BANK SADERAT PLC
Authorised by the PRA and regulated by the FCA & PRA

PILLAR 3 DISCLOSURES

31st December 2022

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ACRONYMS

Acronym	Definition
ALCO	Assets and Liabilities Committee
AML	Anti-Money Laundering
BIA	Basic Indicator Approach
CBI	Central Bank of Iran
CC	Credit Committee
CCB	Capital Conservation Buffer
CET1	Common Equity Tier 1
CCyB	Countercyclical Capital Buffer
CPB	Capital Planning Buffer
CRD IV	Capital Requirements Directive IV
CRO	Chief Risk Officer
CRR	Capital Requirements Regulation
EBA	European Banking Authority
ECAIs	External Credit Assessment Institutions
EU	European Union
EWI	Early Warning Indicator
G-SII	Global Systematically Important Institution
FCA	Financial Conduct Authority
HQLAs	High Quality Liquid Assets
L/C	Letter of Credit
ICAAP	Individual Capital Adequacy Assessment Process
ICG	Individual Capital Guidance
ILAAP	Internal Liquidity Adequacy Assessment Process
INED	Independent Non-Executive Director
LCC	Liquidity Crisis Committee
MC	Management Committee
OFAC	Office of the Foreign Assets Control
PRA	Prudential Regulation Authority
RAS	Risk Appetite Statement
RC	Risk Committee
RMC	Risk Monitoring Committee
RMF	Risk Management Framework
RRP	Recovery and Resolution Plan
RWAs	Risk Weighted Assets
SA	Standardized Approach
TRO	Tehran Representative Office
TFCD	Task Force on Climate related Disclosures
UN	United Nations

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Bank Saderat PLC
Pillar 3 disclosures

Introduction

This document is the Pillar 3 disclosures of Bank Saderat-plc (“the Bank”) as at 31 December 2022. The Bank is a UK registered Bank, authorised by the Prudential Regulation Authority (‘PRA’) and regulated by the Financial Conduct Authority (‘FCA’) and the PRA.

This document will provide information on the methodology used to calculate the capital requirements for the Bank’s business and the management of the risks faced by the Bank. The Bank has considered the following rules and guidelines in preparing this document.

1. Rules laid in part 8 of the Capital Requirements Regulation (‘CRR’)
2. CP 16/22 of PRA on implementation of Basel 3.1 standards: Disclosures (Pillar3)
3. Chapter 11 Disclosure (Pillar 3) of the PRA
4. Pillar 3 disclosure requirements issued by the Basel Committee on Banking Supervision (‘BCBS’)

The provision of meaningful information about common key risk metrics to market participants is an important aspect of a sound banking system. It reduces information asymmetry and helps promote comparability of bank’s risk profiles within and across jurisdiction. Pillar 3 of the Basel 3.1 framework aims to promote market discipline through regulatory disclosure requirements. These requirements enable market participants to access key information relating to a bank’s regulatory capital and risk exposures in order to increase transparency and confidence about a bank’s exposure to risk and the overall adequacy of its regulatory capital.

Basel 3.1 is implemented in UK through the PRA’s CP 16/22 by updating the framework for calculating Pillar 1 risk-weighted assets and assessment of the risk profiles of the Bank, including the capital adequacy . The Pillar 3 disclosures constitute one of the basic requirements of Basel 3

Pillar 1:

Pillar 1 sets out the minimum capital requirement for their credit, market and operational risk exposure.

Pillar2:

Under Pillar 2 banks are required to assess their own risk profile and determine the level of additional capital required over and above Pillar 1 requirements to cover risks not captured in Pillar1. This may be the credit concentration risk or business risks of the firm (external stresses and events, which impact the business cycle of the firm) and other risks identified by the Bank.

More specifically Pillar 2 is defined in Pillar 2A and 2B.

Pillar 2A

Pillar 2A requires the maintenance of supplementary capital to cover those risks not already covered under Pillar 1. In assessing the level of Pillar 2A capital, the Bank has identified the risks to which it is exposed. For each identified risk, the Bank has determined whether it is possible to mitigate or otherwise manage the risk. If mitigation or management is not feasible, the risk will either be avoided or supplementary capital will be held to ensure that, should the risk materialise, the loss or cost associated with that risk will not reduce the capital of the Bank to a level that cannot support the business. . The Prudential Regulatory Authority (‘PRA’) has advised the Bank, to have a minimum Capital add on of 9.17% of Risk Weighted Assets (‘RWA’) under Pillar 2A. The Bank has considered Pillar 2A at 13.90%, of RWA, which is above the minimum capital requirement advised by the PRA.

Pillar 2B

Pillar 2B requires the maintenance of supplementary capital to cover those risks to which the Bank may become exposed over a forward-looking planning horizon (e.g., due to changes in the economic environment). Pillar 2B capital takes the form of Capital Buffers which help to ensure that the Bank continues to meet minimum requirements during a stressed period. Pillar 2B risks are captured in Capital Conservation Buffer, PRA Buffer and Countercyclical Buffer.

Pillar 3

Pillar 3 complements the minimum capital requirement (Pillar 1) and the supplementary capital requirement (Pillar 2) with the aim of developing a set of disclosures which enable market participants to assess information on a bank's risks, capital and risk management procedures.

It is the Bank's policy to disclose the required information under Pillar 3 disclosures, on an annual basis after having taken into consideration, the size and complexity of the business it conducts and has refrained to make disclosures, which the Bank considers as immaterial. The Bank defines materiality, as that of its omission or disclosure can change or influence the decision of a user of the Pillar 3 disclosures, while making an economic decision. Also, from the Bank's perspective, if the required information is judged proprietary or confidential, then the Bank may take decision to exclude from the disclosures. The Bank defines proprietary information as that which, if shared would undermine its competitive position. The Bank defines information as confidential where there are obligations binding it to confidentiality arrangement with customers, suppliers or counterparties.

The disclosure document forms part of the "Annual Financial Statements" as at 31 December 2022 and should be read in conjunction with it. Bank's Pillar 3 disclosure document is published on the Bank's website.

The information contained in this disclosure has not been audited by the Bank's external auditors. However, this document is approved by the Board of Directors ("the Board") on 29 March 2023

The following pages explain the risks inherent in the Bank's business and the structure and procedures that the Board have established to manage those risks. It also explains the Bank's capital structure and how capital adequacy is managed.

