



## ICICI Bank UK PLC

**Pillar 3 disclosures for the year ended  
March 31, 2025**

## Table of Contents

|                     |   |           |
|---------------------|---|-----------|
| <b>1</b>            | <b>Overview</b>   | <b>3</b>  |
| <b>2</b>            | <b>Capital Adequacy</b>   | <b>6</b>  |
| <b>3</b>            | <b>Minimum Capital Requirement</b>  | <b>10</b> |
| <b>4</b>            | <b>Risk Management and Governance framework</b>   | <b>13</b> |
| <b>5</b>            | <b>Credit Risk</b>  | <b>16</b> |
| <b>6</b>            | <b>Market Risk</b>  | <b>21</b> |
| <b>7</b>            | <b>Operational, Information Security, Conduct and Other risk</b>  | <b>25</b> |
| <b>8</b>            | <b>Liquidity Risk</b>   | <b>28</b> |
| <b>9</b>            | <b>Equal Opportunities and Diversity</b>  | <b>31</b> |
| <b>Annexure I</b>   | <b>UK CC1 - Composition of regulatory own funds</b>   | <b>32</b> |
| <b>Annexure II</b>  | <b>UK CC2 - Reconciliation of regulatory own funds to balance sheet in the audited financial statements</b>   | <b>41</b> |
| <b>Annexure III</b> | <b>UK CCA: Main features of regulatory own funds instruments and eligible liabilities instruments</b>   | <b>43</b> |
| <b>Annexure IV</b>  | <b>UK CR4 - Standardised approach - Credit risk exposure and CRM effects<br/>UK CR5 - Standardised approach</b>   | <b>46</b> |
| <b>Annexure V</b>   | <b>UK CCR1 – Analysis of CCR exposure by approach<br/>UK CCR2 – Transactions subject to own funds requirements for CVA risk<br/>UK CCR3 – Standardised approach – CCR exposures by regulatory exposure class and risk weights<br/>UK CCR8 – Exposures to CCPs</b> | <b>50</b> |
| <b>Annexure VI</b>  | <b>Compliance to Pillar 3 requirements</b>  | <b>57</b> |

## **1. Overview**

### **1.1 Background**

ICICI Bank UK PLC (“the Bank”) is authorised by the Prudential Regulation Authority (PRA) and regulated by the PRA and Financial Conduct Authority (FCA). The Bank is a wholly owned subsidiary of ICICI Bank Limited, India (“the Parent Bank”).

Capital Requirements Regulation (EU) No. 575/2013 (CRR) and Capital Requirements Directive (CRD), together referred to as CRD IV, came into force on January 1, 2014 and enforced in the United Kingdom (UK) by the Prudential Regulatory Authority (PRA), together with implementing rules and guidance by European Banking Authority (EBA). CRR II and CRD V published in the Official Journal of the European Union (EU) on June 7, 2019 amended these regulations. The PRA implemented remaining amendments of CRR II in UK with effect from January 1, 2022. These regulations include disclosure requirements known as “Pillar 3” which apply to banks and building societies and are included in the Disclosure (CRR) Part of the PRA Rulebook.

This document details the Pillar 3 disclosure of the Bank and is in addition to the consolidated Basel III – Pillar 3 Disclosures made by the Parent Bank.

### **1.2 Basis of disclosures**

The disclosures have been prepared for the Bank on an individual basis. There is no subsidiary/joint venture of the Bank that is required to be consolidated for accounting or prudential purposes. The disclosures may differ from similar information in the Annual Report prepared in accordance with UK GAAP; therefore, the information in these disclosures may not be directly comparable with that information. The Pillar 3 disclosures have been prepared to explain the basis on which the Bank has prepared and disclosed certain capital requirements and information about the management of certain risks.

### **1.3 Scope of application of Directive requirements**

PRA has implemented certain Basel III standards in UK with effect from January 1, 2022, which broadly corresponds to areas covered by the EU CRR II amendments. PRA has updated its Disclosure (CRR) Part of the PRA Rulebook to include Pillar 3 disclosure amendments that became applicable from January 1, 2022.

The Pillar 3 disclosures have been prepared for the Bank in accordance with the rules laid out in the CRR and CRD as at the applicable reporting date and as adopted by the PRA in its Rulebook.

Any reference to CRR and CRD in the disclosure would mean CRR as amended by CRR II and CRD as amended by CRD V and as adopted by PRA for application in UK. Any reference to EU regulations and directives (including technical standards) mean the UK's version of such regulation or directive, as on-shored into UK law under the European Union (Withdrawal) Act 2018, as amended.

In January 2025, the PRA extended the implementation of the Basel 3.1 standards in UK to January 1, 2027, with a transitional period to ensure full implementation by January 1, 2030. This decision aims to provide additional time for clarity regarding the US plans for Basel 3.1 adoption.

Earlier, in September 2024, the PRA released its second near-final policy statement, outlining the implementation of Basel 3.1 standards concerning credit risk, the output floor, and reporting and disclosure requirements. The Bank is actively working to ensure compliance with CRR III while aligning with the updated PRA timelines by taking proactive steps to ensure full compliance across its jurisdictions.

The Bank has a formal policy, approved by the Audit Committee, which details its approach to complying fully with the Pillar 3 disclosure requirements as laid out in Disclosure (CRR) Part of PRA Rulebook. The disclosures provide information on the Bank's exposures, associated risk weights for different categories of assets and approach to calculating the capital requirements for Pillar 1. These disclosures should be read in conjunction with those made by the Parent Bank as part of their Basel III – Pillar 3 Disclosures.

#### **1.4 Frequency and Disclosure**

In accordance with Disclosure (CRR) Part of the PRA Rulebook, the Bank is classified as a non-listed other institution based on the following assessment:

- The Bank does not meet the criteria for classification as either a 'small and non-complex' institution or a 'large' institution and is therefore classified as an 'other institution'; and
- The Bank's securities are currently not admitted for trading in the UK regulated market and therefore is classified as non-listed institution.

The Bank has to publish Pillar 3 disclosure on an annual basis in accordance with above classification. The Bank has to make disclosure relating to certain CRR articles, as prescribed for the non-listed other institution category in the PRA Rulebook. It may be noted that based on the relevant regulatory thresholds, several disclosure tables mentioned in PRA Rulebook are not applicable to the Bank.

In accordance with Article 432 of the CRR, the Bank is permitted to exclude certain disclosures if they contain proprietary or confidential information or are non-material. Accordingly, the Bank has excluded certain disclosures from the report and the rationale is provided in Annexure VI.

This disclosure is made on an annual basis on the website of the Bank. The disclosures is as at the Accounting Reference Date (ARD), i.e. as at March 31st, and is published along with the publication of the Annual Report on the website.

The row numbers in the tables containing quantitative information refer to the prescribed references within the standardised templates provided by PRA. The rows containing a nil value or which are not applicable, these have been excluded for the purposes of these disclosures.

In case some information is included in the Bank's Annual Report, the reference of the same is provided in this document under respective sections. The archives of the Pillar 3 disclosure for earlier years are available on the Bank's website.

### 1.5 Media and Location

The Annual Report will be published on the Bank's website at <https://www.icicibank.co.uk/en/personal/about-us>. The Pillar 3 disclosures will also be published on the Bank's website at <https://www.icicibank.co.uk/en/personal/basel-disclosures>. The Parent Bank's consolidated disclosures are available at <https://www.icicibank.com/regulatory-disclosure>.

### 1.6 Verification

The Bank's Pillar 3 disclosure for the year ended March 31, 2025 was verified through internal governance process and approved by the Management Committee of the Bank on July 7, 2025. The Bank's compliance with Pillar 3 disclosure requirement is provided in Annexure VI.

The Bank's Pillar 3 disclosure for the year ended March 31, 2025, to the best of our knowledge, complies with Disclosure (CRR) Part of the PRA Rulebook and has been prepared in compliance with the Bank's Pillar 3 disclosure policy and internal control framework.

Mr. Dharam Singla  
CFO, CS & Head of Treasury

Mr. Manish Aggarwal  
Chief Risk Officer

## 2. Capital Adequacy

The Bank's policy is to maintain an adequate capital base so as to maintain investor, creditor, regulator and market confidence and to sustain future development of the business. The Bank's approach to managing capital is designed to ensure that current and expected regulatory capital is met. The Bank maintains adequate surplus capital over the regulatory requirement.

The Bank's regulatory capital requirements are set and monitored by the PRA. The Bank implemented the CRD IV (Basel III) framework, comprising of Capital Requirement Regulation (CRR) and Capital Requirement Directive (CRD IV), for calculating minimum capital requirements, with effect from January 1, 2014. The CRD IV framework was amended by CRR II and CRD V issued in 2019 and were applicable in phases. Pursuant to withdrawal of UK from the European Union (EU), PRA implemented certain Basel III standards, which were part of CRR II amendments, in UK with effect from January 1, 2022.

The Bank's regulatory capital is categorized into two tiers:

- Tier 1 capital, which includes ordinary share capital, retained earnings and regulatory adjustments to Tier 1 capital.
- Tier 2 capital, which includes qualifying subordinated liabilities and regulatory adjustments to Tier 2 capital.

Various limits are applied to the elements of the capital base. Qualifying Tier 2 capital cannot exceed Tier 1 capital. There are regulatory adjustments applied to the computation of regulatory capital under the CRR and CRD guidelines.

The amount and composition of the Bank's capital requirement is determined by assessing the minimum capital requirements under Pillar 1 based upon the CRR, the impact of stress scenario tests and the Bank's Total Capital Requirement (earlier known as Individual Capital Guidance).

The Bank uses regulatory capital ratios in order to monitor its capital base and these capital ratios remain the international standards for measuring capital adequacy. The PRA's approach to such measurement under CRD is primarily based on monitoring the Capital Resource Requirement to available capital resources. The Bank continues to comply with the regulatory capital requirements.

In line with the regulatory requirements of the PRA, the Bank has instituted an Internal Capital Adequacy Assessment Process (ICAAP) which is used to estimate the capital requirements in line with the risk appetite of the Bank. The ICAAP is approved by the Board of the Bank.

Capital is provided for unforeseen and unexpected events based on the risk assessment for each underlying asset class in the Bank's portfolio. Further, in line with industry practice, the Bank acknowledges that capital is not the only mitigating factor for all unforeseen events and contingencies. Therefore, appropriate risk management and governance practices are in place to actively monitor the risks that the Bank may be exposed to in the course of executing its business. Further information on the Bank's risk management and governance is provided in subsequent sections and details are also available in the Bank's Annual Report for the year ended March 31, 2025.

At March 31, 2025, the capital ratio remained adequate at 22.60% (March 31, 2024: 23.37%), with a Tier 1 capital ratio of 19.57% (March 31, 2024: 20.14%) which is above the regulatory requirements stipulated for the Bank. The following table presents the Bank's key metrics of the Bank:

#### UK KM1 - Key metrics template

|         |  | Amount (USD million) |                |
|---------|--|----------------------|----------------|
|         |  | March 31, 2025       | March 31, 2024 |
|         | <b>Available own funds (amounts)</b>   |                      |                |
| 1       | Common Equity Tier 1 (CET1) capital  | 322.9                | 311.3          |
| 2       | Tier 1 capital   | 322.9                | 311.3          |
| 3       | Total capital  | 372.9                | 361.3          |
|         | <b>Risk-weighted exposure amounts</b>  |                      |                |
| 4       | Total risk-weighted exposure amount  | 1,649.7              | 1,546.2        |
|         | <b>Capital ratios (as a percentage of risk-weighted exposure amount)</b>                                   |                      |                |
| 5       | Common Equity Tier 1 ratio (%)   | 19.57%               | 20.14%         |
| 6       | Tier 1 ratio (%)   | 19.57%               | 20.14%         |
| 7       | Total capital ratio (%)  | 22.60%               | 23.37%         |
|         | <b>Additional own funds requirements based on SREP (as a percentage of risk-weighted exposure amount)</b>  |                      |                |
| UK 7a   | Additional CET1 SREP requirements (%)  | 1.95%                | 1.29%          |
| UK 7b   | Additional AT1 SREP requirements (%)   | 0.65%                | 0.43%          |
| UK 7c   | Additional T2 SREP requirements (%)  | 0.86%                | 0.57%          |
| UK 7d   | Total SREP own funds requirements (%)  | 11.46%               | 10.29%         |
|         | <b>Combined buffer requirement (as a percentage of risk-weighted exposure amount)</b>                      |                      |                |
| 8       | Capital conservation buffer (%)  | 2.50%                | 2.50%          |
| UK 8a   | Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%) | -                    | -              |
| 9       | Institution specific countercyclical capital buffer (%)  | 0.91%                | 0.81%          |
| UK 9a   | Systemic risk buffer (%)   | -                    | -              |
| 10      | Global Systemically Important Institution buffer (%)   | -                    | -              |
| UK 10 a | Other Systemically Important Institution buffer  | -                    | -              |
| 11      | Combined buffer requirement (%)  | 3.41%                | 3.31%          |
| UK 11 a | Overall capital requirements (%)   | 14.87%               | 13.60%         |
| 12      | CET1 available after meeting the total SREP own funds requirements (%)                                     | 10.98%               | 12.42%         |

|               |  | March 31,<br>2025 | March 31,<br>2024 |
|---------------|--|-------------------|-------------------|
|               | <b>Leverage ratio</b>  |                   |                   |
| 13            | Total exposure measure excluding claims on central banks           | 2,276.7           | 2,086.8           |
| 14            | Leverage ratio excluding claims on central banks (%)               | 14.18%            | 14.92%            |
|               | <b>Liquidity Coverage Ratio</b>                                    |                   |                   |
| 15            | Total high-quality liquid assets (HQLA) (Weighted value - average) | 464.2             | 475.6             |
| UK<br>16<br>a | Cash outflows - Total weighted value                               | 357.1             | 315.4             |
| UK<br>16<br>b | Cash inflows - Total weighted value                                | 112.9             | 122.2             |
| 16            | Total net cash outflows (adjusted value)                           | 244.2             | 193.2             |
| 17            | Liquidity coverage ratio (%)                                       | 190.08%           | 240.20%           |
|               | <b>Net Stable Funding Ratio</b>                                    |                   |                   |
| 18            | Total available stable funding                                     | 1,678.3           | 1,663.6           |
| 19            | Total required stable funding                                      | 1,111.3           | 1,044.7           |
| 20            | Net Stable Funding Ratio (NSFR ratio) (%)                          | 151.03%           | 159.20%           |

**Notes:**

- a. The final dividend of USD 16.0 million on the ordinary equity shares of the Bank recommended by the Board for the year was deducted from the capital as at March 31, 2025 (FY2024: USD 13.0 million).

**b. Composition of Tier 1 capital**

| Particulars                                      | Amount (USD million) |                |
|--|----------------------|----------------|
|  | March 31, 2025       | March 31, 2024 |
| Permanent share capital                          | 220.1                | 220.1          |
| Retained earnings                                | 117.4                | 103.6          |
| Proposed final dividend                          | (16.0)               | (13.0)         |
| Available for Sale security reserve <sup>1</sup> | 2.2                  | 1.6            |
| Other adjustments <sup>2</sup>                   | (0.8)                | (1.0)          |
| <b>Total Tier 1 capital</b>                      | <b>322.9</b>         | <b>311.3</b>   |

<sup>1</sup>The capital impact is net of tax

<sup>2</sup>Other adjustments include deduction on account of Article 33 (debit value adjustments, cash flow hedge reserve), Article 34 (additional value adjustments) and Article 36 (deduction on account of intangible assets) of CRR.



