI relies on the completeness and correctness of data and documents received from counterparties and, where applicable, third-party vendors and public registers. Assessments regarding the fulfilment of technical criteria are also based on details and information provided by the counterparty, which cannot be verified. We cannot assume liability for the correctness and completeness of underlying data, as submitted by counterparties, and, where applicable, third-party vendors and public registers.

In view of the above, the disclosure is made based on information available as of February 2023, our best understanding of the regulatory requirements as well as banking diligence. Due to the outlined shortcomings in data quality, a lack of precise methodological guidance and widely shared and aligned practices, the interpretation of the results is subject to limitations and is expected to improve over the next years.



# Environmental risk

## 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*

To improve the effectiveness and scope of our sustainability management across the whole of RBI, we have published the Group-wide sustainability strategy 'We create sustainable value'. This strategy consists of three strategic action areas: responsible banker, fair partner and engaged citizen (each of which addresses the three key pillars of sustainability social, economic and environmental), as well as nine core action areas within which we focus our Group-wide sustainability management. In order to systematically address these core areas, which are also important to our stakeholders, we continuously seek to improve our sustainability strategy. Further information on the sustainability strategy can be found in this (see page 22 ff. 'RBI Sustainability Report', financial year 2022).

There are two major external commitments we have signed on the topic of environmental risk:

- RBI has been committed to the world's largest initiative for corporate responsibility and sustainability, the UN Global Compact, since 2010. In 2021, RBI signed up to the Principles for Responsible Banking of the UNEP Finance Initiative and since then has been committed to implementing these principles. In the second year after signing the Principles for Responsible Banking, RBI was again required to conduct an impact analysis on the sustainability impact of our portfolio. As a result of this comprehensive data analysis, two impact areas of strategic importance were identified that are relevant across all three business areas: climate protection and circularity, including resource efficiency, which was analysed as material as early as 2021 (see page 6 of 'RBI Sustainability Report', financial year 2022).
- Specific ESG targets and measures were developed in 2022, relating to climate protection in particular: for example, in September 2022 RBI's Science Based Targets were approved by Science Based Targets initiative. We want to use these science-based climate targets to help minimize the negative environmental impact of our own business activities for the long term – through corporate loans and inhouse ecology, (page 6, 'RBI Sustainability Report', financial year 2022).

In line with above external commitment and regulatory expectations RBI is as well working on including sustainability and ESG related topics within its business strategy.

Based on the overall Group strategy, each client segment is following its own individual business strategy aimed at differentiating RBI in terms of customer experience, to contribute step by step towards RBI's goal of being the most recommended financial services group. Group-wide strategic implementation is based on the strategic roadmap, which sets out the most important initiatives and goals for the next two years and is made transparent and available for the entire organization, including regular status reports. Sustainable finance has also been an integral part of the corporate strategy since 2021 (see also 'RBI Sustainability Report', financial year 2022, pages 89 ff.).

RBI gears its business model to the high-level strategic goal of creating long-term value. ESG is and will remain one of the main trends in the long term. In concrete terms RBI sees, acknowledges, and aligns the further development of its risk management approach to include risks originating from ESG, both at industry and counterparty level (ESG scores have been developed and implemented or are in the final stage of rollout).

While Social and Governance aspects are equally important, alongside regulatory requirements, we are focusing heavily on tackling climate and environmental related risks (transition and physical risks), not only via assessment at counterparty level but also by considering the potential impact of those risks as observed when conducting the ECB climate stress test (see also 'RBI Sustainability Report', financial year 2022, pages 73 ff.).

In terms of business strategy:

- **Corporate:** RBI serves around 146,000 corporate clients across CEE (including medium-sized businesses, large local companies, international corporations and local authorities) as well as local and international institutional clients. Its product range encompasses a broad spectrum of tailored solutions in the areas of finance, capital market advisory and risk hedging as well as an extensive selection of transaction banking solutions (payment transactions, trade and export finance).
- **Retail:** RBI provides services to around 17.41 million retail, private banking and small business customers in CEE, offering a broad product range (e.g., account packages, clearing, settlement and payment services, consumer finance, mortgage loans and investment products). In Austria, RBI performs investment advisory and asset management services for retail customers solely via its subsidiary Kathrein Privatbank.

A more detailed description of RBI Group's business strategy can be found in the 'RBI Sustainability Report', financial year 2022, page 55 ff.

The Strategy development is anchored in all above initiatives namely: Science based targets commitments, UNEP FI Portfolio Impact Assessment, Materiality assessment, GHG Footprint, ECB & internal climate stress test results, ECB Guide on Climate and Environmental related risks.

*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*

In 2022, RBI submitted its science-based climate targets to the Science Based Targets initiative (SBTi) in line with the “well below 2°C” reduction pathway. RBI's targets were approved by SBTi in September 2022. In doing so, RBI has committed to setting CO2 reduction targets for its core business. For further details, see “RBI Sustainability report”, financial year 2022 page 82).

Performance assessment takes into account risk-sensitive performance criteria and appropriate financial, non-financial, qualitative and quantitative performance criteria. The non-financial performance criteria are intended to adequately reflect the business strategy and include, in addition to strategic objectives, adherence to risk management policy and governance and compliance requirements, criteria related to corporate social responsibility, environmental factors and employee related goals, including diversity. These targets, committed at board level, are published in the Remuneration Report (published on a yearly basis by end of Q1). ESG is an important performance component of the RBI group Board of Management and individual Network Units and consistently cascading it down in the organization.

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

Since 2019 RBI has developed and offered a wide range of sustainable financial products, such as green/ social loans, ESG linked finance (both ESG KPI- and rating-linked), green guarantee facilities, ESG linked derivatives and Sustainable debt instruments for corporate and institutional customers. Current investment activities across of RBI Group is further outlined in ‘RBI Sustainability Report’, financial year 2022, page 105 ff.

RBI supports its customers in their sustainable transformation. For Raiffeisen Bank International, it is extremely important to also bring the subject of sustainable finance to Central and Eastern Europe. This is achieved through the network of ESG experts in the subsidiary banks, which RBI head office strengthens through knowledge building and support during consultations. In this way, the RBI Group ensures that customers also receive the best-possible support at local level when choosing a suitable sustainable financing strategy. ‘RBI Sustainability Report’, financial year 2022, page 91 ff. includes further information on initiatives per business area (corporate, financial institutions, retail) towards the groups ESG targets.

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

The Group's internal policies and processes, based on the legal framework and the RBI Code of Conduct (CoC), serve to ensure compliant conduct. All the ESG risk policies of RBI are applicable to the parent organization along with network banks (unless otherwise defined). The policies are implemented through the central risk management unit at RBI's head office.

As a main component of our corporate responsibility, the CoC consciously goes beyond formal and legally ordained conduct and describes how we deal with customers, business partners and employees. It ensures compliance with international standards based on the values of collaboration, proactivity, learning and responsibility. This includes observing laws supporting the fight against money laundering and terrorist financing, prohibiting fraud, corruption and bribery as well as market abuse, avoiding conflicts of interest, complying with financial sanctions, adhering to data protection standards and other forms of critical business practices, including respect for the fundamental rights of employees, as well as complying with environmental laws to the best of our knowledge and ability (see ‘RBI Sustainability Report’, financial year 2022, page 32). RBI Group is headquartered in Austria, which is recognized as a Designated Country under the Equator Principles, indicating the presence of robust environmental and social governance systems, legislation and institutional capacity to mitigate common environmental and social risks associated with the projects financed under the Framework.

RBI is aware of the environmental impact of certain business sectors and thus for several sectors we have started to develop special policies (e.g. Tobacco – for further details see ‘RBI Sustainability Report’, for financial year 2022 page 86) and strategies – Oil & Gas, Steel, Construction & Real Estate, Utilities (still in progress) for this we have in a first phase clustered our customer in line with their ESG Profile, while in second phase we design engagement criteria and operational targets. For further details, see ‘RBI Sustainability Report’, for financial year 2022, pages 83-84.

The ‘ESG Rulebook’ sets out Group-wide uniform definitions for sustainable customers and for green, social and ESG-linked finance within the RBI Group. When classifying transactions, RBI has decided to take the uniform RBI in-house definitions and, wherever possible, the provisions of the currently applicable version of the EU taxonomy<sup>1</sup> into account. Internal RBI definitions of ‘green’, ‘social’ and ‘ESG-linked finance’ are based on the ICMA Green & Social & Sustainability Bond Principles and the LMA Sustainability Linked Principles. In this way, RBI wishes to ensure a uniform understanding of sustainable financing throughout the group and prevent greenwashing, (‘RBI Sustainability Report’, financial year 2022, page 99). On the corporate business side, the RBI Corporate Rating Model User Manual has been enhanced with a dedicated ESG Score Model in December 2022. New and existing customers are requested to fill-out an E-questionnaire with more than 50 data points and questions. In that respect

quantitative and qualitative data on environmental risks are collected from the customers which is incorporated into the mentioned Environmental-Score. In addition, Rating analysts have to answer additional 7 Environmental risk questions based on the disclosure and reports of our customers which are also captured in the E Score. For details on customer data collection, see 'RBI Sustainability Report', financial year 2022, pages 77-78). The E Score as well as a qualitative assessment by the Rating analyst is captured in the Rating Report as part of the Application process.

In RBI Group there is a strong focus on ESG culture both within individual Board areas but as well cross functional:

- One of the initiatives forming part of the Corporate Strategic Roadmap focuses on 'sustainable customers and transactions' and sees sustainable action as an essential component of future business development and positive brand perception. In connection with this, projects and initiatives were again launched in 2022 at RBI's head office and at the subsidiary banks in Central and Eastern Europe.  
It is important to raise awareness of ESG-related topics and ensure efficient cooperation. Accordingly, the Corporate Banking board area has established an international Sustainable Finance Expert Team (Corporate ESG Ambassadors) that includes all the subsidiary banks in Central and Eastern Europe.  
The primary objectives of the network are to pass on knowledge and information between head office and the subsidiary banks in CEE, to advertise ESG activities for corporate customers in the CEE region, and to support these companies so that they can leverage the opportunities available to them in the area of ESG megatrends and for combating global climate change to the greatest possible extent.
- In retail banking area, implementation of the Framework for Green and Social Loans in RBI Retail Banking ensures that RBI network banks may issue sustainability bonds and loans, and use the proceeds to finance or refinance, in whole or in part, existing or future projects that will lead to positive environmental outcomes and social advancements in Europe. Furthermore, RBI focused on creating further awareness and to support a more efficient knowledge sharing hub among the network banks. Accordingly, the Retail Banking board area has established a Sustainability Strategy unit and a network of ESG Ambassadors that includes all the network banks in Central and Eastern Europe. The primary objectives of the network are to pass on knowledge, best practices and information between head office and the subsidiary banks in CEE, to enhance the communication about ESG activities for retail, and to leverage cross-functional and cross-border knowledge. For further details see 'RBI Sustainability Report', financial year 2022, page 91 ff.).

## 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*

The Management Board is the most senior decision-making body for ESG-related strategies, policies and commitments. Each board area must implement their respective sustainability strategies and integrate them into the performance management process. This should be reflected in the ESG policies and conditions for the individual area. The Personnel Committee approves the ESG KPIs for the members of the Management Board of RBI AG, and these are published in the annual remuneration report. See 'RBI Sustainability Report', financial year 2022, page 24 ff. for further details on corporate governance.

Main tools to manage and supervise environmental related risks being pre-approved by the Group Risk Committee and approved by RBI board as of YE 2022 include:

- Environmental, Social and Governance score
- Green Asset Ratio (simplified GAR)
- Financed GHG emissions
- Science-based targets
- Business Policy on Steel Strategy
- Business Policy on Oil & Gas
- Business Policy on Thermal Coal
- Climate stress test methodology and results
- ICAAP: From Q1-2022 onwards, transition and physical risk has been defined as deduction items of the pillar 2 internal capital. Since 2021 environmental risk drivers has been included in the group risk assessment

In addition, RBI Group ESG Rulebook as well as Business Policy on Nuclear Energy belong to main policies, also approved by management body.

ESG related KPIs have been set for each RBI Board Member, and then further cascaded down in the organisation and across the units; a progress report on the RBI Board Members KPIs fulfilment is done on a regular basis. Within the risk area, the efforts have been consolidated in the frame of ESG Risk Project. Cross divisional efforts are being coordinated via the project in a structured manner with clear roles and responsibilities and timelines. For further details see Sustainable corporate management, 'RBI Sustainability Report for financial year 2022', pages 29/73.

*f) Management body's integration of short-, medium- and long-term effects of environmental factors and risks, organizational structure both within business lines and internal control functions*

The integration of the environmental factors and risks in the business lines is done via appropriate annual targets and integrated into the performance assessment.

RBI's performance assessment considers risk-sensitive performance criteria and appropriate financial, non-financial, qualitative and quantitative performance criteria. The non-financial performance criteria are intended to adequately reflect the business strategy and include, in addition to strategic objectives, adherence to risk management policy and governance and compliance requirements, criteria related to corporate social responsibility, environmental factors and employee related goals, including diversity. These targets committed at board level are published in the Remuneration Report (published on a yearly basis by end of Q1).

RBI pursues the approach to address the environmental risks at different levels. On the one hand via the risk framework where each relevant risk department (Market-, Operational-, Liquidity- and Credit-Risk) is responsible for measuring and reporting the environmental driven risk over each specific time horizon (long term, short term and medium term).

Furthermore, RBI as a provider of sustainable financial included sustainability factors in the product approval process of each financial instrument, in the product governance and oversight arrangements Furthermore, RBI defined sustainability standards for its products in accordance with applicable market standards.

RBI has implemented a step-by-step Greenwashing Prevention Check focuses on the structure of financial products and is the pre-condition for RBI Group's involvement with sustainable finance products. The Greenwashing Prevention Check is to be followed by all members of RBI Group. See also 'RBI Sustainability Report for financial year 2022', page 90.

Lastly, policies governing strategically important topics are a key element and form the basis of our effective internal control systems (ICS, see page 37 ff. 'RBI Sustainability Report', financial year 2022). Collectively, these policies are core to our company principles. They include the authority to approve group and company policies as well as departmental and separation of duties policies. As such for identified environmental, social and governance risks appropriate internal controls are developed and implemented in RBI's internal ICS solution, to manage those risks. These controls are reviewed on a regular basis based on their design and effectiveness in accordance with RBI's internal control system framework.

Also, RBI Group Internal Audit has incorporated the strategically important ESG topics into its auditing activities. Since ESG topics affect most business and risk areas, Group Internal Audit monitors ESG topics across all the relevant audit areas, which then serve as input for the annual/quarterly audit plan and for the specific work plan for each individual audit. ESG topics are covered either through specific audits or as one of several topics within an audit (see page 29 ff, 'RBI Sustainability Report', financial year 2022).

*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*

From the point of view of supervision ESG risks are embedded in the group risk framework similarly to other risk types, whereby the methods for measuring ESG risks as a driver of already existing risk types are being continuously enhanced based on its materiality. As such, each relevant risk department (Market-, Operational-, Liquidity- and Credit-Risk) is responsible for measuring the environmental driven risk over each specific time horizon (long term, short term and medium term).

Furthermore, the ESG risk reporting is being included in the risk controlling reporting frame. Currently implemented reports include financed emissions, credit risk transition risk, climate stress test, ESG rating distribution and a report on the simplified GAR results.

In addition to the regular risk committee structure the RBI Management Board is supported in its ESG decisions by the cross-functional, cross-divisional Responsible Banking B-1 Steering Group. This Steering Group is composed of the heads of the divisions in the board areas mainly dealing with ESG topics and acts as an advisory and recommendation body for the board of management. For further details, see 'RBI Sustainability Report', financial year 2022, p. 27.

From business side the Green Bond Committee has been established. Eligible Green and Social Loans are sourced from the various eligible sectors and result from the application of the eligibility criteria, under the responsibility of the Green Bond Committee ('GBC'). The GBC is part of the RBI Group Asset-Liability Committee and represents an extension of its management team. It is comprised of extended management and expert team of Corporate Finance, Group Corporate Credit Management, Group Treasury, Group Sustainability Management and Group Compliance, Group Investor Relation.

The Green Bond Committee is responsible for:

- Ensuring the potential Eligible Loans are aligned with the categories and eligibility criteria as specified in the Use of Proceeds section above, and approving any proposed changes to the eligible Green/ Social Loan Portfolio if the loans no longer meet the eligibility criteria
- Replacing assets that no longer meet the eligibility criteria
- Ensuring the proposed allocations are aligned with the relevant general company policies and Bank's ESG strategy

- Approving the Allocation and Impact Report.

RBI's Sustainable Finance Department is responsible for collecting and monitoring all data required for the evaluation and selection of Eligible Green and Social Loans as well as for the management of the Green / Social / Sustainability Bonds.

#### *h) Lines of reporting and frequency of reporting relating to environmental risk*

Environmental risks are continuously being embedded in the internal risk reporting frame of the bank, e.g., within the relevant report of each applicable risk area. Furthermore, overarching environmental risk reports are reported to the Group Risk Committee (e.g., Climate stress test results, financed emissions are calculated and reported at least yearly basis).

As part of the rating process the ESG Score (and therefore the Environmental Score as well) is assessed with the credit rating update of a customer. The outcome of this assessment is documented in the analyst's report also providing a comprehensive explanation and reasoning. Furthermore, overarching environmental risk reports are reported to the Group Risk Committee (e.g., Climate stress test results, financed emissions, are calculated and reported at least yearly basis).

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

Performance assessment consider risk-sensitive performance criteria and appropriate financial, non-financial, qualitative and quantitative performance criteria. The non-financial performance criteria are intended to adequately reflect the business strategy and include, in addition to strategic objectives, adherence to risk management policy, governance and compliance requirements, criteria related to corporate social responsibility, environmental factors and employee related goals, including diversity. These targets committed at board level are published in the Remuneration Report (published on a yearly basis by end of Q1).

Environmental targets are part of the management objectives (MbO) which have been set for each RBI Board Member, and then further cascaded down in the organization. The MbO targets are reviewed on a yearly basis. For further detail on corporate governance, 'RBI Sustainability Report', financial year 2022, page 23 ff.).

### **Risk Management**

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

RBI Group's integration of relevant time horizons for environmental risks has been defined as part of the yearly risk assessment review, based on which the incorporation of environmental risks in our risk appetite/tolerance framework is being conducted.

Risk appetite of environmental risk on short term is embedded in the existing ICAAP frame, whereas the medium to long term environmental risk is managed and the risk tolerance is set mainly through the science-based targets.

With the Environmental Score (as part of the ESG Score) a medium-long term perspective of the customer is incorporated into the process of the assessment of customers. The Environmental Score is part of the Credit Rating process, the Rating Report as well as of any limit application.

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

Via selected memberships and activities, RBI becomes involved in organizations that promote sustainable business and the relevant framework conditions. An overview of principles and standards used by RBI in the identification and management of environmental factors and risks can be found in 'RBI Sustainability Report', financial year 2022, page 225).

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

To complement materiality analysis performed with UNEP FI Portfolio Impact Analysis tool (see 'RBI Sustainability Report', financial year 2022, page 56 ff.) an extended yearly risk assessment for climate and environmental risk drivers is being implemented within the ICAAP frame (in line with the risk framework method as described in EBA report on management and supervision of ESG risks for credit institutions and investment firms).

For this purpose, climate and environmental risk drivers are linked to potential impact on credit, market, operational and liquidity risk via risk type related transmission channels. Furthermore, to account for a forward-looking perspective and relevance of potential C&E risk materialization, three transition scenarios are being analysed in the materiality assessment:

Scenario	Description
Orderly (Below 2-degree Celsius)	Scenario assume that climate policies are introduced early and become gradually more stringent. Both physical and transition risks are relatively subdued.
Disorderly (Delayed 2-degree Celsius)	Scenario explore higher transition risk due to policies being delayed or divergent across countries and sectors. For example, carbon prices are typically higher for a given temperature outcome.
Hot house world (below 2-degree Celsius cannot be met)	Scenario assume that some climate policies are implemented in some jurisdictions, but globally efforts are insufficient to halt significant global warming. The scenarios result in severe physical risk including irreversible impacts like sea-level rise

With transition risk being defined as the risks related to the process of adjustment towards a low-carbon economy, the transition risk drivers represent climate-related changes that could generate, increase or reduce transition risks. They include changes in public sector (generally government) policies, legislation and regulation, changes in technology and changes in market and customer sentiment, each of which has the potential to generate, accelerate, slow or disrupt the transition towards a low-carbon economy.

Looking one step further, the transmission channels are the causal chains that explain how climate risk drivers give rise to financial risks that impact banks directly or indirectly through their counterparties, the assets they hold and the economy in which they operate. In the current risk assessment methodology, we have identified transmission channels in line with BCBS Paper on "Climate-related risk drivers and their transmission channels" (April 2021):

- **Credit risk:** Credit risk increases if climate risk drivers reduce borrowers' ability to repay and service debt (income effect) or banks' ability to fully recover the value of a loan in the event of default (wealth effect). Macroeconomic and climate related risk factors (e.g., carbon tax, ETS expenses) are used to make sector specific projections on production and operating costs which are "distributed" to the single borrower's financial figures (e.g. operating revenues, operating costs (e.g. COGS and labor), additional costs relating to carbon tax, costs for green transitions etc.). Finally, the projected financial positions are used for the simulation of the PD projection of RBI's rating models for a materiality assessment.
- **Market risk:** Climate and Environmental risk drivers may have a significant impact on the value of financial assets. Transition-related changes in official sector policy, technological advances and investor sentiment can alter or reveal new information about future economic conditions or the value of real or financial assets resulting in downward price shocks and an increase in market volatility in traded assets. For instance, the transition to a low carbon economy can impact commodity markets, especially fossil fuels which are prone to transition risks. Transition risk could also lead to a breakdown in correlations between assets, reducing the effectiveness of hedges and challenging banks' abilities to actively manage their risks. However, where climate risk is already priced in, the potential for unexpected price movements may be reduced. The presence of transition risk may lead to a 'classical' risk factor (e.g., an equity price, or credit spread) being more volatile than historically observed or lead to an increase in the magnitude of the shocks observed historically in a period of stress. Transition risk is assessed using internally developed methodology. Methodology covers both – corporate and sovereign issuers according to which risk levels are assigned to positions – based on the NACE code/industry and risk country of the issuer. Corporate exposures are linked to NACE codes/industries and risk levels are assigned based on the industry share of GHG emissions in total risk country's GHG emissions. Sovereigns are linked to countries and risk levels are based on several factors: industry's GHG emissions, Gross Value Added, Wages and Salaries, Social security costs, Environmental taxes, and Operational surplus and mixed in-come (net).
- **Liquidity risk:** From liquidity risk point of view climate change transition risk can affect inflows from clients' loans repayments (due to lower creditworthiness) and value of securities in liquidity buffer. Liabilities and Retail loans are not deemed vulnerable to transition risk. Meanwhile if to assume that transition risk is spread in time for more than 3 months (i.e. relatively gradual change of legislation environment) the effect on liquidity risk is deemed negligible as balance sheet of RBI AG and NWUs will gradually adopt to the change. If the risk realization period is less than 3 months than the effect will be more feasible and can be accessed with the same assumptions as for market risk in terms of devaluation of securities in liquidity buffer and credit risk in terms of decrease of inflows from loans due to higher default rate.
- **Operational risk:** Corporates, as well as banks, may be exposed to an increasing legal and regulatory compliance risk as well as litigation and liability costs associated with climate-sensitive investments and businesses. Furthermore, climate-related lawsuits could target corporations, as well as banks, for past environmental conduct whilst seeking to direct future conduct. The impact of this transmission channel has been assessed by Operational risk framework in place, as current expected losses are measured by analyzing historical data as well as identification of trends and forward-looking approaches.

Physical risk drivers are changes in both weather and climate that impact economies. They can be categorized as acute risks, which are related to extreme weather events, or chronic risks associated with gradual shifts in climate:

- Acute physical risks are generally considered to consist of: heatwaves, floods, wildfires, and storms, including hurricanes, cyclones and typhoons as well as extreme precipitation.
- Chronic physical risks include rising sea levels, rising average temperatures, and ocean acidification. Extended periods of increased temperatures may lead to the further development of chronic climate events, such as desertification. Similarly, extended periods of increased average temperatures might impact the ecosystem, agriculture in particular.

The way in which physical risks impact economies will vary depending on geographical location as different regions exhibit distinct climate patterns and levels of development. Some regions are expected to be more severely affected than others because they are more exposed and also more vulnerable to specific types of weather disasters. When assessing physical risks data, including scenario analysis from external provider Prometeia has been used. Similar to transition risk, physical risk may affect credit, market, liquidity, and operational risk through risk specific transmission channels:

- Credit risk: Physical risk drivers mainly impact banks' credit risk indirectly through their counterparties. The physical capital (housing, inventory, property, equipment, or infrastructure) of households, corporates and sovereigns can be damaged or destroyed by physical hazards. This damage reduces the value of assets and, consequently, a counterparty's wealth. Physical risk drivers can also negatively impact cash flows of the affected entities as damaged physical capital, such as impaired rental properties and factories, will generate less income. The damage may be caused by acute physical risks and also by chronic physical risks, such as rising sea levels. By mapping portfolio exposure to physical risk map, while accounting for country level coping capacity (INFORM Risk model) the materiality of this transmission channel is assessed.
- Market risk: Physical risk may be sudden and severe, and have knock-on effects across regions and sectors, through interconnected socioeconomic and financial systems. Physical risks emerging from climate change can cause market price fluctuations, such as more frequent and severe extreme weather events causing losses in equity prices due to destruction of firms' assets or capacity to produce. Uncertainty about the timing, intensity and location of future severe weather events and other natural disasters may lead to higher volatility in financial markets. Overall, the presence of physical risk may lead to a 'classical' risk factor (e.g., an equity price, or an exchange rate) being more volatile than historically observed, or being subject to severe jumps, decreasing value of the trading financial instrument. This transmission channel can be assessed by mapping market risk exposure to physical risk map, while considering historical losses and impact on GDP.
- Liquidity risk: with respect to effect of physical climate risk on liquidity risk the logic is similar to situation with transition risk. If the risk event is spread over significant period of time or doesn't have an immediate effect (e.g., rising average temperature), then this risk affects liquidity risk negligibly. In case of realization of acute climate physical risks there could be the following effects:
  - Devaluation of securities in liquidity buffer (in line with Market risk assessment).
  - Decrease of inflows from loans due to higher default rate and higher roll over rate + higher withdrawal of loans from credit lines. Clients including Retail use loans for covering damages caused by the event
  - Outflows from clients' liabilities due to need to cover damage from the event. This effect is not a straightforward cause if a Bank has a significant market share and has a diverse clients' base then most likely one client who suffered from the event would pay to other clients (e.g., Retail clients with damaged houses will pay to construction goods). Additionally in this case the effect can be temporary as if the accounts are main in a client's portfolio inflows from insurance coverage will be reflected in the liabilities relatively soon after the potential decrease.

The materiality of this transmission channel can be evaluated by analyzing effect on liquidity buffer under different interest and credit spread shocks, derived from regional dependent physical risk score.

- Operational risk: physical hazards can affect banks directly as operational risks. For instance, if physical hazards disrupt transportation facilities and telecommunications infrastructure, banks' operational ability may be reduced. The impact of this transmission channel has been assessed by extending the physical risk drivers to the operational risk assessment and scenario

The process step of additional risk assessment has been established to identify the severity of environmental risk from applicable transmission channels within current portfolio and over different time horizons. Input to the risk assessment includes but is not limited to the results of the climate risk stress test (performed using methodologies developed during the ECB Climate stress test 2022) as well as a more granular physical risk map. Methodologies and input parameters to the risk assessment is expected to be further refined during the next years as methodologies and common methodologies evolve.