2. History of the Bank

Bank Saderat-plc ("the Bank") is a UK registered -Bank, with its principal activity in London and is regulated by the Financial Conduct Authority and Prudential Regulations Authority ("the Regulators")

Following the removal of EU sanctions on 22nd October 2016, the Bank resumed normal business on 13th September 2018 and has started to rebuild its business gradually and profitably. The Bank's income is significantly derived from its interbank placements and commercial banking activities. This mix of assets was expected to change, once the commercial lending activities pick up. Hitherto, this has not happened because of secondary US sanctions barring non-US companies from dealing with sanctioned Iranian-owned entities.

2.1 Policy Statement

Basis of Preparation

This document is prepared in the form set out in the Basel 3.1 standards, providing transparent and consistent information on the credit, operational and market risks the Bank faces in its business. These are designed to promote market discipline through the disclosure of key information about risk exposures and risk management processes. No material disclosures have been omitted from this document.

Frequency

The directors, having taken into account the size and complexity of the Bank's operations, believe that an annual disclosure is appropriate, and that these disclosures be made available on the Bank's website, www.saderat-plc.com. The frequency of disclosure will be reviewed should there be a material change in any approach used for the calculation of capital, business structure or regulatory requirements.

This document, in conjunction with the 31st December 2022 Annual Report & Financial Statements represents the Bank's annual public Pillar 3 disclosure for the financial year ended 31st December 2022.

Verification

The Bank's Pillar 3 disclosures have been prepared in accordance with the CP16/22 of the PRA – Implementation of the Basel 3.1 standards: Disclosures (Pillar 3) and was reviewed and approved by the Board on 29 March 2023. These disclosures are not subject to external audit except where they are also included as accounting disclosure requirements in the Bank's Annual Report & Financial Statements 2022.

Declaration

The Board is committed to a strong culture of risk management in order to protect the Bank's market reputation and its ongoing sustainability. It has therefore established governance and management structures, monitored procedures and reported for each type of risk that the Bank is exposed to. These risks are principally liquidity risk, interest rate risk, credit risk, foreign exchange risk and operational risk. The responsibility for identifying and managing the principal risks rest with the Board which has ultimate responsibility for setting the strategy, risk appetite and control framework. The Board considers that, as at 31st December 2022, it had in place adequate systems and controls with regard to its risk profile and strategy and the credit, operational and prudential risks were within the Bank's risk tolerances. The Bank is required to ensure that its external disclosures portray its risk profile comprehensively. The directors have considered the adequacy of the Pillar 3 disclosures in relation to these requirements and are satisfied that they convey the risk profile of the Bank comprehensively. The disclosures of risk management objectives and procedures within this Pillar 3 document are detailed further within the Financial Risk Management note to the 31st December 2022 Annual Report & Financial Statements.

3 Risk Management Framework

The Risk Management Framework ('RMF') of the Bank is to ensure a sustainable business growth and a proactive approach to manage the risks that arise in the course of doing business. RMF consists of policies, controls, processes and systems through which the identified risks are communicated, monitored and managed.

The overall architecture of RMF is:

- Risk Appetite Statement ('RAS')
- Risk identification
- Risk assessment, measurement and mitigation
- Risk monitoring
- Stress testing
- Development of Risk Matrix and Risk Reporting

Bank's 'Risk Appetite Statement' describes the process of determining the risk appetite and defines the type of risk exposure that the Bank can consider and quantifies the amount, which the Bank is prepared to accept in pursuit of its business objectives. Where the risk management process identifies a risk that is unacceptable to the Bank and it cannot be mitigated satisfactorily, the risk is avoided if possible. If a risk cannot be avoided, as it is inherent in the operations of the Bank, the Bank allocates capital to cover the risk. In summary risks are categorised into various categories depending upon their impact on the business strategy of the Bank. RAS is approved by the Board and the business of the Bank is developed within the confines of RAS.

Responsibility for risk management resides across the Bank including the Board, the Risk Monitoring Committee and the individual departments. The Bank has developed the Early Warning Indicators ('EWIs') to monitor and to ensure functioning within the confines of RAS. The EWI indicators are consistent with Recovery Plan ('RP') indicators. The Bank has also in place a 'Risk Matrix', which assess the risks based on their severity of impact, should they materialise and which are based on the Pillar 1 and identified Pillar 2A risks. The Bank's policies and procedures are designed to prevent risk taking which is beyond the Risk Appetite of the Bank.

The Bank's Risk Monitoring Committee and the Board are content with the risk management systems in place in the Bank.

3.1 Material Risks for the Bank

3.1.1 Credit and counterparty risk

Credit risk is the risk that companies, financial institutions and other counterparties will be unable to meet their obligations in a timely manner to the Bank, which may result in financial loss. Credit risk arises principally from the Bank's lending book and from holding investments. The Bank considers only those counterparties for business transactions, who are credit worthy and have integrity in their dealings.

All risk exposures of the Bank are monitored and managed conforming to the Large Exposures Policy ('LEP') of the Bank. The large exposure is an exposure to a client or group of connected clients, where its value exceeds 10% of the Eligible Capital ("EC") of the Bank.

The policy of the Bank is that the maximum exposure to a single counterparty or group of connected clients in total must not exceed 25% of the Bank's EC. Where a client is an institution or where a group of connected clients includes one or more institutions, that value shall not exceed 25 % of the Bank's Eligible Capital or EUR 150 million, whichever the higher, provided that the sum of exposure values, to all connected clients that are not institutions should not exceed 25 % of the institution's Eligible Capital. It is the policy of the Board that exposures over one year should not, in the aggregate, exceed 200% of Eligible Capital, within which aggregate exposures for Iranian risk over one year must not exceed 150% of Eligible Capital. The bank has also determined to collateralise commercial lending on its Iranian exposures, at two times value of the loan facility or by a suitable and acceptable 3rd party guarantee for the exposure amount.

3.1.2 Market Risk

Euro is the base currency of operation of the Bank. Market risk arises when open positions in other currencies are maintained, due to the necessity of the situation and such balances are exposed to movements in Foreign Exchange ('FX') rates, on valuation. Bank Saderat does not maintain a trading book.