**c. Composition of Tier 2 capital**

| Particulars                 | Amount (USD million) |                |
|-----------------------------|----------------------|----------------|
|                             | March 31, 2025       | March 31, 2024 |
| Subordinated notes          | 50.0                 | 50.0           |
| <b>Total Tier 2 Capital</b> | <b>50.0</b>          | <b>50.0</b>    |

The value of the subordinated notes eligible as capital is determined in accordance with CRD and the details of the subordinated notes in issue before regulatory adjustments are given below:

| Issue     | Nature of Issue   | Interest Rate (p.a.) | Interest frequency | Maturity                                    | Currency | Amount in million |
|-----------|---|----------------------|--------------------|---|----------|-------------------|
| 16-Feb-24 | Unsecured, fixed rate reset, callable, subordinated notes | 7.106%               | Semi annually      | Callable in 2029, Maturity in February 2034 | USD      | 50.0              |

**d. Reconciliation with Balance Sheet**

| Particulars   | Amount (USD million) |                |
|---|----------------------|----------------|
|   | March 31, 2025       | March 31, 2024 |
| Shareholders' equity as per the balance sheet                                     | 351.9                | 337.5          |
| Less: Capital contribution  | (12.2)               | (12.2)         |
| Less: Additional value adjustments  | (0.3)                | (0.4)          |
| Less: Gains or losses on liabilities at fair value resulting from own credit risk | (0.0)                | (0.0)          |
| Less: Intangible assets   | (0.5)                | (0.6)          |
| Less: Proposed final dividend   | (16.0)               | (13.0)         |
| <b>Common Equity Tier 1 capital</b>   | <b>322.9</b>         | <b>311.3</b>   |
| <b>Additional Tier 1 capital</b>  | <b>-</b>             | <b>-</b>       |
| <b>Total Tier 1 capital</b>   | <b>322.9</b>         | <b>311.3</b>   |
| Eligible amount of Tier 2 instruments   | 50.0                 | 50.0           |
| <b>Total Tier 2 capital</b>   | <b>50.0</b>          | <b>50.0</b>    |
| <b>Total regulatory capital</b>   | <b>372.9</b>         | <b>361.3</b>   |

- e. Leverage ratio is defined as the ratio of Tier 1 capital to the total leverage ratio exposures excluding claims on central bank. The Bank is currently not subject to the minimum UK leverage ratio requirement of 3.25% published by PRA in its policy statement in October 2021 and effective from January 1, 2022. The Leverage framework is applicable to LREQ firms with retail deposits equal to or greater than GBP 50.00 billion. The PRA expects that firms not in scope of the leverage ratio minimum capital requirement and buffers should manage their leverage risk so that their leverage ratio does not ordinarily fall below 3.25%. The Bank has complied with PRA's expectation and has maintained its leverage ratio adequately above the expected level of 3.25%.
- f. The Liquidity coverage ratio (LCR) in the above table is computed using the liquidity balances which are calculated as the simple averages of month end observations over the 12 months

preceding the end of the year. The LCR of the Bank as at March 31, 2025 was 216.84% (March 31, 2024: 221.17%).

- g. The NSFR is defined as the ratio of available stable funding relative to the required stable funding. PRA has introduced NSFR framework that implements the Basel III standard in UK with effect from January 1, 2022. As per these regulations, the Bank has been complying with the minimum regulatory requirement of NSFR at 100% effective from January 1, 2022. The NSFR in the above table is calculated as the simple averages of four data sets covering the latest and the three previous quarters during the year. The NSFR of the Bank as at March 31, 2025 was 147.50% (March 31, 2024: 152.71%).

## **2.1 Regulatory own funds disclosure and Capital instruments' main features template**

- Composition of regulatory own funds template is provided in Annexure I.
- Reconciliation of regulatory own funds to balance sheet in the audited financial statements is given in Annexure II.
- Disclosure on main features of regulatory own funds instruments and eligible liabilities instruments is given in Annexure III.

## **3. Minimum Capital Requirement**

### **3.1 Pillar 1**

Banking operations are categorized as either trading or banking book, and risk-weighted assets are determined according to specified requirements that seek to reflect the varying levels of risk attached to assets and off-balance sheet exposures.

The Bank determines its Pillar 1 regulatory capital requirement based on the following approaches:

- Credit risk - Standardised approach
- Operational risk – Basic indicator approach
- Market risk - Standardised approach

In addition, the Bank determines Pillar 1 regulatory capital requirement for some other risks as under:

- Counterparty credit risk (CCR): Standardised approach for counterparty credit risk (SA-CCR) with effect from January 1, 2022
- Credit valuation adjustment (CVA) risk: Standardised method

The following table shows the overall Pillar 1 minimum capital requirement and risk weighted assets for the Bank under the Standardised Approach.

**UK OV1: Overview of risk weighted exposure amounts**

Amount (USD million)

|        |  | Risk weighted exposure amounts (RWEAs) |                | Total own funds requirements |                |
|--------|--|--|----------------|------------------------------|----------------|
|        |  | A                                      | B              | C                            |                |
|        |  | March 31, 2025                         | March 31, 2024 | March 31, 2025               | March 31, 2024 |
| 1      | Credit risk (excluding CCR)                                      | 1,487.3                                | 1,397.2        | 119.0                        | 111.8          |
| 2      | Of which the standardised approach                               | 1,487.3                                | 1,397.2        | 119.0                        | 111.8          |
| 3      | Of which the foundation IRB (FIRB) approach                      | -                                      | -              | -                            | -              |
| 4      | Of which slotting approach                                       | -                                      | -              | -                            | -              |
| UK 4a  | Of which equities under the simple risk weighted approach        | -                                      | -              | -                            | -              |
| 5      | Of which the advanced IRB (AIRB) approach                        | -                                      | -              | -                            | -              |
| 6      | Counterparty credit risk - CCR                                   | 16.0                                   | 21.5           | 1.3                          | 1.7            |
| 7      | Of which the standardised approach                               | 11.7                                   | 16.0           | 1.0                          | 1.3            |
| 8      | Of which internal model method (IMM)                             | -                                      | -              | -                            | -              |
| UK 8a  | Of which exposures to a CCP                                      | 0.3                                    | 0.2            | 0.0                          | 0.0            |
| UK 8b  | Of which credit valuation adjustment – CVA                       | 3.8                                    | 4.7            | 0.3                          | 0.4            |
| 9      | Of which other CCR   | 0.2                                    | 0.6            | 0.0                          | 0.0            |
| 15     | Settlement risk  | -                                      | -              | -                            | -              |
| 16     | Securitisation exposures in the non-trading book (after the cap) | -                                      | -              | -                            | -              |
| 17     | Of which SEC-IRBA approach                                       | -                                      | -              | -                            | -              |
| 18     | Of which SEC-ERBA (including IAA)                                | -                                      | -              | -                            | -              |
| 19     | Of which SEC-SA approach   | -                                      | -              | -                            | -              |
| UK 19a | Of which 1250%/ deduction  | -                                      | -              | -                            | -              |
| 20     | Position, foreign exchange and commodities risks (Market risk)   | -                                      | -              | -                            | -              |
| 21     | Of which the standardised approach                               | -                                      | -              | -                            | -              |
| 22     | Of which IMA   | -                                      | -              | -                            | -              |
| UK 22a | Large exposures  | -                                      | -              | -                            | -              |
| 23     | Operational risk   |  |                |                              |                |
| UK 23a | Of which basic indicator approach                                | 146.4                                  | 127.5          | 11.7                         | 10.2           |

|           |  | Risk weighted exposure amounts (RWEAs) |                | Total own funds requirements |                |
|-----------|--|--|----------------|------------------------------|----------------|
|           |  | A                                      | B              | C                            |                |
|           |  | March 31, 2025                         | March 31, 2024 | March 31, 2025               | March 31, 2024 |
| UK 23b    | Of which standardised approach   | -                                      | -              | -                            | -              |
| UK 23c    | Of which advanced measurement approach   | -                                      | -              | -                            | -              |
| 24        | Amounts below the thresholds for deduction (subject to 250% risk weight) (For information) | 4.6                                    | 15.0           | 0.4                          | 1.2            |
| <b>29</b> | <b>Total</b>   | <b>1,649.7</b>                         | <b>1,546.2</b> | <b>132.0</b>                 | <b>123.7</b>   |

**Notes:**

- The Bank follows Standardised approach in line with the regulatory requirements of CRR with effect from January 1, 2022.
- The counterparty credit risk on Securities Financing Transaction is included in point 9.
- Market risk: As per Article 351 of CRR, institutions are required to calculate own funds requirement for Market Risk if the overall open position exceeds 2% of the total own funds. The Bank had an open position of USD 1.5 million (March 31, 2024: USD 5.0 million) which is 0.39% (March 31, 2024: 1.40%) of the total own funds.

### 3.2 Pillar 2A

The Bank's Pillar 2A requirement including the PRA buffer as per the PRA's Total Capital Requirement, (earlier known as Individual Capital Guidance) applicable as at March 31, 2025 was 3.46% (March 31, 2024: 2.29%) of Total Risk Exposure Amount.

### 3.3 Countercyclical capital buffer

The countercyclical capital buffer (CCyB) aims to ensure that the banking sector capital requirements take account of the macro-financial environment in which the banks operate. Its primary objective is to use a buffer of capital to achieve the broader macro-prudential goal of protecting the banking sector from periods of excess aggregate credit growth that have often been associated with the build-up of system-wide risk.

In UK, the Financial Policy Committee of the Bank of England (FPC) is responsible for recognizing or setting up of CCyB rates in respect of foreign exposures.

The FPC announced in December 2021 to increase the UK's CCyB rate from 0% to 1% applicable from December 2022 in line with the usual 12- month implementation period. The FPC further announced in July 2022, increase in UK's CCyB rate from 1% to 2% to be applicable from July 5, 2023.

#### 4. Risk Management and Governance framework

The Bank has a centralised Risk Management Group with a mandate to identify, assess and monitor all its principal risks in accordance with defined policies and procedures. The Risk Management Group (RMG) is independent of the business units and the Chief Risk Officer (CRO) reports directly to the Managing Director and Chief Executive Officer, and also has reporting line to the Chief Risk Officer of the Parent Bank and the Bank's Chairman of the Board Risk Committee (BRC).

The Bank has developed a risk appetite framework articulated within the broader context of the nature, scope, scale and complexity of the Bank's activities. The framework is based on both quantitative parameters such as capital, liquidity and earnings volatility as well as qualitative parameters such as conduct and reputational risk. The risk appetite statement has been further drilled down into portfolio-level limits, which include limits on country of risk and credit ratings of loans. The risk appetite framework and related limits are approved by the Board of Directors. RMG monitors adherence to the risk appetite framework and reports it to the BRC on a quarterly basis.

The Bank operates within a comprehensive risk management framework to ensure that the key risks are clearly identified, understood, measured and monitored and that the policies and procedures established to address and control these risks are strictly adhered to. The outcomes of each of these risk management processes have been used to identify the material risks that the Bank is exposed to. The Bank is primarily exposed to credit risk, market risk (predominantly interest and exchange rate risk), liquidity risk and operational risk (including compliance, conduct and reputational risk). The Bank's largest regulatory capital requirements arise from credit risk in its lending operations.

The risk appetite statements for the Bank are as follows:

1. The Bank shall ensure that its capital adequacy is higher than regulatory guidance and maintain a buffer over the minimum requirement in line with thresholds identified in its Liquidity Contingency, Recovery and Resolution Plans (LC-RRP).
2. The Bank shall ensure that its liquidity is higher than the regulatory guidance, maintain a buffer over the minimum requirement in line with thresholds identified in its LC-RRP and maintain a prudent funding profile.
3. The Bank shall endeavour to limit earnings volatility due to credit losses as a proportion of its Tier 1 capital.
4. The Bank shall manage concentration risk in the portfolio.
5. The Bank will manage market risk within limits specified in Treasury Policy Manual and Mandate (TPMM), Trading book policy and IRRBB management policy.
6. The Bank has a very low tolerance for operational risk including compliance breaches and frauds. The operational risk will be managed within the quantitative and qualitative parameters outlined in the Operational risk appetite framework.

7. The Bank has low tolerance for cyber related risks.
8. The Bank has a very low risk appetite for failure to manage conduct risk and expects that the behaviour and motivation of every employee must be about good conduct and adherence to established controls to deliver fair and appropriate outcomes to our customers.
9. The Bank has low appetite for reputation risk and business risk. The Bank shall ensure risk transparency to regulators, the Board and its Parent Company and will endeavour to minimise risk related surprises to these stakeholders.
10. The Bank is committed to:
  - a. managing transition and physical risks in its portfolio faced today and under future scenarios;
  - b. taking suitable steps to align to the UK government's mission to achieve net zero

Effective corporate governance and compliance is a prerequisite to achieving the Bank's strategic objectives. The Bank has maintained a strong focus on controls, governance, compliance and risk management to provide a sound foundation for the business. It ensures embedding of a controls and compliance culture throughout the organisation. This is achieved through appropriate training, maintaining adequate resources within the control groups commensurate with the Bank's operations, continuous strengthening of internal systems and processes and effective deployment of technology. Information technology is used as a strategic tool for the Bank's business operations, to gain a competitive advantage and to improve its overall productivity and efficiency.

The Bank has adopted a governance framework in line with the corporate governance practices adopted by other UK financial institutions. The Bank's corporate governance framework is based on an effective independent Board, the separation of the Board's supervisory role from the executive management of the Bank and the constitution of Board Committees to oversee critical areas and functions of executive management. The Board is committed to maintaining high standards of corporate governance. The Bank has a total number of five Non-Executive Directors and one Executive Director on the Board. Two of the Non-Executive Directors are representatives of the Bank's Parent Bank, ICICI Bank Limited and three are independent.

The Board is assisted by its sub-committees, the Audit Committee, the Board Governance, Nomination and Remuneration Committee (BGNRC), the Board Risk Committee (BRC), the Board Credit Committee (BCC) and the Board Conduct Risk Committee (BCRC), and follows ICICI Group's overall governance framework. The Board has delegated certain powers to these sub-committees with clear terms of reference and mandate. The Board has further delegated responsibility for the day-to-day management of the Bank to the Managing Director and Chief Executive Officer. In this role, the Managing Director and Chief Executive Officer is supported by the Management Committee, which he chairs. The Management Committee is supported by various other committees, which include the Executive Credit and Risk Committee (ECRC), the Asset Liability Management Committee (ALCO), the Compliance Conduct and Operational Risk Management Committee (CORMAC), Product and Process Approval Committee (PAC) and the

Information Technology & Security Committee (ITSC). A total of four BRC meetings (FY 2024: four) and two BCC meetings were held during the year ended March 31, 2025.