The risk assessment further informs the business strategy review as well as the scenario definition of the integrated stress test. Furthermore, the impact of physical and transition risk in the integrated stress test defines a deduction item in the banks pillar 2 capital definition for adequate risk-taking capacity calculation including the environmental risks.

With regard to supporting the assessment of the creditworthiness of customers, an E-score has been implemented (approved December 2022). Customers, who are sensitive to any kind of environmental risks are identified via the E Score. The E Score is a benchmark model: it is benchmarking the performance of a certain customer to a global industry related portfolio.

#### *m) Activities, commitments and exposures contributing to mitigate environmental risks*

The ESG Rulebook sets out Group-wide uniform definitions for sustainable customers and for green, social and ESG-linked finance within the RBI Group.

When classifying transactions, RBI has decided to take the uniform RBI in-house definitions and, wherever possible, the provisions of the currently applicable version of the EU taxonomy into account. Internal RBI definitions of 'green', 'social' and 'ESG-linked finance' are based on the ICMA Green & Social & Sustainability Bond Principles and the LMA Sustainability Linked Principles. In this way, RBI wishes to ensure a uniform understanding of sustainable financing throughout the group and prevent greenwashing. The definitions of sustainable business transactions are used for qualification and flagging of business transactions as well as form the basis for the anti-greenwashing process, which shall be followed within Corporate and IC customer segments in RBI HO and NWBs in relation to Sustainable Finance Products.

Under the Framework for Green and Social Loans, RBI is setting Retail (PI and SME) Green and (SME) Social Loan definitions based on the Green Loan Principles and EU Taxonomy requirements. These definitions will be implemented by the subsidiary banks in the markets where RBI operates with the aim to support mitigation and adaptation goals. It represents a part of RBI broader sustainability strategy with the aim of focusing on assets with a positive environmental and social impact to support the necessary transition to a sustainable future. For further details on mitigating actions and investments, see 'RBI Sustainability Report', financial year 2022, page 89 ff.).

#### *n) Implementation of tools for identification, measurement and management of environmental risks*

Considering that environmental risks have higher probability to materialize in the long term, risk indicators for the identification of environmental risk over short, medium, and long-term perspective has been defined as part of the risk assessment review.

For short term transition risk, one quantitative indicator is based on ESG score of corporate portfolio. For medium- and long-term transition risks, indicators have been based on corresponding medium- and long-term climate stress test results.

To complement the above, qualitative indicators based on progress of implementation of policies related to C&E risk have been implemented in 2022. The 2022 risk assessment showed low short term and low medium to long term risk of climate related risks. The results of extended C&E risk assessment 2023, based on methodologies and transmission channels described above (point "l") is currently being finalized for approval by management body.

Complementing the analysis performed with UNEP FI Portfolio Impact Analysis tool (see 'RBI Sustainability Report', financial year 2022, page 56 ff.), in 2022 RBI performed a first climate risk stress test calculation as part of the ECB Climate stress test 'bottom-up' stress test exercise. Driven also by the methodology and scope prescribed by the ECB exercise, the focus in 2022 has been on Credit, Market and Operational Risk:

Credit risk: For non-retail portfolio, due to lack of historical data with sharp and prolonged increases in carbon taxes and electricity costs, RBI cannot directly estimate the impact of climate transition policies on corporate default events as done in IFRS9 and stress testing. Instead, RBI currently use an approach that model the impact of such policies on NACE sector level (level 2) and further transpose such impact on to the corporate profitability and debt servicing ability as reflected in their balance sheets, using structural models, and then use the financial module of our corporate rating model to turn projections of firm financials into projections of one-year PDs.

RBI refers to the first step as Transition Risk Engine which consists of two parts:

- Sectoral-level general equilibrium models (modified version of the Orani-G1 Computable General Equilibrium model developed based on the GTAP 10 database): This model produces computationally the impacts of policies or shocks in the economy by relying on the interdependencies among the market participants and ensuring the economic theory of general equilibrium using sets of equations. The output of the sectoral model is the 'stressed' production/output and cost level on the gross level of respective sectors.
- Firm-level balance sheet models: The outputs from the sectoral model are then transposed to the individual companies belong to the respective sectors.

This approach produces stressed balance sheets that include both the 'direct' effect of carbon taxes and the 'indirect' effect of macroeconomic aggregates. Once RBI have stressed corporate balance sheets, the corporate rating model is applied on these shocks to produce one-year PDs. Finally, the projected PD is calculated by taking the internal rating derivation logic into account.

In retail portfolio, especially for Residential Mortgage Exposures an approach to downgrade customers based on stressed Debt-to-Income (DTI) Ratio has been implemented to incorporate the impact of excessive energy price increases onto the



customer's credit worthiness for Residential Mortgage Exposures. The stressed DTI ratio considers effect from increased energy costs under different energy prices developments under the transition scenarios. Customers who experience a worsening Debt-to-Income ratio are being downgraded in addition to the regular rating migrations.

Market risk: in line with the ECB CST 2022, all corporate bonds in the trading book and equity positions in scope of stress test are subjected to this fair value revaluation.

Operational risk: initial scenarios have been defined to account for forward looking risk triggered by environmental risks.

For underwriting Real Estate, the CRREM tool (Carbon Risk Real Estate Monitor) is used to identify scope 1,2,3 CO2 emissions based on their energy consumption, CO2 saved if retrofit applied, indicates if asset is meeting de-carbonization target, indicates monetary present value of excess CO2 emissions and thus helps to evaluate a real estate asset and thus supports credit risk decisions/recommendations.

Accompanying the scenario analysis of the stress test, with the Environmental Score (as part of the ESG Score) a medium-long term perspective of the customer is incorporated into the process of the assessment of customers. The Environmental Score is part of the Credit Rating process, Rating Report as well as of any limit application. The score is assessed and calculated based on subsequent main data fields:

- Transition risk
- Physical risk
- Target setting and fulfilment in terms of a lower carbon-footprint business model
- Environmental risk strategy availability
- Investment and management policies of environmental risks

*o) Results and outcome of the risk tools implemented and the estimated impact of environmental risk on capital and liquidity risk profile*

Environmental, Social and Governance (ESG) risks are viewed as cross-dimensional risks that affect all areas of risk management. As such, considerations about ESG risk factors are continuously being embedded in the management of risk types in the already existing risk management framework.

Transition risk: as a first step to prioritize efforts RBI started to calculate Financed Greenhouse Gas Emissions associated with its lending and investment portfolio. The outcome of the calculations has published in our Group Sustainability Report since 2021 (for financial year 2020).

The outcome of the 2022 climate stress test is in line with assessment from GHG calculation and confirms the sectors/regions identified as mostly affected by climate risk. Whereas the methods on measuring transition risk is still expected to evolve, the latest climate stress test based on methodology and input parameters from the ECB exercise, shows that the portfolio is on short/medium/long term not materially vulnerable to these risks. Effect on market risk in the trading book under short term disorderly scenario is deemed immaterial.

Physical risk: The scenario analysis under the ECB climate-related stress test additionally showed that heat and drought scenarios and the flood risk have a limited impact in RBI. The scenario revealed that despite an increased flood risk in Austria (according to risk map provided by ECB), the impact on RBI's retail business was shown immaterial mainly due to the high-quality loan-to-value distribution of the portfolio. Looking at the direct impact of the energy costs, it can be observed that customers in the Czech Republic, Slovakia and Austria are more deeply affected than Russian customers. This is because the proportion of single-family houses in the Czech Republic, Slovakia, and Austria is much higher than in Russia where most clients live in apartment buildings and thus have a comparatively low level of energy consumption. In other countries, the availability of the EPC label for buildings is very limited, resulting in the need to use conservative estimates. ("RBI Annual Report 2022", p. 196 ff.)

As described under point n) risk indicators for short/medium/long term were introduced in 2022. Based on these indicators, the 2022 risk assessment showed low short to medium climate risk term, and moderate risk on long term climate risk indicators. The indicators are being reviewed on yearly basis, as methodologies evolve.

On the basis of the climate stress test a Pillar 2 deduction item with respect to climate & physical risk has been introduced in beginning 2022.

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

The assessment of a counterparty's sustainability level is based on accurate ESG data. Retrieving such data poses major challenges for customers and banks alike. The purpose of the ESG data is split into three main aspects: 1) the internal risk steering, 2) the fulfilment of regulatory requirements, and 3) for additional reporting under external commitments as the Science Based Targets initiative or the UNEP FI Principles for Responsible Banking.

RBI Group started with a focus on the largest emitters in our corporate loan portfolio to capture the most relevant sources of GHG emissions as well as industries referenced as important in the regulatory Framework: Oil & Gas (EBA ITS Stand 19, Decem-ber 2022 || Annex II - Instructions for ESG prudential disclosures templates.pdf (europa.eu), p. 13).

Besides meeting regulatory requirements, RBI strives to make data collection as easy and convenient as possible for our cus-tomers. For this purpose, ESG data is collected partly from public sources and partly directly from the customers. Our own ESG questionnaire covers the main environmental aspects, i.e., GHG emissions, Circular economy, Energy consumption and Water consumption. Other, "Social" and "Governance" related information is gathered both from annual reports and sustainability re-ports.

From the process perspective, RBI Group is now switching to include the collection procedure into the Rating Process making it a mandatory requirement to collect information generating the financial rating. Further details on the process design can be derived from ESG Framework. Definition of DQIs is a scope for 2023 when more experience with the data is gathered.

To improve level of energy efficiency information, RBI run with its CEE subsidiaries a collection initiative to increase level of EPC coverage on the collateral portfolio. For this purpose, all subsidiaries started the collection on multiple levels (e.g., Approaching customers directly via yearly reviews, scanning public available data bases for EPC labels already collected). Partially some NWUs approached their clients with incentives to give clients the required motivation to get an EPC and submit it to their sub-sidiary. There were multiple difficulties discovered during the year 2022 that explains different fill grades among the CEE coun-tries:

- EPCs are not established in the local legislative (e.g., Belarus, Albania, Kosovo). Kosovo as example does not have certified verifiers to create an EPC.
- EPCs do exist but are not enforced by local law. For clients in those countries EPCs are created on private initia-tive by the client.

For details on the customer data collection, see 'RBI Sustainability Report', financial year 2022, page 77-78).

*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*

In terms of steering, RBI have reflected upon criteria based on which we are clustering with customers in certain industries ac-cording to their esg profile, for which sectoral policies are set in place (in a second phase quantitative targets are planned to be set, together with engagement criteria); with that we are aiming to steer the respective exposure (e.g., exit for Thermal Coal) and green the portfolio. In addition to that with the approval of the science-based targets either a CO2 reduction or a reduc-tion of temperature has been committed and thus a change in the portfolio structure needs to be performed (e.g., real estate finance buildings with a min EPC)

The ESG Score (and therefore the Environmental Score for environmental risk too) is assessed with the credit rating update of a customer. This means, in the Analyst's report, an explanation and reasoning of the outcome is provided and will be added to any limit applications.

On overarching risk appetite level, the climate risk is limited due to the inclusion within ICAAP as deduction item from the pillar 2 capital. The risk-taking capacity of 90% is set by the group risk committee and is subject to yearly review and approval by board of management.

*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*

The ESG risks has been included in the group risk framework and methods as a driver of already existing risk types. For the pur-pose of risk identification, the impact of the environmental risk drivers (e.g., acute and chronic physical risks such as wildfires and storms, flood and rising sea levels, transition risks such as technology transition risk, market sentiment or policy and regu-lation risk) on each risk type (Market-, Operational-, Liquidity- and Credit-Risk) is being assessed in an additional materiality assessment. The materiality assessment is the base for implementation in the ICAAP framework and is expected to be refined over the next years as methodologies are being further developed and common practices evolve. Currently transition risk and physical (flood) risk impact on the credit risk profile is part of the ICAAP calculation, as deduction item of the pillar 2 capital has been defined based on the result of the climate stress test. The results of the yearly risk assessment are thereafter the input for further developments in the ICAAP frame.

Impact on liquidity risk: Taking into account that liquidity risk is triggered by short-term rapid changes, climate and environ-mental risks is expected to have only mild effect liquidity risk profile. The largest effect is expected to be translated from re-spective credit and market risks realization by decreasing of liquidity inflows from loans and devaluation of liquidity buffer. But still the effect is expected to remain low taking into account mitigating factors such as the well diversified loans portfolio, the portfolio of liquidity buffer bonds and the expected limited effect on Retail exposures.

Impact on Operational incl. Reputational risk: RBI is exposed to potential reputational risk from climate-related and environ-mental drivers which might affect demand for its products (e.g., green bonds, other deposits). To mitigate this risk, RBI has es-tablished a process to prevent greenwashing as well as the operational risk framework is being further enhanced with

environmental risk driven scenarios. In addition, physical and transition risk might cause operational risk which is addressed in the Business Continuity Management (BCM) scenarios. The BCM scenarios in general are input parameters to the Pillar 2 Operational risk model.

# Social risk

## Business strategy and processes

*a) 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*

The Group's internal policies and processes, based on the legal framework and the RBI Code of Conduct (CoC), serve to ensure compliant conduct. All the ESG risk policies of RBI are applicable to the parent organization along with network banks (unless otherwise defined). The policies are implemented through the central risk management unit at RBI's head office.

As a main component of our corporate responsibility, the CoC consciously goes beyond formal and legally ordained conduct and describes how we deal with customers, business partners and employees. It ensures compliance with international standards based on the values of collaboration, proactivity, learning and responsibility. This includes observing laws supporting the fight against money laundering and terrorist financing, prohibiting fraud, corruption and bribery as well as market abuse, avoiding conflicts of interest, complying with financial sanctions, adhering to data protection standards and other forms of critical business practices, including respect for the fundamental rights of employees, as well as complying with environmental laws to the best of our knowledge and ability (see 'RBI Sustainability Report', financial year 2022, page 32).

In addition to the focus on environmental concerns, social aspects are becoming increasingly relevant – not least due to the geopolitical situation and the issues arising from it. In order to comply with the current Global Reporting Initiative (GRI) Standards and the planned Corporate Sustainability Due Diligence Directive (CSDDD), RBI worked extensively over the course of the past financial year on the social component of the cross-cutting issue of human rights. The bank developed a Group policy on human rights based on a human rights framework drawn up in cooperation with the Ludwig Boltzmann Institute. This policy serves to implement a more detailed human rights due diligence process and will be reviewed and updated on an ongoing basis in future 'RBI Sustainability Report', financial year 2022, page 4).

Additionally, RBI is one of the signatory companies of the UN Global Compact (UNGC) and is therefore committed to proactively and consistently complying with the principles contained therein, which cover the core areas of human rights, labour regulations, environmental protection and anti-corruption. The concomitant attitude of global responsibility is expected of all employees and managers, as well as of partners and suppliers (RBI Sustainability Report', financial year 2022, pages 19–20). The Bank is headquartered in Austria, which is recognized as a Designated Country under the Equator Principles, indicating the presence of robust environmental and social governance systems, legislation and institutional capacity to mitigate common environmental and social risks associated with the projects financed under the Framework.

The ESG Rulebook sets out Group-wide uniform definitions for sustainable customers and for green, social, and ESG-linked finance within the RBI Group. When classifying transactions, RBI has decided to take the uniform RBI in-house definitions and, wherever possible, the provisions of the currently applicable version of the EU taxonomy into account. Internal RBI definitions of "green", "social" and "ESG-linked finance" are based on the ICMA Green & Social & Sustainability Bond Principles and the LMA Sustainability Linked Principles. In this way, RBI wishes to ensure a uniform understanding of sustainable financing throughout the group and prevent greenwashing. RBI's Retail Banking division (private individuals and SMEs in CEE) has also published its own "Framework for Green and Social Loans", which was also validated by Sustainalytics. By publishing such a framework, we aim to ensure that our green and social loans to retail banking customers are aligned with Green and Social Bond Principles and also meet regulatory requirements, and we expect that additional assets can be flagged as green or social (RBI Sustainability Report', financial year 2022, pages 89).

RBI has established a process to prevent greenwashing and has rolled it out across the Group as part of the RBI Group Rulebook. The greenwashing prevention check focuses on the structure of sustainable financial products, including products that are designated as "green", "social", "sustainability-linked" or similar, for which RBI acts as leading arranger and/or structurer. Under the greenwashing prevention check, RBI commits to certain internal process steps which must be complied with in the event of a transaction with a customer. In particular, ESG experts from RBI AG's Sustainable Finance Team are involved in critical customer transactions as well as, at a minimum, in the bid phase, the execution phase and the decision phase of a financing transaction. By involving the RBI AG ESG experts in ESG transactions, RBI provides a further supervisory body to minimize greenwashing risks and contribute to greenwashing prevention.

With respect to investment sustainable finance strategy, within the corporate and institutional clients' segments, RBI aims to increase the social lending through products like

- Social Loans, where any type of loan instrument is made available exclusively to finance or re-finance, in whole or in part, new and/or existing eligible Social Projects, including Social Schuldschein Loans aligned with LMA - Social Loan Principles, and
- Social Bonds aligned with ICMA - Social Bond Principles or any other internationally recognized standards or
- Other Social Finance Instruments, which follow a use of proceeds concept tied to specific eligible social projects.

In 2022 responsible banking has become a core part of the overall Retail Strategic Roadmap. RBI aims to increase the social lending new sales to private individual and Small Business customers. For further details on sustainable finance initiatives withing RBI, see ('RBI Sustainability Report', financial year 2022, pages 89 ff.).

*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*

RBI has been committed to the world's largest initiative for corporate responsibility and sustainability, the UN Global Compact, since 2010. In 2021, RBI signed up to the Principles for Responsible Banking of the UNEP Finance Initiative and since then has been committed to implementing these principles. This resulted in us, the only European bank, being included in the case studies of the UNEP Finance Initiative published in October 2022. These case studies presented examples of good practice for the impact analysis of banking activities on people and the environment, aimed at minimizing the negative impacts of these activities. (RBI Sustainability Report', financial year 2022, page 6).

In order to fulfil its commitment as a responsible banker, RBI has set new performance-related qualitative and quantitative sustainability targets for all members of the Management Board as part of the remuneration policy for 2022. The six UNEP FI Principles for Responsible Banking, which RBI signed up to in early 2021, serve as a framework for internal control and evaluation. (RBI Sustainability Report', financial year 2022, page 5). The remuneration policy includes provisions which also enable criteria to the Company's social responsibility, to be used when setting the individual performance criteria for the Management Board. The remuneration reports of the last two years are published on RBI website.

With Q4 2022, the ESG Score for Corporate customers was implemented and approved by Group Risk Committee, meaning that for all new and updated Ratings, an ESG Assessment - as well as a separate E, S and G assessment - is performed. The ESG Score is related to a medium to long-term perspective; low ESG Scores indicating a higher medium-long-term risk in terms of transformation and physical risks. This also holds for the 'Sub-scores', meaning for the S - score, which is calculated separately.

*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*

Aligned with the European Convention on Human Rights and the Universal Declaration of Human Rights, RBI is committed to protecting human rights by avoiding financing any projects or parties that do not follow these human rights standards. Additionally, as a signatory to the UNGC, RBI is committed to combating corruption, promoting environmental sustainability and protecting human rights by eliminating forced and child labour and following the UN principles on labour standards. Based on that RBI developed an RBI Group Human Rights Policy, which was approved in January 2023. (See also 'RBI Sustainability Report', financial year 2022, page 31).

The fight against smoking is at the heart of prevention of chronic non-communicable diseases. Concerned about the spread of tobacco smoking and its harmful impact on health and society, RBI, in accordance with its social responsibility objectives, commitment to the Sustainable Development Goals and the Principles for Responsible Banking, introduced a tobacco policy in January 2022. The policy is relevant for all companies or group of companies whose activity is relying on more than 25% on the production or distribution of tobacco products. RBI restricts on- and off-balance financing activities and all investment banking and advisory services in the tobacco industry to globally active producers (including their distributors) that show best-in-class ESG ratings, a clear commitment to responsible marketing, packaging and labelling practices, as well as clear evidence to develop their portfolio away from traditional tobacco products. RBI will not engage in any project or investment financing activities linked to the extension and enhancement of traditional tobacco production facilities. Exposure towards tobacco producers and distributors not eligible under the policy has to be run down completely until 2028 (see as well page 86 from 'RBI Group Sustainability Report' financial year 2022).

The ESG Rulebook sets out Group-wide uniform definitions for sustainable customers and for green, social and ESG-linked finance within the RBI Group. When classifying transactions, RBI has decided to take the uniform RBI in-house definitions and, wherever possible, the provisions of the currently applicable version of the EU taxonomy into account. Internal RBI definitions of "green", "social" and "ESG-linked finance" are based on the ICMA Green & Social & Sustainability Bond Principles and the LMA Sustainability Linked Principles. In this way, RBI wishes to ensure a uniform understanding of sustainable financing throughout the group and prevent greenwashing. RBI's Retail Banking division (private individuals and SMEs in CEE) has also published its own "Framework for Green and Social Loans", which was also validated by Sustainalytics. (RBI Sustainability Report', financial year 2022, page 89).

Furthermore, RBI has established a process to prevent greenwashing and has rolled it out across the Group as part of the RBI Group Rulebook. The greenwashing prevention check focuses on the structure of sustainable financial products, including products that are designated as "green", "social", "sustainability-linked" or similar, for which RBI acts as leading arranger and/or structurer.

One of the initiatives forming part of the Corporate Strategic Roadmap focuses on 'sustainable customers and transactions' and sees sustainable action as an essential component of future business development and positive brand perception. From 2021 on, in connection with this, extensive projects and initiatives have been launched at RBI's head office and at the subsidiary banks in Central and Eastern Europe.

It is important to raise awareness of ESG-related topics and ensure efficient cooperation. Accordingly, the Corporate Banking board area has established an international Sustainable Finance Expert Team (Corporate ESG Ambassadors) that includes all the subsidiary banks in Central and Eastern Europe. The primary objectives of the network are to pass on knowledge and information between head office and the subsidiary banks in CEE, to advertise ESG activities for corporate customers in the CEE region, and to support these companies so that they can leverage the opportunities available to them in the area of ESG megatrends and combating global climate change to the greatest possible extent. Here, too, the Sustainable Finance Team at head office is responsible for onboarding and training the subsidiary banks in CEE. In the corporate banking area, more than 40 colleagues take part in regular monthly teleconferences (Corporate ESG-Ambassador calls) that keep the subsidiary banks in Central and Eastern Europe informed about all of the latest topics in the areas of ESG, the ESG knowledge platform and the ESG MS Teams channel, etc. In addition, dedicated training sessions were held for the Raiffeisen regional banks, Raiffeisen-Leasing, and the marketing and investment units. More than 200 employees were informed about ESG initiatives within the business area. Lastly, more than 1,000 RBI colleagues across six subsidiary banks in Central and Eastern Europe received training on ESG issues in order to increase internal awareness and reinforce the

importance of ESG for RBI. The Green Finance Days are organized locally, with the head office team providing specialist input as required. The presentations and the lively discussions between the participants and speakers showed that many RBI employees are convinced of the growing importance of sustainability in the financial sector. Cooperation with external stakeholders, particularly academic institutions, also plays an important role in the exchange of knowledge and experience, and efforts this year will continue to focus on closer cooperation.

Regular get-together and dialog for ESG ambassadors from Markets & Investment Banking involve experts from Head Office, the subsidiary banks in Central and Eastern Europe and other subsidiaries. The format includes specialist presentations and the exchange of experience among the participants.

By having implemented the Framework for Green and Social Loans in RBI Retail Banking, RBI ensures that RBI network banks may issue sustainability bonds and loans, and use the proceeds to finance or refinance, in whole or in part, existing or future projects that will lead to positive environmental outcomes and social advancements in Europe.

RBI implemented ESG SESAMm (provided by SESAMm, a company in alternative data and artificial intelligence, delivering global investment firms and corporations data-driven insight and investment analytics, which opens an industry data lake with more than 20 billion documents, 4 Mn sources and 14 years of history ([www.sesamm.com](http://www.sesamm.com), 23.1.2023) ) to support the decision making of the due diligence process. The sentiment analysis with ESG SESAMm, supports with timely and actionable ESG and SDG (Sustainable Development Goals) indicators for companies.

## Governance

- d) *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:*
- I. *Activities towards the community and society*
  - II. *Employee relationships and labour standards*
  - III. *Customer protection and product responsibility*
  - IV. *Human rights*

The Supervisory Board of RBI AG considers addressing sustainability-related risk, and as such also social risks and adopting corresponding risk controlling targets to be an important strategic pillar of the banking group's corporate activity. The RBI board of management is the ultimate approval body of the Group ESG-risk framework, which defines the overarching management of ESG risks including social risk which refer to working conditions, health and safety, employee relations and diversity, employee training, inclusiveness, equality, or community programs. The social risks defined within the ESG risk framework RBI are assessed at industry level via the Industry Base score and at counterpart level via the social score.

The framework is reviewed on a yearly basis and approved by the RBI's Board of Management. Any kind of changes of the model must be acknowledged by the Group Risk Committee and to be approved by our Board of Management.

Furthermore, RBI defined internal rules of conduct – the RBI Code of Conduct – as an expression of its commitment to sustainable corporate governance and the accompanying social and ecological responsibility. The structure of RBI's corporate governance is based on various legal standards and other provisions that guide its actions both internally and externally. The Group's internal policies and processes, which are based on the legal framework and the RBI Code of Conduct, serve to ensure compliant conduct.

RBI is one of the signatory companies of the UN Global Compact (UNGC) and is therefore committed to proactively and consistently complying with the ten UNGC principles of responsible business. These principles include the core areas of human rights, labour standards, environmental protection and combating corruption. The concomitant attitude of global responsibility is expected of all employees and managers as well as of partners and suppliers.

- 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*

Social risks arise from the financial impact generated by the misuse of human capital, e.g., with regard to the rights, well-being and interests of people and communities. This could refer to working conditions, health and safety, employee relations and diversity, employee training, inclusiveness, equality, or community programs. The structure of RBI's corporate governance is based on various legal standards and other provisions that guide its actions both internally and externally. Building on the legal framework, RBI defined internal rules of conduct – the RBI Code of Conduct – as an expression of its commitment to sustainable corporate governance and the accompanying social and ecological responsibility. The Group's internal policies and processes, which are based on the legal framework and the RBI Code of Conduct, serve to ensure compliant conduct.

Furthermore Environmental, Social and Governance (ESG) risks are viewed as cross-dimensional risks that affect all areas of risk management. As such, already existing risk types are continuously being extended by ESG risk factors (based on the internally developed materiality assessment).

With regards to ESG Scoring (covering also Social as a Sub score) of RBI's customers, the social dimension has already been integrated and is being further integrated into the internal risk reports in order to allow for the comprehensive risk view and feedback loop to management on the potential social risks of the bank portfolio.