3.1.3 Operational Risk

Operational risk is the risk of loss resulting from inadequate or failed internal processes, fraud, people and systems, or from external events. The Bank has implemented a new core banking system and this will impact a wide range of activities of the Bank, in the short term. The policies and procedure manual has to capture the requirements under the new core banking system and the staff has to receive adequate training in all aspects of the software, which is continuing now. The Bank has implemented a new software for generating and submitting regulatory returns and this will also impact the operational risk framework. These Operational Risk are measured using the Basic Indicator Approach ('BIA') and considered under Pillar 1 & Pillar 2.

3.1.4 Liquidity Risk
Liquidity risk is the risk that the Bank will encounter difficulty in meeting its obligations in a timely manner, on its financial liabilities as they become due.

3.1.5 Interest Rate Risk in the Banking Book
Interest rate risk is the risk of variability of the fair value of future cash flows arising from financial instruments due to changes in interest rates and is measured by analysing assets and liabilities into time bands according to their maturity or next interest repricing date, whichever is the earlier.

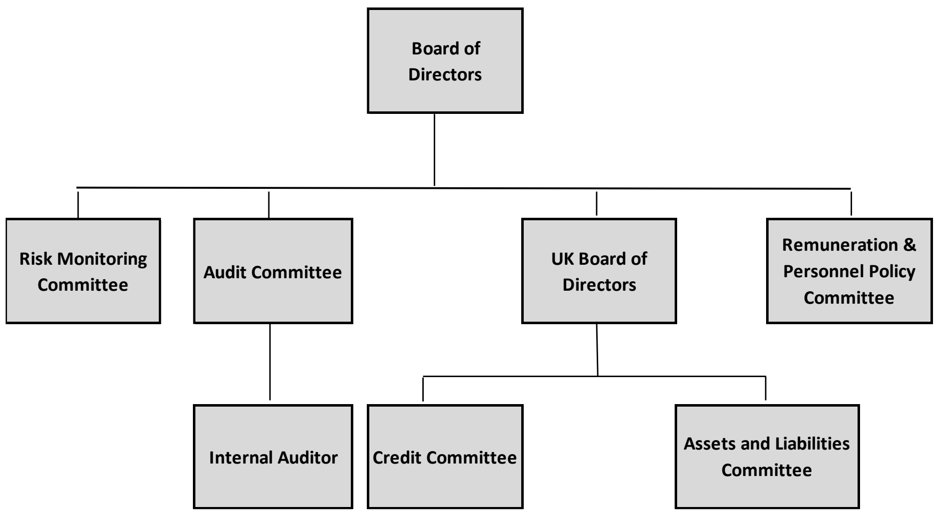
3.1.6 Concentration Risk
The Bank's exposure to Iranian business is significant and will continue to be the same in the near future, as there is little scope to diversify the customer base at this stage. The Bank has limited its exposure to Iran to 300% of its own funds. Concentration of exposure to Iran is significant risk and captured under Pillar 2A for capital allocation

3.1.7 Foreign Exchange Risk
Foreign exchange risk arises from the change in value, expressed in reporting currency, of assets and liabilities held in currencies other than the reporting currency, due to fluctuations in spot or forward exchange rates. The Bank does not take speculative positions in currencies and any net open positions arise in the ordinary course of business.

3.1.8 Business Risks

The Bank functions in a complex and restricted environment. Business risk arises from inappropriate responses to the emerging and prevailing issues and the strategy taken by the Bank. There are also issues arising out of Brexit, payment risk and sanctions risk, which are recognised and capital allocated accordingly.

3.2 Risk Management Governance
The overall responsibility for monitoring and managing the Bank's risk is delegated by the Board to the Risk Monitoring Committee. The organogram below shows the risk management and corporate governance structure. The main elements of risk governance are as follows:



3.2.1 The Board of Directors (the 'Board')
Bank Saderat plc board is the primary governing body of the Bank. It approves the level of risk to which the Bank is exposed and the framework for reporting and managing the risks. The Board structure consists of 3 non-executive directors and one Managing Director. The Chairman of the Board, based in Iran is a non-executive director, who represents the principal shareholder of the Bank. The other two are UK based independent non-executive directors (INED). The Board meets four times a year.

The table below shows the number of directorships/partnerships held by the directors of the Bank.

Name	Role	Number of directorships held
Mr. Seyed Ziya Imany	Chairman	1
Mr. R.J. Speedy	INED	Nil
Dr. D J Reid	INED	Nil
Dr. H Borhani	Managing Director	Nil

The number of directorships shown above excludes the Bank and also counts external directorships held within the same group of companies as a single directorship in line with CRD. Directorships of non-commercial organisations are not included.

The Board determines the overall direction of the Bank, in accordance with the objectives set in the Articles and Memorandum of Association of the Bank. In pursuit of its objectives, the Board defines the Bank's strategy, risk management framework and the organizational structure of the Bank.

The Bank is committed to diversity and we work hard to ensure that all of our people are offered equal opportunities throughout their career with us. We are determined that nobody is discriminated against, directly or indirectly, on the basis of age, ethnic or national origin, religion or beliefs, sexual orientation, gender, marital status or disability. This commitment applies equally to members of the Board. All Board appointments are made on merit, in the context of the skills, experience, independence and knowledge which the Board as a whole requires to be effective.

Section 172

The Board recognises that the long-term success of our business is dependent on the way it works with a large number of important stakeholders. The Directors have had regard to the interests of all our stakeholders (including, for example, our clients, our people, our communities and our shareholders) while complying with their obligations to promote the success of the Company in line with section 172 of the Companies Act.

The Board has discussed these obligations throughout the year, including how stakeholder engagement is incorporated into our long-term decision-making with further details provided on pages 12 to 23. The Board's decision-making considers both risk and reward in pursuit of delivering long-term value for all of our stakeholders, and protecting their interests. Awareness and understanding of the current and the potential risks to the business, including both financial and non-financial risks, are fundamental to how we manage the business.

Further information on how risks are appropriately assessed, monitored, controlled and governed is provided in the Risk management section.