The governance structure of the Bank is depicted below:



The Bank operates the three lines of defence model including independent control groups such as Compliance, Risk, Internal Audit, Finance and Legal to facilitate independent evaluation, monitoring and reporting of various risks. These groups function independently of the business groups and are represented at the various committees. The table below depicts the roles, responsibilities and accountabilities for management of material risks:

| Key risk                     | First line of defence               | Second line of defence      | Third line of defence | Oversight Committee |
|------------------------------|-------------------------------------|-----------------------------|-----------------------|---------------------|
| Credit risk                  | Corporate/Business banking/Treasury | Risk Management Group (RMG) | Internal audit (IA)   | BCC                 |
| Concentration risk           | Corporate/Business banking/Treasury | RMG                         | IA                    | BCC                 |
| Recovery risk                | Corporate/Business banking/Treasury | Legal                       | IA                    | BCC                 |
| Market risk, including IRRBB | Treasury                            | RMG                         | IA                    | BRC                 |
| Liquidity risk               | Treasury                            | RMG                         | IA                    | BRC                 |
| Operational risk             |                                     |                             |                       |                     |
| - Operational                | All                                 | RMG                         | IA                    | BRC                 |
| - Outsourcing                | All                                 | RMG                         | IA                    | BRC                 |
| - Legal                      | All                                 | Compliance/Legal            | IA                    | BRC                 |
| - Compliance & Fraud         | All                                 | Compliance                  | IA                    | BCRC, AC            |
| - People                     | Human Resources                     |                             | IA                    | BGNRC               |



| Key risk                         | First line of defence | Second line of defence | Third line of defence | Oversight Committee |
|----------------------------------|-----------------------|------------------------|-----------------------|---------------------|
| Information security risk        | All                   | RMG                    | IA                    | BRC                 |
| Conduct risk                     | All                   | Compliance             | IA                    | BCRC                |
| Group risk                       | RMG                   | Management Committee   |                       | Board               |
| Strategic risk/<br>Business risk | Management Committee  |                        |                       | Board               |
| Reputation risk                  | All                   | Management Committee   |                       | Board               |

Further information is provided in the Annual Report for the year ended March 31, 2025.

The Bank undertakes transactions with its Parent Group, i.e. ICICI Bank Group, in the normal course of business. For ICICI Bank Group, the PRA has approved limit of 100% of Tier 1 capital. All transactions with the Parent Group are undertaken on an arm's length basis.

### Stress testing framework

The framework for stress testing has been put in place with the approval of the Board and covers the key risks faced by the Bank viz. credit risk, market risk, liquidity risk and operational risk.

The Bank conducts stress testing, which covers credit, market and operational risks, as part of the ICAAP at annual frequency to facilitate capital planning for the Bank. Also, an abridged stress testing is done quarterly under the framework approved by the Board and is reviewed by Management Committee and Board Risk Committee.

The Bank has established the Reverse Stress Testing framework to identify and assess scenarios most likely to cause its business model to become unviable. Further, adequacy and appropriateness of the liquidity stress scenarios are reviewed at least annually as part of review of the Internal Liquidity Adequacy Assessment Process (ILAAP).

## 5. Credit Risk

### 5.1 Credit risk overview

Credit risk is the risk that losses may arise as a result of the Bank's borrowers or market counterparties failing to meet obligations under a contract. The Bank's largest regulatory capital requirements arise from credit risk in its lending operations.

The Bank has developed a risk appetite framework articulated within the broader context of the nature, scope, scale and complexity of the Bank's activities. The risk appetite framework and related limits are approved by the Board of Directors. All credit risk related aspects are governed by the Credit Risk Management Policy (CRMP) of the Bank, which is approved and reviewed annually by the BCC. The CRMP describes the principles which underpin and drive the Bank's approach to credit risk management together with the systems and processes through which they are implemented and administered. It lays down a structured credit approval process and includes the credit rating framework, collateral management framework and provisioning policy.



The Credit Risk team is also responsible for developing credit policies, establishing the delegation of sanctioning powers, limiting and monitoring concentrations of exposure and performing periodic credit stress tests on the Bank's portfolio. The delegation structure for approval of credit limits is approved by the BCC. Credit proposals are approved by the ECRC or the BCC based on, inter alia, the amount and internal risk rating of the facility. All credit proposals put up to the BCC have to be evaluated and recommended by the ECRC. Concentration risk arises from significant exposures to groups of counterparties where likelihood of default is driven by common underlying factors, e.g. sector, economy, geographical location, instrument type. The key parameters of risk concentrations measured in the Bank include sectoral, country, rating category, product specific exposures, counterparty and large exposures. To manage these risks, limits have been stipulated in the risk appetite framework.

Credit quality is monitored on an ongoing basis but can also be triggered by any material credit event coming to the Bank's notice through either primary or secondary sources. The Bank has established a Credit Forum, which comprises Heads of Businesses and the CRO for monitoring corporate exposures. The Credit Forum monitors developments in the Bank's portfolio through the Early Warning Indicators (EWI) framework to identify potential vulnerabilities. Credit risk is also managed at the portfolio level by monitoring and reporting risk dashboards to the BCC at specified intervals.

The Bank has a policy on collateral management and credit risk mitigation (CRM) which provides guidance for identifying eligible collateral as per the relevant articles of the CRR.

Further information is provided in the Annual Report for the year ended March 31, 2025.

## 5.2 Analysis of credit risk exposures as per Credit Quality Step (CQS)

The Bank uses external credit assessments provided by Moody's, Standard & Poor's and Fitch Ratings. These are all recognised as eligible external credit assessment institutions (ECAI) under CRR in UK for the purpose of calculating credit risk requirements under the standardised approach.

The following table details the ECAs used for the standardised credit risk exposure classes.

| Asset class   | ECAI                              |
|---|-----------------------------------|
| Central government or central banks                             | Standard & Poor's, Moody's, Fitch |
| Public sector entities  | Standard & Poor's, Moody's, Fitch |
| Institutions  | Standard & Poor's, Moody's, Fitch |
| Corporates  | Standard & Poor's, Moody's, Fitch |
| Institutions and Corporates with a short-term credit assessment | Standard & Poor's, Moody's, Fitch |

The bank assigns each of its exposures to one of the CQS with reference to relevant issuer and issue credit assessments. Risk weight percentage are then determined with reference to exposure class, CQS, and maturity of the exposure. The mapping of the CQS to the ratings of eligible ECAs is available at:

<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02016R1799-20211207&from=EN>

<https://www.legislation.gov.uk/eur/2016/1799>

The Bank has considered financial collaterals such as deposits held and guarantee issued by other banks as eligible credit risk mitigants.

The Credit risk exposure and CRM effects and risk weight allocation within the respective exposure class under Standardised approach is disclosed in Annexure IV.

### **5.3 Counterparty credit risk**

The Bank deals in derivatives as part of its balance sheet risk management and as part of risk management solutions offered to its clients. The primary derivatives transactions include foreign exchange forwards, cross currency swaps and interest rate swaps. The Bank has no exposure to credit derivative transactions.

The derivative transactions expose the Bank to counterparty credit risk (CCR). CCR is the risk that the counterparty to a derivative transaction could default before the final settlement of the transaction's cash flows.

The Bank computes counterparty exposure value for derivative transactions using the Standardised approach for counterparty credit risk (SA-CCR) as specified in Article 274 of CRR guidelines. The exposure is calculated as the sum of [replacement cost (RC) and potential future exposure (PFE)] multiplied by factor of 1.4. The Bank recognises the effects of netting as risk reducing in accordance with the CRR which reduces the overall exposure only where margining agreement is in place with the counterparty. The counterparty credit limit is set in accordance with the BRC approved CRMP.

The CCR framework also includes a Credit Valuation Adjustment (CVA) for the fair value of CCR for derivative transactions. It represents the capital charge for potential losses due to the credit quality deterioration of a counterparty that does not necessarily end with a default.

As part of compliance to European Market Infrastructure Regulation (EMIR), the Bank centrally clears interest rate swaps through LCH Clearnet (London Clearing House), thereby mitigating the counterparty credit risk. Also, the Bank has entered into credit support annexe (CSA) agreement with its major interbank counterparties, which mandate exchange of daily variation margin based on the movement in MTM.

The Bank also provides counterparty credit risk on its Securities Financing Transactions (SFT) with interbank counterparties. The exposure on account of such SFTs at March 31, 2025 was USD 34.1 million (March 31, 2024: USD 94.9 million). The market value of the securities lent against the SFT transaction is considered as its exposure value. Further, the SFT transactions are governed by Global Master Repurchase Agreement (GMRA) which requires margin exchange, in the event of a significant movement in the market value of the security lent.

The Bank has no contractual obligations linked to its credit rating.

Details relating to Analysis of CCR exposure by approach (CCR1), Transactions subject to own funds requirements for CVA risk (CCR2), Standardised approach – CCR exposures by regulatory exposure class and risk weights (CCR3), and Exposures to CCPs (CCR8) are provided in Annexure V.

Composition of collateral for CCR exposures (CCR5) is not disclosed as the collateral received and posted is below the regulatory threshold prescribed for disclosure.

#### **5.4 Additional Valuation Adjustment (AVA)**

To ensure that the valuation of the Bank's fair valued assets and liabilities achieves an appropriate degree of certainty, AVA has been calculated on the sum of the absolute value of its total fair valued assets and liabilities. The calculation of AVA is as per the regulatory technical standards (RTS) on prudent valuation adjustment published by the EBA. The Bank follows the simplified approach for AVAs and accordingly apply an AVAs of 0.1% on the sum of the absolute value of its total fair valued assets and liabilities. A case by case analysis is done and only completely back to back transactions are excluded from the computation of AVA.

#### **5.5 Credit risk and dilution risk**

##### **Loan impairment provisions**

The Bank regularly reviews its loan portfolio to assess for impairment. Provisions are established to recognise incurred losses in the loan portfolio carried at amortised cost. In determining whether an impairment has occurred at the balance sheet date, the Bank assesses if there is objective evidence of impairment as a result of one or more events that occurred after the initial recognition of the asset (a 'loss event') and that loss event (or events) has an impact on the estimated future cash flows of the financial asset or group of financial assets that can be reliably estimated. It may not be possible to identify a single, discrete event that caused the impairment and rather the combined effect of several events may have caused the impairment.

In accordance with the guidelines of FRS 102, an impairment loss for financial assets measured at amortized cost is the difference between the asset's carrying amount and the present value of the estimated future cash flows discounted at the asset's original effective interest rate. The estimated future cash flows take into account only the credit losses that have been incurred at the time of the impairment loss calculation. In case the expected cash flows are not available, the breakup value of security/collateral for respective facilities under watch is calculated in accordance with the Bank's collateral valuation policy. In line with accounting guidelines, the Bank recognises an impairment loss equal to the best estimate within the range of reasonable possible outcomes, taking into account all relevant information available about conditions existing at the end of the reporting period.

Collectively assessed impairment allowances cover credit losses inherent in portfolios with similar economic characteristics, when there is objective evidence to suggest that they contain impaired claims, but, the individual impaired items cannot yet be identified. In assessing the need for collective impairment allowances, management considers factors such as historical loss trends, credit quality of the portfolio, portfolio size, concentrations, and economic factors. The

aggregate amount of specific and collective provisions is intended to be sufficient to absorb estimated credit losses generated in the loan portfolio. The collective impairment policy, as defined in the CRMP, stipulates that collective provision, based on the credit rating of the exposures, needs to be provided in respect of the entire performing loan and receivables portfolio. The Bank has followed FRS 102 guidelines for defining its collective impairment policy wherein the provisioning is determined by the extent of the underlying credit risk in the portfolio of the Bank. This is also the direction provided by the Basel accord. The exposures that are individually assessed for impairment and for which an impairment loss is or continues to be recognised, are not included in the collective assessment of impairment. In line with market practice, the Bank has been using a representative set of Probability of Default (PD)/Loss Given Default (LGD) data to determine the extent of provisioning required to be made in respect of the performing loan portfolio on a collective basis. The aggregate provisioning requirement is arrived at by multiplying the outstanding amounts under each portfolio type (internally rated and externally rated exposures) on the relevant date with the corresponding PD and LGD.

Further disclosure on past due and impaired assets, allowance for credit losses, and a reconciliation of changes in the specific and general credit adjustments is provided in the Annual report for the year ended March 31, 2025.

#### **Impairment of available for sale financial assets**

The Bank regularly reviews its available for sale securities portfolio to assess for impairment. The Bank considers all available evidence, including observable market data or information about events specifically relating to the securities which may result in a shortfall in recovery of future cash flows. These events may include various parameters viz. price movements, ratings, rating downgrades, CDS and discount margins and the use of credit monitoring tools and general independent advice. Once impairment has been identified, the amount of impairment is measured based on the difference between the acquisition cost (net of any principal repayment and amortisation) and current fair value, less any impairment loss previously recognised in profit or loss. In determining whether an impairment event has occurred at the balance sheet date, the Bank considers whether there is any observable data which comprises evidence of the occurrence of a loss event, and evidence that the loss event results in a decrease in estimated future cash flows or their timings. Such observable data includes any adverse change in the payment status of borrowers or changes in economic conditions that correlate with defaults on loan repayment obligations. For equity investments a significant or prolonged decline in the fair value of an available for sale equity investment below its cost is an objective evidence of impairment considered by the Bank.

The Bank's impaired AFS securities include equity investment only. Additional information on the Bank's accounting policies, analysis of overdue and impaired exposures and valuation methodologies is provided in the Annual Report for the year ended March 31, 2025.

## 6. Market Risk

Market risk is the possibility of loss arising from changes in the value of a financial instrument as a result of changes in market variables such as interest rates, exchange rates, credit spreads and other asset prices. It also includes the interest rate risk in banking book. The Bank's key policies for managing market risk as approved by the Board Risk Committee (BRC)/ALCO are:

- Treasury policy manual and mandate (TPMM) which also includes the trading book policy statement (TBPS);
- Interest Rate Risk in Banking Book (IRRBB);
- Valuation, Model Validation Policy and Independent Price Verification Policy

These policies are designed to ensure that transactions in securities, foreign exchange and derivatives are conducted in accordance with sound and acceptable business practices as well as regulatory guidelines and laws governing such transactions. The policies are reviewed periodically to take into account changed business requirements, the economic environment and revised policy guidelines.

The key market risks to which the Bank is exposed relate to:

- Interest rate risk – Interest rate risk is defined as the risk of loss which the Bank will incur as a result of an increase or decrease in interest rates. Interest income and expense from interest sensitive assets and liabilities are impacted by changes in interest rates. The overall value of the investment portfolio, the underlying value of the Bank's other assets, liabilities, and off-balance sheet (OBS) instruments are also impacted due to changes in interest rates because the present value of future cash flows changes when interest rates change.
- Forex risk – This risk arises due to positions in non- US dollar denominated currencies, which in turn arise from assets and liabilities in those currencies. Foreign exchange risk is managed within the Treasury function in accordance with approved position limits.
- Equity Risk – Equity price risk arises due to the volatility in price movement of the Bank's investment in equity shares and convertibles. Threshold triggers are defined for decline in the values of equity investments and an escalation framework is in place. The value of the Bank's equity investments at March 31, 2025 was USD 5.5 million (March 31, 2024: USD 6.1 million) and the option value of convertibles at March 31, 2025 was Nil (March 31, 2024: Nil).
- Price Risk - Price risk is the risk to the price of investments arising out of changes in multiple factors such as interest rate volatility. The price risk for the Bank is inter-alia monitored through price value of basis point (PV01), value at risk (VaR) and cumulative stop loss. The risk appetite of the Bank includes limits for such risk metrics. The Bank does not have active trading book subjected to mark to market risk. The Bank hedges most of its AFS book to minimise portfolio losses due to interest rate changes by entering into interest rate swaps. In view of this, price risk is not deemed as material risk. Further, the Bank has discussed price risk in subsequent sections through the section on VaR and also through the impact of a change in interest rates on investments held in the AFS portfolio.

The Bank enters into various financial instruments as principal to manage balance sheet interest rate and foreign exchange rate risk. These mainly include interest rate swaps and exchange rate related contracts. The Bank uses derivatives to mitigate interest rate risk. Hedge accounting is applied to derivatives and hedged items when the criteria under IAS39 for financial instruments as permitted by FRS 102 have been met. For qualifying hedges, the fair

value changes of the derivative are substantially matched by corresponding fair value changes of the hedged item, both of which are recognised in profit and loss.