The Management Board is supported in its ESG decisions by the cross-functional and cross-divisional Responsible Banking B-1 Steering Group. This steering group is composed of the divisional heads from all board areas whose main focus is on ESG issues, and acts as an advisory and recommendation body for the Management Board. Each member of the B-1 Steering Group has an appropriate level of knowledge and experience in ESG activities. The inclusion of all relevant areas serves to ensure vigilance with regard to ESG risks as well as implementing a holistic approach to sustainability. The group meets monthly with the chair rotating every three months in 2022 to ensure that each area was involved at the highest level. Group ESG & Sustainability Management is not only an active member but is also responsible for coordinating this steering group. The steering group has the following tasks and responsibilities:

- It advises the Management Board on ESG issues: The Steering Group or the relevant departments inform the Management Board in an appropriate manner about any potential or existing material impacts, risks, and opportunities related to sustainability, e.g., the need to make changes to ESG strategies, implementing provisions, or ESG-related commitments.
- It recommends ESG KPIs in relation to the members of the Management Board's performance management activities at head office and in the subsidiaries.
- It monitors the holistic alignment of the principles for responsible banking.
- It discusses and reviews RBI's ESG strategy in relation to its "Paris alignment" and as well as the UNEP FI Principles for Responsible Banking.

- (See as well page 28 from 'RBI Group Sustainability Report' financial year 2022).

#### *f) Lines of reporting and frequency of reporting relating to social risk*

RBI has in place several reporting channels defined in the whistleblowing and customer complaints programs. Any issue raised by these channels are addressed via standard procedures including internal reporting to management. Furthermore, as of June 2021, the position of a Corporate Ombudsperson was created in and for RBI AG. Every employee in RBI AG, regardless of status or role, can contact the ombudsperson confidentially to clarify questions, obtain information, discuss concerns and situations informally and seek help. The independence and neutrality of the position is guaranteed by the management. This position is not only an additional possibility to address potential social risks in a confidential manner, but moreover a knowledge hub for making the organization aware of issues and therefore supporting on a preventive and transformative way to drive sustainable culture. This systemic-structural pillar is ensured by documenting the content of those cases – for sure on an anonymous and not attributable to individual persons concerned way –, analysing and clustering it, as well as in drawing conclusions based on the material for the whole organization. The results and recommendations were made available to the members of the Board, extensive bilateral talks about it followed. The results of the report were also presented to other relevant stakeholders like P&OI, Compliance, Medical Health and Staff Council. Discussions about possible actions and implementations of the findings are now processed.

As part of the rating process the ESG Score is assessed with the credit rating update of a customer. Thus, in the Analyst's report, an explanation and reasoning of the outcome is provided and will be added to any limit applications (e.g. for those presented in the weekly credit committee)

RBI has set up a balance sheet report on asset and liability exposures with ESG rating split, allowing a deep dive from business line and industry to counterparty level and a historic comparison (week over week, month to date, quarter to date, year to date) of the exposure development in ESG rating buckets. This chapter serves as one input to the biyearly risk assessment.

#### *g) Alignment of the remuneration policy in line with institution's social risk-related objectives*

Performance assessment consider risk-sensitive performance criteria and appropriate financial, non-financial and qualitative and quantitative performance criteria. The non-financial performance criteria are intended to adequately reflect the business strategy and include, in addition to strategic objectives, adherence to risk management policy and governance and compliance requirements, criteria related to corporate social responsibility, and also environmental factors and employee related goals, including diversity. These targets committed at board level are published in the Remuneration Report (published on a yearly basis by end of Q1)

Social targets are part of the management objectives (MbO) which are set have been set for each RBI Board Member. The MbO targets are and reviewed on a yearly basis.

### **Risk management**

#### *h) Definitions, methodologies and international standards on which the social risk management framework is based*

Via selected memberships and activities, RBI becomes involved in organizations that promote sustainable business and the relevant framework conditions. The following gives an overview of standards used by RBI in the identification and management of social factors and risks:

- The human rights policy approved by the RBI's management in January 2023 sets out the general framework for Human Rights management in order to comply with the UN and European Human Rights standards and EU regulations:
  - Universal Declaration of Human Rights · International Covenant on Civil and Political Rights
  - International Covenant on Social, Economic and Cultural Rights
  - Fundamental Principles of the International Labour Organisation (ILO): Freedom of Association, Right to Organise and Collective Bargaining, Abolition of Forced Labour and Worst Forms of Child Labour, Equal Remuneration, Non-Discrimination (in Employment and Occupation)
  - European Convention on Human Rights
  - EU regulation referring to Human Rights, currently in a dynamic development as the proposed Corporate Sustainability Due Diligence Directive and the Corporate Sustainability Reporting Directive (including Annex Regulation (EU) 1893/2006) as well as to the minimum social safeguard principle of the EU Taxonomy Regulation · Standards of the Global Reporting Initiative (GRI)
- LMA - Social Loan Principle - Social Loans from (any type of loan instrument made available exclusively to finance or re-finance, in whole or in part, new and/or existing eligible Social Projects), including Social Schuldschein Loans are in line with these principles



- ICMA – Social Bond Principles – Social Bonds (any type of bond instrument where the proceeds or an equivalent amount will be exclusively applied to finance or re-finance, in part or in full, new and/or existing eligible Social Projects) are in line with these principles
- Important part of the social framework is the incorporation of the sentiment analysis by ESG SESAMm in RBI's processes and strategy. SESAMm supports this with timely and actionable ESG and SDG (Sustainable Development Goals) indicators for companies.
- The ESG Scoring Model was implemented for Corporate Customers in Q4 2022, including a model description as well as its incorporation into the Model Risk Framework. The model description explains the aggregated ESG Score as well as the methodologies of the Sub Scores (E/S/G) and was part of a Group Risk Committee acknowledgment and Board of Management Approval.

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

The group policy 'RBI Group ESG Rulebook', among others stipulates the exact group wide social definitions used for qualification and flagging of business transactions as well as form the basis for the greenwashing prevention check process, which shall be followed within Corporate and IC customer segments in RBI HO and NWBs in relation to Sustainable Finance Products.

The Greenwashing Prevention Check shall be applicable for all Sustainable Finance Products defined within the group policy 'RBI Group ESG Rulebook', including products which use the expression 'social' besides 'green', 'sustainability', 'transition', 'sustainable', 'environmental', 'sustainability-linked', 'ESG' or any equivalently labelled expression as part of the product definition, where RBI AG and/or a NWB acts as leading arranger and/or (sustainability) structurer of such a product. It also applies in cases, where RBI AG and/or a NWB acts as an investor/ lender only for the corresponding part of the credit risk of the Sustainable Finance Product as described within the rulebook.

The ESG Score (and therefore the S Score for social risk too) is assessed with the credit rating update of a customer. This means, in the Analyst's report, an explanation and reasoning of the outcome is provided and will be added to any limit applications (e.g., for those presented in the weekly credit committee).

Another tool adding to the framework is the ESG SESAMm which supports with timely and actionable ESG and SDG (Sustainable Development Goals) indicators for companies which is included in decision-making processes.

Furthermore, all potential Eligible Social Loans are subject to RBI's standard credit process in line with the normal course of business, including:

- Know-Your-Customer (KYC) procedure
- Compliance
- Credit risk analysis
- CSR relevance assessment (all loans which pass through RBI's head office approval process)
- Sector policies (Sensitive business areas are regulated in individual sector policies, e.g., war material, nuclear power, coal, gambling)
- Code of conduct

Only loans that have been approved through RBI's standard regular credit process can be further considered for Social Bond eligibility. Eligible Social Loans are sourced from the various eligible sectors and result from the application of the eligibility criteria described within the group policy 'RBI Group ESG Rulebook' for corporate and institutional clients' segments in RBI HO and NWBs. Colleagues involved into the process (product/ relationship managers, ESG experts, etc.) in RBI HO and NWBs have been trained accordingly to identify sustainable finance products within the scope of the RBI Group ESG Rulebook. Qualification of the business transaction shall be performed based on the 'four-eye principle'.

The Framework for Green and Social Loans incorporate in the RBI Retail Banking and published in 2022, represents a part of RBI broader sustainability strategy with the aim of focusing on assets with a positive environmental and social impact to support the necessary transition to a sustainable future. Under this Framework, RBI is defining Retail (SME) Social Loan definitions based on the EU Taxonomy requirements. These definitions will be implemented by the Network Banks in the markets where RBI operates with the aim to support mitigation and adaptation goals.

*j) Activities, commitments, and assets contributing to mitigate social risk*

RBI Group is committed to respect the UN Guiding Principles on Business and Human Rights and to conduct Human Rights due diligence.

RBI's Group Human Rights Policy, which was approved in January 2023 sets out RBI's values, areas of impact and influence, and responsibilities in relation to its human rights responsibilities in accordance with the RBI Code of Conduct. It is the result of work and cooperation between the Ludwig Boltzmann Institute of Fundamental and Human Rights and a cross-divisional RBI working group established in 2022 specifically to address the topic of human rights.

The policy states the importance of the topic and serves as a starting point towards further defining and implementing a risk-based due diligence process. In order to respect, promote and comply with human rights, RBI refers to its sphere of influence among employees, suppliers and customers. With regard to employees and suppliers RBI Group is already able to draw on established state-of-the-art processes and policies. In terms of customers, the policy illustrates how RBI is adapting existing processes and highlights further key tasks that are being addressed by the cross-divisional working group. It is a continuously evolving working and learning process that takes the new EU regulatory requirements into consideration and is subject to the UN Guiding Principles on Business and Human Rights.

*k) Implementation of tools for identification and management of social risk*

The ESG Score (and therefore the S Score for social risk too) is assessed with the credit rating update of a customer. This means, in the Analyst's report, an explanation and reasoning of the outcome is provided and will be added to any limit applications (e.g., for those presented in the weekly credit committee). Inclusions of the S Score in climate stress activities, in particular on rating impacts, need to be further evaluated.

In addition, a sentiment analysis with ESG SESAMm is incorporate, which supports with timely and actionable ESG and SDG (Sustainable Development Goals) indicators for companies. Digital solutions for a Human Rights sentiment assessment via the SESAMm tool shall be further developed (e.g., using relative key words to capture Environmental, Social and Governance issues that are publicly available)

Furthermore, RBI has in place several reporting channels defined in the whistleblowing and customer complaints programs. Any issue raised by these channels are addressed via standard procedures including internal reporting to management.

*l) Description of setting limits to social risk and cases to trigger escalation and exclusion in the case of breaching these limits*

The Group Business Compliance Risk Framework serves as the guiding document determining the business compliance risk appetite with dedicated preconditions on countries, clients and products that are offered towards RBI Group's Institutional Clients customer base.

The country assessment part covers the following main domains: Quality of AML/CFT Framework, Bribery and Corruption, Financial Transparency and Standards, Public Transparency and Accountability, Legal and Political Risks. The information is derived among others from the following indices: Worldwide Governance Indicator, Global Terrorism Index, Corruption Perceptions Index (CPI), Heritage Foundation.

In the client assessment there are multiple indicators based on which RBI Group does not engage into business relationships e.g., sanctioned entity or sensitive business areas, restricted industries. Furthermore, the Minimum Social Safeguard criteria within the EU Taxonomy screening according to the ESG Rulebook shall be further developed.

Additionally, a product matrix has been developed with the aim to base a business strategy depending on the inherent compliance risks for Institutional Clients. The assessment of each product was derived amongst others from: the reputational risk, the AML product risk, the transparency level, the cash intensity.

The ESG Score (and therefore the Social Score for social risk too) is assessed with the credit rating update of a customer. This means, in the Analyst's report, an explanation and reasoning of the outcome is provided and will be added to any limit applications.

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

The ESG risks has been included in the group risk framework and methods as a driver of already existing risk types. The methods for measuring ESG risks as a driver of already existing risk types are being continuously enhanced based on its materiality. As such, each relevant risk department (Market-, Operational-, Liquidity- and Credit-Risk) is responsible for measuring the social driven risk.

The Identification of social risk is mainly through the counterparty level ESG-scoring, as well as via ESG SESAMm tool suite.

The initial focus has been on the environmental risk transmission channels. Social risks to other prudential risk categories are to be planned

# Governance risk

## Governance

*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*

RBI places great value on responsible and transparent business management to strengthen and maintain the understanding and trust of its stakeholders. This is a prerequisite for the performance of our banking group. The traditional Raiffeisen values provide the basis for this (see page 18 of RBI Sustainability Report for financial year 2022) as does the Code of Conduct, which is applied across the Group. Generating added value for the long term is our primary strategic objective.

The Code of Conduct (CoC; see page 32 ff of RBI Sustainability Report for financial year 2022), is a binding regulatory framework that is applicable Group-wide for all employees and can be found in the respective national language on all the websites of RBI and the subsidiary banks in Central and Eastern Europe. The Management Board of RBI AG bears ultimate responsibility for the CoC. Operational responsibility for implementing the CoC in all global group units lies with the respective competent management bodies. The divisional head responsible for compliance is tasked with coordinating the activities in connection with the CoC.

Violations and breaches of the CoC (e.g., general statistics and KPIs) are reported regularly (at least annually) to the Management Board of RBI AG, and to the relevant committees (Risk Committee, Audit Committee) of the Supervisory Board of RBI AG. Specific material cases are ultimately escalated to the highest management bodies on an ad hoc basis.

At (non-retail) customer level RBI has developed the ESG customer score by measuring the impact of ESG-related risk through individual scores. In this context governance related risks at customer level are measured by scoring questions on transparency, business ethics, diversity and strategy and risk management (see page 77 ff. of RBI Sustainability Report for financial year 2022). As for the Environmental and Social Score, the Governance Score also has to be acknowledged by the Group Risk Committee and to be approved by the Board of Management.

Additionally, the Governance Score is reported in the Credit Rating Statement and Reports and therefore part of any limit applications of our customers (incl. those which are decided in the Credit Committee).

Lastly, RBI AG's ESG Advisory Team provides in-depth and intensive advice on various sustainable financing formats geared towards customers' business models and sustainability strategies. These sustainable financing formats can cover a wide range of financial instruments (bonds, Schuldschein loans, syndicated loans, bilateral facilities, etc.) and a variety of sustainability formats (linking with ESG ratings or sustainability targets or linking through proof of use of funds).

For this earmarked financing, it is necessary to verify whether corresponding projects comply with the sustainability standards specified by the market. The basis for this assessment is provided by the EU Taxonomy Regulation and the ICMA standards. The ESG Advisory Experts support our customers in verifying the suitability of various projects and activities regarding EU Taxonomy compliance and as regards RBI's internal definitions of green, social or sustainable transactions, which also refer to best market practice (see page 91 ff. of RBI Sustainability Report for financial year 2022).

*b) Institution's accounting of the counterparty's highest governance body's role in non-financial reporting*

Governance risks refer to the governance practices of the institutions' counterparties, including the inclusion of ESG factors in policies and procedures under the governance of the counterparties. This may include, but is not limited to, executive pay, board diversity and structure, shareholder rights, bribery and corruption, compliance, ethical standards (e.g., data ethics), fair tax strategy, etc.

In this context governance-related risks at customer level are measured by scoring questions on transparency, business ethics, diversity and strategy and risk management (see page 76 ff. of RBI Sustainability Report for financial year 2022).

Part of the assessment hence incorporates information from Rating Analysts of the respective non-financial documents (e.g., Annual Reports, Sustainability Reports).

*c) Institution's integration in governance arrangements of the governance performance of their counterparties including:*

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

In line with page 76 ff RBI Sustainability Report for financial year 2022 definition, Governance risks refer to the governance practices of the institutions' counterparties, including the inclusion of ESG factors in policies and procedures under the governance of the counterparties. This may include, but is not limited to, executive pay, board diversity and structure, shareholder rights, bribery and corruption, compliance, ethical standards (e.g., data ethics), fair tax strategy, etc.

As a result, in the context of the ESG customer score the governance-related risks at customer level are measured by scoring questions on transparency, business ethics, diversity and strategy and risk management.

Independent of the governance score RBI has in place internal code of conduct provisions incl. market code specifics for suppliers and compliance programs related to whistleblowing, customer complaints and anti-bribery & corruption including conflict of interest. All employees are obliged to report serious violations of the CoC, such as market abuse, fraud, theft, embezzlement, bribery or corruption. RBI uses a software solution from an external service provider that enables anonymous electronic reporting. Violations and breaches of the CoC (e.g., general statistics and KPIs) are reported regularly (at least annually) to the Management Board of RBI AG, and to the relevant committees (Risk Committee, Audit Committee) of the Supervisory Board of RBI AG. Specific material cases are ultimately escalated to the highest management bodies on an ad hoc basis. (See page 32 ff. of RBI Sustainability Report for financial year 2022).

Beyond this solution, in June 2021, the position of Corporate Ombudsperson was created within and for RBI AG. All employees of RBI AG, irrespective of their status or role, can approach the ombudsperson in confidence in order to clarify questions, obtain information, discuss matters and situations informally, and seek help. The independence and neutrality of the position is guaranteed (see page 142 ff. of RBI Sustainability Report for financial year 2022).

RBI has internal policies in place governing the handling of conflicts of interest. RBI employees are required to disclose potential and actual conflicts of interest in accordance with defined system-based reporting guidelines. Reports filed are assessed by the Compliance department and remedial action is taken as required. Provision is also made for regular monitoring and disclosure of conflicts of interest. The Management Board receives regular reports, and an appropriate escalation procedure is in place. RBI strives to prevent and avoid conflicts of interest. RBI discloses conflicts of interest to its stakeholders in accordance with statutory requirements relating to capital markets or other relevant regulations (see page 35 ff. of RBI Sustainability Report for financial year 2022).

In addition, RBI established a central complaints management function and adopted corresponding head office and Group directives and contributes channelling critical concerns/ethical considerations into the existing frameworks. (See page 70 ff. of RBI Sustainability Report for financial year 2022).

Lastly, employees received training on identifying certain signals which indicate that certain activities and sectors are particularly critical from a sustainability perspective. For particularly critical customers and/or projects, an ESG expert opinion is prepared. This analyses ESG factors at project level and at company level and assesses their impact on the environment and social issues. The ESG expert opinion is taken into account in the lending decision process and thus plays a key role in preventing negative impacts from an ESG perspective (see page 90 ff. of RBI Sustainability Report for financial year 2022).

In 2022, 130 reports were received, 74 of them via the whistle-blower system, 56 of which were received and responded to by the ombudsperson. The reports/requests for advice related to bribery and corruption (3), conflicts of interest (5), fraud and theft (8), harassment, discrimination and retaliation (41) and other internal misconduct (75). (See page 33 ff. of RBI Sustainability Report for financial year 2022).

Lastly, policies governing strategically important topics are a key element and form the basis of our effective internal control systems (ICS, see page 37 ff. of RBI Sustainability Report for financial year 2022). Collectively, these policies are core to our company principles. They include the authority to approve group and company policies as well as departmental and separation of duties policies. As such for identified environmental, social and governance risks appropriate internal controls are developed and implemented in RBI's internal ICS solution, to manage those risks. These controls are reviewed on a regular basis based on their design and effectiveness in accordance with RBI's internal control system framework.

## 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*

In line with page 76 ff 'RBI Sustainability Report', financial year 2022, definition, Governance risks refer to the governance practices of the institutions' counterparties, including the inclusion of ESG factors in policies and procedures under the governance of the counterparties. This may include, but is not limited to, executive pay, board diversity and structure, shareholder rights, bribery and corruption, compliance, ethical standards (e.g., data ethics), fair tax strategy, etc.

As a result, in the context of the ESG customer score the governance-related risks at customer level are measured by scoring questions on transparency, business ethics, diversity and strategy and risk management.

Independent of the governance score RBI has in place internal code of conduct provisions incl. market code specifics for suppliers and compliance programs related to whistleblowing, customer complaints and anti-bribery & corruption including conflict of interest.

All employees are obliged to report serious violations of the CoC, such as market abuse, fraud, theft, embezzlement, bribery or corruption. RBL uses a software solution from an external service provider that enables anonymous electronic reporting.

Violations and breaches of the CoC (e.g., general statistics and KPIs) are reported regularly (at least annually) to the Management Board of RBL AG, and to the relevant committees (Risk Committee, Audit Committee) of the Supervisory Board of RBL AG. Specific material cases are ultimately escalated to the highest management bodies on an ad hoc basis. (See page 32 ff. of 'RBL Sustainability Report', financial year 2022).

# Quantitative disclosure

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

Template 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. In this template institutions information on exposures towards non-financial corporates that operate in sectors that contribute highly to climate change and in carbon-related sectors, and on the quality of those exposures is disclosed.

RBI reports in Column 'h' the financed GHG emissions associated with the Total Gross Carrying amount. As requested by the EBA ITS, RBI reports this information in tonnes of CO2 equivalents. In our calculations we aggregate Scope 1 and Scope 2 of our investees, and do not yet include Scope 3 of counterparts as in general methodologies for estimating this indirect scope of emissions are in very early stage and internal methods does not cover it. The total amount of financed emissions – corresponding to Scope 3 category 15 emissions of RBI Group for the exposures reported in the Template, amounts to 9,089,922 t Co2e. Of these, 11.72% are calculated based on company specific reporting.

The calculation methodology applied is based on the PCAF standard.

As required by Annex II we specify in detail our methodological approaches:

- Calculations are performed **only if all the parameters needed for the calculations are available**. The Scope 3/financed emissions amounts reported in Column "h" correspond to less than the total exposure reported in Template 1 - namely EUR 12,759 Mn out of EUR 51,753mn are covered with the calculations
- A **proportionate approach is applied**: share of our investees Scope 1 and Scope 2 emissions that is equal to the sum of outstanding exposure (loans and advances, debt securities and equity) over the total Balance Sheet of the counterparty relevant for RBI Group Scope3/financed emission calculations is being considered. This ratio is referred to as the "**Attribution Factor**" in the PCAF Standard. The following data sources are used for the calculation of the Attribution Factor:
  - RBI internal credit risk system
  - RBI Rating data base

For investees' Scope 1 and 2 emissions **we follow the PCAF methodology** and use the following data sources:

Reported clients' emissions are used whenever available, collected directly via customer questionnaire, or manually from clients' public disclosures, or via verified 3rd party data providers.

- Physical activity-based emissions estimations are not included in the portfolio covered in Template 1, i.e. the percentage of total Scope 3/financed emissions calculated based on primary physical activity data is 0%
- economic activity-based emissions estimations have been performed based on investees' total yearly revenues and economic activity-based emission factors. The percentage of total Scope 3/financed emissions calculated based on such data is 88.28%. The following data sources have been used:
  - RBI Rating data base
  - PCAF database for emission factors based on Country of Risk and Industry

We apply a GCC approach for the GHG calculations, meaning that the Country of Risk, Industry, and financials "assigned" to a client are identified based on the following hierarchy: a) country of risk and GICS industry of the top GCC Head if available; if not b) country of risk and GICS industry of counterparty

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*	39 710	528		7 008	1 185	-1 261	-326	-767	8 667 223		10%	30 444	6 366	1 281	1 620	4
2 A - Agriculture, forestry and fishing	1 471			293	124	-108	-14	-81	443 255			1 208	213	26	24	3
3 B - Mining and quarrying	946	5		71	131	-127	-11	-114	1 437 798		4%	664	212	62	7	4
4 B.05 - Mining of coal and lignite	118	3		0	101	-99	0	-98	33 200			115			3	0
5 B.06 - Extraction of crude petroleum and natural gas	537	2		23	0	-1	0	0	1 084 528		3%	304	169	62	3	6
6 B.07 - Mining of metal ores	116			22	26	-23	-10	-12	2 388			104	11		1	2
7 B.08 - Other mining and quarrying	60			6	0	-1	0	0	34 293		38%	58	2	0	0	3
8 B.09 - Mining support service activities	114			20	3	-4	0	-3	283 389			84	30		0	3
9 C - Manufacturing	11 352	416		2 618	304	-334	-122	-175	3 127 810		22%	8 751	1 880	103	618	3
10 C.10 - Manufacture of food products	1 653			289	44	-50	-14	-26	304 867		6%	1 286	308	1	58	2
11 C.11 - Manufacture of beverages	244			73	5	-9	-4	-4	59 825		0%	205	35	4	0	2
12 C.12 - Manufacture of tobacco products	7			7	0	0	0	0	0		0%	7			0	0
13 C.13 - Manufacture of textiles	52			21	5	-5	0	-5	6 768		7%	43	8	0	2	2
14 C.14 - Manufacture of wearing apparel	46			13	2	-2	0	-1	2 081		26%	42	2	1	1	2
15 C.15 - Manufacture of leather and related products	23			2	4	-2	0	-2	705			20	3			2
16 C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials	389			147	11	-10	-2	-7	30 891			192	179	4	14	5
17 C.17 - Manufacture of pulp, paper and paperboard	509			92	5	-8	-2	-3	46 783		26%	420	84	0	6	3
18 C.18 - Printing and service activities related to printing	105			20	4	-2	0	-1	8 133			93	11	1	0	2
19 C.19 - Manufacture of coke oven products	143	8		70	6	-15	-10	-5	200 333		5%	125	16		1	2



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
20	C.20 - Production of chemicals	1 277	270		184	64	-41	-7	-32	758 951		62%	1 204	63	1	10	2
21	C.21 - Manufacture of pharmaceutical preparations	268			56	0	-1	-1	0	41 871		19%	192	74		3	3
22	C.22 - Manufacture of rubber products	617			184	10	-18	-7	-9	83 286		10%	526	81	10	0	3
23	C.23 - Manufacture of other non-metallic mineral products	326			104	3	-8	-5	-2	275 410		15%	245	78	2	1	3
24	C.24 - Manufacture of basic metals	1 365	137		698	17	-59	-46	-12	946 837		46%	1 122	205		38	2
25	C.25 - Manufacture of fabricated metal products, except machinery and equipment	830			139	22	-22	-6	-13	93 285		8%	551	140	4	136	2
26	C.26 - Manufacture of computer, electronic and optical products	722			9	4	-4	0	-3	57 816		60%	465	171	52	35	5
27	C.27 - Manufacture of electrical equipment	556			49	2	-5	-1	-2	34 334			416	17	1	122	1
28	C.28 - Manufacture of machinery and equipment n.e.c.	594			139	36	-29	-5	-22	90 760		4%	383	106	2	102	2
29	C.29 - Manufacture of motor vehicles, trailers and semi-trailers	779			181	42	-27	-8	-15	30 015		10%	534	146	19	79	3
30	C.30 - Manufacture of other transport equipment	219			47	1	-3	-1	0	22 049		16%	163	57	0	0	3
31	C.31 - Manufacture of furniture	189			27	11	-8	-1	-7	21 354			144	40	0	5	3
32	C.32 - Other manufacturing	208			59	1	-2	-1	-1	5 212		0%	196	5	2	5	2
33	C.33 - Repair and installation of machinery and equipment	231			8	3	-3	0	-2	6 245			178	52	1	0	4
34	D - Electricity, gas, steam and air conditioning supply	1 872	82		496	25	-38	-10	-24	487 269		15%	1 258	411	198	4	4
35	D35.1 - Electric power generation, transmission and distribution	1 371	60		314	3	-12	-8	-2	201 084		20%	741	165	0	1	4
36	D35.11 - Production of electricity	883	59		293	3	-11	-7	-2	138 152		25%	358	62		0	2
37	D35.2 - Manufacture of gas; distribution of gaseous fuels through mains	420	22		180	15	-17	-2	-15	194 739			54	26	1		2
38	D35.3 - Steam and air conditioning supply	81			3	7	-8	0	-7	91 447		14%	464	220	197	3	3

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
39	E - Water supply; sewerage, waste management and remediation activities	416		82	3	8	5	2	884 600		3%	242	68	44	63	7
40	F - Construction	1 978	25		410	92	-80	-15	-54	85 709	1%	1 564	222	77	114	4
41	F.41 - Construction of buildings	1 230	25		234	53	-43	-10	-27	31 812	2%	949	131	60	90	4
42	F.42 - Civil engineering	243		61	15	-11	-1	-7	27 133		1%	214	20	9	0	3
43	F.43 - Specialised construction activities	504	0		115	24	-26	-4	-20	26 764		401	71	8	24	3
44	G - Wholesale and retail trade; repair of motor vehicles and motorcycles	10 133	0		1 692	270	-253	-44	-181	1 746 057	8%	8 879	963	54	237	2
45	H - Transportation and storage	2 973		542	124	-116	-19	-86	294 611		4%	2 310	625	17	21	4
46	H.49 - Land transport and transport via pipelines	1 941		410	32	-41	-14	-20	183 470		4%	1 384	541	16	0	4
47	H.50 - Water transport	175		43	53	-54	-1	-53	36 829		1%	152	21	0	2	2
48	H.51 - Air transport	148		13	5	-7	0	-5	15 389		0%	147	0		1	4
49	H.52 - Warehousing and support activities for transportation	585		47	32	-13	-3	-7	50 282		6%	509	59	1	17	3
50	H.53 - Postal and courier activities	124		30	1	-2	-1	-1	8 642		5%	119	5		1	2
51	I - Accommodation and food service activities	589		255	86	-41	-8	-30	9 593			431	69	69	20	5
52	L - Real estate activities	7 981		549	26	-173	-89	-23	150 521		1%	5 136	1 702	630	513	6
53	Exposures towards sectors other than those that highly contribute to climate change*	12 042	41		2 418	429	-999	-170	-243			8 951	2 272	125	685	3
54	K - Financial and insurance activities	919	1		300	6	-21	-18	-1			680	78	23	138	3
55	Exposures to other sectors (NACE codes J, M - U)	11 123	41		2 118	423	-978	-152	-242			8 271	2 194	102	547	3
56	TOTAL	51 753	570		9 425	1 613	-1 673	-496	-1 010	9 570 102	12%	31 134	6 444	1 304	1 757	3

\* 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

# Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral

Template 2 includes information on the distribution of real estate loans and advances and of repossessed collateral, by energy consumption and by EPC label of the collateral.