The Board delegates authority for many of the ongoing operational decisions to:

3.2.2 The UK Board

The UK Board comprises the two UK based independent non-executive directors (INEDs) and the Managing Director. The Credit Committee and the Assets and Liabilities Committee report to the UK Board, which meets four times a year.

3.2.3 The Audit Committee

The Audit Committee comprises the non-executive Chairman representing the principal shareholder and the two UK based independent non-executive directors. It is chaired by an independent non-executive director. It may be attended by the Managing Director, the Assistant Managing Director, the Financial Controller, the Compliance Officer, the Internal Auditor and the External Auditor. The Audit

Committee meets four times a year and reports directly to the Board. There is an opportunity at each meeting for the members to discuss any matter without executive management being present.

The Audit Committee is responsible for the assessment of the effectiveness of controls that are in place to mitigate risk and determines the risks to be assessed. It also oversees the Internal Audit function, receives internal audit reports and is responsible for approving the detailed audit plan and timetable. The Audit Committee also receives an annual report which is used to assure the Board that controls are adequate and appropriate.

3.2.4 The Risk Monitoring Committee

The Risk Monitoring Committee comprises the two UK based independent non-executive directors, the Managing Director and the Chief Risk Officer. It meets twice a year and reports to the Board.

The Risk Monitoring Committee is charged with the responsibility of advising the directors on the nature and relative scale of the risks confronting the Bank, the appropriateness of the controls intended to manage those risks and whether the residual risk is within the parameters approved by the Board. The Risk Monitoring Committee oversees the production of a Risk Register whereby each department analyses the risks to which it is subject, how it is mitigated and the residual risk is managed. These departmental risks are then consolidated into a Bank Risk Register. The Risk Monitoring Committee also ensures that contingency plans are in place to achieve business continuity in the event of serious disruption to business operations.

3.2.5 The Remuneration and Personnel Policy Committee

The Remuneration and Personnel Policy Committee comprises the two UK based independent non-executive directors, the Managing Director and the Bank’s Chairman. It is charged with

the responsibility of advising the Board on matters related to remuneration, including the Bank's bonus and salary review policy. It also considers matters related to employment

legislation, terms and conditions of employment, the staff handbook, disciplinary matters, staff complaints and the appeals process.

3.2.6 The Credit Committee

The Credit Committee comprises the Managing Director, the Assistant Managing Director, the Financial Controller and the Operations Manager. Meetings are held as and when necessary. The Credit Committee receives annual reviews of outstanding borrowers and reports to the UK Board.

The Internal Assessment Criteria for Business Lending Purposes

The Board has approved an in-house developed rating system which is used as part of the determination as to whether the Credit Committee is able to approve a loan or advance, or whether higher level approval would need to be sought from either the UK Board or the Board. It is also used when conducting annual reviews of borrowers to assess their on-going credit standing and to consider whether a loan or advance should be placed on a "watch list" due to a deteriorating assessment of the borrower. The system is based upon a point scoring method with points awarded against various criteria from an analysis of accounts and other information about the borrower. The sum of the points awarded determines the rating of each borrower from A (the highest) to D (the lowest). It is likely that any D rated borrowers would be in default resulting in the raising of a provision against the debt unless adequate security renders a provision unnecessary.

3.2.7 The Assets and Liabilities Committee

The Assets and Liabilities Committee comprises the Managing Director, the Assistant Managing Director and the Financial Controller. Other heads of department are invited to attend from time-to-time. It meets once a month and reports to the UK Board. The Assets and Liabilities Committee monitors to ensure that the Bank's financial resources are being managed within the Bank's policy guidelines and the applicable regulatory framework and receives financial and statistical reports related to exposures, liquidity and capital adequacy.

4 Own funds Capital requirements and buffers

4.1 Own funds

The Bank's own funds, as at 31 December 2022 are €193.228m comprising the Tier 1 capital (‘CET 1’), which includes share capital, the general banking risk reserve and retained earnings (Tier 1 Capital). The Bank does not hold any Tier 2 or Tier 3 Capital.

	€’000	
Ordinary share capital	183,220	94.82%
General Banking Reserve	6,000	3.11%
Retained Earnings	4,001	2.07%
Total Tier 1 capital	193,221	100.00%

The Tier 1 Capital is comprised of issued and fully paid-up ordinary shares of €1 each, audited retained earnings to 31st December 2022 and a general banking risk reserve, which was raised to maintain the regulatory capital base and is not available for distribution. The Bank does not apply any filters and deductions in the audited financial statements.

The Board, is overall responsible for the capital management of the Bank. The Board in turn has vested the ‘Risk Monitoring Committee’ and ‘ALCO’ to monitor and manage the identified risks. The Risk Monitoring Committee, in turn has delegated the responsibility for managing the individual risks to the Risk Department. This structure of management is to ensure that, the credit, market and operational risks in the Bank are managed within the overall guidelines of the Board and within the Risk Appetite Statement of the Bank. In the process, the Bank has assessed the resilience of the capital resources available, in extreme stress conditions and adverse events. The Bank’s capital resources and retained earnings as at 31 December 2022, are sufficient to support the envisaged business growth in the year 2023. The amounts used above for capital adequacy are the same as disclosed in the 31st December 2022 Financial Statements.

Capital Requirement, Resources & Ratios:

The Bank's capital requirement and resources at 31st December 2022, under the Basel III convention:

The PRA requires Pillar 2A to be 9.17%, after making adjustments to Credit Concentration risk. But as a prudential measure the Bank has calculated Pillar 2A to be 13.90% after factoring Sanctions Risk, Payment Risk and Financial risk due to climate change at various levels.