The Bank has devised various risk metrics for different products and investments. These risk metrics are measured and reported to senior management by the Bank's independent Treasury Monitoring and Reporting Group (TMRG). Some of the risk metrics adopted by the Bank for monitoring its risks are value-at-risk (VaR), duration of equity (DoE), price value of basis point (PV01) and stop loss amongst others. The risk appetite of the Bank includes limits for these risk metrics.

VaR is calculated using a parametric approach at a 99% confidence level over a one day holding period. The total VAR for the Bank's AFS portfolio, including investment portfolio, as at March 31, 2025 was USD 1.0 million (March 31, 2024: USD 1.9 million). The maximum, average and minimum VAR during the year for the AFS portfolio, including investment portfolio, was USD 2.0 million, USD 1.5 million and USD 1.2 million (FY 2024: USD 2.4 million, USD 2.0 million and USD 1.7 million) respectively.

### **Interest rate risk in the Banking book**

Interest rate risk in the Banking book ("IRRBB") is the risk that changes in market interest rates might adversely affect the Bank's financial condition. It is the risk of potential variability in earnings and capital value resulting from changes in market interest rates.

The Bank follows IRRBB policy in accordance with the standardised framework prescribed in the PRA rulebook effective from January 1, 2022. The Bank's IRRBB policy sets out the processes and key controls required to identify all IRRBB risks arising from banking book operations, to monitor the risk exposures via a set of metrics with a frequency in line with the risk management horizon, and to manage these risks within agreed risk appetite and limits.

In order to manage its interest rate risk in its banking book, the Bank has set out various measurement tools like Interest rate sensitivity reports, Duration of Equity, Delta EvE, Delta NII and Sensitivity analysis of hedge portfolio. Computation of these measurement tools are based on assumptions approved by the Board Risk Committee and are reviewed periodically.

The Delta EVE is the change in the net present value of all cash flows originating from banking book assets, liabilities and off-balance- sheet items resulting from a change in interest rates, assuming that all banking book positions run off. The Bank has considered the scenarios prescribed in the PRA rulebook for computation of Delta EVE. The delta EVE measure is calculated on a monthly basis and is applied to the full life of transactions allowing the risk over the whole life of positions to be considered. It does not capture the impact of business growth or management actions, and is based on the gap based approach with expected balance sheet run-off profile.

Alongside the requirement to monitor and evaluate the potential impact of changes in interest rates on economic value, the PRA expects firms to monitor and evaluate the potential impact on earnings volatility. This earning volatility is measured through change in net interest income (Delta NII). The Delta NII is a measure of the potential change in NII due to an adverse interest rate movement over a predefined time horizon. Considering the size of the Bank's balance sheet

and considering business activities, earnings are assessed for the period of 1 year. The main model assumptions for Delta NII are:

- The balance sheet is kept at the current level, i.e. no growth is assumed, and run-off balances are reinvested to maintain a constant balance sheet
- Non-maturity positions are adjusted for an assumed behavioural profile, to align with the expected product life-cycle

The interest rate sensitivity report indicates whether the Bank will be in a position to benefit from rising interest rates by having a positive gap or whether it will be impacted from declining interest rates by a negative gap.

The Bank also uses Duration of Equity (“DoE”) as an all-encompassing measure, which takes into consideration duration and value of both assets and liabilities. DoE is a measure of interest rate sensitivity, which indicates how much the market value of equity, would change if interest rates change by 1%. Currently, a limit of +/- 3.0 has been prescribed for overall DoE of the Bank. The measures for interest rate risk in the banking book are reported to the ALCO on a monthly basis and to the Board Risk Committee on a quarterly basis.

The Bank monitors the P&L volatility which may arise from hedge portfolio as the hedges become ineffective by scenario analysis for 200 bps parallel shift in interest rates (both +ve and -ve) change on the portfolio of hedge effective instruments. Analysis highlights the maximum P&L impact arising out of the above scenarios by considering only those swaps that contribute negatively. The scenario impact is presented to the ALCO on a monthly basis.



**UK IRRBB1 - Quantitative information on IRRBB**

Amount (USD million)

|     |                        | a              | c              | e              |
|-----|------------------------|----------------|----------------|----------------|
|     |                        | $\Delta$ EVE   | $\Delta$ NII   | Tier 1 capital |
|     | Period                 | March 31, 2025 | March 31, 2025 | March 31, 2025 |
| 010 | Parallel shock up      | (15.3)         | (0.2)          |                |
| 020 | Parallel shock down    | 3.5            | 0.2            |                |
| 030 | Steepener shock        | 1.7            |                |                |
| 040 | Flattener shock        | (6.6)          |                |                |
| 050 | Short rates shock up   | (12.3)         |                |                |
| 060 | Short rates shock down | 4.1            |                |                |
| 070 | <b>Maximum</b>         | (15.3)         | (0.2)          |                |
| 080 | <b>Tier 1 capital</b>  |                |                | 322.9          |

|     |                        | a              | c              | e              |
|-----|------------------------|----------------|----------------|----------------|
|     |                        | $\Delta$ EVE   | $\Delta$ NII   | Tier 1 capital |
|     | Period                 | March 31, 2024 | March 31, 2024 | March 31, 2024 |
| 010 | Parallel shock up      | (15.5)         | (0.2)          |                |
| 020 | Parallel shock down    | 3.4            | (0.9)          |                |
| 030 | Steepener shock        | 1.3            |                |                |
| 040 | Flattener shock        | (6.0)          |                |                |
| 050 | Short rates shock up   | (11.9)         |                |                |
| 060 | Short rates shock down | 3.7            |                |                |
| 070 | <b>Maximum</b>         | (15.5)         | (0.9)          |                |
| 080 | <b>Tier 1 capital</b>  |                |                | 311.3          |

Further information in relation to Market Risk is provided in the Annual Report for the year ended March 31, 2025.



## 7. Operational, Information Security, Conduct and Other risk

### Operational Risk

Operational risk is the risk of loss resulting from inadequate or failed internal processes, people, and systems or from external events. 'Compliance and legal' risk which is defined as the risk that arises from a failure or inability to comply with the laws, regulations or voluntary codes applicable to the financial services industry and 'conduct' risk, which includes risks arising from unfair treatment and delivering inappropriate outcomes to its customers, are also considered within the ambit of operational risk. The Bank has also identified outsourcing and information security risks as key operational risks affecting the Bank and has put in place effective controls including policies and procedure to manage, mitigate and monitor these risks.

The management of operational risk within the Bank is governed by the Operational Risk Management Policy (ORMP) which is reviewed and approved by the BRC on an annual basis. The Bank has determined and articulated an Operational Risk Appetite (ORA) which has been defined as the acceptable maximum level of operational risk that the Bank is willing to accept in pursuit of its strategic objectives, taking into account its stakeholders as well as regulatory requirements. It has been expressed both in quantitative and qualitative terms. The Bank has expressed its ORA as a percentage of financial parameters, i.e., operating income and operating expenses based on the average level of losses for the previous years and has also taken into account the existing controls and expected future developments/ initiatives. The Bank has implemented a Risk and Control Self-Assessment (RCSA) approach to identify and ensure effective control of its operational risks. The RCSAs along with Key Risk Indicators and collection and analysis of operational risk incidents are the tools implemented for systematic management of operational risk within the Bank. The risk dashboard along-with the detailed operational risk incident report are periodically reported to the BRC.

The Bank has identified 'Outsourcing' as a key operational risk within the Bank. In order to provide guidelines for the application of a standardised approach to all Third Party Arrangements (TPAs) [Outsourced Arrangements (OAs) as well as Non Outsourced Third Party Arrangements (NOTPAs)], entered into by the Bank, the Bank has developed and implemented 'Policy for the Outsourcing and third party risk management'. The Policy is reviewed and approved by BRC on an annual basis. Based on the materiality assessment and risk assessment carried out in accordance with regulatory expectations, all material TPAs are notified to the BRC.

A brief section on the operational risk management framework including governance structure, various management and measurement tools implemented within the Bank is covered in the Annual Report of the Bank for the year ended March 31, 2025.

The Bank carries out an operational risk scenario analysis and stress testing exercise for assessing the adequacy of the operational risk capital charge. Various operational risk scenarios/events based on existing and external loss data, risks identified in RCSAs and internal audit reports, have been identified and assessed and each of these scenarios is assessed for its probability and financial impact. The scenarios cover key operational risks such as outsourcing risk, information security risk, business practice and conduct, technology risk, people risk, natural disaster and man-made disasters. Some of these have been further amalgamated to create seven high impact operational risk scenarios. For the purpose of stress testing, the adequacy of

Pillar 1 capital has been assessed by comparing it to stress operational risk losses using three approaches. The detailed process is mentioned in "quantitative assessment of operational risk drivers" framework which is reviewed on an annual basis as part of the ICAAP.

The Bank has adopted the Basic Indicator Approach for the purposes of calculating its operational risk capital charge as per Basel II and has provided USD 11.72 million capital towards the operational risk requirements as at March 31, 2025 (March 31, 2024: USD 10.2 million).

### **Information Security Risk**

The Bank has established an Information Security Risk Management Framework (ISRMF) for the management of information security (IS) related risks including cyber risk, within the guidelines of the Group Information Security Policy. The purpose of the framework is to ensure that due care is exercised in protecting the critical systems and related information of the Bank and also defines minimum security standards required for securing the IT resources of the Bank. The Board is ultimately responsible for ensuring adherence to the regulatory information security requirements. On a day to day basis, compliance with the requirements of the ISRMF is overseen by the Information Security Officer (ISO) of the Bank. In addition, the Bank has established an Information Technology and Security Committee (ITSC) comprising senior management that oversees important IT and information security issues brought out during the course of the day-to-day operations, review of material deficiencies/breaches (if any), remedial measures, analysis of monitoring reports provided by the Information Security Group of Parent Bank, Internal Audit and Compliance with respect to data protection issues. The ITSC is presented with updates on various IT related aspects such as IT security controls, availability of key IT applications, inventory management, secure configuration of network devices, update on IT projects, actionable emanating out of internal/external audits, penetration testing and/or risk assessments.

In April 2025, the Bank renewed its "Cyber Essentials" certification and badge. Cyber Essentials is a UK government information security assurance scheme operated by the National Cyber Security Centre that encourages organisations in UK to adopt good practices in information security. The certification demonstrates the Bank's continuous commitment to cyber security and it provides reassurance to customers and vendors that the Bank is working to secure their information and data by implementing essential cyber security measures.

Adequacy of capital for information security risks has been assessed as part of the impact of failure of the Bank's website and internet banking platform under Pillar 2B, detailed in the ICAAP document of the Bank. Additionally, potential impact on account of 'cyber-crime' has also been identified as part of the 'scenario analysis and stress testing' framework of the Bank.

### **Conduct Risk**

The Bank's conduct risk philosophy is to develop and maintain long term relationships with its customers, based on openness, trust and fairness. It expects that the behaviour and motivation of every employee must be about good conduct and adherence to established controls to deliver fair and appropriate outcomes to our customers. The Bank evaluates the impact of the changing regulatory requirements on an ongoing basis and is fully committed to establishing controls to deliver fair and appropriate outcomes for its customers.

The Compliance group is responsible for the monitoring and framing policies and procedures to mitigate conduct risk including frauds within the conduct risk appetite of the Bank. Performance against conduct risk related matters are reviewed and monitored by the Bank's BCRC and at the executive level by the CORMAC. Both Committees meet on a periodic basis and receive regular updates from Business, Operations and Compliance teams.

### **Climate change**

The Bank closely monitors the regulatory landscape and steps being taken by the industry on 'Climate Change' and 'Environmental Social & Governance (ESG)'. The CRO has the additional responsibility as SMF to ensure that the regulatory expectations are adequately addressed. The BRC provides an oversight to the climate change related action plan of the Bank. A Working Group (WG), chaired by the CRO and with members from Legal, Risk, Compliance, Finance, Treasury and business groups, meets regularly to track the latest regulatory guidance and expectations and developments in the industry with regard to Climate change. The WG is making use of guides published by the Climate Financial Risk Forum (CFRF), which is co-chaired by the FCA and the PRA. The CFRF has been established with the objective to build capacity and share best practice across financial regulators and industry in the UK to advance responses to the financial risks from climate change. The guides aim to help financial firms in the UK to understand the risks and opportunities that arise from climate change, and provide support for how to integrate them into risk, strategy and decision-making processes. The Bank continues to enhance identification, oversight and management of climate-related risks proportionate to its size and nature of operations. For example, for its loans against property (LAP) business, the Bank has stipulated minimum requirement for energy efficiency rating (evidenced through Energy Performance Certificate (EPC) for properties mortgaged to the Bank. For corporate borrowers constituting the credit portfolio, a process has been institutionalised to score parameters like sectoral, regulatory, physical, transition, litigation and reputation risks on account of climate change as part of appraisal and asset quality review (AQR) notes. The final weighted scores have been used to categorise the financial impact of climate change on the borrower's business into either 'High', 'Medium', 'Low' or 'Safe'. The Bank proposes to increase engagement with borrowers assessed as potential 'High' impact, and seek more information on the action plan to transition to net zero.

The Bank has reviewed the recommendation the PRA and FCA's Climate Financial Risk Forum in its guide of June 2020 to link sovereign exposures to Notre Dame University's Notre Dame-Global Adaptation Index (ND-GAIN). The ND-GAIN Country Index summarizes a country's vulnerability to climate change and other global challenges in combination with its readiness to improve resilience. It aims to help governments, businesses and communities to better prioritize investments for a more efficient response to the immediate global challenges ahead. 192 UN countries have been ranked in the index, with higher rank being better. The Bank undertakes exposures for countries which are ranked below 100 (with only exception being India, as it is the home country of its Parent Bank).

The Bank has enhanced risk appetite statements pertaining to Climate Change effective from April 2023. These enhancements are reproduced below:

- a. No greenfield/brownfield project lending to thermal coal mining or thermal coal power generation companies in Europe and UK
- b. No greenfield/brownfield project lending to oil exploration, drilling and refining companies in Europe and UK
- c. EPC ratings – No incremental lending against mortgage of properties rated “E” in FY 2025 (except borrowers who accept covenant to upgrade to “C” or better rating within a reasonable time period not exceeding 2 years from date of first disbursement or except if properties rated “E” are a part of portfolio of properties and do not exceed 25% of the overall portfolio pool based on value or cash flows)

Further information is provided in the Annual Report for the year ended March 31, 2025.

## 8. Liquidity Risk

Liquidity risk arises due to insufficient available cash flows including the potential difficulty of resorting to the financial markets in order to meet payment obligations. The Bank's key policies for managing liquidity risk, as approved by the Board, are:

- Internal Liquidity Adequacy Assessment Process (ILAAP)
- Liquidity, Contingency, Recovery and Resolution Plans (LC-RRP)

The Bank differentiates liquidity risk between funding liquidity risk and market liquidity risk. Funding liquidity risk is the risk that the Bank will not be able to efficiently meet cash flow requirements in a timely manner for its payment obligations including liability repayments, under adverse conditions and business as usual conditions, and to fund all investment/lending opportunities, under adverse conditions and business as usual conditions. Market liquidity refers to a Bank's ability to execute its transactions and to close out its positions at a fair market price. This may become difficult in certain market conditions either because of the underlying product itself or because of the Bank's own creditworthiness.

The Bank's liquidity risk management philosophy is to be able, even under adverse conditions, to meet all liability repayments on time and to fund all investment opportunities by raising sufficient funds either by increasing liabilities or by converting assets into cash expeditiously and at reasonable cost.