As stated in the introduction of this chapter, availability of energy efficiency data is a current challenge. Given that the information on the EPC labels for parts of the portfolio is missing, RBI employed an approximation model to estimate the distribution of the energy consumption across its collateral portfolio. The model is based on a linear regression of the energy efficiency against some relevant parameters of the collateral (as e.g., the year built, region, whether it is a retail or non-retail collateral). The model was trained on internally available data amended by externally available data sources on energy efficiency.<sup>2</sup> Using this model, for each collateral a probability assessment of the building being in one of the respective energy consumption bands was done and the exposure related to this collateral was then distributed across the bands according to this probability distribution.

Furthermore, Enerdata (Odysee) has been used to convert, where applicable due to availability, final energy information in primary energy information. For this purpose, a Primary Energy Factor (PEF) has been calculated. The PEFs we calculated for each relevant country with a simplified approach (approach confirmed by Enerdata<sup>3</sup>). For the calculation we used the country specific primary and final energy consumption ratio as basis.

<sup>2</sup> External sources and providers of energy efficiency data include:

- Serbia: Central Registry for Energy Passports" (<https://www.crep.gov.rs/>)
- Slovakia: <http://www.inforeg.sk/inforeg/Default.aspx>
- Czech: DEKPROJEKT s.r.o. (external/advisory firm specialized in energy efficiency <https://www.tzb-info.cz/firmy/dekprojekt>)
- Russia: database of the State Corporation - Support Fund for the Reform of the Housing and Utilities Sector.

<sup>3</sup> Enerdata is an independent research and consulting firm specialising in the analysis and modelling of the global energy markets and its drivers. ([https://www.enerdata.net/publications/world-energy-statistics-supply-and-demand.html?gclid=EA1a1QobChMI9reZkKyD\\_QIVQuh3Ch1-WA24EAAYASAAEgJHhFD\\_BwE](https://www.enerdata.net/publications/world-energy-statistics-supply-and-demand.html?gclid=EA1a1QobChMI9reZkKyD_QIVQuh3Ch1-WA24EAAYASAAEgJHhFD_BwE))

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 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		Of which level of energy efficiency (EP score in kWh/m² of collateral) estimated
1	Total EU area	35 474	10 531	20 233	2 725	1 063	609	204	1 961	2 907	1 262	404	49	12	71	28 994	100%
2	Of which Loans collateralised by commercial immovable property	8 036	2 025	3 710	1 377	500	276	147	1 140	1 491	929	357	49	12	22	4 036	100%
3	Of which Loans collateralised by residential immovable property	27 427	8 506	16 523	1 348	563	332	57	821	1 416	333	47	0	0	49	24 946	100%
4	Of which Collateral obtained by taking possession: residential and commercial immovable properties	11														11	0%
5	Of which Level of energy efficiency (EP score in kWh/m² of collateral) estimated	32 104	9 106	19 034	2 419	931	431	183								23 604	100%
6	Total non-EU area	6 291	837	864	1 805	597	177	26	5	15	18				1	6 252	68%
7	Of which Loans collateralised by commercial immovable property	2 641	412	219	706	256	109	25	4	0	14				1	2 621	65%
8	Of which Loans collateralised by residential immovable property	3 628	426	645	1 099	340	67	1		15	4					3 609	70%
9	Of which Collateral obtained by taking possession: residential and commercial immovable properties	22														22	0%
10	Of which Level of energy efficiency (EP score in kWh/m² of collateral) estimated	4 252	786	862	1 805	597	177	25								4 244	100%

Disclosure was restated as only collected label information from EPC certificates is now reported under the Level of energy efficiency (EPC label of collateral); estimated EPC labels from one EU network country that were previously used, are not included anymore.

# Banking book - Climate change transition risk: Exposures to top 20 carbon-intensive firms

Template 4 shows RBIs exposures towards the top 20 carbon-intensive companies in the world. The top polluters have been identified using Climate Accountability 2020) Carbon Majors dataset.

**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 counter-parties compared to total gross carrying amount (aggregate)*	Of which environmentally sustainable (CCM)	Weighted average maturity	Number of top 20 polluting firms included
1	90	0.17%		2.36	3

# Banking book – Climate change physical risk: Exposures subject to physical risk

Template 5 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 climate-related hazards.

In absence of more detailed methodological instructions by EBA for the identification of “sensitivity” to Physical Risk, RBI Group has chosen the following approach that allows a homogeneous, granular and forward-looking identification of climate-change related physical risk sensitivities.

The assessment is based on a comprehensive set of climate change related physical risk hazards – 6 classified as “acute” – associated with sudden weather-related events – and 8 chronic – arising from gradual changes in climate patterns. Hazard severity is assessed on a spatial grid of 30x30km (1x1km for flood risk), based on climatology's modelled in NGFS-like scenario “Orderly Transition”, over a time horizon of up to 2050. Considering the large and diverse geographical footprint of RBI Group's activities, hazard data at the basis of the assessment was provided by an external data provider, Prometeia S.P.A., to guarantee an adequate geographical coverage and a consistent physical risk measurement across regions that are of relevance for the Group. The identification of “exposures sensitive to” physical risk is performed based on the following 3-step approach.

As a first step “relevant” locations corresponding to our assets in scope are identified. For collateral assets, the address of the real estate is used to identify the location relevant for physical risk assessment. For Non-Financial Corporates (NFCs), lacking more representative data, the registration address /head quarter address of counterparties was used as proxy for the location at which hazard sensitivity is assessed. In a second step, the physical risk sensitivity of each location corresponding to RBI exposures is measured by using hazard specific “Synthetical Physical Risk Indicators” (SPRI), i.e., qualitative flags on a 1-4 grades scale. A location is considered as sensitive to acute physical risk if within a time horizon consistent with the maturity of the bank's exposure – it is exposed to any of the acute risks identified to a level corresponding to the highest grade (SPRI = “very high”). As a final step, results are adjusted by applying a Vulnerability Matrix – a tool developed by Prometeia S.P.A., that reflects the different vulnerability of different economic activities or asset types to the same weather and climatic conditions. The assessment does not take into account mitigation measures (insurance, or adaptation measures that are able to avert or minimise the effects of a weather-related event). Once a location is identified as being “sensitive to” as per logic described – the entire exposure is allocated to the relevant column in Template 5.

Data limitations did not allow a physical risk assessment for the entire portfolio in scope. Out of EUR 39.131mn of NFCs exposure in scope of Template 5, we are able to perform an assessment for EUR 30.317 mn (77% of total) while for collateralised exposures out of EUR 41.731 mn, we covered EUR 34.330 mn (82% of total). Out of total exposure covered for the NFC exposures, based on methodology applied, 32% is found to be sensitive to acute physical risk, 7% to chronic physical risk and 11% to both risks at the same time. Out of total exposure covered for collateralized exposures 17% is found to be sensitive to acute physical risk, while no collaterals were exposed to chronic physical risk or both risks at the same time.

For the purpose of regional split of physical risk vulnerability, due to the distribution of RBI portfolio in areas not covered by NUTS nomenclature<sup>4</sup>, the portfolio is split on segments Central Europe, South-eastern Europe, Eastern Europe, Western Europe, Northern Europe, Southern Europe, Southwestern Europe and Rest of world. Exposure booked in Russian entity has been fully allocated to Eastern Europe. European region definitions were based on the country segmentation suggested by The World Factbook.

<sup>4</sup> National structures - NUTS - Nomenclature of territorial units for statistics - Eurostat (europa.eu)

[illegible]

[illegible]



[illegible]

[illegible]

[illegible]

[illegible]

[illegible]

[illegible]

# Other climate change mitigating actions that are not covered in the EU Taxonomy

The purpose of this template is to provide information on other actions put in place by the institution to mitigate climate-change-related risks. It covers other activities of the institutions that are not included in Template 7 and Template 8.

Exposure has been identified according to our internal regulations stipulated in the 'ESG Rulebook', which sets out Group-wide uniform definitions for sustainable customers and for green, social and ESG-linked finance within the RBI Group. When classifying transactions, RBI has decided to take the uniform RBI in-house definitions and, wherever possible, the provisions of the currently applicable version of the EU taxonomy into account. Internal RBI definitions of 'green', 'social' and 'ESG-linked finance' are based on the ICMA Green & Social & Sustainability Bond Principles and the LMA Sustainability Linked Principles. See also 'RBI Sustainability Report', financial year 2022, page 99.

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	257	Yes	No	Includes exposures toward green and sustainable bonds as identified by external and internal classification, held in banking book
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				
8	Loans (e.g. green, sustainable, sustainability-linked under standards other than the EU standards)	Financial corporations	434	Yes	No	Exposures that have satisfied all other eligibility criteria except NFRD status.
9		Non-financial corporations	548	Yes	No	Exposures that have satisfied all other eligibility criteria except NFRD status, either due to non EU location, size or lack of public listing.
10		Of which Loans collateralised by commercial immovable property	46	Yes	No	Exposures that have satisfied all other eligibility criteria except NFRD status, either due to non EU location, size or lack of public listing. Collateralized by CRE
11		Households	0	Yes	No	Exposures that have satisfied all other eligibility criteria except NFRD status, either due to non EU location, size or lack of public listing.
12		Of which Loans collateralised by residential immovable property	0	Yes	No	Exposures that have satisfied all other eligibility criteria except NFRD status, either due to non EU location, size or lack of public listing. Collateralized by RRE
13		Of which building renovation loans				
14		Other counterparties				

December loan exposure figures were restated as no assumption of eligibility is made based on NACE industry alone in order to be aligned with future disclosure rules on eligibility and alignment.



# Annex 1

## Management Board

As of 31 December 2022, the Management Board of RBI consisted of six members. Details on the education and careers of the Management Board members (according to Article 435(2)(b) CRR) are available on RBI's website under <https://www.rbinternational.com/en/who-we-are/facts-figures/boards.html>.

Johann Strobl			
Directorships in RBI AG:		Management Board: Member (CEO)	
Number of directorships held in Supervisory Board and Management Board according to Art. 435 para 2 lit a CRR			
	Number of Directorships with an entity that pursues a commercial objective	Number of Directorships according to sec 5 para 1 lit 9a BWG	Number of Directorships with an entity that does not pursue a commercial objective
Supervisory Board:	6	0	1
Management Board:	1	1	

Andreas Gschwentner			
Directorships in RBI AG:	Board of Management: Member (COO/CIO)		
Number of directorships held in Supervisory Board and Management Board according to Art. 435 para 2 lit a CRR			
	Number of Directorships with an entity that pursues a commercial objective	Number of Directorships according to sec 5 para 1 lit 9a BWG	Number of Directorships with an entity that does not pursue a commercial objective
Supervisory Board:	6	0	1
Management Board:	1	1	

Lukas Januszewski			
Directorships in RBI AG:		Board of Management: Member (Markets & Investment Banking)	
Number of directorships held in Supervisory Board and Management Board according to Art. 435 para 2 lit a CRR			
	Number of Directorships with an entity that pursues a commercial objective	Number of Directorships according to sec 5 para 1 lit 9a BWG	Number of Directorships with an entity that does not pursue a commercial objective
Supervisory Board:	5	0	0
Management Board:	1	1	

Peter Lennkh			
Directorships in RBI AG:		Board of Management: Member (Corporate Banking)	
Number of directorships held in Supervisory Board and Management Board according to Art. 435 para 2 lit a CRR			
	Number of Directorships with an entity that pursues a commercial objective	Number of Directorships according to sec 5 para 1 lit 9a BWG	Number of Directorships with an entity that does not pursue a commercial objective
Supervisory Board:	8	1	1
Management Board:	1	1	4

Hannes Mösenbacher			
Directorships in RBI AG:		Board of Management: Member (CRO)	
Number of directorships held in Supervisory Board and Management Board according to Art. 435 para 2 lit a CRR			
	Number of Directorships with an entity that pursues a commercial objective	Number of Directorships according to sec 5 para 1 lit 9a BWG	Number of Directorships with an entity that does not pursue a commercial objective
Supervisory Board:	5	0	1
Management Board:	1	1	1

Andrii Stepanenko			
Directorships in RBI AG:		Board of Management: Member (Retail)	
Number of directorships held in Supervisory Board and Management Board according to Art. 435 para 2 lit a CRR			
	Number of Directorships with an entity that pursues a commercial objective	Number of Directorships according to sec 5 para 1 lit 9a BWG	Number of Directorships with an entity that does not pursue a commercial objective
Supervisory Board:	8	0	0
Management Board:	1	1	0

# Supervisory Board

As of 31 December 2022, the Supervisory Board of RBI consisted of the following members. Details on the education and careers of the Supervisory Board members (according to Article 435(2)(b) CRR) are available on RBI's website under <https://www.rbinternational.com/en/who-we-are/facts-figures/boards.html>.

Erwin Harneseder			
Directorships in RBI AG:	Supervisory Board: Chairman		
	Nomination, Personnel, Remuneration and Working Committee: Chairman		
	Risk Committee: Second Deputy Chairman		
	Audit Committee: First Deputy Chairman		

## Number of directorships held in Supervisory Board and Management Board according to Art. 435 para 2 lit a CRR

	Number of Directorships with an entity that pursues a commercial objective	Number of Directorships according to sec 5 para 1 lit 9a BWG	Number of Directorships with an entity that does not pursue a commercial objective
Supervisory Board:	14	3	10
Management Board:	0	0	0

Martin Schaller			
Directorships in RBI AG:	Supervisory Board: First Deputy Chairman		
	Digitalisation and Risk Committee: First Deputy Chairman		
	Nomination, Personnel, Remuneration and Working Committee: Second Deputy Chairman		

## Number of directorships held in Supervisory Board and Management Board according to Art. 435 para 2 lit a CRR

	Number of Directorships with an entity that pursues a commercial objective	Number of Directorships according to sec 5 para 1 lit 9a BWG	Number of Directorships with an entity that does not pursue a commercial objective
Supervisory Board:	2	0	1
Management Board:	1	1	11

Heinrich Schaller			
Directorships in RBI AG:	Supervisory Board: Deputy Chairman		
	Nomination, Personnel, Remuneration and Working Committee: First Deputy Chairman		
	Audit Committee: Second Deputy Chairman		
	Risk Committee: Member		

## Number of directorships held in Supervisory Board and Management Board according to Art. 435 para 2 lit a CRR

	Number of Directorships with an entity that pursues a commercial objective	Number of Directorships according to sec 5 para 1 lit 9a BWG	Number of Directorships with an entity that does not pursue a commercial objective
Supervisory Board:	11	1	3
Management Board:	1	1	4

Michael Höllerer			
Directorships in RBI AG:	Supervisory Board: Member		

## Number of directorships held in Supervisory Board and Management Board according to Art. 435 para 2 lit a CRR

	Number of Directorships with an entity that pursues a commercial objective	Number of Directorships according to sec 5 para 1 lit 9a BWG	Number of Directorships with an entity that does not pursue a commercial objective
Supervisory Board:	7	2	9
Management Board:	2	1	0

Eva Eberhartinger			
Directorships in RBI AG:	Supervisory Board: Member		
	Audit Committee: Chairwoman		
	Remuneration and Risk Committee		

## Number of directorships held in Supervisory Board and Management Board according to Art. 435 para 2 lit a CRR

	Number of Directorships with an entity that pursues a commercial objective	Number of Directorships according to sec 5 para 1 lit 9a BWG	Number of Directorships with an entity that does not pursue a commercial objective
Supervisory Board:	2	1	0
Management Board:	0	0	0

Andrea Gaal			
Directorships in RBI AG:		Supervisory Board: Member	
		Digitalisation Committee: Chairwoman	
		Working, Audit, Remuneration, Nomination, Personnel and Risk Committee: Member	
Number of directorships held in Supervisory Board and Management Board according to Art. 435 para 2 lit a CRR			
	Number of Directorships with an entity that pursues a commercial objective	Number of Directorships according to sec 5 para 1 lit 9a BWG	Number of Directorships with an entity that does not pursue a commercial objective
Supervisory Board:	1	1	0
Management Board:	0	0	0
Peter Gauper			
Directorships in RBI AG:		Supervisory Board: Member	
Number of directorships held in Supervisory Board and Management Board according to Art. 435 para 2 lit a CRR			
	Number of Directorships with an entity that pursues a commercial objective	Number of Directorships according to sec 5 para 1 lit 9a BWG	Number of Directorships with an entity that does not pursue a commercial objective
Supervisory Board:	1	0	0
Management Board:	2	1	0
Michael Alge			
Directorships in RBI AG:		Supervisory Board: Member	
		Digitalisation Committee: Member	
Number of directorships held in Supervisory Board and Management Board according to Art. 435 para 2 lit a CRR			
	Number of Directorships with an entity that pursues a commercial objective	Number of Directorships according to sec 5 para 1 lit 9a BWG	Number of Directorships with an entity that does not pursue a commercial objective
Supervisory Board:	2	1	1
Management Board:	2	1	3
Rudolf Könighofer			
Directorships in RBI AG:		Supervisory Board: Member	
Number of directorships held in Supervisory Board and Management Board according to Art. 435 para 2 lit a CRR			
	Number of Directorships with an entity that pursues a commercial objective	Number of Directorships according to sec 5 para 1 lit 9a BWG	Number of Directorships with an entity that does not pursue a commercial objective
Supervisory Board:	2	1	2
Management Board:	4	1	10
Heinz Konrad			
Directorships in RBI AG:		Supervisory Board: Member	
		Nomination and Personell Committee: Member	
Number of directorships held in Supervisory Board and Management Board according to Art. 435 para 2 lit a CRR			
	Number of Directorships with an entity that pursues a commercial objective	Number of Directorships according to sec 5 para 1 lit 9a BWG	Number of Directorships with an entity that does not pursue a commercial objective
Supervisory Board:	3	1	1
Management Board:	3	1	9
Reinhard Mayr			
Directorships in RBI AG:		Supervisory Board: Member	
		Audit, Digitalisation Committee: Member	
Number of directorships held in Supervisory Board and Management Board according to Art. 435 para 2 lit a CRR			
	Number of Directorships with an entity that pursues a commercial objective	Number of Directorships according to sec 5 para 1 lit 9a BWG	Number of Directorships with an entity that does not pursue a commercial objective
Supervisory Board:	3	1	2
Management Board:	1	1	11

Birgit Noggler			
Directorships in RBI AG:	Supervisory Board: Member		
	Risk Committee: Chairwoman		
	Working, Audit, Remuneration, Nomination and Personnel Committee: Member		
Number of directorships held in Supervisory Board and Management Board according to Art. 435 para 2 lit a CRR			
	Number of Directorships with an entity that pursues a commercial objective	Number of Directorships according to sec 5 para 1 lit 9a BWG	Number of Directorships with an entity that does not pursue a commercial objective
Supervisory Board:	7	1	0
Management Board:	1	0	3

# Annex 2

## Scope of consolidation

Information on the consolidation method applied for each entity within the accounting and the regulatory scopes of consolidation of RBl as of 31 December 2022 is disclosed in the following tables.

Name of the entity	Method of accounting consolidation	Method of regulatory consolidation	Description of the entity
Abade Immobilienleasing GmbH	Fully consolidated	Fully consolidated	Financial Institution
Abade Immobilienleasing GmbH & Co Projekt Lauterbach KG	Fully consolidated	Fully consolidated	Financial Institution
Abura Immobilienleasing GmbH & Co. Projekt Seniorenhaus Boppard KG	Fully consolidated	Fully consolidated	Financial Institution
Achat Immobilien GmbH & Co. Projekt Hochtaunus-Stift KG	Fully consolidated	Fully consolidated	Financial Institution
Acridin Immobilienleasing GmbH & Co. Projekt Marienfeld KG	Fully consolidated	Fully consolidated	Financial Institution
Adagium Immobilienleasing GmbH	Fully consolidated	Fully consolidated	Financial Institution
Adamas Immobilienleasing GmbH & Co. Projekt Pflegeheim Werdau KG	Fully consolidated	Fully consolidated	Financial Institution
Adiantum Immobilienleasing GmbH & Co. Projekt Schillerhöhe Weimar KG	Fully consolidated	Fully consolidated	Financial Institution
Ados Immobilienleasing GmbH	Fully consolidated	Fully consolidated	Financial Institution
Agamemnon Immobilienleasing GmbH & Co. Projekt Pflegeheim Freiberg KG	Fully consolidated	Fully consolidated	Financial Institution
AGIOS Raiffeisen-Immobilien Leasing Gesellschaft m.b.H.	Fully consolidated	Fully consolidated	Financial Institution
Akcenta CZ a.s.	Fully consolidated	Fully consolidated	Company with ancillary banking services
AKRIOS Raiffeisen-Immobilien-Leasing GmbH	Fully consolidated	Fully consolidated	Financial Institution
A-Leasing SpA	Fully consolidated	Fully consolidated	Financial Institution
RL-ALPHA Holding GmbH	Fully consolidated	Fully consolidated	Financial Institution
AMYKOS RBI Leasing-Immobilien GmbH	Fully consolidated	Fully consolidated	Financial Institution
ARCANA Raiffeisen-Immobilien-Leasing Gesellschaft m.b.H.	Fully consolidated	Fully consolidated	Financial Institution
A-Real Estate S.p.A.	Fully consolidated	Fully consolidated	Financial Institution
Raiffeisen Property Holding International GmbH	Fully consolidated	Fully consolidated	Financial Institution
Austria Leasing Beteiligungsgesellschaft mbH	Fully consolidated	Fully consolidated	Financial Institution
Austria Leasing GmbH	Fully consolidated	Fully consolidated	Financial Institution
AL Taunussteiner Grundstücks-GmbH & Co KG	Fully consolidated	Fully consolidated	Financial Institution
Raiffeisen Bank JSC	Fully consolidated	Fully consolidated	Credit Institution
BAILE Handels- und Beteiligungsgesellschaft m.b.H.	Fully consolidated	Fully consolidated	Financial Institution
Burgenländische Kommunalgebäudeleasing Gesellschaft m.b.H.	Fully consolidated	Fully consolidated	Financial Institution
Canopa Raiffeisen-Immobilien-Leasing Gesellschaft m.b.H.	Fully consolidated	Fully consolidated	Financial Institution
RBA banka a.d.	Fully consolidated	Fully consolidated	Credit Institution
Raiffeisen CEE Region Holding GmbH	Fully consolidated	Fully consolidated	Financial Holding Company
CERES Raiffeisen-Immobilien-Leasing GmbH	Fully consolidated	Fully consolidated	Financial Institution
CINOVA RBI Leasing-Immobilien GmbH	Fully consolidated	Fully consolidated	Financial Institution
Raiffeisen CIS Region Holding GmbH	Fully consolidated	Fully consolidated	Financial Holding Company
Centralised Raiffeisen International Services & Payments S.R.L.	Fully consolidated	Fully consolidated	Company with ancillary banking services
CUPIDO Raiffeisen-Immobilien-Leasing GmbH	Fully consolidated	Fully consolidated	Financial Institution
WHIBK Raiffeisen-Immobilien-Leasing GmbH	Fully consolidated	Fully consolidated	Financial Institution
Doplňková dôchodková spoločnosť Tatra banky	Not consolidated	Fully consolidated	Financial Institution
DOROS Raiffeisen-Immobilien-Leasing GmbH	Fully consolidated	Fully consolidated	Financial Institution
Elevator Ventures Beteiligungs GmbH	Fully consolidated	Fully consolidated	Financial Institution
Equa Sales & Distribution s.r.o. (in Liqu.)	Fully consolidated	Fully consolidated	Financial Institution
ETEOKLES Raiffeisen-Immobilien-Leasing GmbH	Fully consolidated	Fully consolidated	Financial Institution
Floreasca City Center Verwaltung Kft.	Fully consolidated	Fully consolidated	Financial Institution
GENO Leasing Ges.m.b.H.	Fully consolidated	Fully consolidated	Financial Institution
RBI Group IT GmbH	Fully consolidated	Fully consolidated	Company with ancillary banking services
HABITO Raiffeisen-Immobilien-Leasing GmbH	Fully consolidated	Fully consolidated	Financial Institution
Health Resort RBI Immobilien-Leasing GmbH	Fully consolidated	Fully consolidated	Financial Institution