Bank Saderat PLC
Pillar 3 disclosures Continued

Capital Requirements as at 31 DECEMBER 2022		
SHARE CAPITAL		183,220
GENERAL RESERVE		6,000
RESERVES		4,001
COMMON EQUITY TIER 1 CAPITAL (CET1)		193,221
TIER 1 CAPITAL		193,221
TOTAL CAPITAL / OWN FUNDS		**193,221**
Risk Weighted Assets		204,055
FX Risk		748
Operational Risk		9,124
Total Risk Amount (Total RWA)		**213,927**
PILLAR 1 (MINIMUM REQUIREMENTS)	Risk weighting	
CREDIT RISK CAPITAL REQUIREMENT	8%	16,324
POSITION RISK CAPITAL REQUIREMENT	8%	60
OPERATIONAL RISK CAPITAL	8%	730
PILLAR 1 (MINIMUM REQUIREMENTS)		**17,114**
Pillar 2A requirements		
SETTLEMENT / RESIDUAL RISK (RWA)	1.25%	2,674
MARKET RISK (FOREX)	0.125%	267
CONCENTRATION RISK (higher of the breakdown or 6.82% of RWA)	6.82%	14,590
CONCENTRATION RISK CAPITAL REQUIREMENT - Single name	3.50%	7,487
CONCENTRATION RISK CAPITAL REQUIREMENT - Country	1.32%	2,824
CONCENTRATION RISK CAPITAL REQUIREMENT - Sector	2.00%	4,279
OPERATIONAL RISK CAPITAL REQUIREMENT	1.80%	3,851
INTEREST RATE RISK IN BANKING BOOK	0.90%	1,925
SANCTION RISK	1.00%	2,139
Payment risk	1.50%	3,209
Financial risk due to climate change	0.50%	1,070
	13.90%	
ADDITIONAL (PILLAR 2A ADD ON) OWN FUNDS REQUIREMENTS		**29,725**
TCR calculated by the Bank (Pillar 1+Pillar 2A)		**46,839**
SREP capital as advised by PRA = TREA* 17.17% (8%+9.17%)		**36,731**
Total PRA buffer Capital Requirement		10,118
OVERALL CAPITAL REQUIREMENT (OCR)		**56,958**
CAPITAL COVER		339.24%
Captal Conservation Buffer (CCB)	**2.50%**	**5,348**
PRA Buffer Requirement :	**1.23%**	**2,631**
Countercyclical Buffer 1% RWA	**1.00%**	**2,139**
Total PRA buffer Capital Requirement		**10,118**
Total Regulatory Capital		**56,958**

4.3 Capital Buffers

The Bank calculates CET1 capital ratio and the Total Capital ratio as per the CRR requirements and is compliant with the regulatory limits set in CRR Article 92.

Bank Saderat PLC
Pillar 3 disclosures Continued

	31/12/2022
CET1 Capital ratio	90.31%
Total Capital ratio	90.31%

The Bank is neither a Global Systemically Important Institution ('G-SII'), nor Other Systemically Important Institution ('O-SII'). Therefore, the Bank is not required to keep G-SII or O-SII buffers. The Capital Planning Buffer was introduced from 1 January 2016 and it comprises the following elements:

Capital Planning Buffer	31/12/2022	€ '000
Capital Conservation Buffer (CCB)	2.5% of Total Risk Weighted Assets	5,348
PRA Buffer	1.23% of RWA	2,631
Countercyclical Buffer (CCyB)	1% of RWA	2,139
Total Capital Buffer (Pillar 2B)		10,118

Countercyclical Buffer ('CCyB'), which was set to increase to 2% by December 2020 of the exposure to UK borrowers is now deferred and reduced to 0%, due to prevailing COVID-19 pandemic conditions. CCyB requires firms to build up capital when aggregate credit growth in a particular geographical country is judged to be associated with a build-up of system-wide risk and hence this capital buffer to cushion during stress periods. Under the PRA rule book, the Bank needs to consider the weighted average of CCyB pass through rates for its assets in different jurisdictions. The Bank has relatively limited exposure to the UK compared to its exposure to Iran. But the Iranian regulators have not advised of any CCyB buffer for the reason that Basel III is not yet fully implemented in Iran. However, the Bank decided to act prudently and introduced 1% of RWA as CCyB to cover exposure to Iran.

The PRA buffer stands reduced to 1.23% of the Risk Weighted Assets from 31 December 2022.

5 Qualitative & Quantitative disclosures

5.1 Credit Risk

Credit risk is the risk that companies, financial institutions and other counterparties will be unable to meet their obligations to the Bank which may result in financial loss. Credit risk arises principally from the Bank's lending book. The Bank uses the Simplified Method of calculating its credit risk capital requirement using the standard risk weighting table. Credit Risk Exposure is disclosed in the Quantitative Disclosures below. The Bank believes that sufficient mitigations are in place to cover the high and low credit risks but considers it to be prudent to hold additional Pillar 2 capital of 1.25% of risk weighted assets (RWA) to cover the medium risk in this category. At 31st December 2022, this capital requirement amounted to €2,674k on the Iranian exposure (2021: €2,881k).

5.11 Concentration of credit risk

Concentration risk is a measure of the Bank's exposure to an individual counterparty, group of connected counterparties, industry sector or country. The Bank has significant concentrations of exposure to counterparties in the banking and commercial sectors in Iran. As a measure of prudence, additional capital of 6.82% of RWA has been allocated to compensate for the high concentration of assets in Iran under Pillar 2A. At 31st December 2022, this capital amounts to €14,590k. There is significant overlap between Iranian exposures and banking sector exposures. Pillar 2A includes an add-on for the banking sector, so no capital is allocated beyond these amounts.

6 Quantitative Disclosures (Credit)

6.1 Credit Risk Exposure as at 31 December 2022

Credit Risk

Credit risk is the risk that companies, financial institutions and other counterparties will be unable to meet their obligations to the Bank which may result in financial loss. Credit risk arises principally from the Bank's remaining lending book. The Bank uses the Simplified Method of calculating its credit risk capital requirement using the standard risk weighting table.

Exposures at 31st December 2022	Carrying Value €000's	Weighted Under Basel III €000's	8% Weighted Asset €000's
Cash	1,690	-	-
Lending to Bank Saderat Group companies	47,047	45,836	3,666
Lending to Other Banks	146,047	127,658	10,211
Lending to Non-Banks	14,026	17,317	1,385
Other Assets	13,432	13,281	1,063
	222,242	**204,093**	**16,325**

Pillar 2 Capital

From the various risks attributed to credit, one has been identified as high risk to the Bank, this being a fall in the price of shares quoted on the Tehran Stock Exchange which are held as security for loans. The mitigant for this risk is that the Bank normally demands 200% cover for secured lending.