### **Structure and organisation of the liquidity risk management function**

The Board and senior management (members of the Management Committee) are responsible for ensuring the overall appropriateness of the Bank's liquidity management practices by defining the Bank's risk appetite through the finance planning cycle and monitoring the risk profile of the Bank through the Risk Management committees. These Committees monitor and escalate the risks to the attention of the Board and senior management as set out in policy. The use of the ILAAP has enhanced the Bank's liquidity management processes.

The organisation structure for liquidity management is outlined below:



## Liquidity risk management

The risk identification and quantification approach adopted by the Bank for each material risk driver is considered appropriate to the nature, size and complexity of the Bank's business. The Bank has considered various stressed risk events to assess the overall liquidity adequacy of the Bank under stressed conditions. The Bank remains committed to ensuring that all its stakeholders are protected by maintaining adequate liquid assets to withstand a range of severe stressed events and by having a prudent funding profile. The liquidity and funding risk appetite statement ensures that the Bank adequately monitors the short term and structural liquidity risk. Also, it ensures that the Bank maintains adequate liquid assets for severe stress scenarios. The analysis of the risk drivers covers the potential liquidity risks that may arise out of the key service lines of the Bank and defines adequate controls to mitigate these risks. The Bank considers the stress horizon of 90 day for the liquidity risk appetite adequate based on its balance sheet structure and its business mode.

## Liquidity risk appetite statement

The Bank has implemented the CRD/CRR liquidity guidelines as specified by PRA. As per the guidelines, the Bank has prepared an Internal Liquidity Adequacy Assessment Process (ILAAP) document outlining the liquidity risk appetite of the Bank. The Bank maintains a diversified funding base comprising retail, corporate customer deposits and institutional balances. The Bank also holds unencumbered, high quality liquid assets to protect against stress conditions. The

Bank monitors and manages its overall liquidity risk appetite by ensuring that it maintains liquidity coverage ratio above regulatory requirements, by having adequate liquid assets for projected stressed outflows under various scenarios and also ensures that its liquidity gap position is within the approved limit for the various time buckets. This framework is further augmented by defining risk limits for individual liquidity risk drivers. ALCO and BRC review these parameters on monthly and quarterly basis respectively.

### **Stress testing**

The ILAAP document sets out the framework used to ensure that the Bank maintains sufficient liquidity at all times, including periods of stress. This has been done through the robust liquidity stress testing under various identified scenarios. Under each scenario, the Bank assesses the behavior of each liquidity risk drivers and estimates the amount of liquidity required to mitigate net stress outflows. The stress testing is carried out daily. The results of the stress test are reported to the ALCO and BRC & Board on a monthly and quarterly basis respectively.

Further, from October 1, 2015 the Bank maintains Liquidity Coverage Ratio (LCR) as stipulated by the PRA. The LCR is intended to ensure that a bank maintains an adequate level of unencumbered HQLA which can be used to offset the net stressed outflows the Bank could encounter under a combined stress scenario lasting 30 days. No material adverse impact was observed on the Bank's liquidity positions and other market risk parameters during FY2025. The Bank holds an adequate level of liquidity in excess of regulatory requirements and requirements as per internal risk appetite defined in ILAAP.

### **Contingency Funding Plan**

The Bank's LC-RRP document details the overall approach and actions the Bank would undertake in order to manage the Bank's liquidity and capital positions during liquidity contingency or recovery scenarios.

The Liquidity Contingency Plan (LCP) sets out the plan of action the Bank would use to fund business activity in liquidity stress situation. The LCP outlines a list of potential risk factors, key reports and metrics that are reviewed on an ongoing basis to assist in assessing the severity of, and of individuals to foster effective coordination, control and distribution of information, all of which are critical in the management of a crisis.

The LCP also details the responsibilities of these groups and individuals, which include making and disseminating key decisions, coordinating all contingency activities throughout the duration of the crisis and managing internal and external communication.

Further information in relation to Liquidity risk is provided in the Annual Report for the year ended March 31, 2025.

## **9. Equal Opportunities and Diversity**

The Bank is an equal opportunities employer and is committed to providing equal opportunities and avoiding unlawful discrimination. This Policy aims to ensure that no one is unfairly discriminated against because of their age, disability, gender, reassignment, race, colour, nationality, ethnic or national origin, religion or belief, sex, sexual orientation, marriage and civil partnership and status, or pregnancy and maternity. The Policy states that the Bank will not discriminate against individuals (including members of the management body) on the grounds stated, in any area of recruitment or employment including job selection, training, promotion, appraisal, salary, administration and terms and conditions of employment, discipline and selection for redundancy.



**UK CC1 - Composition of regulatory own funds**

|  |   | Amount (USD million) |                   |   |
|--|---|----------------------|-------------------|---|
|  |   | March 31,<br>2025    | March 31,<br>2024 | Source based on reference<br>numbers/letters of the bal-<br>ance sheet under the regula-<br>tory scope of consolidation<br>(UK CC2) |
| <b>Common Equity Tier 1 (CET1) capital: instruments and reserves</b> |   |                      |                   |   |
| 1  | Capital instruments and the related share premium accounts  | 220.1                | 220.1             | 20a   |
|  | of which: ordinary shares   | 220.1                | 220.1             | 20a   |
| 2  | Retained earnings   | 90.6                 | 74.8              | 22a   |
| 3  | Accumulated other comprehensive income (and other reserves)   | 2.2                  | 1.6               | 23a   |
| UK-3a  | Funds for general banking risk  | -                    | -                 |   |
| 4  | Amount of qualifying items referred to in Article 484 (3) CRR and the related share premium accounts subject to phase out from CET1   | -                    | -                 |   |
| 5  | Minority interests (amount allowed in consolidated CET1)  | -                    | -                 |   |
| UK-5a  | Independently reviewed interim profits net of any foreseeable charge or dividend  | 10.8                 | 15.8              | 22a   |
| 6  | <b>Common Equity Tier 1 (CET1) capital before regulatory adjustments</b>  | <b>323.7</b>         | <b>312.3</b>      |   |
| <b>Common Equity Tier 1 (CET1) capital: regulatory adjustments</b>   |   |                      |                   |   |
| 7  | Additional value adjustments (negative amount)  | (0.3)                | (0.4)             |   |
| 8  | Intangible assets (net of related tax liability) (negative amount)  | (0.5)                | (0.6)             | 8a  |
| 9  | Empty set in the UK   | -                    | -                 |   |
| 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) CRR are met) (negative amount) | -                    | -                 |   |
| 11   | Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value   | -                    | -                 |   |



|        |  | March 31,<br>2025 | March 31,<br>2024 | Source based on reference<br>numbers/letters of the bal-<br>ance sheet under the regula-<br>tory scope of consolidation<br>(UK CC2) |
|--------|--|-------------------|-------------------|---|
| 12     | Negative amounts resulting from the calculation of expected loss amounts   | -                 | -                 |   |
| 13     | Any increase in equity that results from securitised assets (negative amount)  | -                 | -                 |   |
| 14     | Gains or losses on liabilities valued at fair value resulting from changes in own credit standing  | (0.0)             | (0.0)             |   |
| 15     | Defined-benefit pension fund assets (negative amount)  | -                 | -                 |   |
| 16     | Direct, indirect and synthetic holdings by an institution of own CET1 instruments (negative amount)  | -                 | -                 |   |
| 17     | Direct, indirect and synthetic holdings of the CET1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)      | -                 | -                 |   |
| 18     | Direct, indirect and synthetic holdings of the CET1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount) | -                 | -                 |   |
| 19     | Direct, indirect and synthetic holdings of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)           | -                 | -                 |   |
| 20     | Empty set in the UK  | -                 | -                 |   |
| UK-20a | Exposure amount of the following items which qualify for a RW of 1250%, where the institution opts for the deduction alternative   | -                 | -                 |   |

|        |  | March 31,<br>2025 | March 31,<br>2024 | Source based on reference<br>numbers/letters of the bal-<br>ance sheet under the regula-<br>tory scope of consolidation<br>(UK CC2) |
|--------|--|-------------------|-------------------|---|
| UK-20b | of which: qualifying holdings outside the financial sector (negative amount)   | -                 | -                 |   |
| UK-20c | of which: securitisation positions (negative amount)   | -                 | -                 |   |
| UK-20d | of which: free deliveries (negative amount)  | -                 | -                 |   |
| 21     | Deferred tax assets arising from temporary difference (amount above 10 % threshold , net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)  | -                 | -                 |   |
| 22     | Amount exceeding the 17.65% threshold (negative amount)  | -                 | -                 |   |
| 23     | of which: direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities  | -                 | -                 |   |
| 24     | Empty set in the UK  | -                 | -                 |   |
| 25     | of which: deferred tax assets arising from temporary difference  | -                 | -                 |   |
| UK-25a | Losses for the current financial year (negative amount)  | -                 | -                 |   |
| UK-25b | Foreseeable tax charges relating to CET1 items except where the institution suitably adjusts the amount of CET1 items insofar as such tax charges reduce the amount up to which those items may be used to cover risks or losses (negative amount) | -                 | -                 |   |
| 26     | Empty set in the UK  | -                 | -                 |   |
| 27     | Qualifying AT1 deductions that exceeds the AT1 items of the institution (negative amount)  | -                 | -                 |   |
| 27a    | Other regulatory adjustments to CET1 capital (including IFRS 9 transitional adjustments when relevant)   | -                 | -                 |   |
| 28     | <b>Total regulatory adjustments to Common Equity Tier 1 (CET1)</b>   | <b>(0.8)</b>      | <b>(1.0)</b>      |   |
| 29     | <b>Common Equity Tier 1 (CET1) capital</b>   | <b>322.9</b>      | <b>311.3</b>      |   |

|  |   | March 31,<br>2025 | March 31,<br>2024 | Source based on reference<br>numbers/letters of the bal-<br>ance sheet under the regula-<br>tory scope of consolidation<br>(UK CC2) |
|--|---|-------------------|-------------------|---|
| <b>Additional Tier 1 (AT1) capital: instruments</b>            |   |                   |                   |   |
| 30   | Capital instruments and the related share premium accounts  | -                 | -                 |   |
| 31   | of which: classified as equity under applicable accounting standards  | -                 | -                 |   |
| 32   | of which: classified as liabilities under applicable accounting stand-<br>ards  | -                 | -                 |   |
| 33   | Amount of qualifying items referred to in Article 484 (4) CRR and the<br>related share premium accounts subject to phase out from AT1 as de-<br>scribed in Article 486(3) CRR   | -                 | -                 |   |
| UK-33a   | Amount of qualifying items referred to in Article 494a(1) CRR subject<br>to phase out from AT1  | -                 | -                 |   |
| UK-33b   | Amount of qualifying items referred to in Article 494b(1) CRR subject<br>to phase out from AT1  | -                 | -                 |   |
| 34   | Qualifying Tier 1 capital included in consolidated AT1 capital (includ-<br>ing minority interest not included in row 5) issued by subsidiaries and<br>held by third parties   | -                 | -                 |   |
| 35   | of which: instruments issued by subsidiaries subject to phase-out   | -                 | -                 |   |
| 36   | <b>Additional Tier 1 (AT1) capital before regulatory adjustments</b>  | -                 | -                 |   |
| <b>Additional Tier 1 (AT1) capital: regulatory adjustments</b> |   |                   |                   |   |
| 37   | Direct, indirect and synthetic holdings by an institution of own AT1 in-<br>struments (negative amount)   | -                 | -                 |   |
| 38   | Direct, indirect and synthetic holdings of the AT1 instruments of fi-<br>nancial sector entities where those entities have reciprocal cross hold-<br>ings with the institution designed to inflate artificially the own funds<br>of the institution (negative amount) | -                 | -                 |   |

|   |   | March 31,<br>2025 | March 31,<br>2024 | Source based on reference<br>numbers/letters of the bal-<br>ance sheet under the regula-<br>tory scope of consolidation<br>(UK CC2) |
|---|---|-------------------|-------------------|---|
| 39                                      | Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount) | -                 | -                 |   |
| 40                                      | Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)  | -                 | -                 |   |
| 41                                      | Empty set in the UK   | -                 | -                 |   |
| 42                                      | Qualifying T2 deductions that exceed the T2 items of the institution (negative amount)  | -                 | -                 |   |
| 42a                                     | Other regulatory adjustments to AT1 capital   | -                 | -                 |   |
| 43                                      | <b>Total regulatory adjustments to Additional Tier 1 (AT1) capital</b>  | -                 | -                 |   |
| 44                                      | <b>Additional Tier 1 (AT1) capital</b>  | -                 | -                 |   |
| 45                                      | <b>Tier 1 capital (T1 = CET1 + AT1)</b>   | <b>322.9</b>      | <b>311.3</b>      |   |
| <b>Tier 2 (T2) capital: instruments</b> |   |                   |                   |   |
| 46                                      | Capital instruments and the related share premium accounts  | 50.0              | 50.0              | 14a   |
| 47                                      | Amount of qualifying items referred to in Article 484 (5) CRR and the related share premium accounts subject to phase out from T2 as described in Article 486(4) CRR  | -                 | -                 |   |
| UK-47a                                  | Amount of qualifying items referred to in Article 494a (2) CRR subject to phase out from T2   | -                 | -                 |   |
| UK-47b                                  | Amount of qualifying items referred to in Article 494b (2) CRR subject to phase out from T2   | -                 | -                 |   |

|  |   | March 31,<br>2025 | March 31,<br>2024 | Source based on reference<br>numbers/letters of the bal-<br>ance sheet under the regula-<br>tory scope of consolidation<br>(UK CC2) |
|--|---|-------------------|-------------------|---|
| 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  | -                 | -                 |   |
| 49   | of which: instruments issued by subsidiaries subject to phase-out   | -                 | -                 |   |
| 50   | Credit risk adjustments   | -                 | -                 |   |
| 51   | <b>Tier 2 (T2) capital before regulatory adjustment</b>   | <b>50.0</b>       | <b>50.0</b>       |   |
| <b>Tier 2 (T2) capital: regulatory adjustments</b> |   |                   |                   |   |
| 52   | Direct, indirect and synthetic holdings by an institution of own T2 in-<br>struments and subordinated loans (negative amount)   | -                 | -                 |   |
| 53   | Direct, indirect and synthetic holdings of the T2 instruments and sub-<br>ordinated loans of financial sector entities where those entities have<br>reciprocal cross holdings with the institution designed to inflate artifi-<br>cially the own funds of the institution (negative amount)     | -                 | -                 |   |
| 54   | Direct, indirect and synthetic holdings of the T2 instruments and sub-<br>ordinated loans of financial sector entities where the institution does<br>not have a significant investment in those entities (amount above 10<br>% threshold and net of eligible short positions) (negative amount) | -                 | -                 |   |
| 54a  | Empty set in the UK   | -                 | -                 |   |
| 55   | Direct, indirect and synthetic holdings of the T2 instruments and sub-<br>ordinated loans of financial sector entities where the institution has a<br>significant investment in those entities (net of eligible short positions)<br>(negative amounts)  | -                 | -                 |   |
| 56   | Empty set in the UK   | -                 | -                 |   |
| UK-56a   | Qualifying eligible liabilities deductions that exceed the eligible liabili-<br>ties items of the institution (negative amount)   | -                 | -                 |   |