Name of the entity	Method of accounting consolidation	Method of regulatory consolidation	Description of the entity
Kathrein Capital Management GmbH	Not consolidated	Fully consolidated	Financial Institution
Infrastruktur Heilbad Sauerbrunn RBI-Leasing GmbH & Co.KG.	Fully consolidated	Fully consolidated	Financial Institution
Raiffeisen investicni spolecnost a.s.	Not consolidated	Fully consolidated	Financial Institution
Kathrein Privatbank Aktiengesellschaft	Fully consolidated	Fully consolidated	Credit Institution
KAURI Handels und Beteiligungs GmbH	Fully consolidated	Fully consolidated	Financial Institution
Lentia Immobilienleasing GmbH & Co. Albert-Osswald-Haus KG	Fully consolidated	Fully consolidated	Financial Institution
LYRA Raiffeisen Immobilien Leasing Gesellschaft m.b.H.	Fully consolidated	Fully consolidated	Financial Institution
RL-Mörby AB	Fully consolidated	Fully consolidated	Financial Institution
Raiffeisen ÖHT Beteiligungs GmbH	Fully consolidated	Fully consolidated	Financial Institution
Orestes Immobilienleasing GmbH & Co. Projekt Wiesbaden KG	Fully consolidated	Fully consolidated	Financial Institution
Ostarrichi Immobilienleasing GmbH & Co. Projekt Langenbach KG	Fully consolidated	Fully consolidated	Financial Institution
OVIS Raiffeisen-Immobilien-Leasing Gesellschaft m.b.H.	Fully consolidated	Fully consolidated	Financial Institution
Valida Plus AG	Fully consolidated	Fully consolidated	Financial Institution
PELIAS Raiffeisen-Immobilien-Leasing GmbH	Fully consolidated	Fully consolidated	Financial Institution
PERSES RBI Leasing-Immobilien GmbH	Fully consolidated	Fully consolidated	Financial Institution
PLANA Raiffeisen-Leasing Gesellschaft m.b.H.	Fully consolidated	Fully consolidated	Financial Institution
FCC Office Building SRL	Fully consolidated	Fully consolidated	Company with ancillary banking services
Raiffeisen-Gemeindegebäudeleasing Gesellschaft m.b.H.	Fully consolidated	Fully consolidated	Financial Institution
Raiffeisen-Kommunalgebäudeleasing Gesellschaft m.b.H.	Fully consolidated	Fully consolidated	Financial Institution
RALT Raiffeisen-Leasing Gesellschaft m.b.H.	Fully consolidated	Fully consolidated	Financial Institution
RALT Raiffeisen-Leasing Gesellschaft m.b.H. & Co. KG	Fully consolidated	Fully consolidated	Financial Institution
S.A.I. Raiffeisen Asset Management S.A.	Fully consolidated	Fully consolidated	Financial Institution
RAN zehn Raiffeisen-Anlagenvermietung Gesellschaft m.b.H.	Fully consolidated	Fully consolidated	Financial Institution
RAN vierzehn Raiffeisen-Anlagevermietung GmbH	Fully consolidated	Fully consolidated	Financial Institution
Raiffeisen-Anlagenvermietung Gesellschaft m.b.H.	Fully consolidated	Fully consolidated	Financial Institution
Raiffeisen Bank Sha.	Fully consolidated	Fully consolidated	Credit Institution
Raiffeisen Bank d.d. Bosna i Hercegovina	Fully consolidated	Fully consolidated	Credit Institution
Priorbank JSC	Fully consolidated	Fully consolidated	Credit Institution
RBI Beijing Branch	Fully consolidated	Fully consolidated	Credit Institution
Raiffeisenbank a.s.	Fully consolidated	Fully consolidated	Credit Institution
RBI Zweigniederlassung Frankfurt	Fully consolidated	Fully consolidated	Credit Institution
Raiffeisenbank Austria d.d.	Fully consolidated	Fully consolidated	Credit Institution
Raiffeisen Bank Zrt.	Fully consolidated	Fully consolidated	Credit Institution
Raiffeisen Bank International AG	Fully consolidated	Fully consolidated	Credit Institution
RBI eins Leasing Holding GmbH	Fully consolidated	Fully consolidated	Financial Institution
RBI ITS Leasing-Immobilien GmbH	Fully consolidated	Fully consolidated	Financial Institution
RBI LEA Beteiligungs GmbH	Fully consolidated	Fully consolidated	Financial Institution
RBI Leasing GmbH	Fully consolidated	Fully consolidated	Financial Institution
RBI LGG Holding GmbH	Fully consolidated	Fully consolidated	Financial Institution
RB International Markets (USA) LLC	Fully consolidated	Fully consolidated	Financial Institution
Raiffeisen Bank International AG (Spółka Akcyjna) Oddział w Polsce	Fully consolidated	Fully consolidated	Credit Institution
RBI Slovak Branch	Fully consolidated	Fully consolidated	Credit Institution
Raiffeisen Bank Kosovo J.S.C.	Fully consolidated	Fully consolidated	Credit Institution
Raiffeisen Bank S.A.	Fully consolidated	Fully consolidated	Credit Institution

Name of the entity	Method of accounting consolidation	Method of regulatory consolidation	Description of the entity
Raiffeisen banka a.d.	Fully consolidated	Fully consolidated	Credit Institution
AO Raiffeisenbank	Fully consolidated	Fully consolidated	Credit Institution
OOO Raiffeisen Capital Asset Management Company	Fully consolidated	Fully consolidated	Financial Institution
RBI Singapore Branch	Fully consolidated	Fully consolidated	Credit Institution
Raiffeisen Bausparkasse Gesellschaft m.b.H.	Fully consolidated	Fully consolidated	Credit Institution
Raiffeisen Bausparkassen Holding GmbH	Fully consolidated	Fully consolidated	Financial Institution
Aedificium Banca pentru Locuinte S.A.	Fully consolidated	Fully consolidated	Credit Institution
RBI London Branch	Fully consolidated	Fully consolidated	Credit Institution
Raiffeisen Corporate Leasing GmbH	Fully consolidated	Fully consolidated	Financial Institution
Baumgartner Höhe RBI Leasing-Immobilien GmbH	Fully consolidated	Fully consolidated	Financial Institution
RL Retail Holding GmbH	Fully consolidated	Fully consolidated	Financial Institution
Raiffeisen Factor Bank AG	Fully consolidated	Fully consolidated	Financial Institution
Raiffeisen-Immobilien-Leasing Gesellschaft m.b.H.	Fully consolidated	Fully consolidated	Financial Institution
Raiffeisen International Liegenschaftsbesitz GmbH	Fully consolidated	Fully consolidated	Financial Institution
RIL VII Raiffeisen-Immobilien-Leasing Gesellschaft m.b.H.	Fully consolidated	Fully consolidated	Financial Institution
RIL XIV Raiffeisen-Immobilien-Leasing Gesellschaft m.b.H.	Fully consolidated	Fully consolidated	Financial Institution
Raiffeisen-Invest-Gesellschaft m.b.H.	Fully consolidated	Fully consolidated	Financial Institution
RIRE Holding GmbH	Fully consolidated	Fully consolidated	Financial Institution
Raiffeisen Kapitalanlage-Gesellschaft m.b.H.	Fully consolidated	Fully consolidated	Financial Institution
Raiffeisen-Leasing Equipment Finance GmbH	Fully consolidated	Fully consolidated	Financial Institution
Raiffeisen Leasing sh.a.	Fully consolidated	Fully consolidated	Financial Institution
RL-Pro Auxo Sp.z.o.o.	Fully consolidated	Fully consolidated	Financial Institution
RL Anlagenvermietung Gesellschaft m.b.H.	Fully consolidated	Fully consolidated	Financial Institution
Raiffeisen-Leasing Finanzierungs GmbH	Fully consolidated	Fully consolidated	Financial Institution
Raiffeisen-Leasing Beteiligung GesmbH	Fully consolidated	Fully consolidated	Financial Institution
Raiffeisen Leasing d.o.o. Sarajevo	Fully consolidated	Fully consolidated	Financial Institution
JLLC "Raiffeisen-leasing"	Fully consolidated	Fully consolidated	Financial Institution
Raiffeisen-Leasing	Fully consolidated	Fully consolidated	Financial Institution
Raiffeisen-Leasing Gesellschaft m.b.H.	Fully consolidated	Fully consolidated	Financial Institution
RL Grundstückverwaltung Klagenfurt-Süd GmbH	Fully consolidated	Fully consolidated	Financial Institution
Raiffeisen-Leasing d.o.o.	Fully consolidated	Fully consolidated	Financial Institution
Raiffeisen-Leasing International Gesellschaft m.b.H.	Fully consolidated	Fully consolidated	Financial Institution
RLI Holding Gesellschaft m.b.H.	Fully consolidated	Fully consolidated	Financial Institution
Raiffeisen-Leasing Immobilienmanagement Gesellschaft m.b.H.	Fully consolidated	Fully consolidated	Financial Institution
Raiffeisen Leasing Kosovo LLC	Fully consolidated	Fully consolidated	Financial Institution
Raiffeisen-Leasing Litauen UAB	Fully consolidated	Fully consolidated	Financial Institution
RL-Nordic AB	Fully consolidated	Fully consolidated	Financial Institution
Raiffeisen Leasing-Projektfinanzierung Gesellschaft m.b.H.	Fully consolidated	Fully consolidated	Financial Institution
Raiffeisen FinCorp	Fully consolidated	Fully consolidated	Financial Institution
Raiffeisen Leasing IFN S.A.	Fully consolidated	Fully consolidated	Financial Institution
Raiffeisen Leasing d.o.o.	Fully consolidated	Fully consolidated	Financial Institution
OOO Raiffeisen-Leasing	Fully consolidated	Fully consolidated	Financial Institution
Regional Card Processing Center s.r.o.	Fully consolidated	Fully consolidated	Company with ancillary banking services
Raiffeisen Corporate Lizing Zrt.	Fully consolidated	Fully consolidated	Financial Institution



Name of the entity	Method of accounting consolidation	Method of regulatory consolidation	Description of the entity
Raiffeisen RS Beteiligungs GmbH	Fully consolidated	Fully consolidated	Financial Holding Company
Raiffeisen Digital Bank AG	Fully consolidated	Fully consolidated	Credit Institution
"Raiffeisen-Rent" Vermögensberatung und Treuhand Gesellschaft m.b.H.	Fully consolidated	Fully consolidated	Financial Institution
Raiffeisen consulting d.o.o.	Fully consolidated	Fully consolidated	Financial Institution
Raiffeisen stavebni sporitelna a.s.	Fully consolidated	Fully consolidated	Credit Institution
RUBRA Raiffeisen-Immobilien-Leasing Gesellschaft m.b.H.	Fully consolidated	Fully consolidated	Financial Institution
Raiffeisen Wohnbaubank Aktiengesellschaft	Fully consolidated	Fully consolidated	Financial Institution
RZB - BLS Holding GmbH	Fully consolidated	Fully consolidated	Financial Institution
RBI Invest GmbH	Fully consolidated	Fully consolidated	Financial Holding Company
RBI Beteiligungs GmbH	Fully consolidated	Fully consolidated	Financial Holding Company
RZB Versicherungsbeteiligung GmbH	Fully consolidated	Fully consolidated	Financial Institution
SALVELINUS Handels- und Beteiligungsgesellschaft m.b.H	Fully consolidated	Fully consolidated	Financial Institution
SAMARA Raiffeisen-Immobilien-Leasing Gesellschaft m.b.H.	Fully consolidated	Fully consolidated	Financial Institution
Raiffeisen Rehazentrum Schruns Immobilienleasing GmbH	Fully consolidated	Fully consolidated	Financial Institution
Raiffeisen SEE Region Holding GmbH	Fully consolidated	Fully consolidated	Financial Holding Company
SINIS Raiffeisen-Immobilien-Leasing Gesellschaft m.b.H.	Fully consolidated	Fully consolidated	Financial Institution
Insurance Limited Liability Company "Priorlife"	Fully consolidated	Fully consolidated	Insurance Company
SOLAR II Raiffeisen-Immobilien-Leasing Gesellschaft m.b.H.	Fully consolidated	Fully consolidated	Financial Institution
Tatra Asset Management	Fully consolidated	Fully consolidated	Financial Institution
Tatra banka	Fully consolidated	Fully consolidated	Credit Institution
Tatra-Leasing	Fully consolidated	Fully consolidated	Financial Institution
Unterinntaler Raiffeisen-Leasing GmbH & Co KG	Fully consolidated	Fully consolidated	Financial Institution
Ukrainian Processing Center PJSC	Fully consolidated	Fully consolidated	Company with ancillary banking services
URSA Raiffeisen-Immobilien-Leasing Gesellschaft m.b.H.	Fully consolidated	Fully consolidated	Financial Institution
Vindalo Properties Limited	Fully consolidated	Fully consolidated	Company with ancillary banking services
Valida Holding AG	Fully consolidated	Fully consolidated	Financial Institution
WEGA Raiffeisen-Immobilien-Leasing Gesellschaft m.b.H.	Fully consolidated	Fully consolidated	Financial Institution
Adorant Immobilienleasing GmbH & Co. Projekt Heilsbrunn und Neuendettelsau KG	Fully consolidated	At-equity	Other company type
Adrittura Immobilienleasing GmbH & Co. Projekt Eiching KG	Fully consolidated	At-equity	Other company type
Anton Proksch Institut Kalksburg RBI Immobilien Leasing GmbH	Fully consolidated	At-equity	Other company type
B52 RBI Leasing-Immobilien GmbH	Fully consolidated	At-equity	Other company type
Expo 2000 Real Estate EOOD	Fully consolidated	At-equity	Other company type
Campus NBhf RBI Immobilien-Leasing GmbH	Fully consolidated	At-equity	Other company type
CP Inlandsimmobilien-Holding GmbH	Fully consolidated	At-equity	Other company type
Skytower Building SRL	Fully consolidated	At-equity	Other company type
FMK Fachmarktcenter Kohlbruck Betriebs GmbH	Fully consolidated	At-equity	Other company type
FMZ PRIMUS Ingatlanfejlesztő Kft.	Fully consolidated	At-equity	Other company type
Raiffeisen WohnBau Vienna GmbH	Fully consolidated	At-equity	Other company type
GTNMS RBI Immobilien-Leasing GmbH	Fully consolidated	At-equity	Other company type
Invest Vermögensverwaltungs-GmbH	Fully consolidated	At-equity	Other company type
R Karpo Immobilien Linie S.R.L.	Fully consolidated	At-equity	Other company type
LARENTIA Raiffeisen-Immobilien-Leasing GmbH	Fully consolidated	At-equity	Other company type
Objekt Linser Areal Immobilienerrichtungs GmbH & Co. KG	Fully consolidated	At-equity	Other company type
Valida Pension AG	Fully consolidated	At-equity	Other company type

Name of the entity	Method of accounting consolidation	Method of regulatory consolidation	Description of the entity
Raiffeisen Mandatory and Voluntary Pension Funds Management Company Plc.	Fully consolidated	At-equity	Other company type
Raiffeisen-Leasing Fuhrparkmanagement Gesellschaft m.b.H.	Fully consolidated	At-equity	Other company type
RL LUX Holding S.a.r.l.	Fully consolidated	At-equity	Other company type
RL-PROMITOR Holding GmbH	Fully consolidated	At-equity	Other company type
RL-PROMITOR Sp. z.o.o.	Fully consolidated	At-equity	Other company type
Viktor Property	Fully consolidated	At-equity	Other company type
Raiffeisen Leasing d.o.o.	Not consolidated	At-equity	Other company type
Raiffeisen WohnBau Tirol GmbH	Fully consolidated	At-equity	Other company type
Raiffeisen Property International GmbH	Fully consolidated	At-equity	Other company type
Raiffeisen Property Management GmbH	Fully consolidated	At-equity	Other company type
Raiffeisen Pension Insurance d.d.	Fully consolidated	At-equity	Insurance Company
Raiffeisen-Rent-Immobilienprojektentwicklung Gesellschaft m.b.H.	Fully consolidated	At-equity	Other company type
Raiffeisen-Rent Immobilienprojektentwicklung Gesellschaft m.b.H. Objekt Wallgasse 12 KG	Fully consolidated	At-equity	Other company type
Raiffeisen Rent DOO	Fully consolidated	At-equity	Other company type
Raiffeisen WohnBau Seeresidenz Weyregg GmbH	Fully consolidated	At-equity	Other company type
Sky Tower Immobilien- und Verwaltung Kft	Fully consolidated	At-equity	Other company type
Raiffeisen WohnBau Wien GmbH	Fully consolidated	At-equity	Other company type
Abrawiza Immobilienleasing GmbH & Co. Projekt Fernwald KG	Not consolidated	Neither consolidated nor deducted	Other company type
Abrawiza Immobilienleasing GmbH	Not consolidated	Neither consolidated nor deducted	Other company type
Abura Immobilienleasing GmbH	Not consolidated	Neither consolidated nor deducted	Financial Institution
Achat Immobilienleasing GmbH	Not consolidated	Neither consolidated nor deducted	Financial Institution
Acridin Immobilienleasing GmbH	Not consolidated	Neither consolidated nor deducted	Financial Institution
Adamas Immobilienleasing GmbH	Not consolidated	Neither consolidated nor deducted	Financial Institution
Adiantum Immobilienleasing GmbH	Not consolidated	Neither consolidated nor deducted	Financial Institution
Adipes Immobilienleasing GmbH & Co. Projekt Bremervörde KG	Not consolidated	Not consolidated	Other company type
Adipes Immobilienleasing GmbH	Not consolidated	Neither consolidated nor deducted	Other company type
Adorant Immobilienleasing GmbH	Not consolidated	Neither consolidated nor deducted	Other company type
Adrett Immobilienleasing GmbH	Not consolidated	Neither consolidated nor deducted	Other company type
Adrittura Immobilienleasing GmbH	Not consolidated	Neither consolidated nor deducted	Financial Institution
Adufe Immobilienleasing GmbH	Not consolidated	Neither consolidated nor deducted	Other company type
Adular Immobilienleasing GmbH	Not consolidated	Neither consolidated nor deducted	Financial Institution
Adular Immobilienleasing GmbH & Co. Projekt Rödermark KG	Not consolidated	Neither consolidated nor deducted	Financial Institution
Agamemnon Immobilienleasing GmbH	Not consolidated	Neither consolidated nor deducted	Financial Institution
AGITO Immobilien-Leasing GesmbH	Not consolidated	Neither consolidated nor deducted	Financial Institution
AKCENTA DE GmbH	Not consolidated	Neither consolidated nor deducted	Financial Institution
Akcenta Logistic a.s.	Not consolidated	Not consolidated	Other company type
Austria Leasing GmbH & Co. KG Immobilienverwaltung CURA	Not consolidated	Neither consolidated nor deducted	Financial Institution
Allgäu Reha Immobilienleasing GmbH	Fully consolidated	Not consolidated	Other company type
Angaga Handels- und Beteiligungs GmbH	Not consolidated	Not consolidated	Other company type
ASCENT Pflege Borna Immobilienleasing GmbH	Fully consolidated	Not consolidated	Other company type
ASCENT Pflege Erfurt Immobilienleasing GmbH	Fully consolidated	Not consolidated	Other company type
ASCENT Pflege Hettstedt Immobilienleasing GmbH	Fully consolidated	Not consolidated	Other company type
ASCENT Pflege Schleswig Immobilienleasing GmbH	Fully consolidated	Not consolidated	Other company type
AURIGA Raiffeisen-Immobilien-Leasing Gesellschaft m.b.H.	Not consolidated	Neither consolidated nor deducted	Financial Institution

Name of the entity	Method of accounting consolidation	Method of regulatory consolidation	Description of the entity
Austria Leasing GmbH & Co. KG Immobilienverwaltung Projekt Eberdingen	Not consolidated	Neither consolidated nor deducted	Financial Institution
Austria Leasing Immobilienverwaltungsgesellschaft mbH	Not consolidated	Neither consolidated nor deducted	Financial Institution
Bulevard Centar BBC Holding d.o.o.	Not consolidated	Not consolidated	Company with ancillary banking services
BRL Raiffeisen-Immobilien-Leasing Gesellschaft m.b.H.	Not consolidated	Neither consolidated nor deducted	Other company type
Campus ATZ + DOS RBI Immobilien-Leasing GmbH	Fully consolidated	Neither consolidated nor deducted	Other company type
Centrotrade Holding GmbH	Not consolidated	Not consolidated	Other company type
Queens Garden Sp z.o.o.	Not consolidated	Neither consolidated nor deducted	Other company type
Raiffeisen Continuum Management GmbH	Not consolidated	Neither consolidated nor deducted	Financial Institution
Raiffeisen Continuum GmbH & Co KG	Not consolidated	Neither consolidated nor deducted	Financial Institution
CP Logistikcenter Errichtungs- und Verwaltungs GmbH	Not consolidated	Not consolidated	Other company type
CURO Raiffeisen-Immobilien-Leasing Gesellschaft m.b.H.	Not consolidated	Neither consolidated nor deducted	Other company type
Raiffeisen Apart GmbH	Not consolidated	Not consolidated	Other company type
Dom-office 2000	Not consolidated	Not consolidated	Other company type
DORISCUS ENTERPRISES LTD.	Not consolidated	Not consolidated	Other company type
EPPA Raiffeisen-Immobilien-Leasing GmbH	Not consolidated	Not consolidated	Other company type
Eurolease RE Leasing	Not consolidated	Not consolidated	Other company type
OOO Estate Management	Not consolidated	Not consolidated	Other company type
Essox d.o.o.	Not consolidated	Not consolidated	Other company type
Expo Forest 1 EOOD	Not consolidated	Not consolidated	Other company type
Expo Forest 2 EOOD	Not consolidated	Not consolidated	Other company type
Expo Forest 3 EOOD	Not consolidated	Not consolidated	Other company type
Expo Forest 4 EOOD	Not consolidated	Not consolidated	Other company type
Extra Year Investments Limited	Not consolidated	Neither consolidated nor deducted	Financial Institution
Limited Liability Company FAIRO	Not consolidated	Neither consolidated nor deducted	Company with ancillary banking services
Fairo GmbH	Not consolidated	Neither consolidated nor deducted	Company with ancillary banking services
FARIO Handels- und Beteiligungsgesellschaft m.b.H.	Not consolidated	Not consolidated	Other company type
RPM Budapest KFT	Not consolidated	Not consolidated	Other company type
Golden Rainbow International Limited	Not consolidated	Neither consolidated nor deducted	Financial Institution
Humanitarian Fund "Budinir Bosko Kostic"	Not consolidated	Not consolidated	Other company type
IDUS Handels- und Beteiligungs GmbH	Not consolidated	Not consolidated	Other company type
IGNIS Raiffeisen-Immobilien-Leasing Gesellschaft m.b.H.	Not consolidated	Neither consolidated nor deducted	Financial Institution
Infrastruktur Heilbad Sauerbrunn GmbH	Not consolidated	Neither consolidated nor deducted	Financial Institution
INFRA MI 1 Immobilien Gesellschaft mbH	Not consolidated	Not consolidated	Other company type
CP Linzerstraße 221-227 Projektentwicklungs GmbH	Not consolidated	Not consolidated	Other company type
RBI Retail Innovation LLC	Not consolidated	Neither consolidated nor deducted	Company with ancillary banking services
INPROX Split d.o.o.	Not consolidated	Not consolidated	Other company type
ISIS Raiffeisen Immobilien Leasing GmbH	Not consolidated	Neither consolidated nor deducted	Financial Institution
Immoservice Polska Sp.z.o.o.	Not consolidated	Not consolidated	Other company type
First Leasing Service Center GmbH	Not consolidated	Not consolidated	Other company type
RBI Kantinenbetriebs GmbH	Not consolidated	Not consolidated	Other company type
Kathrein & Co. Trust Holding GmbH	Not consolidated	Neither consolidated nor deducted	Financial Institution
Kathrein & Co Life Settlement Gesellschaft m.b.H.	Not consolidated	Not consolidated	Other company type
Körlog Logistika Építő és Kivitelező Korlátolt Felelősségű Társaság	Not consolidated	Not consolidated	Other company type
KOTTO Raiffeisen-Immobilien-Leasing GmbH	Not consolidated	Neither consolidated nor deducted	Other company type

Name of the entity	Method of accounting consolidation	Method of regulatory consolidation	Description of the entity
Kathrein Private Equity GmbH	Not consolidated	Not consolidated	Other company type
LENTIA Immobilienleasing GmbH	Not consolidated	Neither consolidated nor deducted	Financial Institution
LIBRA Raiffeisen-Immobilien-Leasing Gesellschaft m.b.H.	Not consolidated	Neither consolidated nor deducted	Financial Institution
Objekt Linser Areal Immobilienerichtungs GmbH	Not consolidated	Not consolidated	Other company type
LOTA Handels- und Beteiligungs-GmbH	Not consolidated	Neither consolidated nor deducted	Other company type
CP Projekte Muthgasse Entwicklungs GmbH	Not consolidated	Not consolidated	Other company type
MAMONT GmbH	Not consolidated	Not consolidated	Other company type
MELIKERTES Raiffeisen-Mobilien-Leasing GmbH	Not consolidated	Neither consolidated nor deducted	Other company type
Nerudova Property s.r.o.	Not consolidated	Not consolidated	Company with ancillary banking services
Raiffeisen Windpark Zistersdorf GmbH	Not consolidated	Not consolidated	Other company type
Raiffeisen WohnBau Zwei GmbH	Not consolidated	Neither consolidated nor deducted	Other company type
Orestes Immobilienleasing GmbH	Not consolidated	Neither consolidated nor deducted	Financial Institution
OSTARRICHI Immobilienleasing GmbH	Not consolidated	Neither consolidated nor deducted	Financial Institution
PARO Raiffeisen Immobilien Leasing Gesellschaft m.b.H.	Not consolidated	Neither consolidated nor deducted	Financial Institution
Valida Consulting GmbH	Not consolidated	Not consolidated	Other company type
Priamos Immobilienleasing GmbH	Not consolidated	Neither consolidated nor deducted	Financial Institution
Pro Invest da Vinci e.o.o.d.	Not consolidated	Not consolidated	Other company type
PROKNE Raiffeisen-Immobilien-Leasing GmbH	Not consolidated	Not consolidated	Other company type
Propria Raiffeisen-Immobilien-Leasing GmbH	Not consolidated	Not consolidated	Other company type
Radwinter sp.z o.o.	Not consolidated	Not consolidated	Other company type
Raiffeisen Autó Lízing Kft.	Not consolidated	Not consolidated	Other company type
RAN elf Raiffeisen-Anlagenvermietung Gesellschaft m.b.H.	Not consolidated	Neither consolidated nor deducted	Other company type
RBI Real Estate Services Czechia s.r.o.	Not consolidated	Neither consolidated nor deducted	Other company type
RBI Real Estate Services Polska SP.z.o.o.	Not consolidated	Neither consolidated nor deducted	Other company type
RB International Investment Asia Limited	Not consolidated	Neither consolidated nor deducted	Other company type
Raiffeisen Burgenland Leasing GmbH	Not consolidated	Neither consolidated nor deducted	Financial Institution
RBM Wohnbau Ges.m.b.H.	Not consolidated	Not consolidated	Other company type
Limited Liability Company RBRU Specialized Depositary	Not consolidated	Neither consolidated nor deducted	Financial Institution
RB Szolgáltató Központ Kft. - RBSC Kft.	Not consolidated	Neither consolidated nor deducted	Other company type
Raiffeisen Capital a.d. Banja Luka	Not consolidated	Neither consolidated nor deducted	Financial Institution
RCR Ukraine LLC	Not consolidated	Neither consolidated nor deducted	Company with ancillary banking services
REC Alpha LLC	Fully consolidated	Not consolidated	Company with ancillary banking services
Limited Liability Company REC GAMMA	Not consolidated	Neither consolidated nor deducted	Company with ancillary banking services
PLUSFINANCE LAND S.R.L.	Not consolidated	Neither consolidated nor deducted	Company with ancillary banking services
RIRBRO ESTATE MANAGEMENT S.R.L.	Not consolidated	Neither consolidated nor deducted	Company with ancillary banking services
Real Estate Rent 4 DOO	Not consolidated	Neither consolidated nor deducted	Other company type
RBI Retail Innovation GmbH	Not consolidated	Not consolidated	Company with ancillary banking services
Raiffeisen Befektetési Alapkezelő Zrt.	Not consolidated	Neither consolidated nor deducted	Financial Institution
Raiffeisen Invest d.o.o.	Not consolidated	Neither consolidated nor deducted	Financial Institution