Medium risks relate to the deterioration of a counterparty's financial position, an illiquid market in the Tehran Stock Exchange, the inability to convert Iranian Rials into hard currency, a beneficiary being insolvent at the time of discounting a bill of exchange and the incorrect handling of a documentary credit.

Low risks include the inability of Iranian banks to pay; the insolvency of the borrower; the inability to enforce security claims due to defective documentation and a series of risks relating to internal procedural failures.

The Bank believes that sufficient mitigants are in place to cover the high and low credit risks but considers it to be prudent to hold additional Pillar 2 capital of 1.25% of risk weighted assets to cover the medium risk in this category. At 31st December 2022, this amounted to €2,674k.

The Pillar 1 capital required to support €204,093k of risk weighted assets at 31st December 2022 is €16.327k.

6.1.1 Concentration of Credit Risk as at 31 December 2022

The table below shows the Bank's geographic concentrations of credit risk as at 31st December 2022.

As at 31 December 2022	Iran	Germany	United Kingdom	Others	Total
	€' 000	€' 000	€' 000	€' 000	€' 000
Cash & balances at Central banks			1,690		1,690
loans & advances to banks	154,143	23,364	14,574	185	192,267
loans & advances to customers	14,026				14,026
Other assets	-				0
	168,169	**23,364**	**16,265**	**185**	**207,983**

6.1.2 Average exposure to credit risk by credit class as at 31/12/2022

	As at 31/12/2022	Average during 2022
Loans & Advances to Banks	193,957.30	192,319.50
Loans & Advances to customers	14,026.00	15,763.86

6.1.3 non-bank credit exposures by industrial sector at 31st December 2022.

		As at 31st December 2022			As at 31st December 2021	
	Limit as % of EC	Outstanding	Limit	Capacity	Outstanding	Limit
		€000's	€000's	€000's	€000's	€000's
Automotive	20%	-	38,646	38,646	-	38,530
Industrial	20%	-	38,646	38,646	-	38,530
Transport	30%	-	57,968	57,968	-	57,794
Utilities	30%	5,714	57,968	52,254	8,573	49,221
Metals	20%	-	38,646	38,646	-	38,530
Mining and Quarrying	20%	2,528	38,646	36,118	869	37,661
Telecommunications	20%	-	38,646	38,646	-	38,530
Construction	30%	5,784	57,968	52,185	8,087	49,708
Agricuture, Foresdtry, fishing and fo	20%		38,646	36,118	-	37,661
Oil, Gas and petrochem	60%	-	115,937	115,937	-	115,589
Non-Bank financial institutions including investm,ent cos and pension funds	40%	-	77,291	77,291	-	77,059
Real Estate (commercial)	30%	-	57,968	57,968	-	57,794
Whole and retail trade	20%	-	38,646	38,646	-	38,530
Services and other	20%	-	38,646	38,646	-	3,850
		14,026	734,266	717,712	17,529	728,195

Residual maturity.

The residual maturity breakdown of all the exposures, excluding impairment provisions, analysed by class is as follows as at 31 December 2022:

Residual Maturity
31-Dec-22

	Less than three months	Between three and six months	Between six months and one year	Between one and five years	Total
Cash and balances at banks	1,690	-	-	-	1,690
Loans and advances to banks	98,305	1,878	92,084	-	192,267
Loans and advances to customers	6,156	299	2,026	5,546	14,026
	106,151	2,176	94,110	5,546	207,983

7. Market Risk

Market risk is the risk that changes in interest rates, foreign exchange rates or other prices will have an adverse effect on the Bank's financial condition or results. The Bank does not have a trading book, however any currency risk arising from the Bank's commercial banking and lending activities in the banking book is treated as though it was a trading book item and managed accordingly. In 2022 the Market Risk is recognised at 0.125% of RWA and is considered sufficient in the present situation. In the present context, we have recognised Sanctions risk and also have allotted capital for other risks.

Market risk is reported to the Assets and Liabilities Committee, which in turn reports to the Board, through the UK Board.

7.1 Interest Rate Risk in the Banking Book

Interest rate risk is the risk of variability of the fair value of future cash flows arising from financial instruments due to changes in interest rates.

The Bank is exposed to interest rate risk in the banking book due to mismatches between the repricing dates of assets and liabilities. This risk is monitored by the Assets and Liabilities Committee, reporting to the UK Board and through them, to the Board.

Material residual interest rate mismatches at 31st December 2022 exist in Euros, Sterling, US Dollars and United Arab Emirates Dirhams for periods up to one year.

Consolidated interest rate mismatches at 31st December 2022:

The following shows the interest rate gaps as at 31st December 2022

	Less than three months €000's	More than three months but less than six months €000's	More than six months but less than one €000's	More than one year €000's	Undated Non-interest bearing €000's	Total €000's
Assets						
Cash and balances at central banks	-	-	-	-	1,690	1,690
Cash, loans and advances to banks and customers	163,555	39,616	4,813			206,294
Tangible fixed assets	-	-	-	-	12,346	12,346
Other assets	-	-	-	-	381	381
Capital Work in Progress	-	-	-	-	431	431
Prepayments and accrued income	-	-	-	-	1,100	1,100
Total assets	**163,555**	**39,616**	**4,813**	**-**	**15,948**	**222,242**
Liabilities						
Deposits by banks & customer accounts	26,666		-	-	-	26,666
Other liabilities		-	-	-	2,348	2,348
Shareholders' funds	-	-	-	-	193,228	193,228
Total liabilities	**26,666**	**-**	**-**	**-**	**195,576**	**222,242**
Interest rate sensitivity gap	**136,889**	**39,617**	**4,813**	**-**	**(179,628)**	

The majority of financial assets and liabilities have floating rates of interest. Margins are determined when loans or deposits are agreed and do not change during the life of the transaction.
An interest rate gap is the timing difference between the resetting of interest rates on assets and liabilities within each currency of operation. The cost of closing an interest rate gap is the cost of borrowing, at market rates, an amount equal to the gap for the same time period. Impairment provisions against loans and advances to customers are not interest bearing and are shown in the undated non-interest-bearing column.

The effect on net interest income of a 2% movement in interest rates across all currencies and all periods at 31st December 2022 was €888k (202**1**: €1,047k). This calculation assumes that all interest rate gaps were closed in the market by taking deposits or placing amounts at interest rates 2% above or below the actual rate applied to each gap in each currency.