|   |   | March 31,<br>2025 | March 31,<br>2024 | Source based on reference<br>numbers/letters of the bal-<br>ance sheet under the regula-<br>tory scope of consolidation<br>(UK CC2) |
|---|---|-------------------|-------------------|---|
| UK-56b  | Other regulatory adjustments to T2 capital  | -                 | -                 |   |
| 57  | <b>Total regulatory adjustments to Tier 2 (T2) capital</b>  | -                 | -                 |   |
| 58  | <b>Tier 2 (T2) capital</b>  | 50.0              | 50.0              |   |
| 59  | <b>Total capital (TC = T1 + T2)</b>   | 372.9             | 361.3             |   |
| 60  | <b>Total Risk exposure amount</b>   | 1,649.7           | 1,546.2           |   |
| <b>Capital ratios and buffers</b>   |   |                   |                   |   |
| 61  | Common Equity Tier 1 (as a percentage of total risk exposure amount)  | 19.57%            | 20.14%            |   |
| 62  | Tier 1 (as a percentage of total risk exposure amount)  | 19.57%            | 20.14%            |   |
| 63  | Total capital (as a percentage of total risk exposure amount)   | 22.60%            | 23.37%            |   |
| 64  | Institution CET1 overall capital requirement (CET1 requirement in accordance with Article 92 (1) CRR, plus additional CET1 requirement which the institution is required to hold in accordance with point (a) of Article 104(1) CRD, plus combined buffer requirement in accordance with Article 128(6) CRD) expressed as a percentage of risk exposure amount) | 9.85%             | 9.10%             |   |
| 65  | of which: capital conservation buffer requirement   | 2.50%             | 2.50%             |   |
| 66  | of which: countercyclical buffer requirement  | 0.91%             | 0.81%             |   |
| 67  | of which: systemic risk buffer requirement  | -                 | -                 |   |
| UK-67a  | of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer  | -                 | -                 |   |
| 68  | Common Equity Tier 1 available to meet buffers (as a percentage of risk exposure amount)  | 10.98%            | 12.42%            |   |
| 69,70,71  | [non-relevant in UK]  | -                 | -                 |   |
| <b>Amounts below the thresholds for deduction (before risk-weighting)</b> |   |                   |                   |   |

|  |   | March 31,<br>2025 | March 31,<br>2024 | Source based on reference<br>numbers/letters of the bal-<br>ance sheet under the regula-<br>tory scope of consolidation<br>(UK CC2) |
|--|---|-------------------|-------------------|---|
| 72   | Direct and indirect holdings of own funds and eligible liabilities of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions) | -                 | -                 |   |
| 73   | Direct and indirect holdings of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 17.65% threshold and net of eligible short positions)                      | -                 | -                 |   |
| 74   | Empty set in the UK   | -                 | -                 |   |
| 75   | Deferred tax assets arising from temporary difference (amount below 17.65 % threshold , net of related tax liability where the conditions in Article 38 (3) CRR are met)  | -                 | -                 |   |
| <b>Applicable caps on the inclusion of provisions in Tier 2</b>  |   |                   |                   |   |
| 76   | Credit risk adjustments included in T2 in respect of exposures subject to standardised approach (prior to the application of the cap)   | -                 | -                 |   |
| 77   | Cap on inclusion of credit risk adjustments in T2 under standardised approach   | -                 | -                 |   |
| 78   | Credit risk adjustments included in T2 in respect of exposures subject to internal rating-based approach (prior to the application of the cap)  | -                 | -                 |   |
| 79   | Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach  | -                 | -                 |   |
| <b>Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2014 and 1 Jan 2022)</b> |   |                   |                   |   |
| 80   | Current cap on CET1 instruments subject to phase-out arrangements   | -                 | -                 |   |
| 81   | Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)   | -                 | -                 |   |

|    |   | March 31,<br>2025 | March 31,<br>2024 | Source based on reference<br>numbers/letters of the bal-<br>ance sheet under the regula-<br>tory scope of consolidation<br>(UK CC2) |
|----|---|-------------------|-------------------|---|
| 82 | Current cap on AT1 instruments subject to phase-out arrangements                            | -                 | -                 |   |
| 83 | Amount excluded from AT1 due to cap (excess over cap after re-<br>demptions and maturities) | -                 | -                 |   |
| 84 | Current cap on T2 instruments subject to phase-out arrangements                             | -                 | -                 |   |
| 85 | Amount excluded from T2 due to cap (excess over cap after redemp-<br>tions and maturities)  | -                 | -                 |   |

**Notes:**

- a. The final dividend of USD 16.0 million on the ordinary equity shares of the Bank recommended by the Board for the year was deducted from profits for the year ended March 31, 2025 (FY 2024: USD 13.0 million).



Annexure II

UK CC2 - Reconciliation of regulatory own funds to balance sheet in the audited financial statements

Amount (USD million)

|                    |   | Balance sheet as in published financial statements |                      | Reference UK CC1 |
|--------------------|---|--|----------------------|------------------|
|                    |   | As at March 31, 2025                               | As at March 31, 2024 |                  |
| <b>Assets</b>      |   |  |                      |                  |
| 1                  | Cash and Balances at Central Banks                        | 403.9  | 219.6                |                  |
| 2                  | Treasury Bill and other eligible bills                    | 140.6  | 146.5                |                  |
| 3                  | Loans and advances to banks                               | 339.6  | 355.6                |                  |
| 4                  | Loans and advances to customers                           | 964.5  | 888.9                |                  |
| 5                  | Debt Securities   | 529.6  | 545.7                |                  |
| 6                  | Equity Shares   | 5.4  | 6.1                  |                  |
| 7                  | Derivative Financial instruments                          | 23.0   | 23.7                 |                  |
| 8                  | Tangible and intangible fixed assets                      | 2.4  | 2.4                  |                  |
| 8a                 | of which, other intangibles                               | 0.5  | 0.6                  | 8                |
| 9                  | Other assets  | 11.3   | 13.3                 |                  |
| 10                 | Prepayments and accrued income                            | 1.3  | 1.5                  |                  |
| <b>11</b>          | <b>Total assets</b>                                       | <b>2,421.6</b>                                     | <b>2,203.3</b>       |                  |
| <b>Liabilities</b> |   |  |                      |                  |
| 12                 | Deposits by banks   | 27.2   | -                    |                  |
| 13                 | Customer accounts   | 1,901.6  | 1,668.6              |                  |
| 14                 | Bonds and medium term notes (including subordinated debt) | 50.6   | 50.0                 |                  |
| 14a                | of which: considered for Tier 2 capital                   | 50.0   | 50.0                 | 46               |
| 15                 | Derivative Financial instruments                          | 16.6   | 19.2                 |                  |

|                             |   | Balance sheet as in published financial statements |                      | Reference UK CC1 |
|-----------------------------|---|--|----------------------|------------------|
|                             |   | As at March 31, 2025                               | As at March 31, 2024 |                  |
| 16                          | Other liabilities                             | 28.6   | 24.2                 |                  |
| 17                          | Accruals and deferred income                  | 11.7   | 11.1                 |                  |
| 18                          | Repurchase Agreements                         | 33.4   | 92.7                 |                  |
| <b>19</b>                   | <b>Total liabilities</b>                      | <b>2,069.7</b>                                     | <b>1,865.8</b>       |                  |
| <b>Shareholders' Equity</b> |   |  |                      |                  |
| 20                          | Issued share capital                          | 220.1  | 220.1                |                  |
| 20a                         | <i>of which: considered for CET 1 capital</i> | 220.1  | 220.1                | 1                |
| 21                          | Capital contribution                          | 12.2   | 12.2                 |                  |
| 22                          | Retained earnings                             | 117.4  | 103.6                |                  |
| 22a                         | <i>of which: considered for CET 1 capital</i> | 101.4  | 90.6                 | 2 and UK-5a      |
| 23                          | Available for sale reserve                    | 2.2  | 1.6                  |                  |
| 23a                         | <i>of which: considered for CET 1 capital</i> | 2.2  | 1.6                  | 3                |
| <b>24</b>                   | <b>Total shareholders' equity</b>             | <b>351.9</b>                                       | <b>337.5</b>         |                  |

**Notes:**

- The Bank's Pillar 3 disclosures have been prepared on an individual basis. There is no subsidiary/joint venture of the Bank that is required to be consolidated for accounting or regulatory prudential purposes. The Bank's scope of accounting consolidation and its scope of regulatory consolidation are exactly the same and accordingly the column (a) and (b) of the Template UK CC2 has been merged for disclosure purposes.
- Italicised values represent subsets of values directly above them, and also show the splits between Tier 1 and Tier 2 Capital detailed in the CRR Own Funds.

### Annexure III

#### UK CCA: Main features of regulatory own funds instruments and eligible liabilities instruments

| 1     | Issuer  | ICICI Bank UK Plc                      | ICICI Bank UK Plc      | ICICI Bank UK Plc                         |
|-------|---|--|------------------------|---|
| 2     | Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)              | Ordinary Shares USD                    | Ordinary Shares GBP    | XS2767345122                              |
| 2a    | Public or private placement   | Private                                | Private                | Public                                    |
| 3     | Governing law(s) of the instrument  | English                                | English                | English                                   |
| 3a    | Contractual recognition of write down and conversion powers of resolution authorities           | No                                     | No                     | Yes                                       |
|       | Regulatory treatment  |  |                        |   |
| 4     | Current treatment taking into account, where applicable, transitional CRR rules                 | Common Equity Tier 1                   | Common Equity Tier 1   | Tier 2                                    |
| 5     | Post-transitional CRR rules   | Common Equity Tier 1                   | Common Equity Tier 1   | Tier 2                                    |
| 6     | Eligible at solo/(sub-)consolidated/ solo & (sub-)consolidated                                  | Solo                                   | Solo                   | Solo                                      |
| 7     | Instrument type (types to be specified by each jurisdiction)                                    | Ordinary Share Capital                 | Ordinary Share Capital | Dated Subordinated Bonds with issuer call |
| 8     | Amount recognised in regulatory capital (Currency in million, as of most recent reporting date) | USD 220.0 million                      | USD 0.1 million        | USD 50.0 million                          |
| 9     | Nominal amount of instrument  | USD 220.0 million                      | GBP 0.05 million       | USD 50.0 million                          |
| UK-9a | Issue price   | USD 1.00 per share                     | GBP 1.00 per share     | 100.00%                                   |
| UK-9b | Redemption price  | N/A                                    | N/A                    | 100.00%                                   |
| 10    | Accounting classification   | Shareholder's equity                   | Shareholder's equity   | Liability - amortised cost                |
| 11    | Original date of issuance   | 01-Aug-2003 and on various other dates | 28-Apr-2003            | 16-Feb-2024                               |
| 12    | Perpetual or dated  | Perpetual                              | Perpetual              | Dated with Issuer call option             |

|        |  |                 |                 |   |
|--------|--|-----------------|-----------------|---|
| 13     | Original maturity date   | No maturity     | No maturity     |   |
| 14     | Issuer call subject to prior supervisory approval                              | No              | No              | Yes   |
| 15     | Optional call date, contingent call dates and redemption amount                | N/A             | N/A             | 16-Feb-2029; Redemption at par                                  |
| 16     | Subsequent call dates, if applicable   | N/A             | N/A             | N/A   |
|        | Coupons / dividends  |                 |                 |   |
| 17     | Fixed or floating dividend/coupon  | Floating        | Floating        | Fixed to floating   |
| 18     | Coupon rate and any related index  | N/A             | N/A             | 7.106% till 16-Feb-2030, thereafter US Treasury Rate plus 3.00% |
| 19     | Existence of a dividend stopper  | N/A             | N/A             | No  |
| UK-20a | Fully discretionary, partially discretionary or mandatory (in terms of timing) | N/A             | N/A             | N/A   |
| UK-20b | Fully discretionary, partially discretionary or mandatory (in terms of amount) | N/A             | N/A             | N/A   |
| 21     | Existence of step up or other incentive to redeem                              | No              | No              | No  |
| 22     | Noncumulative or cumulative  | Noncumulative   | Noncumulative   | Noncumulative   |
| 23     | Convertible or non-convertible   | Non-convertible | Non-convertible | Non-convertible   |
| 24     | If convertible, conversion trigger(s)  | N/A             | N/A             | N/A   |
| 25     | If convertible, fully or partially   | N/A             | N/A             | N/A   |
| 26     | If convertible, conversion rate  | N/A             | N/A             | N/A   |
| 27     | If convertible, mandatory or optional conversion                               | N/A             | N/A             | N/A   |
| 28     | If convertible, specify instrument type convertible into                       | N/A             | N/A             | N/A   |
| 29     | If convertible, specify issuer of instrument it converts into                  | N/A             | N/A             | N/A   |

| 30     | Write-down features   | No                                     | No                                     | Yes   |
|--------|---|--|--|---|
|        |   |  |  | A decision that the Bank or its Parent Bank (as the case may be) would become non-viable either without a write-down of bonds or without injection of capital from public sector / equivalent support, as determined by RBI and provided that the local regulator does not object to such determination |
| 31     | If write-down, write-down trigger(s)  | N/A                                    | N/A                                    |   |
| 32     | If write-down, full or partial  | N/A                                    | N/A                                    | Full  |
| 33     | If write-down, permanent or temporary   | N/A                                    | N/A                                    | Permanent   |
| 34     | If temporary write-down, description of write-up mechanism  | N/A                                    | N/A                                    | N/A   |
| 34a    | Type of subordination (only for eligible liabilities)   | N/A                                    | N/A                                    | N/A   |
| UK-34b | Ranking of the instrument in normal insolvency proceedings  | Ranks below all other forms of capital | Ranks below all other forms of capital | Ranks above all other forms of capital  |
| 35     | Position in subordination hierarchy in liquidation (specify instrument type immediately Senior to instrument) | Perpetual Deeply Subordinated Debt     | Perpetual Deeply Subordinated Debt     | Unsecured and Un-subordinated Debt  |
| 36     | Non-compliant transitioned features   | No                                     | No                                     | No  |
| 37     | If yes, specify non-compliant features  | N/A                                    | N/A                                    | N/A   |
| 37a    | Link to the full term and conditions of the instrument (signposting)  | N/A                                    | N/A                                    | N/A   |

**UK CR4 – Standardised approach – Credit risk exposure and CRM effects**

**As at March 31, 2025**

**Amount (USD million)**

| Exposure classes  | Exposures before CCF and before CRM |                             | Exposures post CCF and post CRM |                          | RWAs and RWAs density |                  |
|---|-------------------------------------|-----------------------------|---------------------------------|--------------------------|-----------------------|------------------|
|   | On-balance-sheet exposures          | Off-balance-sheet exposures | On-balance-sheet exposures      | Off-balance-sheet amount | RWAs                  | RWAs density (%) |
|   | a                                   | b                           | c                               | d                        | e                     | f                |
| Central governments or central banks                            | 543.3                               | -                           | 543.3                           | -                        | -                     | 0.00%            |
| Institutions  | 395.3                               | 46.8                        | 445.7                           | 25.3                     | 203.7                 | 43.25%           |
| Corporates  | 944.8                               | 335.0                       | 894.4                           | 66.6                     | 916.2                 | 95.34%           |
| Secured by mortgages on immovable property                      | 421.6                               | -                           | 421.6                           | -                        | 259.4                 | 61.54%           |
| Exposures in default  | 2.3                                 | -                           | 2.3                             | -                        | 2.3                   | 100.00%          |
| Institutions and corporates with a short-term credit assessment | 62.4                                | 7.1                         | 62.4                            | 5.1                      | 49.5                  | 73.36%           |
| Equity  | 5.5                                 | -                           | 5.5                             | -                        | 5.5                   | 100.00%          |
| Other items   | 24.8                                | -                           | 24.8                            | 134.0                    | 50.7                  | 31.91%           |
| <b>TOTAL</b>  | <b>2,400.0</b>                      | <b>388.9</b>                | <b>2,400.0</b>                  | <b>231.0</b>             | <b>1,487.3</b>        | <b>56.53%</b>    |

**Notes:**

- Exposure and RWA amounts exclude counterparty credit risk (CCR) exposure in accordance with the instructions provided in the regulation.
- Exposure classes where the exposure and RWA amount is NIL has been excluded from above table.