Name of the entity	Method of accounting consolidation	Method of regulatory consolidation	Description of the entity
Raiffeisen Future AD Beograd drustvo za upravljanje dobrovoljnim penzijskim fondom	Not consolidated	Neither consolidated nor deducted	Financial Institution
Raiffeisen Investment Advisory GmbH	Not consolidated	Neither consolidated nor deducted	Financial Institution
Raiffeisen Biztosításközvetítő Kft.	Not consolidated	Neither consolidated nor deducted	Insurance Company
Raiffeisen Insurance and Reinsurance Broker S.R.L.	Not consolidated	Not consolidated	Company with ancillary banking services
Raiffeisen Insurance Broker Kosovo L.L.C.	Not consolidated	Neither consolidated nor deducted	Company with ancillary banking services
Raiffeisen Invest Društvo za upravljanje fondovima d.d. Sarajevo	Not consolidated	Neither consolidated nor deducted	Financial Institution
RAIFFEISEN INVEST AD DRUSTVO ZA UPRAVLJANJE INVESTICIONIM FONDOVIMA BEOGRAD	Not consolidated	Neither consolidated nor deducted	Financial Institution
Raiffeisen Immobilien Kapitalanlage-Gesellschaft m.b.H.	Not consolidated	Neither consolidated nor deducted	Financial Institution
Raiffeisen International Invest Holding GmbH	Not consolidated	Neither consolidated nor deducted	Financial Institution
RIL XIII Raiffeisen-Immobilien-Leasing Gesellschaft m.b.H.	Not consolidated	Neither consolidated nor deducted	Financial Institution
Raiffeisen Immobilienfonds	Not consolidated	Neither consolidated nor deducted	Financial Institution
R-Insurance Services sp. z o.o.	Not consolidated	Not consolidated	Other company type
RK 60 Kft	Not consolidated	Not consolidated	Other company type
Ares property	Not consolidated	Not consolidated	Other company type
Ate Property	Not consolidated	Not consolidated	Other company type
Argos Property	Not consolidated	Not consolidated	Other company type
Aglaia Property	Not consolidated	Not consolidated	Other company type
Raiffeisen-Leasing Anlagen und KFZ Vermietungs GmbH	Not consolidated	Neither consolidated nor deducted	Financial Institution
Ananke Property	Not consolidated	Not consolidated	Other company type
Apate Property	Not consolidated	Not consolidated	Other company type
RL-BETA Holding GmbH	Not consolidated	Not consolidated	Other company type
Beroe Property	Not consolidated	Not consolidated	Other company type
Production unitary enterprise "PriortransAgro"	Not consolidated	Not consolidated	Other company type
Cranto Property	Not consolidated	Not consolidated	Other company type
RL-Delta Holding GmbH	Not consolidated	Not consolidated	Other company type
Dafne Property	Not consolidated	Not consolidated	Other company type
Dero Property	Not consolidated	Not consolidated	Other company type
Eunomia Property	Not consolidated	Not consolidated	Other company type
Eos Property	Not consolidated	Neither consolidated nor deducted	Other company type
RL-Epsilon Holding GmbH	Not consolidated	Neither consolidated nor deducted	Other company type
RL-ETA Holding GmbH	Not consolidated	Not consolidated	Other company type
Fobos Property	Not consolidated	Not consolidated	Other company type
Fidurock Residential a.s.	Not consolidated	Not consolidated	Other company type
Falos Property	Not consolidated	Not consolidated	Other company type
RL-Gamma Holding GmbH	Not consolidated	Neither consolidated nor deducted	Other company type
GEONE Holesovice Two s.r.o.	Not consolidated	Not consolidated	Other company type
GRENA REAL s.r.o.	Not consolidated	Not consolidated	Other company type
Grainulos s.r.o.	Not consolidated	Not consolidated	Other company type
R.L.H. Holding GmbH	Not consolidated	Neither consolidated nor deducted	Financial Institution
Harmonia Property	Not consolidated	Not consolidated	Other company type

Name of the entity	Method of accounting consolidation	Method of regulatory consolidation	Description of the entity
Hefaistos Property	Not consolidated	Not consolidated	Other company type
Hypnos Property	Not consolidated	Neither consolidated nor deducted	Other company type
Hestia Property	Not consolidated	Not consolidated	Other company type
Raiffeisen-Leasing Immobilienverwaltung Gesellschaft m.b.H.	Not consolidated	Neither consolidated nor deducted	Financial Institution
RL-Jota Holding GmbH	Not consolidated	Neither consolidated nor deducted	Other company type
Keto Property	Not consolidated	Not consolidated	Other company type
Kappa Estates s.r.o.	Not consolidated	Not consolidated	Other company type
Kleio Property	Not consolidated	Not consolidated	Other company type
Raiffeisen Direct Investments CZ	Not consolidated	Not consolidated	Other company type
RL-Lamda s.r.o.	Not consolidated	Not consolidated	Other company type
Ligea Property	Not consolidated	Not consolidated	Other company type
Melpomene Property	Not consolidated	Not consolidated	Other company type
Morfeus Property	Not consolidated	Neither consolidated nor deducted	Other company type
Medea Property	Not consolidated	Not consolidated	Other company type
RL Leasing Gesellschaft m.b.H.	Not consolidated	Neither consolidated nor deducted	Financial Institution
Nereus Property	Not consolidated	Not consolidated	Other company type
RL-Opis Holding GmbH	Not consolidated	Not consolidated	Other company type
JFD Real s.r.o.	Not consolidated	Not consolidated	Other company type
Palace Holding s.r.o.	Not consolidated	Not consolidated	Other company type
Appolon Property	Not consolidated	Not consolidated	Other company type
Astra Property	Not consolidated	Not consolidated	Other company type
RLRE Carina Property	Not consolidated	Not consolidated	Other company type
Chronos Property	Not consolidated	Neither consolidated nor deducted	Other company type
Credibilis a.s.	Not consolidated	Not consolidated	Other company type
Dike Property	Not consolidated	Not consolidated	Other company type
Holeckova Property s.r.o.	Not consolidated	Neither consolidated nor deducted	Other company type
Hebe Property	Not consolidated	Not consolidated	Other company type
Kalypso Property	Not consolidated	Not consolidated	Other company type
Lucius Property	Not consolidated	Neither consolidated nor deducted	Financial Institution
Leto Property	Not consolidated	Not consolidated	Other company type
Luna Property	Not consolidated	Not consolidated	Other company type
Orchideus Property	Not consolidated	Not consolidated	Other company type
ACB Ponava	Not consolidated	Not consolidated	Other company type
Photon Energie s.r.o.	Not consolidated	Not consolidated	Other company type
Pontos Property	Not consolidated	Not consolidated	Other company type
GS55 Sazovice s.r.o.	Not consolidated	Not consolidated	Other company type
Selene Property	Not consolidated	Not consolidated	Other company type
Sirius Property	Not consolidated	Neither consolidated nor deducted	Other company type
Residence Park Trebes	Not consolidated	Not consolidated	Other company type
UPC Real	Not consolidated	Neither consolidated nor deducted	Other company type

Name of the entity	Method of accounting consolidation	Method of regulatory consolidation	Description of the entity
RLRE Ypsilon Property	Not consolidated	Neither consolidated nor deducted	Other company type
Zefyros Property	Not consolidated	Not consolidated	Other company type
SeEnergy PT	Not consolidated	Not consolidated	Other company type
Thaumas Property	Not consolidated	Not consolidated	Other company type
Sazavska 826 s.r.o.	Not consolidated	Not consolidated	Other company type
Limited Liability Company "Raiffeisen Leasing"	Not consolidated	Neither consolidated nor deducted	Financial Institution
RL-Prom-Wald Sp. Z.o.o	Not consolidated	Not consolidated	Other company type
Raiffeisen-Leasing Wärmeverorgungsanlagenbetriebs GmbH	Not consolidated	Neither consolidated nor deducted	Other company type
Robert Károly Körút Irodaház Kft.	Not consolidated	Not consolidated	Other company type
Raiffeisen INVEST Sh.a.	Not consolidated	Neither consolidated nor deducted	Financial Institution
R.P.I. Handels- und Beteiligungsgesellschaft m.b.H.	Fully consolidated	Not consolidated	Financial Institution
Raiffeisen Property Management Bulgaria EOOD	Not consolidated	Not consolidated	Other company type
Raiffeisen Assistance doo Sarajevo	Not consolidated	Neither consolidated nor deducted	Other company type
Raiffeisen Assistance D.O.O.	Not consolidated	Not consolidated	Other company type
Raiffeisen Salzburg Invest GmbH	Not consolidated	Neither consolidated nor deducted	Financial Institution
Raiffeisen Wohnbauleasing Gesellschaft m.b.H.	Not consolidated	Neither consolidated nor deducted	Financial Institution
RBI PE Handels- und Beteiligungs GmbH	Not consolidated	Neither consolidated nor deducted	Financial Institution
SCTE Első Ingatlanfejlesztő és Ingatlanhasznosító Kft.	Not consolidated	Not consolidated	Other company type
SCT Kársz utca Ingatlankezelő Kft.	Not consolidated	Neither consolidated nor deducted	Other company type
SF Hotelerrichtungsgesellschaft m.b.H.	Not consolidated	Neither consolidated nor deducted	Other company type
Raiffeisen Property Estate s.r.o.	Not consolidated	Not consolidated	Other company type
SOLIDA Raiffeisen-Immobilien-Leasing Gesellschaft m.b.H.	Not consolidated	Neither consolidated nor deducted	Financial Institution
STYRIA Immobilienleasing GmbH	Not consolidated	Neither consolidated nor deducted	Other company type
Styria Immobilienleasing GmbH & Co. Projekt Ahlen KG	Not consolidated	Not consolidated	Other company type
Szentkirály utca 18 Kft.	Not consolidated	Not consolidated	Other company type
THYMO Raiffeisen-Leasing Gesellschaft m.b.H.	Not consolidated	Not consolidated	Other company type
Tatra Leasing Broker	Not consolidated	Neither consolidated nor deducted	Other company type
Akcenta Digital s.r.o.	Not consolidated	Neither consolidated nor deducted	Financial Institution
VINDOBONA Immobilienleasing GmbH	Not consolidated	Neither consolidated nor deducted	Financial Institution
ZHS Office- & Facilitymanagement GmbH	Fully consolidated	Neither consolidated nor deducted	Company with ancillary banking services
ZRB 17 Errichtungs GmbH	Not consolidated	Not consolidated	Other company type
Aspius Immobilien Holding International GmbH	Not consolidated	Not consolidated	Other company type
RDI Czech 1 s.r.o.	Not consolidated	Not consolidated	Other company type
RDI Management s.r.o.	Not consolidated	Neither consolidated nor deducted	Other company type
RDI Czech 3 s.r.o	Not consolidated	Not consolidated	Other company type
RDI Czech 4 s.r.o	Not consolidated	Not consolidated	Other company type
RDI Czech 5 s.r.o	Not consolidated	Not consolidated	Other company type
SASSK Ltd.	Not consolidated	Not consolidated	Other company type
Limited Liability Company European Insurance Agency	Not consolidated	Not consolidated	Other company type
FEBRIS Raiffeisen-Immobilien-Leasing GmbH	Not consolidated	Not consolidated	Financial Institution

Name of the entity	Method of accounting consolidation	Method of regulatory consolidation	Description of the entity
St. Marx-Immobilien Verwertungs- und Verwaltungs GmbH	Not consolidated	Not consolidated	Other company type
MORHUA Handels- und Beteiligungs GmbH	Not consolidated	Not consolidated	Other company type
RL-Nordic OY	Not consolidated	Not consolidated	Financial Institution
RL-OPIS SPOLKA Z OGRANICZONA ODPOWIEDZIALNOSCIA	Not consolidated	Not consolidated	Other company type
RDI Czech 6 s.r.o	Not consolidated	Not consolidated	Other company type
RBI Retail Innovation SK s.r.o.	Not consolidated	Neither consolidated nor deducted	Company with ancillary banking services
R.B.T. Beteiligungsgesellschaft m.b.H	Not consolidated	Not consolidated	Other company type
Rent GRJ	Not consolidated	Not consolidated	Other company type
Rent PO	Not consolidated	Neither consolidated nor deducted	Financial Institution
ZUNO GmbH	Not consolidated	Not consolidated	Other company type
Raiffeisen Investment Financial Advisory Services Ltd. Co.	Not consolidated	Neither consolidated nor deducted	Financial Institution
Antoninska 2 s.r.o.	Not consolidated	Not consolidated	Other company type
Dolni namesti 34	Not consolidated	Not consolidated	Other company type
RL Jankomir d.o.o.	Not consolidated	Not consolidated	Other company type
Veletzní 42 s.r.o.	Not consolidated	Not consolidated	Other company type
Gaia Property	Not consolidated	Not consolidated	Other company type
Sky Solar Distribuce s.r.o.	Not consolidated	Not consolidated	Other company type
REF HP 1 s.r.o.	Not consolidated	Not consolidated	Other company type
Stara 19 s.r.o.	Not consolidated	Not consolidated	Other company type
Theia Property	Not consolidated	Not consolidated	Other company type
Vlhka 26 s.r.o.	Not consolidated	Not consolidated	Other company type
Raiffeisen-Wohnbauleasing Österreich GmbH	Not consolidated	Neither consolidated nor deducted	Financial Institution
Raiffeisen Ingatlan Üzemeltető Kft.	Not consolidated	Not consolidated	Other company type
Inprox Zagreb Sesvete d.o.o.	Not consolidated	Not consolidated	Other company type
Zahradnicka Property s.r.o.	Not consolidated	Not consolidated	Other company type
EMCOM Beteiligungs GmbH	At-equity	At-equity	Financial Institution
LEIPNIK-LUNDENBURGER INVEST Beteiligungs Aktiengesellschaft	At-equity	At-equity	Other company type
NOTARTREUHANDBANK AG	At-equity	At-equity	Financial Institution
Österreichische Hotel- und Tourismusbank Gesellschaft m.b.H.	At-equity	At-equity	Credit Institution
Oesterreichische Kontrollbank Aktiengesellschaft	At-equity	At-equity	Credit Institution
Prva stavebna sporitelna a.s.	At-equity	At-equity	Credit Institution
Raiffeisen Informatik GmbH & Co KG	At-equity	At-equity	Company with ancillary banking services
Raiffeisen-Leasing Management GmbH	At-equity	At-equity	Other company type
Raiffeisen Life Insurance Company LLC	At-equity	At-equity	Insurance Company
UNIQA Insurance Group AG	At-equity	At-equity	Insurance Company
card complete Service Bank AG	At-equity	At-equity	Credit Institution
Posojilnica Bank eGen	At-equity	At-equity	Credit Institution
CIT ONE SA	Not consolidated	Not consolidated	Company with ancillary banking services
ESP BH doo	Not consolidated	Not consolidated	Other company type
Fondul de Garantare a Creditului Rural S.A.	Not consolidated	Neither consolidated nor deducted	Financial Institution



Name of the entity	Method of accounting consolidation	Method of regulatory consolidation	Description of the entity
Greenix Limited	Not consolidated	Not consolidated	Other company type
MASTERINVEST Kapitalanlage GmbH	Not consolidated	Neither consolidated nor deducted	Financial Institution
Medicur - Holding Gesellschaft m.b.H.	Not consolidated	Not consolidated	Other company type
Monilogi s.r.o.	Not consolidated	Not consolidated	Other company type
Top Vorsorge-Management GmbH	Not consolidated	Not consolidated	Other company type
RC Gazdasági és Adótanácsadó Zrt.	Not consolidated	Neither consolidated nor deducted	Other company type
Raiffeisen Informatik Geschäftsführungs GmbH	Not consolidated	Not consolidated	Other company type
Slovak Banking Credit Bureau	Not consolidated	Neither consolidated nor deducted	Company with ancillary banking services
Syrena Immobilien Holding AG	Not consolidated	Not consolidated	Other company type
Tojon Beteiligungs GmbH	Not consolidated	Not consolidated	Other company type
W 3 Errichtungs- und Betriebs-Aktiengesellschaft	Not consolidated	Not consolidated	Other company type
PSA Payment Services Austria GmbH	Not consolidated	Neither consolidated nor deducted	Financial Institution
Adoria Grundstückvermietungs Gesellschaft m.b.H.	Not consolidated	Neither consolidated nor deducted	Financial Institution
Speedinvest Co-Invest AC GmbH & Co KG	Not consolidated	Not consolidated	Financial Institution
AIL Swiss-Austria Leasing AG	Not consolidated	Neither consolidated nor deducted	Financial Institution
ALCS Association of Leasing Companies in Serbia	Not consolidated	Not consolidated	Other company type
ALMC hf.	Not consolidated	Not consolidated	Other company type
Rehazentrum Kitzbühel Immobilien-Leasing GmbH	Not consolidated	Neither consolidated nor deducted	Financial Institution
A-Trust Gesellschaft für Sicherheitssysteme im elektronischen Datenverkehr GmbH	Not consolidated	Not consolidated	Other company type
Austrian Reporting Services GmbH	Not consolidated	Not consolidated	Company with ancillary banking services
Aventin Grundstücksverwaltungs Gesellschaft m.b.H. in Liqu.	Not consolidated	Neither consolidated nor deducted	Financial Institution
Biroul de Credit S.A.	Not consolidated	Neither consolidated nor deducted	Financial Institution
Bad Sauerbrunn Thermalwasser Nutzungs- und Verwertungs GmbH.	Not consolidated	Not consolidated	Other company type
BTS Holding a.s. "v likvidácii"	Not consolidated	Not consolidated	Other company type
CADO Raiffeisen-Immobilien-Leasing Ges.m.b.H.	Not consolidated	Neither consolidated nor deducted	Financial Institution
CONATUS Grundstückvermietungs Gesellschaft m.b.H.	Not consolidated	Neither consolidated nor deducted	Financial Institution
Raiffeisen Continuum GmbH	Not consolidated	Neither consolidated nor deducted	Other company type
CULINA Grundstückvermietungs Gesellschaft m.b.H.	Not consolidated	Neither consolidated nor deducted	Financial Institution
Die Niederösterreichische Leasing Gesellschaft m.b.H.	Not consolidated	Not consolidated	Other company type
Die Niederösterreichische Leasing GmbH & Co KG	Not consolidated	Neither consolidated nor deducted	Financial Institution
D. Trust Certifikacná Autorita	Not consolidated	Not consolidated	Other company type
Epsilon - Grundverwertungsgesellschaft m.b.H. in Liqu.	Not consolidated	Neither consolidated nor deducted	Financial Institution
ESQUILIN Grundstücksverwaltungs Gesellschaft m.b.H.	Not consolidated	Neither consolidated nor deducted	Financial Institution
FACILITAS Grundstückvermietungs Gesellschaft m.b.H.	Not consolidated	Neither consolidated nor deducted	Financial Institution
Fintech Growth Fund Europe GmbH & Co KG	Not consolidated	Not consolidated	Financial Institution
FORIS Grundstückvermietungs Gesellschaft m.b.H.	Not consolidated	Neither consolidated nor deducted	Financial Institution
G + R Leasing Gesellschaft m.b.H.	Not consolidated	Not consolidated	Other company type
G + R Leasing Gesellschaft m.b.H. & Co. KG.	Not consolidated	Neither consolidated nor deducted	Financial Institution
Hrvatski registar obveza po kreditima d.o.o.	Not consolidated	Neither consolidated nor deducted	Company with ancillary banking services
Kommunal-Infrastruktur & Immobilien Zeltweg GmbH	Not consolidated	Neither consolidated nor deducted	Other company type

Name of the entity	Method of accounting consolidation	Method of regulatory consolidation	Description of the entity
LITUS Grundstückvermietungs Gesellschaft m.b.H.	Not consolidated	Neither consolidated nor deducted	Financial Institution
MIRA Raiffeisen-Immobilien-Leasing Gesellschaft m.b.H.	Not consolidated	Neither consolidated nor deducted	Financial Institution
AVION-Grundverwertungsgesellschaft m.b.H.	Not consolidated	Neither consolidated nor deducted	Financial Institution
NÖ-KL Kommunalgebäudeleasing Gesellschaft m.b.H.	Not consolidated	Neither consolidated nor deducted	Financial Institution
NÖ Raiffeisen Kommunalprojekte Service Gesellschaft m.b.H.	Not consolidated	Neither consolidated nor deducted	Financial Institution
NÖ. HYPO Leasing und Raiffeisen-Immobilien-Leasing Traisenhaus GesmbH & Co OG	Not consolidated	Neither consolidated nor deducted	Financial Institution
Österreichische Wertpapierdaten Service GmbH	Not consolidated	Neither consolidated nor deducted	Company with ancillary banking services
Pisano Limited	Not consolidated	Not consolidated	Other company type
QUIRINAL Grundstücksverwaltungs Gesellschaft m.b.H.	Not consolidated	Neither consolidated nor deducted	Financial Institution
Raiffeisen e-force GmbH	Not consolidated	Neither consolidated nor deducted	Company with ancillary banking services
REMUS Raiffeisen-Immobilien-Leasing Gesellschaft m.b.H.	Not consolidated	Neither consolidated nor deducted	Financial Institution
Raiffeisen-IMPULS-Liegenschaftsverwaltung Gesellschaft m.b.H.	Not consolidated	Neither consolidated nor deducted	Financial Institution
Raiffeisen-Impuls-Zeta Immobilien GmbH	Not consolidated	Neither consolidated nor deducted	Financial Institution
Raiffeisen Kooperations eGen	Not consolidated	Not consolidated	Other company type
Raiffeisen-Leasing BOT s.r.o.	Not consolidated	Not consolidated	Other company type
RLKG Raiffeisen-Leasing GmbH	Not consolidated	Neither consolidated nor deducted	Financial Institution
Raiffeisen-Leasing Mobilien und KFZ GmbH	Not consolidated	Neither consolidated nor deducted	Financial Institution
Raiffeisen Salzburg Leasing GmbH	Not consolidated	Neither consolidated nor deducted	Financial Institution
RSAL Raiffeisen Steiermark Anlagenleasing GmbH	Not consolidated	Neither consolidated nor deducted	Financial Institution
RSC Raiffeisen Service Center GmbH	Not consolidated	Not consolidated	Company with ancillary banking services
RSIL Immobilienleasing Raiffeisen Steiermark GmbH	Not consolidated	Neither consolidated nor deducted	Financial Institution
Sarajevska berza-burza vrijednosnih papira dd Sarajevo	Not consolidated	Not consolidated	Financial Institution
Seilbahnleasing GmbH	Not consolidated	Neither consolidated nor deducted	Financial Institution
SKR Lager 102 AB	Not consolidated	Not consolidated	Other company type
SPICA Raiffeisen-Immobilien-Leasing Gesellschaft m.b.H.	Not consolidated	Neither consolidated nor deducted	Financial Institution
Steirische Gemeindegebäude Leasing Gesellschaft m.b.H.	Not consolidated	Neither consolidated nor deducted	Financial Institution
Steirische Kommunalgebäudeleasing Gesellschaft m.b.H.	Not consolidated	Neither consolidated nor deducted	Financial Institution
Steirische Leasing für Gebietskörperschaften Ges.m.b.H.	Not consolidated	Not consolidated	Financial Institution
Steirische Leasing für öffentliche Bauten Gesellschaft m.b.H.	Not consolidated	Neither consolidated nor deducted	Financial Institution
SWO Kommunalgebäudeleasing Gesellschaft m.b.H.	Not consolidated	Neither consolidated nor deducted	Financial Institution
TKL V Grundverwertungsgesellschaft m.b.H.	Not consolidated	Neither consolidated nor deducted	Financial Institution
TKL VI Grundverwertungsgesellschaft m.b.H.	Not consolidated	Neither consolidated nor deducted	Financial Institution
TKL VII Grundverwertungsgesellschaft m.b.H.	Not consolidated	Neither consolidated nor deducted	Financial Institution
TKL VIII Grundverwertungsgesellschaft m.b.H.	Not consolidated	Neither consolidated nor deducted	Financial Institution
TRABITUS Grundstückvermietungs Gesellschaft m.b.H.	Not consolidated	Neither consolidated nor deducted	Financial Institution
VALET-Grundstücksverwaltungs Gesellschaft m.b.H.	Not consolidated	Neither consolidated nor deducted	Financial Institution

Name of the entity	Method of accounting consolidation	Method of regulatory consolidation	Description of the entity
vc trade GmbH	Not consolidated	Not consolidated	Company with ancillary banking services
VERMREAL Liegenschaftserwerbs- und -betriebs GmbH	Not consolidated	Not consolidated	Other company type
Vorarlberger Kommunalgebäudeleasing Gesellschaft m.b.H. in Liqu.	Not consolidated	Neither consolidated nor deducted	Financial Institution
Analytical Credit Rating Agency (Joint Stock Company)	Not consolidated	Not consolidated	Other company type
Private Joint Stock Company Sumy Enterprise Agrotechservice	Not consolidated	Not consolidated	Other company type
Accession Mezzanine Capital III L.P.	Not consolidated	Neither consolidated nor deducted	Other company type
Burza cennych papierov v. Bratislave	Not consolidated	Not consolidated	Other company type
Belarussian currency and stock exchange JSC	Not consolidated	Not consolidated	Other company type
Private Joint Stock Company Bird Farm Bershadskyi	Not consolidated	Not consolidated	Other company type
Wiener Börse Aktiengesellschaft	Not consolidated	Not consolidated	Other company type
Budapest Stock Exchange	Not consolidated	Not consolidated	Financial Institution
Commodity Exchange Crimean Interbank Currency Exchange	Not consolidated	Not consolidated	Other company type
Central Depository and Clearing Company	Not consolidated	Not consolidated	Financial Institution
Euro Banking Association (ABE Clearing S.A.S.)	Not consolidated	Not consolidated	Financial Institution
EMERGING EUROPE GROWTH FUND II	Not consolidated	Neither consolidated nor deducted	Other company type
European Investment Fund S.A.	Not consolidated	Not consolidated	Financial Institution
Einlagensicherung AUSTRIA Ges.m.b.H.	Not consolidated	Not consolidated	Financial Institution
OJSC NBFI Single Settlement and Information Space	Not consolidated	Neither consolidated nor deducted	Financial Institution
Einlagensicherung der Banken und Bankiers Gesellschaft m.b.H. in Liqu.	Not consolidated	Not consolidated	Company with ancillary banking services
Export and Industry Bank Inc.	Not consolidated	Not consolidated	Credit Institution
Private Joint Stock Company First All-Ukrainian Credit Bureau	Not consolidated	Not consolidated	Other company type
Garantiqa Hitegarancia ZRT.	Not consolidated	Not consolidated	Company with ancillary banking services
HOBEX AG	Not consolidated	Not consolidated	Financial Institution
Agricultural Open Joint Stock Company Illintsi Livestock Breeding Enterprise	Not consolidated	Not consolidated	Other company type
Open Joint Stock Company Kyiv Special Project and Design Bureau Menas	Not consolidated	Not consolidated	Other company type
National Settlement Depository	Not consolidated	Not consolidated	Financial Institution
Public Joint Stock Company National Depository of Ukraine	Not consolidated	Not consolidated	Financial Institution
NÖ Raiffeisen-Leasing Gemeindeprojekte Gesellschaft m.b.H.	Not consolidated	Not consolidated	Financial Institution
Österreichische Raiffeisen-Sicherungseinrichtung eGen	Not consolidated	Not consolidated	Financial Institution
Oberpinzg. Fremdenverkehrsförderungs- und Bergbahnen AG	Not consolidated	Not consolidated	Other company type
Pannon Lúd Kft	Not consolidated	Not consolidated	Other company type
Joint Stock Company Stock Exchange PFTS	Not consolidated	Not consolidated	Other company type
Raiffeisen-Landesbank Tirol AG	Not consolidated	Neither consolidated nor deducted	Credit Institution
Raiffeisen Software GmbH	Not consolidated	Not consolidated	Company with ancillary banking services
Raiffeisen Digital GmbH	Not consolidated	Not consolidated	Company with ancillary banking services
S.C. DEPOZITARUL CENTRAL S.A.	Not consolidated	Not consolidated	Other company type
RAIFFEISEN-HOLDING NIEDERÖSTERREICH-WIEN registrierte Genossenschaft mit beschränkter Haftung	Not consolidated	Neither consolidated nor deducted	Credit Institution
RLB Holding eGen OÖ	Not consolidated	Neither consolidated nor deducted	Financial Institution
Raiffeisenlandesbank Kärnten - Rechenzentrum und Revisionsverband	Not consolidated	Not consolidated	Credit Institution
Registry of Securities in FBH	Not consolidated	Not consolidated	Financial Institution
Public Joint Stock Company Settlement Center for Servicing of Contracts in Financial Markets	Not consolidated	Not consolidated	Other company type
SELENE Raiffeisen-Immobilien-Leasing Gesellschaft m.b.H.	Not consolidated	Not consolidated	Other company type

Name of the entity	Method of accounting consolidation	Method of regulatory consolidation	Description of the entity
Societatea de Transfer de Fonduri si Decontari-TRANSFOND S.A	Not consolidated	Not consolidated	Financial Institution
Society for Worldwide Interbank Financial Telecommunication srl	Not consolidated	Not consolidated	Financial Institution
Tarfin Limited	Not consolidated	Not consolidated	Other company type
Lorit Kommunalgebäudeleasing Gesellschaft m.b.H.	Not consolidated	Not consolidated	Financial Institution
TKL II. Grundverwertungsgesellschaft m.b.H.	Not consolidated	Not consolidated	Financial Institution
Private Joint Stock Company Ukrainian Interbank Currency Exchange	Not consolidated	Not consolidated	Other company type
Vindobona Immobilienleasing GmbH & Co. Projekt Autohaus KG	Not consolidated	Not consolidated	Financial Institution
Visa Inc.	Not consolidated	Not consolidated	Company with ancillary banking services
Zhytomyr Commodity Agroindustrial Exchange	Not consolidated	Not consolidated	Other company type
Ziloti Holding S.A.	Not consolidated	Not consolidated	Other company type
The Zagreb Stock Exchange joint stock company	Not consolidated	Not consolidated	Other company type

# Annex 3

## Capital instruments

The following tables present the terms and conditions of RBI's capital instruments according to Article 437 (b) CRR. If "N/A" is inserted, the question is not applicable.