The Bank's exposure to interest rate risk is not expected to change significantly during the course of 2023.The capital allocation for interest rate risk is 0.9% of RWAs

8 Operational Risk

Operational risk is the risk of loss to the Bank resulting from deficiencies in internal processes, personnel, technology and infrastructure, and from external factors other than credit, market and liquidity risk. The Bank's objective is to manage operational risk so as to balance the avoidance of financial loss through the implementation of controls, whilst avoiding procedures which inhibit efficiency and increase costs unjustifiably. Deficient operational procedures may relate to account opening procedures, capturing of the incorrect data in the systems, balance verification procedures in customers' accounts, segregation of functions and such other related issues.

The Bank has implemented a new core banking system in the year 2022. Appropriate training are provided to all staff members to ensure that the new core banking system is appropriately managed.

The Bank has a Business Continuity Policy ('BCP') in place to maintain the Bank functions in the event of a disaster and no access to bank premises. This is a cloud-based system.

The Bank recognises the important role of 'Internal Audit' function to monitor the internal control systems and to this extent has outsourced the 'Internal Auditor' to a 3rd party service provider.

The Bank has elected to use the Basic Indicator Approach ('BIA') for quantifying the Operational Risk. Under this approach, the operational risk capital is calculated by mapping the Bank's three-year average net interest income and net non-interest income and applying 15% thereto, in accordance with CRR Article 315 as in the following table. The capital requirement for Operational Risk is €715k

Since its formation the Bank has not suffered any material operating loss and the directors consider that sufficiently robust operating procedures are in place to ensure that any operating loss that can reasonably be expected to occur in the foreseeable future would be more than adequately covered by the amount of capital allocated on this basis. A cyber-attack incident occurred on 7 March 2022, with no material loss and was managed with 3rd party support. Following this attack, new hardware and software were installed in the Bank.

	2020	2021	2022
	€ 000	€ 000	€ 000
Net interest income	4,650	5118	4719
Fees and commissions receivable	8	20	21
Fees and commissions payable	(6)	0	0
FX Profits/(losses)	(55)	58	65
	4,597	5,196	4,805
Average	4,866		
15% thereof = capital requirement	730		9,124

9 Foreign Exchange Risk

Foreign exchange risk arises from the change in value expressed in reporting currency, of assets and liabilities held in currencies other than the reporting currency, due to fluctuations in spot or forward exchange rates. Exposures are measured and monitored regularly and the position managed in terms of net exposure.

The foreign exchange position risk requirement in Pillar 1 is calculated by:

- calculating the net open position in each currency
- converting each such net position into base currency equivalent at spot rates of exchange
- calculating the total of all net short positions
- multiplying by 8%.

Net Currency position analysis as at 31 December 2022

Currency risk is that the Bank will suffer loss as a result of movements in foreign exchange rate.

The following analysis gives details of the Bank's financial assets and liabilities in Euro, based on the currencies in which they are denominated to identify the extent to which the foreign currency exposures of the Bank are matched or mismatched.

Bank Saderat PLC
Pillar 3 disclosures Continued

As at 31st December 2022 Assets	US Dollar €000s	UAE Dirhams €000s	Other Currencies €000s	Sterling €000s	Total €000s
Cash, loans and advances to banks	4,779	174	322	9,763	15,038
Loans and advances to customers	-	-	-	-	-
Other assets	-	-	-	-	-
Capital Work in Progress	-	-	-	-	-
Prepayments and accrued income	34	-	-	53	87
Total assets	**4,813**	**174**	**322**	**9,816**	**15,125**
Liabilities					
Deposits by banks	2,891	3	123	6,504	9,521
Customer accounts	908	10	3	1,189	2,110
Other liabilities	78	-	60	2,118	2,256
Total liabilities	**3,877**	**13**	**186**	**9,810**	**13,887**
Net position	**936**	**161**	**136**	**6**	**1,239**

There were no off-balance sheet positions.

Impact on Pillar 2 Capital

As foreign exchange positions are deemed to be insignificant and it is expected that they will remain so for the foreseeable future, it is not considered necessary to hold additional capital to cover these positions, in excess of the position risk requirement included under Pillar 1.

10 Past due and impaired.

A financial asset is past due when the counterparty has failed to make a payment when contractually due. Past due does not mean that a counterparty will never pay, but it can trigger various actions such as renegotiation, enforcement of covenants or legal proceedings.

Past due and Impairment
31-Dec-22

	Less than 1 month		> 1 month but< 3 months		> 3 months	
	Principal	Interest	Principal	Interest	Principal	Interest
	€ '000		€ ' 000		€ ' 000	
Industrial Sector						
Construction	-	-	-	-	10,684	1,610
	-	-	-	-	10,684	1,610

Carrying value of cash, loans and advances

31st December 2022	Exposure €000's	Neither Past Due nor Impaired €000's	Past Due but not Impaired €000's	Impaired €000's	Secured by TSE Shares €000's	Secured by guarantee €000's
Cash	1,690	1,690	-	-	-	-
Loans and advances to banks	192,267	192,267	-	-	-	-
Loans and advances to customers	14,026	1,258	474	12,294	12,294	10,072
	207,983	**195,215**	**474**	**12,294**	**12,294**	**10,072**

The carrying value of loans are secured as follows:

The directors are of the opinion that should it be deemed necessary to realise the security, in all the above instances sufficient funds would be realised to realise the carrying value of the loans. On-going assessment is made to determine whether there is objective evidence that a specific financial asset or group of financial assets is impaired. Evidence of impairment may include past due amounts or other indications that the borrower has defaulted, is experiencing significant financial difficulty or where a debt has been restructured to reduce the burden to the counterparty. If such evidence exists, the estimated recoverable amount of that asset is determined and any impairment loss is provided for.

Amounts are written off when collection of the loan or advance is considered to be impossible. On secured loans, any write off would take place only after ultimate realisation of collateral value. All write offs are on a case-by-case basis, taking account of the exposure at the date of the write off.