As at March 31, 2024

Amount (USD million)

| Exposure classes  | Exposures before CCF and before CRM |                             | Exposures post CCF and post CRM |                          | RWAs and RWAs density |                  |
|---|-------------------------------------|-----------------------------|---------------------------------|--------------------------|-----------------------|------------------|
|   | On-balance-sheet exposures          | Off-balance-sheet exposures | On-balance-sheet exposures      | Off-balance-sheet amount | RWAs                  | RWAs density (%) |
|   | a                                   | b                           | c                               | d                        | e                     | f                |
| Central governments or central banks                            | 365.0                               | -                           | 365.0                           | -                        | -                     | 0.00%            |
| Institutions  | 369.1                               | 9.6                         | 405.3                           | 5.5                      | 157.9                 | 38.43%           |
| Corporates  | 890.0                               | 145.1                       | 852.9                           | 37.6                     | 842.2                 | 94.57%           |
| Secured by mortgages on immovable property                      | 392.9                               | -                           | 392.9                           | -                        | 234.2                 | 59.62%           |
| Exposures in default  | 11.2                                | -                           | 11.2                            | -                        | 16.3                  | 144.82%          |
| Institutions and corporates with a short-term credit assessment | 117.5                               | 6.7                         | 117.5                           | 4.5                      | 99.5                  | 81.56%           |
| Equity  | 6.1                                 | -                           | 6.1                             | -                        | 6.1                   | 100.00%          |
| Other items   | 30.4                                | -                           | 31.3                            | 18.7                     | 41.0                  | 81.99%           |
| <b>TOTAL</b>  | <b>2,182.2</b>                      | <b>161.4</b>                | <b>2,182.2</b>                  | <b>66.3</b>              | <b>1,397.2</b>        | <b>62.14%</b>    |



UK CR5 – Standardised approach

As at March 31, 2025

Amount (USD million)

| Exposure classes   | Risk weight  |              |              |              |                |             |            |          | Total          | Of which unrated |
|--|--------------|--------------|--------------|--------------|----------------|-------------|------------|----------|----------------|------------------|
|  | 0%           | 20%          | 35%          | 50%          | 100%           | 150%        | 250%       | Others   |                |                  |
|  | a            | e            | f            | g            | j              | k           | l          | o        | p              | q                |
| Central governments or central banks   | 543.3        | -            | -            | -            | -              | -           | -          | -        | 543.3          | -                |
| Institutions   | -            | 127.3        | -            | 330.9        | 12.8           | -           | -          | -        | 471.0          | -                |
| Corporates   | -            | 33.1         | -            | 41.3         | 878.5          | 8.1         | -          | -        | 961.0          | 411.8            |
| Exposures secured by mortgages on immovable property                         | -            | -            | 229.9        | -            | 191.7          | -           | -          | -        | 421.6          | 421.6            |
| Exposures in default   | -            | -            | -            | -            | 2.3            | -           | -          | -        | 2.3            | 2.3              |
| Exposures to institutions and corporates with a short-term credit assessment | -            | 18.7         | -            | 22.2         | 10.4           | 16.2        | -          | -        | 67.5           | -                |
| Equity exposures   | -            | -            | -            | -            | 5.5            | -           | -          | -        | 5.5            | 5.5              |
| Other items  | 18.4         | 115.7        | -            | -            | 22.9           | -           | 1.8        | -        | 158.8          | 158.9            |
| <b>TOTAL</b>   | <b>561.7</b> | <b>294.8</b> | <b>229.9</b> | <b>394.4</b> | <b>1,124.1</b> | <b>24.3</b> | <b>1.8</b> | <b>-</b> | <b>2,631.0</b> | <b>1,000.1</b>   |

**Notes:**

- Exposure amounts exclude counterparty credit risk exposure in accordance with the instructions provided in the regulation. Exposure classes classification is post CCF and post CRM.
- Exposure classes and risk weight % category where the exposure amount is NIL has been excluded from above table.
- Exposures for which a credit assessment by a nominated ECAI is not available has been included in the “Of which Unrated” category.

As at March 31, 2024

Amount (USD million)

| Exposure classes   | Risk weight  |              |              |              |                |             |            |          | Total          | Of which unrated |
|--|--------------|--------------|--------------|--------------|----------------|-------------|------------|----------|----------------|------------------|
|  | 0%           | 20%          | 35%          | 50%          | 100%           | 150%        | 250%       | Others   |                |                  |
|  | a            | e            | f            | g            | j              | k           | l          | o        | p              | q                |
| Central governments or central banks   | 365.0        | -            | -            | -            | -              | -           | -          | -        | 365.0          | -                |
| Institutions   | -            | 159.3        | -            | 250.9        | 0.6            | -           | -          | -        | 410.8          | -                |
| Corporates   | -            | 54.5         | -            | 31.9         | 781.6          | 22.5        | -          | -        | 890.5          | 315.4            |
| Exposures secured by mortgages on immovable property                         | -            | -            | 221.5        | -            | 171.4          | -           | -          | -        | 392.9          | 392.9            |
| Exposures in default   | -            | -            | -            | -            | 1.1            | 10.1        | -          | -        | 11.2           | 11.2             |
| Exposures to institutions and corporates with a short-term credit assessment | -            | 6.2          | -            | 38.2         | 74.6           | 3.0         | -          | -        | 122.0          | -                |
| Equity exposures   | -            | -            | -            | -            | 6.1            | -           | -          | -        | 6.1            | 6.1              |
| Other items  | 10.7         | 9.1          | -            | -            | 24.2           | -           | 6.0        | -        | 50.0           | 50.0             |
| <b>TOTAL</b>   | <b>375.7</b> | <b>229.1</b> | <b>221.5</b> | <b>321.0</b> | <b>1,059.6</b> | <b>35.6</b> | <b>6.0</b> | <b>-</b> | <b>2,248.5</b> | <b>775.6</b>     |

**UK CCR1 – Analysis of CCR exposure by approach**

**As at March 31, 2025**

**Amount (USD million)**

|     |   | a                             | b  | c        | d  | e                            | f                                 | g                 | h           |
|-----|---|-------------------------------|--|----------|--|------------------------------|-----------------------------------|-------------------|-------------|
|     |   | Replace-<br>ment cost<br>(RC) | Potential<br>future<br>exposure<br>(PFE) | EEP<br>E | Alpha<br>used for<br>compu-<br>ting regu-<br>latory ex-<br>posure<br>value | Exposure<br>value<br>pre-CRM | Exposure<br>value<br>post-<br>CRM | Exposure<br>value | RWE<br>A    |
| UK1 | Original Exposure Method (for derivatives)                            | -                             | -  | -        | 1.4  | -                            | -                                 | -                 | -           |
| UK2 | Simplified SA-CCR (for derivatives)                                   | -                             | -  | -        | 1.4  | -                            | -                                 | -                 | -           |
| 1   | SA-CCR (for derivatives)  | 2.9                           | 11.3                                     | -        | 1.4  | 19.9                         | 19.9                              | 19.9              | 11.7        |
| 2   | IMM (for derivatives and SFTs)  | -                             | -  | -        |  | -                            | -                                 | -                 | -           |
| 2a  | Of which securities financing transactions<br>netting sets            | -                             | -  | -        |  | -                            | -                                 | -                 | -           |
| 2b  | Of which derivatives and long settlement<br>transactions netting sets | -                             | -  | -        |  | -                            | -                                 | -                 | -           |
| 2c  | Of which from contractual cross-product net-<br>ting sets             | -                             | -  | -        |  | -                            | -                                 | -                 | -           |
| 3   | Financial collateral simple method (for SFTs)                         | -                             | -  | -        |  | 34.1                         | 1.0                               | 1.0               | 0.2         |
| 4   | Financial collateral comprehensive method<br>(for SFTs)               |                               |  |          |  | -                            | -                                 | -                 | -           |
| 5   | VaR for SFTs  |                               |  |          |  | -                            | -                                 | -                 | -           |
| 6   | <b>Total</b>  |                               |  |          |  | <b>54.0</b>                  | <b>20.9</b>                       | <b>20.9</b>       | <b>11.9</b> |

**Notes:** Derivatives exposure amount excludes exposure to CCPs in line with instructions provided in the regulation.

As at March 31, 2024

Amount (USD million)

|     |   | a                             | b  | c        | d  | e                            | f                                 | g                 | h           |
|-----|---|-------------------------------|--|----------|--|------------------------------|-----------------------------------|-------------------|-------------|
|     |   | Replace-<br>ment cost<br>(RC) | Potential<br>future<br>exposure<br>(PFE) | EEP<br>E | Alpha<br>used for<br>compu-<br>ting regu-<br>latory ex-<br>posure<br>value | Exposure<br>value<br>pre-CRM | Exposure<br>value<br>post-<br>CRM | Exposure<br>value | RWE<br>A    |
| UK1 | Original Exposure Method (for derivatives)                            | -                             | -  | -        | 1.4  | -                            | -                                 | -                 | -           |
| UK2 | Simplified SA-CCR (for derivatives)                                   | -                             | -  | -        | 1.4  | -                            | -                                 | -                 | -           |
| 1   | SA-CCR (for derivatives)  | 3.0                           | 17.6                                     | -        | 1.4  | 28.8                         | 28.8                              | 28.8              | 16.0        |
| 2   | IMM (for derivatives and SFTs)  | -                             | -  | -        |  | -                            | -                                 | -                 | -           |
| 2a  | Of which securities financing transactions<br>netting sets            | -                             | -  | -        |  | -                            | -                                 | -                 | -           |
| 2b  | Of which derivatives and long settlement<br>transactions netting sets | -                             | -  | -        |  | -                            | -                                 | -                 | -           |
| 2c  | Of which from contractual cross-product net-<br>ting sets             | -                             | -  | -        |  | -                            | -                                 | -                 | -           |
| 3   | Financial collateral simple method (for SFTs)                         | -                             | -  | -        |  | 94.9                         | 2.7                               | 2.7               | 0.6         |
| 4   | Financial collateral comprehensive method<br>(for SFTs)               |                               |  |          |  | -                            | -                                 | -                 | -           |
| 5   | VaR for SFTs  |                               |  |          |  | -                            | -                                 | -                 | -           |
| 6   | <b>Total</b>  |                               |  |          |  | <b>123.7</b>                 | <b>31.5</b>                       | <b>31.5</b>       | <b>16.6</b> |

**UK CCR2 – Transactions subject to own funds requirements for CVA risk**

**As at March 31, 2025**

**Amount (USD million)**

|     |  | <b>a</b>              | <b>b</b>    |
|-----|--|-----------------------|-------------|
|     |  | <b>Exposure value</b> | <b>RWEA</b> |
| 1   | Total transactions subject to the Advanced method  | -                     | -           |
| 2   | (i) VaR component (including the 3x multiplier)  |                       |             |
| 3   | (ii) stressed VaR component (including the 3x multiplier)                                |                       |             |
| 4   | Transactions subject to the Standardised method  | 19.9                  | 3.8         |
| UK4 | Transactions subject to the Alternative approach (Based on the Original Exposure Method) | -                     | -           |
| 5   | <b>Total transactions subject to own funds requirements for CVA risk</b>                 | <b>19.9</b>           | <b>3.8</b>  |

**As at March 31, 2024**

**Amount (USD million)**

|     |  | <b>a</b>              | <b>b</b>    |
|-----|--|-----------------------|-------------|
|     |  | <b>Exposure value</b> | <b>RWEA</b> |
| 1   | Total transactions subject to the Advanced method  | -                     | -           |
| 2   | (i) VaR component (including the 3x multiplier)  |                       |             |
| 3   | (ii) stressed VaR component (including the 3x multiplier)                                |                       |             |
| 4   | Transactions subject to the Standardised method  | 28.8                  | 4.7         |
| UK4 | Transactions subject to the Alternative approach (Based on the Original Exposure Method) | -                     | -           |
| 5   | <b>Total transactions subject to own funds requirements for CVA risk</b>                 | <b>28.8</b>           | <b>4.7</b>  |

UK CCR3 – Standardised approach – CCR exposures by regulatory exposure class and risk weights

As at March 31, 2025

Amount (USD million)

| Exposure classes            | Risk weight |    |    |     |            |            |     |     |            |      |        | Total exposure value |
|-----------------------------|-------------|----|----|-----|------------|------------|-----|-----|------------|------|--------|----------------------|
|                             | A           | b  | c  | d   | e          | f          | g   | h   | i          | J    | k      |                      |
|                             | 0%          | 2% | 4% | 10% | 20%        | 50%        | 70% | 75% | 100%       | 150% | Others |                      |
| Institutions                | -           | -  | -  | -   | 4.1        | 9.9        | -   | -   | -          | -    | -      | 14.0                 |
| Corporates                  | -           | -  | -  | -   | -          | -          | -   | -   | 5.9        | -    | -      | 5.9                  |
| <b>Total exposure value</b> | -           | -  | -  | -   | <b>4.1</b> | <b>9.9</b> | -   | -   | <b>5.9</b> | -    | -      | <b>19.9</b>          |

**Notes:**

a. Exposure value is post CRM.

b. Exposure classes where the exposure amount is Nil has been excluded from above table.