Issuer	Raiffeisen Bank International AG	Raiffeisen Bank International AG	Raiffeisen Bank International AG
Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)	AT0000606306	XS1640667116	XS1756703275
Governing law(s) of the instrument	Austrian law	German/Austrian law	German/Austrian law
Regulatory treatment			
Transitional CRR rules	Common Equity Tier 1	Additional Tier 1	Additional Tier 1
Post-transitional CRR rules	Common Equity Tier 1	Additional Tier 1	Additional Tier 1
Eligible at solo/(sub-)consolidated/solo and (sub-)consolidated	Solo and consolidated	Solo and consolidated	Solo and consolidated
Instrument type (types to be specified by each jurisdiction)	Common Equity Tier 1 instrument according to Art 28 CRR	Additional Tier 1 instrument according to Art 52 CRR	Additional Tier 1 instrument according to Art 52 CRR
Amount recognized in regulatory capital as of 31 December 2020	EUR 1,001,708,971	EUR 650,000,000	EUR 497,000,000
Nominal amount of instrument	EUR 1,003,265,844	EUR 650,000,000	EUR 500,000,000
Issue price	N/A	100%	100%
Redemption price	N/A	100%	100%
Accounting classification	Shareholder's equity	Equity	Equity
Original date of issuance	25 April 2005	5 July 2017	24 January 2019
Perpetual or dated	N/A	Perpetual	Perpetual
Original maturity date	N/A	No maturity	No maturity
Issuer call subject to prior supervisory approval	N/A	Yes	Yes
Optional call date, contingent call dates, and redemption amount	N/A	15.12.2022; in addition tax and regulatory call rights; Optional redemption at par	15.06.2025; in addition tax and regulatory call rights; Optional redemption at par
Subsequent call dates, if applicable	N/A	Semi-annually	Semi-annually
Coupons / dividends			
Fixed or floating dividend/coupon	Floating	Fixed to Reset Rate	Fixed to Reset Rate
Coupon rate and any related index	N/A	5Y mid swap rate + margin of 5,954%	4.5% until 15.06.2025 and afterwards 5Y mid swap rate + margin of 3.877%
Existence of a dividend stopper	N/A	Yes	Yes
Fully discretionary, partially discretionary or mandatory (in terms of timing)	N/A	Fully discretionary	Fully discretionary
Fully discretionary, partially discretionary or mandatory (in terms of amount)	N/A	Fully discretionary	Fully discretionary
Existence of step up or other incentive to redeem	N/A	No	No
Noncumulative or cumulative	N/A	Non-cumulative	Non-cumulative
Convertible or non-convertible	N/A	Non-convertible	Non-convertible
If convertible, conversion trigger (s)	N/A	N/A	N/A
If convertible, fully or partially	N/A	N/A	N/A
If convertible, conversion rate	N/A	N/A	N/A
If convertible, mandatory or optional conversion	N/A	N/A	N/A
If convertible, specify instrument type convertible into	N/A	N/A	N/A
If convertible, specify issuer of instrument it converts into	N/A	N/A	N/A
Write-down features	N/A	Yes	Yes
If write-down, write-down trigger (s)	N/A	5,125% CET1 trigger on RBI Regulatory Group or Issuer level; statutory approach	5,125% CET1 trigger on RBI Regulatory Group or Issuer level; statutory approach
If write-down, full or partial	N/A	Fully or partially	Fully or partially
If write-down, permanent or temporary	N/A	Temporary	Temporary
If temporary write-down, description of write-up mechanism	N/A	Write Up at sole discretion of the Issuer to the extent permitted in compliance with the Applicable Supervisory Regulations (applied on a pro rata basis)	Write Up at sole discretion of the Issuer to the extent permitted in compliance with the Applicable Supervisory Regulations (applied on a pro rata basis)
Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Additional Tier 1	Tier 2	Tier 2
Non-compliant transitioned features	N/A	No	No
If yes, specify non-compliant features	N/A	N/A	N/A

Raiffeisen Bank International			
Issuer	AG	Raiffeisenbank a.s.	Raiffeisenbank a.s.
Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)	XS2207857421	CZ0000300553	CZ0000301221
Governing law(s) of the instrument	German/Austrian law	German/Austrian law	German/Austrian law
Regulatory treatment			
Transitional CRR rules	Additional Tier 1	Additional Tier 1	Additional Tier 1
Post-transitional CRR rules	Additional Tier 1	Additional Tier 1	Additional Tier 1
Eligible at solo/(sub-)consolidated/solo and (sub-)consolidated	Solo and consolidated	Consolidated	Consolidated
Instrument type (types to be specified by each jurisdiction)	Additional Tier 1 instrument according to Art 52 CRR	Additional Tier 1 instrument according to Art 52 CRR	Additional Tier 1 instrument according to Art 52 CRR
Amount recognized in regulatory capital as of 31 December 2020	EUR 497,173,750	EUR 8,841,521	EUR 3,112,113
Nominal amount of instrument	EUR 500,000,000	EUR 70,000,000	EUR 25,200,000
Issue price	100%	100%	100%
Redemption price	100%	100%	100%
Accounting classification	Equity	Equity	Equity
Original date of issuance	29 July 2020	18 December 2014	30 January 2017
Perpetual or dated	Perpetual	Perpetual	Perpetual
Original maturity date	No maturity	No maturity	No maturity
Issuer call subject to prior supervisory approval	Yes	Yes	Yes
Optional call date, contingent call dates, and redemption amount	15.12.2026; in addition tax and regulatory call rights; Optional redemption at par	30.05.2025; in addition tax and regulatory call rights; redemption at par	30.05.2022; in addition tax and regulatory call rights; redemption at par
Subsequent call dates, if applicable	Semi-annually	Annually always on 30.5.	Annually always on 30.5.
Coupons / dividends			
Fixed or floating dividend/coupon	Fixed to Reset Rate	Floating	Floating
Coupon rate and any related index	6% until 15.12.2026 and afterwards 5Y mid swap rate + margin of 6.446%	12M EURIBOR + margin of 6,625% p.a.	12M EURIBOR + margin of 8.63% p.a.
Existence of a dividend stopper	No	Yes	Yes
Fully discretionary, partially discretionary or mandatory (in terms of timing)	Fully discretionary	Fully discretionary	Fully discretionary
Fully discretionary, partially discretionary or mandatory (in terms of amount)	Fully discretionary	Fully discretionary	Fully discretionary
Existence of step up or other incentive to redeem	No	No	No
Noncumulative or cumulative	Non-cumulative	Non-cumulative	Non-cumulative
Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible
If convertible, conversion trigger (s)	N/A	N/A	N/A
If convertible, fully or partially	N/A	N/A	N/A
If convertible, conversion rate	N/A	N/A	N/A
If convertible, mandatory or optional conversion	N/A	N/A	N/A
If convertible, specify instrument type convertible into	N/A	N/A	N/A
If convertible, specify issuer of instrument it converts into	N/A	N/A	N/A
Write-down features	Yes	Yes	Yes
If write-down, write-down trigger (s)	5,125% CET1 trigger on RBI Regulatory Group or Issuer level; statutory approach	7% CET1 trigger on Raiffeisenbank a.s. Regulatory Group or Issuer level; statutory approach	5,125% CET1 trigger on Raiffeisenbank a.s. Regulatory Group or Issuer level; statutory approach
If write-down, full or partial	Fully or partially	Fully or partially	Fully or partially
If write-down, permanent or temporary	Temporary	Temporary	Temporary
If temporary write-down, description of write-up mechanism	Write Up at sole discretion of the Issuer to the extent permitted in compliance with the Applicable Supervisory Regulations (applied on a pro rata basis)	Write Up at sole discretion of the Issuer to the extent permitted in compliance with the Applicable Supervisory Regulations (applied on a pro rata basis)	Write Up at sole discretion of the Issuer to the extent permitted in compliance with the Applicable Supervisory Regulations (applied on a pro rata basis)
Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Tier 2	Tier 2	Tier 2
Non-compliant transitioned features	No	No	No
If yes, specify non-compliant features	N/A	N/A	N/A

Issuer	Raiffeisenbank a.s.	Raiffeisenbank a.s.	Raiffeisenbank a.s.
Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)	CZ0000302856	CZ0000302344	CZ0000303185
Governing law(s) of the instrument	German/Austrian law	German/Austrian law	German/Austrian law
Regulatory treatment			
Transitional CRR rules	Additional Tier 1	Additional Tier 1	Additional Tier 1
Post-transitional CRR rules	Additional Tier 1	Additional Tier 1	Additional Tier 1
Eligible at solo/(sub-)consolidated/solo and (sub-)consolidated	Consolidated	Consolidated	Consolidated
Instrument type (types to be specified by each jurisdiction)	Additional Tier 1 instrument according to Art 52 CRR	Additional Tier 1 instrument according to Art 52 CRR	Additional Tier 1 instrument according to Art 52 CRR
Amount recognized in regulatory capital as of 31 December 2020	EUR 8,154,337	EUR 3,506,763	EUR 6,859,554
Nominal amount of instrument	EUR 30,000,000	EUR 30,000,000	EUR 26,000,000
Issue price	100%	100%	100%
Redemption price	100%	100%	100%
Accounting classification	Equity	Equity	Equity
Original date of issuance	27 November 2020	28 November 2019	24 May 2021
Perpetual or dated	Perpetual	Perpetual	Perpetual
Original maturity date	No maturity	No maturity	No maturity
Issuer call subject to prior supervisory approval	Yes	Yes	Yes
Optional call date, contingent call dates, and redemption amount	30.05.2026; in addition tax and regulatory call rights; redemption at par	30.05.2025; in addition tax and regulatory call rights; redemption at par	30.05.2025; in addition tax and regulatory call rights; redemption at par
Subsequent call dates, if applicable	Annually always on 30.5.	Annually always on 30.5.	Annually always on 30.5.
Coupons / dividends			
Fixed or floating dividend/coupon	Fixed to the first call date	Floating	Floating
Coupon rate and any related index	7,183% p.a.	12M EURIBOR + margin of 6,625% p.a.	12M EURIBOR + margin of 6,625% p.a.
Existence of a dividend stopper	Yes	Yes	Yes
Fully discretionary, partially discretionary or mandatory (in terms of timing)	Fully discretionary	Fully discretionary	Fully discretionary
Fully discretionary, partially discretionary or mandatory (in terms of amount)	Fully discretionary	Fully discretionary	Fully discretionary
Existence of step up or other incentive to redeem	No	No	No
Noncumulative or cumulative	Non-cumulative	Non-cumulative	Non-cumulative
Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible
If convertible, conversion trigger (s)	N/A	N/A	N/A
If convertible, fully or partially	N/A	N/A	N/A
If convertible, conversion rate	N/A	N/A	N/A
If convertible, mandatory or optional conversion	N/A	N/A	N/A
If convertible, specify instrument type convertible into	N/A	N/A	N/A
If convertible, specify issuer of instrument it converts into	N/A	N/A	N/A
Write-down features	Yes	Yes	Yes
If write-down, write-down trigger (s)	7% CET1 trigger on Raiffeisenbank a.s. Regulatory Group or Issuer level; statutory approach	7% CET1 trigger on Raiffeisenbank a.s. Regulatory Group or Issuer level; statutory approach	7% CET1 trigger on Raiffeisenbank a.s. Regulatory Group or Issuer level; statutory approach
If write-down, full or partial	Fully or partially	Fully or partially	Fully or partially
If write-down, permanent or temporary	Temporary	Temporary	Temporary
If temporary write-down, description of write-up mechanism	Write Up at sole discretion of the Issuer to the extent permitted in compliance with the Applicable Supervisory Regulations (applied on a pro rata basis)	Write Up at sole discretion of the Issuer to the extent permitted in compliance with the Applicable Supervisory Regulations (applied on a pro rata basis)	Write Up at sole discretion of the Issuer to the extent permitted in compliance with the Applicable Supervisory Regulations (applied on a pro rata basis)
Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Tier 2	Tier 2	Tier 2
Non-compliant transitioned features	No	No	No
If yes, specify non-compliant features	N/A	N/A	N/A



Issuer	Raiffeisen Bank International AG	Raiffeisen Bank International AG	Raiffeisen Bank International AG
Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)	AT0000285473	AT000B010889	AT000B011168
Governing law(s) of the instrument	Austrian law	Austrian law	Austrian law
Regulatory treatment			
Transitional CRR rules	Tier 2	Tier 2	Tier 2
Post-transitional CRR rules	Tier 2	Tier 2	Tier 2
Eligible at solo/(sub-)consolidated/solo and (sub-)consolidated	Solo and consolidated	Solo and consolidated	Solo and consolidated
Instrument type (types to be specified by each jurisdiction)	Tier 2 instrument according to Art 63 CRR	Tier 2 instrument according to Art 63 CRR	Tier 2 instrument according to Art 63 CRR
Amount recognized in regulatory capital as of 31 December 2020	EUR 20,232,500	EUR 6,684,267	EUR 4,315,591
Nominal amount of instrument	EUR 20,000,000	EUR 22,000,000	EUR 10,800,000
Issue price	100%	88%	100%
Redemption price	100%	100%	100%
Accounting classification	Liability - at amortized cost	Liability - fair value structured	Liability - fair value structured
Original date of issuance	28 September 2005	10 November 2008	02 January 2009
Perpetual or dated	Dated	Dated	Dated
Original maturity date	28 September 2035	31 October 2031	29 December 2023
Issuer call subject to prior supervisory approval	Yes	No	No
Optional call date, contingent call dates, and redemption amount	28.Sep.25	No	No
Subsequent call dates, if applicable	No	No	No
Coupons / dividends			
Fixed or floating dividend/coupon	Fixed Rate	Fixed Rate	Fixed Rate
Coupon rate and any related index	4.50%	4.50%	5.30%
Existence of a dividend stopper	No	No	No
Fully discretionary, partially discretionary or mandatory (in terms of timing)	Mandatory	Mandatory	Mandatory
Fully discretionary, partially discretionary or mandatory (in terms of amount)	Mandatory	Mandatory	Mandatory
Existence of step up or other incentive to redeem	No	No	No
Noncumulative or cumulative	Non-cumulative	Non-cumulative	Non-cumulative
Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible
If convertible, conversion trigger (s)	N/A	N/A	N/A
If convertible, fully or partially	N/A	N/A	N/A
If convertible, conversion rate	N/A	N/A	N/A
If convertible, mandatory or optional conversion	N/A	N/A	N/A
If convertible, specify instrument type convertible into	N/A	N/A	N/A
If convertible, specify issuer of instrument it converts into	N/A	N/A	N/A
Write-down features	No	No	No
If write-down, write-down trigger (s)	N/A	N/A	N/A
If write-down, full or partial	N/A	N/A	N/A
If write-down, permanent or temporary	N/A	N/A	N/A
If temporary write-down, description of write-up mechanism	N/A	N/A	N/A
Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Senior instruments	Senior instruments	Senior instruments
Non-compliant transitioned features	No	No	No
If yes, specify non-compliant features	N/A	N/A	N/A

Issuer	Raiffeisen Bank International AG	Raiffeisen Bank International AG	Raiffeisen Bank International AG
Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)	HP0CD130905_1	HP0MCD130905_1	XS2353473692
Governing law(s) of the instrument	Austrian law	Austrian law	Austrian law
Regulatory treatment			
Transitional CRR rules	Tier 2	Tier 2	Tier 2
Post-transitional CRR rules	Tier 2	Tier 2	Tier 2
Eligible at solo/(sub-)consolidated/solo and (sub-)consolidated	Solo and consolidated	Solo and consolidated	Solo and consolidated
Instrument type (types to be specified by each jurisdiction)	Tier 2 instrument according to Art 63 CRR	Tier 2 instrument according to Art 63 CRR	Tier 2 instrument according to Art 63 CRR
Amount recognized in regulatory capital as of 31 December 2020	EUR 2,743,257	EUR 2,529,375	EUR 500,242,536
Nominal amount of instrument	EUR 5,000,000	EUR 2,500,000	EUR 500,000,000
Issue price	100%	100%	99%
Redemption price	100%	100%	100%
Accounting classification	Liability - at amortized cost	Liability - at amortized cost	Liability - fair value hedge
Original date of issuance	15 September 2005	27 September 2005	17 June 2021
Perpetual or dated	Dated	Dated	Dated
Original maturity date	15 September 2025	27 September 2035	17 June 2033
Issuer call subject to prior supervisory approval	No	No	Yes
Optional call date, contingent call dates, and redemption amount	No	27 September 2025, 100%	19 June 2028
Subsequent call dates, if applicable	No	No	No
Coupons / dividends			
Fixed or floating dividend/coupon	Fixed Rate	Fixed Rate	Fixed to Call Date
Coupon rate and any related index	4.22%	4.50%	1,375% p.a. until Call Date / 7 year EUR Mid-Swap Rate +160bps
Existence of a dividend stopper	No	No	No
Fully discretionary, partially discretionary or mandatory (in terms of timing)	Mandatory	Mandatory	Mandatory
Fully discretionary, partially discretionary or mandatory (in terms of amount)	Mandatory	Mandatory	Mandatory
Existence of step up or other incentive to redeem	No	No	No
Noncumulative or cumulative	Non-cumulative	Non-cumulative	Non-cumulative
Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible
If convertible, conversion trigger (s)	N/A	N/A	N/A
If convertible, fully or partially	N/A	N/A	N/A
If convertible, conversion rate	N/A	N/A	N/A
If convertible, mandatory or optional conversion	N/A	N/A	N/A
If convertible, specify instrument type convertible into	N/A	N/A	N/A
If convertible, specify issuer of instrument it converts into	N/A	N/A	N/A
Write-down features	No	No	No
If write-down, write-down trigger (s)	N/A	N/A	N/A
If write-down, full or partial	N/A	N/A	N/A
If write-down, permanent or temporary	N/A	N/A	N/A
If temporary write-down, description of write-up mechanism	N/A	N/A	N/A
Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Senior instruments	Senior instruments	Senior unsecured
Non-compliant transitioned features	No	No	No
If yes, specify non-compliant features	N/A	N/A	N/A

Issuer	Raiffeisen Bank International AG	Raiffeisen Bank International AG	Raiffeisen Bank International AG
Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)	SSD_20130801_01	SSD_20130814_01	XS2534786590
Governing law(s) of the instrument	German law	German law	Austrian Law
Regulatory treatment			
Transitional CRR rules	Tier 2	Tier 2	Tier 2
Post-transitional CRR rules	Tier 2	Tier 2	Tier 2
Eligible at solo/(sub-)consolidated/solo and (sub-)consolidated	Solo and consolidated	Solo and consolidated	Solo and consolidated
Instrument type (types to be specified by each jurisdiction)	Tier 2 instrument according to Art 63 CRR	Tier 2 instrument according to Art 63 CRR	Tier 2 instrument according to Art 63 CRR
Amount recognized in regulatory capital as of 31 December 2020	EUR 5,109,747	EUR 2,600,716	EUR 497,133,511
Nominal amount of instrument	EUR 5,000,000	EUR 20,000,000	EUR 500,000,000
Issue price	100%	98%	99%
Redemption price	100%	100%	100%
Accounting classification	Liability - fair value option	Liability - fair value option	Liability - fair value hedge
Original date of issuance	07 August 2013	21 August 2013	20 September 2022
Perpetual or dated	Dated	Dated	Dated
Original maturity date	07 August 2028	21 August 2023	20 December 2032
Issuer call subject to prior supervisory approval	Yes	Yes	Yes
Optional call date, contingent call dates, and redemption amount	No	No	20 December 2027
Subsequent call dates, if applicable	No	No	No
Coupons / dividends			
Fixed or floating dividend/coupon	Fixed Rate	Fixed Rate	Fixed to Call Date
			7.375% p.a. until Call Date / 5.25 Y Mid-Swap rate + 520bps
Coupon rate and any related index	5.45%	5.30%	
Existence of a dividend stopper	No	No	No
Fully discretionary, partially discretionary or mandatory (in terms of timing)	Mandatory	Mandatory	Mandatory
Fully discretionary, partially discretionary or mandatory (in terms of amount)	Mandatory	Mandatory	Mandatory
Existence of step up or other incentive to redeem	No	No	No
Noncumulative or cumulative	Non-cumulative	Non-cumulative	Non-cumulative
Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible
If convertible, conversion trigger (s)	N/A	N/A	N/A
If convertible, fully or partially	N/A	N/A	N/A
If convertible, conversion rate	N/A	N/A	N/A
If convertible, mandatory or optional conversion	N/A	N/A	N/A
If convertible, specify instrument type convertible into	N/A	N/A	N/A
If convertible, specify issuer of instrument it converts into	N/A	N/A	N/A
Write-down features	No	No	No
If write-down, write-down trigger (s)	N/A	N/A	N/A
If write-down, full or partial	N/A	N/A	N/A
If write-down, permanent or temporary	N/A	N/A	N/A
If temporary write-down, description of write-up mechanism	N/A	N/A	N/A
Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Senior instruments	Senior instruments	Senior instruments
Non-compliant transitioned features	No	No	No
If yes, specify non-compliant features	N/A	N/A	N/A

Issuer	Raiffeisen Bank International AG	Raiffeisen Bank International AG	Raiffeisen Bank International AG
Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)	XS0981632804	AT000B010962	HP0FD050905_2
Governing law(s) of the instrument	German law	Austrian law	Austrian law
Regulatory treatment			
Transitional CRR rules	Tier 2	Tier 2	Tier 2
Post-transitional CRR rules	Tier 2	Tier 2	Tier 2
Eligible at solo/(sub-)consolidated/solo and (sub-)consolidated	Solo and consolidated	Solo and consolidated	Solo and consolidated
Instrument type (types to be specified by each jurisdiction)	Tier 2 instrument according to Art 63 CRR	Tier 2 instrument according to Art 63 CRR	Tier 2 instrument according to Art 63 CRR
Amount recognized in regulatory capital as of 31 December 2020	EUR 80,161,281	EUR 4,889,242	EUR 23,713,315
Nominal amount of instrument	EUR 500,000,000	EUR 13,000,000	EUR 40,000,000
Issue price	100%	100%	100%
Redemption price	100%	100%	100%
Accounting classification	Liability - fair value hedge	Liability - fair value structured	Liability - fair value option
Original date of issuance	16 October 2013	01 December 2008	15 September 2005
Perpetual or dated	Dated	Dated	Dated
Original maturity date	16 October 2023	30 November 2023	15 December 2025
Issuer call subject to prior supervisory approval	Yes	No	No
Optional call date, contingent call dates, and redemption amount	Tax call, regulatory call, principal amount	No	No
Subsequent call dates, if applicable	No	No	No
Coupons / dividends			
Fixed or floating dividend/coupon	Fixed Rate	Fixed Rate	Fixed Rate
Coupon rate and any related index	6.00%	5.30%	4.00%
Existence of a dividend stopper	No	No	No
Fully discretionary, partially discretionary or mandatory (in terms of timing)	Mandatory	Mandatory	Mandatory
Fully discretionary, partially discretionary or mandatory (in terms of amount)	Mandatory	Mandatory	Mandatory
Existence of step up or other incentive to redeem	No	No	No
Noncumulative or cumulative	Non-cumulative	Non-cumulative	Non-cumulative
Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible
If convertible, conversion trigger (s)	N/A	N/A	N/A
If convertible, fully or partially	N/A	N/A	N/A
If convertible, conversion rate	N/A	N/A	N/A
If convertible, mandatory or optional conversion	N/A	N/A	N/A
If convertible, specify instrument type convertible into	N/A	N/A	N/A
If convertible, specify issuer of instrument it converts into	N/A	N/A	N/A
Write-down features	No	No	No
If write-down, write-down trigger (s)	N/A	N/A	N/A
If write-down, full or partial	N/A	N/A	N/A
If write-down, permanent or temporary	N/A	N/A	N/A
If temporary write-down, description of write-up mechanism	N/A	N/A	N/A
Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Senior instruments	Senior instruments	Senior instruments
Non-compliant transitioned features	No	No	No
If yes, specify non-compliant features	N/A	N/A	N/A