As at March 31, 2024

Amount (USD million)

| Exposure classes            | Risk weight |    |    |     |            |             |     |     |            |      |        | Total exposure value |
|-----------------------------|-------------|----|----|-----|------------|-------------|-----|-----|------------|------|--------|----------------------|
|                             | A           | b  | c  | d   | e          | f           | g   | h   | i          | J    | k      |                      |
|                             | 0%          | 2% | 4% | 10% | 20%        | 50%         | 70% | 75% | 100%       | 150% | Others |                      |
| Institutions                | -           | -  | -  | -   | 3.7        | 19.6        | -   | -   | -          | -    | -      | 23.3                 |
| Corporates                  | -           | -  | -  | -   | -          | -           | -   | -   | 5.5        | -    | -      | 5.5                  |
| <b>Total exposure value</b> | -           | -  | -  | -   | <b>3.7</b> | <b>19.6</b> | -   | -   | <b>5.5</b> | -    | -      | <b>28.8</b>          |

**UK CCR8 – Exposures to CCPs**
**As at March 31, 2025**
**Amount (USD million)**

|           |   | <b>a</b>              | <b>b</b>    |
|-----------|---|-----------------------|-------------|
|           |   | <b>Exposure value</b> | <b>RWEA</b> |
| <b>1</b>  | <b>Exposures to QCCPs (total)</b>   |                       | <b>0.3</b>  |
| 2         | Exposures for trades at QCCPs (excluding initial margin and default fund contributions); of which     | 13.6                  | 0.3         |
| 3         | (i) OTC derivatives   | 13.6                  | 0.3         |
| 4         | (ii) Exchange-traded derivatives  | -                     | -           |
| 5         | (iii) SFTs  | -                     | -           |
| 6         | (iv) Netting sets where cross-product netting has been approved                                       | -                     | -           |
| 7         | Segregated initial margin   | 4.3                   |             |
| 8         | Non-segregated initial margin   | -                     | -           |
| 9         | Prefunded default fund contributions  | -                     | -           |
| 10        | Unfunded default fund contributions   | -                     | -           |
| <b>11</b> | <b>Exposures to non-QCCPs (total)</b>   |                       | <b>-</b>    |
| 12        | Exposures for trades at non-QCCPs (excluding initial margin and default fund contributions); of which | -                     | -           |
| 13        | (i) OTC derivatives   | -                     | -           |
| 14        | (ii) Exchange-traded derivatives  | -                     | -           |



|    |   | a              | b    |
|----|---|----------------|------|
|    |   | Exposure value | RWEA |
| 15 | (iii) SFTs  | -              | -    |
| 16 | (iv) Netting sets where cross-product netting has been approved | -              | -    |
| 17 | Segregated initial margin                                       | -              |      |
| 18 | Non-segregated initial margin                                   | -              | -    |
| 19 | Prefunded default fund contributions                            | -              | -    |
| 20 | Unfunded default fund contributions                             | -              | -    |

As at March 31, 2024

Amount (USD million)

|   |   | a              | b          |
|---|---|----------------|------------|
|   |   | Exposure value | RWEA       |
| 1 | <b>Exposures to QCCPs (total)</b>   |                | <b>0.2</b> |
| 2 | Exposures for trades at QCCPs (excluding initial margin and default fund contributions); of which | 8.2            | 0.2        |
| 3 | (i) OTC derivatives   | 8.2            | 0.2        |
| 4 | (ii) Exchange-traded derivatives  | -              | -          |
| 5 | (iii) SFTs  | -              | -          |
| 6 | (iv) Netting sets where cross-product netting has been approved                                   | -              | -          |
| 7 | Segregated initial margin   | 3.0            |            |

|           |   | a              | b    |
|-----------|---|----------------|------|
|           |   | Exposure value | RWEA |
| 8         | Non-segregated initial margin   | -              | -    |
| 9         | Prefunded default fund contributions  | -              | -    |
| 10        | Unfunded default fund contributions   | -              | -    |
| <b>11</b> | <b>Exposures to non-QCCPs (total)</b>   |                | -    |
| 12        | Exposures for trades at non-QCCPs (excluding initial margin and default fund contributions); of which | -              | -    |
| 13        | (i) OTC derivatives   | -              | -    |
| 14        | (ii) Exchange-traded derivatives  | -              | -    |
| 15        | (iii) SFTs  | -              | -    |
| 16        | (iv) Netting sets where cross-product netting has been approved                                       | -              | -    |
| 17        | Segregated initial margin   | -              |      |
| 18        | Non-segregated initial margin   | -              | -    |
| 19        | Prefunded default fund contributions  | -              | -    |
| 20        | Unfunded default fund contributions   | -              | -    |

## Annexure VI

### Compliance to Pillar 3 requirements

The table below lists the CRR article reference with a high level summary of disclosure requirement along with information on compliance by the Bank for those requirements. The below table contains reference to only those CRR articles for which disclosure is required in accordance with Article 433c (2) of CRR for non-listed Other Institution.

| CRR reference  | Disclosure requirement   | Compliance reference  |
|--|--|---|
| <b>Scope of disclosure requirements</b>                      |  |   |
| 431 (1)  | Requirement to publish Pillar 3 disclosures  | Bank publishes Pillar 3 disclosures for the year ended March 31, 2025 on its website.   |
| 431 (2)  | Permission granted by the competent authorities for any specific methodologies shall make public disclosure of the information                                     | The Bank has not obtained any such permission from the competent authorities.   |
| 431 (3)  | Institution must have a formal policy to comply with Pillar 3 disclosure requirements covering written attestation by senior management and internal verification. | Refer Section 1.3 – Scope of application of Directive requirements;<br>Section 1.4 - Frequency and Disclosure;<br>Section 1.6 – Verification  |
| 431 (4)  | All quantitative disclosures shall be accompanied by a qualitative narrative and any other supplementary information that may be necessary                         | The Bank provides appropriate narrative or supplementary information wherever required in the disclosure document.  |
| 431 (5)  | Explanation of ratings decision to SMEs and other corporate applicants for loans upon request.   | The Bank handles all loan applications through its relationship managers. The relationship manager suitably explains the rating decision in writing upon receipt of such request from SME and other corporate applicants. |
| <b>Non-material, proprietary or confidential information</b> |  |   |
| 432 (1)  | Institutions may omit information that is not material.  | Refer section 1.4 – Frequency and Disclosure  |

| CRR reference  | Disclosure requirement  | Compliance reference   |
|--|---|--|
| 432 (2)  | Institutions may omit information that is proprietary or confidential.  |  |
| 432 (3)  | Where 432 (2) apply this must be stated in the disclosures, and more general information must be disclosed.   |  |
| Frequency of disclosure  |   |  |
| 433  | Disclosures shall be published in accordance with Article 433a, 433b, and 433c. Annual disclosure shall be published on the same date on which institution publish their financial statements or as soon as possible thereafter.            | Refer Section 1.4 – Frequency and Disclosure   |
| Disclosure by institutions – Large, Small and non-complex and Others |   |  |
| 433a   | Disclosures by Large Institutions   | Not applicable, as the Bank is not classified as large institution.  |
| 433b   | Disclosures by Small and Non-Complex Institutions   | Not applicable, as the Bank is not classified as small and non-complex institution.  |
| 433c   | Disclosures by Other Institutions: Institutions that are not subject to Article 433a or 433b shall disclose the information outlined below with the following frequency   | Refer Section 1.4 – Frequency and Disclosure   |
| 433c (1)   | Institutions that are not subject to Article 433a or 433b shall disclose the information outlined with the following frequency: annual, semi-annual, quarterly  | The Bank being a non-listed institution has disclosed the information outlined in Article 433c (2) on an annual basis. The Bank discloses the information in Pillar 3 disclosure document using the Disclosure Format prescribed under the regulation. |
| 433c (2)   | By way of derogation to paragraph 1, other institution that are non-listed shall disclose the following information on an annual basis:<br>(a) points (a), (e) and (f) of Article 435(1);<br>(b) points (a), (b) and (c) of Article 435(2): |  |

| CRR reference                                  | Disclosure requirement   | Compliance reference  |
|--|--|---|
|  | (c) point (a) of Article 437;<br>(d) points (c) and (d) of Article 438;<br>(e) the key metrics referred to in Article 447;<br>(f) points (a) to (d), (h) to (k) of Article 450(1).   |   |
| 433c (3)                                       | Notwithstanding paragraph 1 and 2, for institution subject to this Article that are small CRR firms, the disclosure required in relation to the information referred to in Article 450 is as follow:<br>(a) for non-listed institution, no disclosure is required<br>(b) otherwise, points (a)-(d), (h)(i) and h(ii) of Article 450(1) | The Bank being a non-listed institution and a small CRR firm. No disclosure is required for Article 450.  |
| <b>Means of disclosures</b>                    |  |   |
| 434 (1)  | To disclose information required in Title II and III in electronic format and in a single medium or location.  | Refer Section 1.4 – Frequency and Disclosure; Section 1.5 – Media and Location  |
| 434 (2)  | To make available on website an archive of the information required to be disclosed.   | Refer Section 1.4 – Frequency and Disclosure  |
| 434a   | Uniform Disclosure formats   | The Bank has used the uniform disclosure format provided in the regulation for making disclosure.   |
| 434b   | Timing and Means of disclosures under Article 441  | Not applicable as the Bank is not a G-SII.  |
| <b>Risk management objectives and policies</b> |  |   |
| 435  | Disclose their risk management objectives and policies for each separate category of risk, including the risks referred to in this Title. These disclosures shall include:   | Refer Section 4 – Risk Management and Governance Framework<br>Section 5 – Credit Risk<br>Section 6 – Market Risk<br>Section 7 – Operational, Information Security, Conduct and other risk<br>Section 8 – Liquidity Risk |
| 435 (1) (a)                                    | Strategies and processes to manage those categories of risks   |   |
| 435 (1) (e)                                    | declaration approved by the management body on the adequacy of risk management   |   |

| CRR reference    | Disclosure requirement   | Compliance reference   |
|------------------|--|--|
|                  | arrangements of the institution providing assurance that the risk management systems put in place are adequate with regard to the institution's profile and strategy   |  |
| 435 (1) (f)      | concise risk statement approved by the management body succinctly describing the relevant institution's overall risk profile associated with the business strategy; that statement shall include:  |  |
| 435 (1) (f)(i)   | key ratios and figures providing external stakeholders with a comprehensive view of the institution's management of risk, including how the risk profile of the institution interacts with the risk tolerance set by the management body |  |
| 435 (1) (f)(ii)  | information on intragroup transactions and transactions with related parties that may have a material impact of the risk profile of the consolidated group.  |  |
| 435 (2) (a)      | Number of directorships held by members of the management body.  | Refer Section 1.4 – Frequency and Disclosure and Annexure VI – Disclosure not published in accordance with Article 432 |
| 435 (2) (b)      | Recruitment policy for the selection of members of the management body and their actual knowledge, skills and expertise.   | Refer Section 1.4 – Frequency and Disclosure and Annexure VI - Disclosure not published in accordance with Article 432 |
| 435 (2) (c)      | Policy on diversity with regard to selection of members of the management body, its objective and any relevant targets set out in that policy, and the extent to which such objectives and targets have been achieved.                   | Refer Section 9 – Equal Opportunities and Diversity  |
| <b>Own funds</b> |  |  |
| 437 (a)          | Reconciliation of CET1, AT1 and T2 capital with financial  | Refer Section 2 – Capital adequacy   |

| CRR reference  | Disclosure requirement   | Compliance reference   |
|--|--|--|
|  | statements.  |  |
| <b>Own Funds Requirements and Risk-Weighted Exposure Amounts</b> |  |  |
| 438 (c)  | Result of ICAAP  | In line with the regulatory requirements, the Bank has instituted an ICAAP, which is used to estimate the capital requirements in line with the risk appetite of the Bank. The ICAAP is approved by the Board of the Bank at the start of each financial year. The Bank provides the result of ICAAP as and when demanded / prescribed by the regulator. |
| 438 (d)  | Capital requirement amounts and risk weighted exposure amount for different risk category set out in Part Three. | Refer Section 3 – Minimum Capital Requirement  |
| <b>Disclosure of Key Metrics</b>                                 |  |  |
| 447  | Institutions shall disclose the following key metrics in a tabular format:                                       | Refer Section 2 – Capital adequacy   |
| 447 (a)  | The composition of their own funds and their own funds requirements as calculated in accordance with Article 92  |  |
| 447 (b)  | The total risk exposure amount as calculated in accordance with Article 92(3);                                   |  |
| 447 (c)  | Where applicable, the amount and composition of additional own funds which the institutions are required to hold |  |
| 447 (d)  | Their combined buffer requirement which the institutions are required to hold                                    |  |
| 447 (e)  | Their leverage ratio and the total exposure measure as calculated in accordance with Article 429                 |  |
| 447 (f)  | Information in relation to their liquidity coverage ratio  |  |
| 447 (g)  | Information in relation to their net stable funding requirement  |  |
| 447 (h)  | Their own funds and eligible liabilities ratios and their components, numerator and denominator                  | The Bank is currently not classified as G-SIIs, hence not applicable.  |
| <b>Remuneration disclosures</b>                                  |  |  |

| CRR reference | Disclosure requirement   | Compliance reference  |
|---------------|--|---|
| 450 (1)       | Information regarding the remuneration policy and practices for those categories of staff whose professional activities have a material impact on its risk profile:  | In accordance with Article 433c (3), the Bank being a non-listed institution and a small CRR firm. No disclosure is required for Article 450. |
| 450 (1) (a)   | (a) information concerning the decision-making process used for determining the remuneration policy, as well as the number of meetings held by the main body overseeing remuneration during the financial year, including, if applicable, information about the composition and the mandate of a remuneration committee, the external consultant whose services have been used for the determination of the remuneration policy and the role of the relevant stakeholders; |   |
| 450 (1) (b)   | Information about the link between pay of the staff and their performance;   |   |
| 450 (1) (c)   | Most important design characteristics of the remuneration system, including information on the criteria used for performance measurement and risk adjustment, deferral policy and vesting criteria;  |   |
| 450 (1) (d)   | Ratios between fixed and variable remuneration set in accordance with rules 15.9 to 15.13 of the Remuneration Part of the PRA Rulebook;  |   |
| 450 (1) (h)   | Aggregate quantitative information on remuneration for staff whose professional activities have a material impact on the risk profile of the institution:  |   |



| CRR reference     | Disclosure requirement   | Compliance reference  |
|-------------------|--|---|
| 450 (1) (h) (i)   | Amounts of remuneration for the financial year split into fixed remuneration including a description of the fixed components and variable remuneration, and the number of beneficiaries; | In accordance with Article 433c (3), the Bank being a non-listed institution and a small CRR firm. No disclosure is required for Article 450. |
| 450 (1) (h) (ii)  | Amounts and forms of awarded variable remuneration, split into cash, shares, share-linked instruments and other types separately for the part paid upfront and the deferred part;        |   |
| 450 (1) (h) (iii) | Amounts of deferred remuneration awarded for previous performance periods, split into the amount due to vest in the financial year and the amount due to vest in subsequent years;       |   |
| 450 (1) (h) (iv)  | Amounts of deferred remuneration due to vest in the financial year and the number of beneficiaries of those awards;  |   |
| 450 (1) (h) (v)   | the guaranteed variable remuneration awards during the financial year, and the number of beneficiaries of those rewards;   |   |
| 450 (1) (h) (vi)  | severance payments awarded in previous periods, that have been paid out during the financial year;   |   |
| 450 (1) (h) (vii) | Amounts of severance payments awarded during the financial year, number of beneficiaries and highest such award to a single person.  |   |
| 450 (1) (i)       | Number of individuals with annual remuneration of EUR 1 million or more, broken down into specified pay bands.   |   |
| 450 (1) (k)       | information on whether the institution benefits from a derogation laid down in the Remuneration Part of the PRA Rulebook at 5.3, and/or 12.2   |   |

| CRR reference | Disclosure requirement   | Compliance reference  |
|---------------|--|---|
|               | (second subparagraph), and 15.A1(3).   |   |
| 450 (endnote) | Institutions to comply with Article 450 in a manner that is appropriate to their size, internal organisation and the nature, scope and complexity of their activities and without prejudice to the GDPR. | In accordance with Article 433c (3), the Bank being a non-listed institution and a small CRR firm. No disclosure is required for Article 450. |

In accordance with the requirement of Article 433c (2) of CRR for non-listed other institution category, the Bank is not required to disclose all the information mentioned under Part Eight of CRR or Disclosure (CRR) Part of PRA Rulebook. The Bank has accordingly disclosed only the required information in accordance with Article 433c (2) of CRR in this disclosure.

#### Disclosures not published in accordance with Article 432

The Bank has not disclosed the below information on account of confidentiality in accordance with Article 432 of CRR:

| CRR reference | Disclosure requirement   | Compliance reference  |
|---------------|--|---|
| 435 (2) (a)   | Number of directorships held by members of the management body.  | The Bank publishes details of directors who held office during the year as part of its annual report. Number of directorships held by directors is currently not published separately as it is considered confidential in nature in accordance with Article 432 of CRR. The Bank reviews these details to identify any conflict of interest and to take appropriate action, as and when required. |
| 435 (2) (b)   | Recruitment policy for the selection of members of the management body and their actual knowledge, skills and expertise. | Owing to confidentiality, the recruitment policy for the selection of members of the management body of the Bank is currently not disclosed as part of the Pillar 3 disclosures in accordance with Article 432 of CRR. The experience and expertise the Bank's directors are published on the website of the Bank.  |