Issuer	Raiffeisen Bank International AG	Raiffeisen Bank International AG	Raiffeisen Bank International AG
Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)	HP0FD080905_1	HP0FSS030206_1	AT0000A1E5F7
Governing law(s) of the instrument	Austrian law	Austrian law	Austrian law
Regulatory treatment			
Transitional CRR rules	Tier 2	Tier 2	Tier 2
Post-transitional CRR rules	Tier 2	Tier 2	Tier 2
Eligible at solo/(sub-)consolidated/solo and (sub-)consolidated	Solo and consolidated	Solo and consolidated	Solo and consolidated
Instrument type (types to be specified by each jurisdiction)	Tier 2 instrument according to Art 63 CRR	Tier 2 instrument according to Art 63 CRR	Tier 2 instrument according to Art 63 CRR
Amount recognized in regulatory capital as of 31 December 2020	EUR 3,123,229	EUR 4,650,065	EUR 5,387,888
Nominal amount of instrument	EUR 22,000,000	EUR 20,000,000	CZK 270,000,000 / EUR 10,365,975
Issue price	100%	100%	98%
Redemption price	100%	100%	100%
Accounting classification	Liability - fair value option	Liability - fair value option	Liability - fair value hedge
Original date of issuance	13 September 2005	13 February 2006	04 May 2015
Perpetual or dated	Dated	Dated	Dated
Original maturity date	13 September 2023	13 February 2024	04 May 2025
Issuer call subject to prior supervisory approval	No	No	Yes
Optional call date, contingent call dates, and redemption amount	No	No	No
Subsequent call dates, if applicable	No	No	No
Coupons / dividends			
Fixed or floating dividend/coupon	Fixed Rate	Fixed Rate	Fixed Rate
Coupon rate and any related index	4.00%	4.24%	5.40%
Existence of a dividend stopper	No	No	No
Fully discretionary, partially discretionary or mandatory (in terms of timing)	Mandatory	Mandatory	Mandatory
Fully discretionary, partially discretionary or mandatory (in terms of amount)	Mandatory	Mandatory	Mandatory
Existence of step up or other incentive to redeem	No	No	No
Noncumulative or cumulative	Non-cumulative	Non-cumulative	Non-cumulative
Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible
If convertible, conversion trigger (s)	N/A	N/A	N/A
If convertible, fully or partially	N/A	N/A	N/A
If convertible, conversion rate	N/A	N/A	N/A
If convertible, mandatory or optional conversion	N/A	N/A	N/A
If convertible, specify instrument type convertible into	N/A	N/A	N/A
If convertible, specify issuer of instrument it converts into	N/A	N/A	N/A
Write-down features	No	No	No
If write-down, write-down trigger (s)	N/A	N/A	N/A
If write-down, full or partial	N/A	N/A	N/A
If write-down, permanent or temporary	N/A	N/A	N/A
If temporary write-down, description of write-up mechanism	N/A	N/A	N/A
Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Senior instruments	Senior instruments	Senior instruments
Non-compliant transitioned features	No	No	No
If yes, specify non-compliant features	N/A	N/A	N/A

Issuer	Raiffeisen Bank International AG	Raiffeisen Bank International AG	Raiffeisen Bank International AG
Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)	AT0000A1FGP2	XS2049823763	XS2189786226
Governing law(s) of the instrument	Austrian law	Austrian law	German/Austrian law
Regulatory treatment			
Transitional CRR rules	Tier 2	Tier 2	Tier 2
Post-transitional CRR rules	Tier 2	Tier 2	Tier 2
Eligible at solo/(sub-)consolidated/solo and (sub-)consolidated	Solo and consolidated	Solo and consolidated	Solo and consolidated
Instrument type (types to be specified by each jurisdiction)	Tier 2 instrument according to Art 63 CRR	Tier 2 instrument according to Art 63 CRR	Tier 2 instrument according to Art 63 CRR
Amount recognized in regulatory capital as of 31 December 2020	EUR 2,349,374	EUR 504,186,217	EUR 504,764,721
Nominal amount of instrument	CZK 111,000,000 / EUR 4,261,874	EUR 500,000,000	EUR 500,000,000
Issue price	98%	99%	99%
Redemption price	100%	100%	100%
Accounting classification	Liability - fair value hedge	Liability - fair value hedge	Liability - fair value hedge
Original date of issuance	03 July 2015	12 September 2019	18 June 2020
Perpetual or dated	Dated	Dated	Dated
Original maturity date	03 July 2025	12 March 2030	18 June 2032
Issuer call subject to prior supervisory approval	Yes	Yes	Yes
Optional call date, contingent call dates, and redemption amount	No	12 March 2025	15 December 2026; in addition tax and regulatory call rights; Optional redemption at par
Subsequent call dates, if applicable	No	No	No
Coupons / dividends			
Fixed or floating dividend/coupon	Fixed Rate	Fixed Rate	Fixed to Reset Date
Coupon rate and any related index	5.40%	1.50%	2.875% p.a. until 18 June 2027/ 5-year EUR Mid-Swap + margin of 3.15%
Existence of a dividend stopper	No	No	No
Fully discretionary, partially discretionary or mandatory (in terms of timing)	Mandatory	Mandatory	Mandatory
Fully discretionary, partially discretionary or mandatory (in terms of amount)	Mandatory	Mandatory	Mandatory
Existence of step up or other incentive to redeem	No	No	No
Noncumulative or cumulative	Non-cumulative	Non-cumulative	Non-cumulative
Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible
If convertible, conversion trigger (s)	N/A	N/A	N/A
If convertible, fully or partially	N/A	N/A	N/A
If convertible, conversion rate	N/A	N/A	N/A
If convertible, mandatory or optional conversion	N/A	N/A	N/A
If convertible, specify instrument type convertible into	N/A	N/A	N/A
If convertible, specify issuer of instrument it converts into	N/A	N/A	N/A
Write-down features	No	No	No
If write-down, write-down trigger (s)	N/A	N/A	N/A
If write-down, full or partial	N/A	N/A	N/A
If write-down, permanent or temporary	N/A	N/A	N/A
If temporary write-down, description of write-up mechanism	N/A	N/A	N/A
Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Senior instruments	Senior instruments	Senior Non-Preferred instruments
Non-compliant transitioned features	No	No	No
If yes, specify non-compliant features	N/A	N/A	N/A

Issuer	Raiffeisen Bank S.A.	Raiffeisenbank a.s.	Raiffeisenbank a.s.
Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)	ROJX86UZW1R4		
Governing law(s) of the instrument	Romanian law	Austrian law	Austrian law
Regulatory treatment			
Transitional CRR rules	Tier 2	Tier 2	Tier 2
Post-transitional CRR rules	Tier 2	Tier 2	Tier 2
Eligible at solo/(sub-)consolidated/solo and (sub-)consolidated	Solo and consolidated	Solo and consolidated	Solo and consolidated
Instrument type (types to be specified by each jurisdiction)	Tier 2 instrument according Art 63 CRR	Tier 2 instrument according Art 63 CRR	Tier 2 instrument according Art 63 CRR
Amount recognized in regulatory capital as of 31 December 2020	EUR 96,979,493	EUR 24,998,963	EUR 7,499,689
Nominal amount of instrument	RON 480,000,000	EUR 25,000,000	EUR 7,500,000
Issue price	100%	N/A (loan format)	N/A (loan format)
Redemption price	100%	N/A (loan format)	N/A (loan format)
Accounting classification	Liability - fair value hedge	At amortized costs	At amortized costs
Original date of issuance	19 December 2019	14 December 2018	27 June 2019
Perpetual or dated	Dated	Dated	Dated
Original maturity date	19 December 2029	14 December 2028	27 June 2029
Issuer call subject to prior supervisory approval	Yes	Yes	Yes
Optional call date, contingent call dates, and redemption amount	No	14 December 2023	27 June 2024
Subsequent call dates, if applicable	No	No	No
Coupons / dividends			
Fixed or floating dividend/coupon	Floating Rate	Floating Rate	Floating Rate
Coupon rate and any related index	ROBOR3M + 3.5%	zero floored 6M EURIBOR + 3.7%	zero floored 3M EURIBOR + 3.7%
Existence of a dividend stopper	No	No	No
Fully discretionary, partially discretionary or mandatory (in terms of timing)	Mandatory	N/A	N/A
Fully discretionary, partially discretionary or mandatory (in terms of amount)	Mandatory	N/A	N/A
Existence of step up or other incentive to redeem	No	No	No
Noncumulative or cumulative	Non-cumulative	N/A	N/A
Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible
If convertible, conversion trigger (s)	N/A	N/A	N/A
If convertible, fully or partially	N/A	N/A	N/A
If convertible, conversion rate	N/A	N/A	N/A
If convertible, mandatory or optional conversion	N/A	N/A	N/A
If convertible, specify instrument type convertible into	N/A	N/A	N/A
If convertible, specify issuer of instrument it converts into	N/A	N/A	N/A
Write-down features	No	No	No
If write-down, write-down trigger (s)	N/A	N/A	N/A
If write-down, full or partial	N/A	N/A	N/A
If write-down, permanent or temporary	N/A	N/A	N/A
If temporary write-down, description of write-up mechanism	N/A	N/A	N/A
Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Senior instruments	Senior unsecured	Senior unsecured
Non-compliant transitioned features	No	No	No
If yes, specify non-compliant features	N/A	N/A	N/A

Issuer	Raiffeisenbank a.s.	Raiffeisenbank a.s.	Raiffeisenbank a.s.
Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)			CZ0003704595
Governing law(s) of the instrument	Austrian law	Austrian law	Czech law
Regulatory treatment			
Transitional CRR rules	Tier 2	Tier 2	Tier 2
Post-transitional CRR rules	Tier 2	Tier 2	Tier 2
Eligible at solo/(sub-)consolidated/solo and (sub-)consolidated	Solo and consolidated	Solo and consolidated	Solo and consolidated
Instrument type (types to be specified by each jurisdiction)	Tier 2 instrument according Art 63 CRR	Tier 2 instrument according Art 63 CRR	Tier 2 instrument according Art 63 CRR
Amount recognized in regulatory capital as of 31 December 2020	EUR 7,999,668	EUR 2,999,876	EUR 11,785,861
Nominal amount of instrument	EUR 8,000,000	EUR 3,000,000	CZK 300,000,000
Issue price	N/A (loan format)	N/A (loan format)	100%
Redemption price	N/A (loan format)	N/A (loan format)	100%
Accounting classification	At amortized costs	At amortized costs	At amortized costs
Original date of issuance	27 November 2020	28 May 2021	26 September 2017
Perpetual or dated	Dated	Dated	Dated
Original maturity date	27 November 2030	28 May 2031	26 September 2027
Issuer call subject to prior supervisory approval	Yes	Yes	Yes
Optional call date, contingent call dates, and redemption amount	27 November 2025	28 May 2026	26 September 2022
Subsequent call dates, if applicable	No	No	No
Coupons / dividends			
Fixed or floating dividend/coupon	Floating Rate	Floating Rate	Fixed Rate
Coupon rate and any related index	zero floored 3M EURIBOR + 3.8%	zero floored 6M EURIBOR + 3.7%	4.4%
Existence of a dividend stopper	No	No	No
Fully discretionary, partially discretionary or mandatory (in terms of timing)	N/A	N/A	N/A
Fully discretionary, partially discretionary or mandatory (in terms of amount)	N/A	N/A	N/A
Existence of step up or other incentive to redeem	No	No	No
Noncumulative or cumulative	N/A	N/A	N/A
Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible
If convertible, conversion trigger (s)	N/A	N/A	N/A
If convertible, fully or partially	N/A	N/A	N/A
If convertible, conversion rate	N/A	N/A	N/A
If convertible, mandatory or optional conversion	N/A	N/A	N/A
If convertible, specify instrument type convertible into	N/A	N/A	N/A
If convertible, specify issuer of instrument it converts into	N/A	N/A	N/A
Write-down features	No	No	No
If write-down, write-down trigger (s)	N/A	N/A	N/A
If write-down, full or partial	N/A	N/A	N/A
If write-down, permanent or temporary	N/A	N/A	N/A
If temporary write-down, description of write-up mechanism	N/A	N/A	N/A
Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Senior unsecured	Senior unsecured	Subordinated
Non-compliant transitioned features	No	No	No
If yes, specify non-compliant features	N/A	N/A	N/A



Issuer	Raiffeisenbank a.s.	Raiffeisen Bank d.d.	Raiffeisenbank a.s.
Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)	CZ0003704900	YYBASRZBA001	
Governing law(s) of the instrument	Czech law	Law of Bosnia and Herzegovina	Czech law
Regulatory treatment			
Transitional CRR rules	Tier 2	Tier 2	Tier 2
Post-transitional CRR rules	Tier 2	Tier 2	Tier 2
Eligible at solo/(sub-)consolidated/solo and (sub-)consolidated	Solo and consolidated	Solo and consolidated	Solo and consolidated
	Tier 2 instrument according Art 63 CRR	Tier 2 instrument according Art 63 CRR	Tier 2 instrument according Art 63 CRR
Instrument type (types to be specified by each jurisdiction)			
Amount recognized in regulatory capital as of 31 December 2020	EUR 12,439,874	EUR 22,271,607	EUR 2,657
Nominal amount of instrument	CZK 300,000,000	EUR 23,000,000	CZK 500,000
Issue price	100%	100%	100%
Redemption price	100%	100%	100%
Accounting classification	At amortized costs	At amortized costs	Subordinated deposit
Original date of issuance	18 September 2019	18 November 2022	22 August 2017
Perpetual or dated	Dated	Dated	Dated
Original maturity date	18 September 2029	18 November 2032	22 August 2023
Issuer call subject to prior supervisory approval	Yes	No	No
Optional call date, contingent call dates, and redemption amount	18 September 2025	N/A	In case end of T2 eligibility 1M prior redemption, full amount incl. interest
Subsequent call dates, if applicable	No	No	No
Coupons / dividends			
Fixed or floating dividend/coupon	Fixed rate	Floating Rate	Fixed rate
Coupon rate and any related index	4.06%	EURIBOR + margin of 5.5% p.a.	4.06%
Existence of a dividend stopper	No	No	No
Fully discretionary, partially discretionary or mandatory (in terms of timing)	N/A	N/A	N/A
Fully discretionary, partially discretionary or mandatory (in terms of amount)	N/A	N/A	N/A
Existence of step up or other incentive to redeem	No	No	No
Noncumulative or cumulative	N/A	N/A	N/A
Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible
If convertible, conversion trigger (s)	N/A	N/A	N/A
If convertible, fully or partially	N/A	N/A	N/A
If convertible, conversion rate	N/A	N/A	N/A
If convertible, mandatory or optional conversion	N/A	N/A	N/A
If convertible, specify instrument type convertible into	N/A	N/A	Tier 1 instrument
If convertible, specify issuer of instrument it converts into	N/A	N/A	N/A
Write-down features	No	No	No
If write-down, write-down trigger (s)	N/A	N/A	N/A
If write-down, full or partial	N/A	N/A	N/A
If write-down, permanent or temporary	N/A	N/A	N/A
If temporary write-down, description of write-up mechanism	N/A	N/A	N/A
Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Subordinated	Subordinated	Subordinated
Non-compliant transitioned features	No	No	No
If yes, specify non-compliant features	N/A	N/A	N/A

Issuer	Raiffeisenbank a.s.	Raiffeisenbank a.s.	Raiffeisenbank a.s.
Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)			
Governing law(s) of the instrument	Czech law	Czech law	Czech law
Regulatory treatment			
Transitional CRR rules	Tier 2	Tier 2	Tier 2
Post-transitional CRR rules	Tier 2	Tier 2	Tier 2
Eligible at solo/(sub-)consolidated/solo and (sub-)consolidated	Solo and consolidated	Solo and consolidated	Solo and consolidated
Instrument type (types to be specified by each jurisdiction)	Tier 2 instrument according Art 63 CRR	Tier 2 instrument according Art 63 CRR	Tier 2 instrument according Art 63 CRR
Amount recognized in regulatory capital as of 31 December 2020	EUR 30,543	EUR 1,170	EUR 3,679
Nominal amount of instrument	CZK 5,000,000	CZK 250,000	CZK 600,000
Issue price	100%	100%	100%
Redemption price	100%	100%	100%
Accounting classification	Subordinated deposit	Subordinated deposit	Subordinated deposit
Original date of issuance	26 September 2017	25 July 2017	27 September 2017
Perpetual or dated	Dated	Dated	Dated
Original maturity date	26 September 2023	25 July 2023	27 September 2023
Issuer call subject to prior supervisory approval	No	No	No
Optional call date, contingent call dates, and redemption amount	In case end of T2 eligibility 1M prior redemption, full amount incl.interest	In case end of T2 eligibility 1M prior redemption, full amount incl.interest	In case end of T2 eligibility 1M prior redemption, full amount incl.interest
Subsequent call dates, if applicable	No	No	No
Coupons / dividends			
Fixed or floating dividend/coupon	Fixed rate	Fixed rate	Fixed rate
Coupon rate and any related index	4.06%	3.65%	3.23%
Existence of a dividend stopper	No	No	No
Fully discretionary, partially discretionary or mandatory (in terms of timing)	N/A	N/A	N/A
Fully discretionary, partially discretionary or mandatory (in terms of amount)	N/A	N/A	N/A
Existence of step up or other incentive to redeem	No	No	No
Noncumulative or cumulative	N/A	N/A	N/A
Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible
If convertible, conversion trigger (s)	N/A	N/A	N/A
If convertible, fully or partially	N/A	N/A	N/A
If convertible, conversion rate	N/A	N/A	N/A
If convertible, mandatory or optional conversion	N/A	N/A	N/A
If convertible, specify instrument type convertible into	Tier1 instrument	Tier1 instrument	Tier1 instrument
If convertible, specify issuer of instrument it converts into	N/A	N/A	N/A
Write-down features	No	No	No
If write-down, write-down trigger (s)	N/A	N/A	N/A
If write-down, full or partial	N/A	N/A	N/A
If write-down, permanent or temporary	N/A	N/A	N/A
If temporary write-down, description of write-up mechanism	N/A	N/A	N/A
Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Subordinated	Subordinated	Subordinated
Non-compliant transitioned features	No	No	No
If yes, specify non-compliant features	N/A	N/A	N/A

Issuer	Raiffeisenbank a.s.	Raiffeisenbank a.s.	Raiffeisenbank a.s.
Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)			
Governing law(s) of the instrument	Czech law	Czech law	Czech law
Regulatory treatment			
Transitional CRR rules	Tier 2	Tier 2	Tier 2
Post-transitional CRR rules	Tier 2	Tier 2	Tier 2
Eligible at solo/(sub-)consolidated/solo and (sub-)consolidated	Solo and consolidated	Solo and consolidated	Solo and consolidated
Instrument type (types to be specified by each jurisdiction)	Tier 2 instrument according Art 63 CRR	Tier 2 instrument according Art 63 CRR	Tier 2 instrument according Art 63 CRR
Amount recognized in regulatory capital as of 31 December 2020	EUR 2,889	EUR 806	EUR 110,365
Nominal amount of instrument	CZK 800,000	CZK 250,000	CZK 20,000,000
Issue price	100%	100%	100%
Redemption price	100%	100%	100%
Accounting classification	Subordinated deposit	Subordinated deposit	Subordinated deposit
Original date of issuance	8 June 2017	22 May 2017	31 August 2017
Perpetual or dated	Dated	Dated	Dated
Original maturity date	8 June 2023	22 May 2023	31 August 2023
Issuer call subject to prior supervisory approval	No	No	No
Optional call date, contingent call dates, and redemption amount	In case end of T2 eligibility 1M prior redemption, full amount incl.interest	In case end of T2 eligibility 1M prior redemption, full amount incl.interest	In case end of T2 eligibility 1M prior redemption, full amount incl.interest
Subsequent call dates, if applicable	No	No	No
Coupons / dividends			
Fixed or floating dividend/coupon	Fixed rate	Fixed rate	Fixed rate
Coupon rate and any related index	3.65%	3.65%	4.06%
Existence of a dividend stopper	No	No	No
Fully discretionary, partially discretionary or mandatory (in terms of timing)	N/A	N/A	N/A
Fully discretionary, partially discretionary or mandatory (in terms of amount)	N/A	N/A	N/A
Existence of step up or other incentive to redeem	No	No	No
Noncumulative or cumulative	N/A	N/A	N/A
Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible
If convertible, conversion trigger (s)	N/A	N/A	N/A
If convertible, fully or partially	N/A	N/A	N/A
If convertible, conversion rate	N/A	N/A	N/A
If convertible, mandatory or optional conversion	N/A	N/A	N/A
If convertible, specify instrument type convertible into	Tier1 instrument	Tier1 instrument	Tier1 instrument
If convertible, specify issuer of instrument it converts into	N/A	N/A	N/A
Write-down features	No	No	No
If write-down, write-down trigger (s)	N/A	N/A	N/A
If write-down, full or partial	N/A	N/A	N/A
If write-down, permanent or temporary	N/A	N/A	N/A
If temporary write-down, description of write-up mechanism	N/A	N/A	N/A
Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Subordinated	Subordinated	Subordinated
Non-compliant transitioned features	No	No	No
If yes, specify non-compliant features	N/A	N/A	N/A

Issuer	Raiffeisenbank a.s.	Raiffeisenbank a.s.	Raiffeisenbank a.s.
Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)			
Governing law(s) of the instrument	Czech law	Czech law	Czech law
Regulatory treatment			
Transitional CRR rules	Tier 2	Tier 2	Tier 2
Post-transitional CRR rules	Tier 2	Tier 2	Tier 2
Eligible at solo/(sub-)consolidated/solo and (sub-)consolidated	Solo and consolidated	Solo and consolidated	Solo and consolidated
Instrument type (types to be specified by each jurisdiction)	Tier 2 instrument according Art 63 CRR	Tier 2 instrument according Art 63 CRR	Tier 2 instrument according Art 63 CRR
Amount recognized in regulatory capital as of 31 December 2020	EUR 2,450	EUR 1,166	EUR 1,107
Nominal amount of instrument	CZK 650,000	CZK 290,000	CZK 250,000
Issue price	100%	100%	100%
Redemption price	100%	100%	100%
Accounting classification	Subordinated deposit	Subordinated deposit	Subordinated deposit
Original date of issuance	15 June 2017	26 June 2017	14 July 2017
Perpetual or dated	Dated	Dated	Dated
Original maturity date	15 June 2023	26 June 2023	14 July 2023
Issuer call subject to prior supervisory approval	No	No	No
Optional call date, contingent call dates, and redemption amount	In case end of T2 eligibility 1M prior redemption, full amount incl.interest	In case end of T2 eligibility 1M prior redemption, full amount incl.interest	In case end of T2 eligibility 1M prior redemption, full amount incl.interest
Subsequent call dates, if applicable	No	No	No
Coupons / dividends			
Fixed or floating dividend/coupon	Fixed rate	Fixed rate	Fixed rate
Coupon rate and any related index	3.65%	2.80%	2.80%
Existence of a dividend stopper	No	No	No
Fully discretionary, partially discretionary or mandatory (in terms of timing)	N/A	N/A	N/A
Fully discretionary, partially discretionary or mandatory (in terms of amount)	N/A	N/A	N/A
Existence of step up or other incentive to redeem	No	No	No
Noncumulative or cumulative	N/A	N/A	N/A
Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible
If convertible, conversion trigger (s)	N/A	N/A	N/A
If convertible, fully or partially	N/A	N/A	N/A
If convertible, conversion rate	N/A	N/A	N/A
If convertible, mandatory or optional conversion	N/A	N/A	N/A
If convertible, specify instrument type convertible into	Tier1 instrument	Tier1 instrument	Tier1 instrument
If convertible, specify issuer of instrument it converts into	N/A	N/A	N/A
Write-down features	No	No	No
If write-down, write-down trigger (s)	N/A	N/A	N/A
If write-down, full or partial	N/A	N/A	N/A
If write-down, permanent or temporary	N/A	N/A	N/A
If temporary write-down, description of write-up mechanism	N/A	N/A	N/A
Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Subordinated	Subordinated	Subordinated
Non-compliant transitioned features	No	No	No
If yes, specify non-compliant features	N/A	N/A	N/A

Issuer	Raiffeisenbank a.s.	Raiffeisenbank a.s.	Raiffeisenbank a.s.
Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)			
Governing law(s) of the instrument	Czech law	Czech law	Czech law
Regulatory treatment			
Transitional CRR rules	Tier 2	Tier 2	Tier 2
Post-transitional CRR rules	Tier 2	Tier 2	Tier 2
Eligible at solo/(sub-)consolidated/solo and (sub-)consolidated	Solo and consolidated	Solo and consolidated	Solo and consolidated
Instrument type (types to be specified by each jurisdiction)	Tier 2 instrument according Art 63 CRR	Tier 2 instrument according Art 63 CRR	Tier 2 instrument according Art 63 CRR
Amount recognized in regulatory capital as of 31 December 2020	EUR 28,045	EUR 37,333	EUR 7,880
Nominal amount of instrument	CZK 5,000,000	CZK 6,203,750	CZK 1,000,000
Issue price	100%	100%	100%
Redemption price	100%	100%	100%
Accounting classification	Subordinated deposit	Subordinated deposit	Subordinated deposit
Original date of issuance	4 September 2017	22 September 2017	13 December 2017
Perpetual or dated	Dated	Dated	Dated
Original maturity date	4 September 2023	22 September 2023	13 December 2023
Issuer call subject to prior supervisory approval	No	No	No
Optional call date, contingent call dates, and redemption amount	In case end of T2 eligibility 1M prior redemption, full amount incl.interest	In case end of T2 eligibility 1M prior redemption, full amount incl.interest	In case end of T2 eligibility 1M prior redemption, full amount incl.interest
Subsequent call dates, if applicable	No	No	No
Coupons / dividends			
Fixed or floating dividend/coupon	Fixed rate	Fixed rate	Fixed rate
Coupon rate and any related index	4.06%	4.06%	3.65%
Existence of a dividend stopper	No	No	No
Fully discretionary, partially discretionary or mandatory (in terms of timing)	N/A	N/A	N/A
Fully discretionary, partially discretionary or mandatory (in terms of amount)	N/A	N/A	N/A
Existence of step up or other incentive to redeem	No	No	No
Noncumulative or cumulative	N/A	N/A	N/A
Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible
If convertible, conversion trigger (s)	N/A	N/A	N/A
If convertible, fully or partially	N/A	N/A	N/A
If convertible, conversion rate	N/A	N/A	N/A
If convertible, mandatory or optional conversion	N/A	N/A	N/A
If convertible, specify instrument type convertible into	Tier1 instrument	Tier1 instrument	Tier1 instrument
If convertible, specify issuer of instrument it converts into	N/A	N/A	N/A
Write-down features	No	No	No
If write-down, write-down trigger (s)	N/A	N/A	N/A
If write-down, full or partial	N/A	N/A	N/A
If write-down, permanent or temporary	N/A	N/A	N/A
If temporary write-down, description of write-up mechanism	N/A	N/A	N/A
Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Subordinated	Subordinated	Subordinated
Non-compliant transitioned features	No	No	No
If yes, specify non-compliant features	N/A	N/A	N/A

Issuer	Raiffeisenbank a.s.
Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)	
Governing law(s) of the instrument	Czech law
Regulatory treatment	
Transitional CRR rules	Tier 2
Post-transitional CRR rules	Tier 2
Eligible at solo/(sub-)consolidated/solo and (sub-)consolidated	Solo and consolidated
Instrument type (types to be specified by each jurisdiction)	Tier 2 instrument according Art 63 CRR
Amount recognized in regulatory capital as of 31 December 2020	EUR 1,015
Nominal amount of instrument	CZK 300,000
Issue price	100%
Redemption price	100%
Accounting classification	Subordinated deposit
Original date of issuance	29 May 2017
Perpetual or dated	Dated
Original maturity date	29 May 2023
Issuer call subject to prior supervisory approval	No
Optional call date, contingent call dates, and redemption amount	In case end of T2 eligibility 1M prior redemption, full amount incl.interest
Subsequent call dates, if applicable	No
Coupons / dividends	
Fixed or floating dividend/coupon	Fixed rate
Coupon rate and any related index	3.65%
Existence of a dividend stopper	No
Fully discretionary, partially discretionary or mandatory (in terms of timing)	N/A
Fully discretionary, partially discretionary or mandatory (in terms of amount)	N/A
Existence of step up or other incentive to redeem	No
Noncumulative or cumulative	N/A
Convertible or non-convertible	Non-convertible
If convertible, conversion trigger (s)	N/A
If convertible, fully or partially	N/A
If convertible, conversion rate	N/A
If convertible, mandatory or optional conversion	N/A
If convertible, specify instrument type convertible into	Tier 1 instrument
If convertible, specify issuer of instrument it converts into	N/A
Write-down features	No
If write-down, write-down trigger (s)	N/A
If write-down, full or partial	N/A
If write-down, permanent or temporary	N/A
If temporary write-down, description of write-up mechanism	N/A
Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Subordinated
Non-compliant transitioned features	No
If yes, specify non-compliant features	N/A

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