10.1 Reconciliation of movements in provisions as at 31 December 2022

Impairment provisions	31.12.2022 €
At beginning of period	**10,664,780**
Exchange adjustments	154,193
Written Off	-
Increase/(Reduction) in provisions	542,170
Interest Suspence - (note 1c)	(638,365)
At end of period	**10,722,778**

Operational risk is formally reviewed at quarterly intervals. This review then encompasses the experience gained during the previous quarter and also ensures that any risks associated with new areas of business, or changes in emphasis or scale of existing areas of business are incorporated in the risk review.

Climate Change

The Bank has continued to develop its approach towards the management of financial risks from climate change. The Bank has substantially revised its procedures and reporting in order to ensure that its governance and operations are in line with the specific requirements of SS3/19 which became effective at the start of 2022. To this end the Bank has allocated responsibility for climate change issues to the Chief Risk Officer and also engaged external consultants to review and advise on its procedures. The Bank has set its standards according to the recommendations of the Task Force on Climate Related Disclosures 'TFCD' and updates will be made as the quality of climate data and reporting methodologies continue to evolve.

The risk types which the Bank has identified for more detailed analysis to evaluate the impact on the Bank of potential climate change related financial risks are:

i. Physical risk – risks which arise from the increasing severity and frequency of climate and weather related events, for instance rising sea water levels, floods, heat waves, hurricanes and storms.
ii. Transition risk – risk which arise from the transition to net zero emissions which will require structural changes to the economy and the resulting changes in policy, technology and consumer demand which this entails.

1 Governance

The Board of Directors has direct supervision both over the strategy for climate change and the management of associated financial risks arising from climate change. The Risk Management Framework has been updated to incorporate Climate Risk, and the Credit Risk process has been supplemented with a parallel assessment of the financial risks arising from Climate Change risk. Metrics to evaluate climate change risk and across a range of stressed scenarios have also been developed. Climate Risk is formally reviewed every six months at the Risk Monitoring Committee which in turn reports to the Board of Directors. Staff training has been implemented to develop organisational awareness of the impact of climate change and a course was run in January 2023.

2. Strategy

The Bank recognises the importance of Climate Change and is committed to manage both physical and transitional financial risks due to climate change by controlling its portfolio risk and focussing strategically on assets that will have a positive impact on climate change. The small size of the loan book and the restrictions on business activity limit the Bank's ability to implement this yet in a significant way, but the Bank is optimistic that its business will grow and will enable it to implement its strategy as new assets are introduced to the Bank.

3 Risk Management

The Bank has comprehensively updated its Climate Change policy and developed a set of metrics to quantify the financial risk arising from climate change and to apply this across a range of scenarios. This enables a scoring matrix to be developed for each underwriting risk, and is reviewed as part of the credit risk assessment process. The Bank will continue to develop this as clients familiarise themselves with these new procedures and as our understanding of underlying risks improves, technical capabilities evolve, and methodologies develop and become more standardised. Climate risk assessment has been incorporated across the overall risk management process.

4 Metrics & targets

At 31 December 2022 total loans outstanding before provisions and security totalled €22.37m and the Bank has measured its net financial exposure using a stressed higher physical risk scenario at zero. The Bank allocated 0.5% of risk weighted assets to cover future financial risks in December 2021 and has retained this allocation at December 2022. The Bank has affirmed its intention to diversify its portfolio and ambition to move towards net zero by 2050 in line with the Paris Agreement and will continue to assess its progress in the light of its specific operating circumstances.

11 Other Risks

The Bank has considered the following additional risks and the mitigations in place to ameliorate those risks in the context of providing additional Pillar 2 capital against Operational Risk.

i. Strategic risk
ii. Liquidity risk
iii. Transactional risk
iv. Settlement risk
v. Regulatory risk
vi. Reputational risk
vii. Systemic risk
viii. Pension risk

i. <u>Strategic risk</u>

The following categories of strategic risk have been identified:

a) Iran's inability to pay its debts due to low oil price or insufficient hard currency
b) Difficulty in enforcing security in the Iranian courts
c) Difficulty in obtaining and keeping clearing facilities due to international pressure on other banks

In a worst case scenario, investment of the Bank's free capital, together with a sensible programme of cost reduction, would allow the Bank to remain solvent.

The risk of loss due to difficulty in enforcing security in the Iranian courts is a type of credit risk, albeit a risk that could be triggered by political events and is therefore covered in the additional capital allocated for credit risk.

ii. <u>Liquidity risk</u>

During the sanction period and since the removal of sanctions, the Bank has been highly liquid as assets existing at the date of sanctions mature into cash. This highly liquid position will not change significantly as the Bank gradually resumes business and operates normally. No additional capital is required, therefore, to support liquidity risk.

iii. <u>Transactional risk</u>

With the exception of the risk that a borrower may not adhere to covenants in their facility, all other transactional risks are common with credit risks. The single highest risk is that of a fall in the price

of shares on the Tehran Stock Exchange when such shares are held as collateral. This risk has been dealt with as a credit risk.

iv. <u>Settlement risk</u>

Settlement risk may be divided into two elements: risks that relate to the failure of a payments system internally and risks of settlement failure due to sanctions, closure of correspondent accounts or the inability to access external payment systems.

The Bank has been living for many years with the risk that payments may be disrupted and is therefore confident that internal payment procedures and controls over systems are sufficiently robust to justify the conclusion that no additional capital is required to mitigate these risks beyond that already provided for operational risk.

v. <u>Regulatory risk</u>

The Bank has minimal retail business that could be subject to consumer protection legislation. The Board has adopted a series of policies designed to ensure that the Bank operates in accordance with its statutory obligations and has created a "culture of compliance" throughout the organisation to ensure that regulatory requirements are met. The Bank does not consider that the allocation of additional capital for regulatory risk is necessary.

vi. <u>Reputational risk</u>

These medium to low probability risks may be analysed into two areas reflecting the underlying reason from which reputational risk may arise:

a) IT related risk such as data loss, internal or external hacking, defamatory e-mails or theft of confidential data.

b) Internal failings with regard to staff matters, e.g. loss of personal data or failure to comply with employment legislation.

Reputational risk in respect of the above, is intangible and considered to be mitigated by having in place appropriate and robust procedures together with a high degree of management overview of operations. It is not considered that the allocation of additional capital is necessary to mitigate these risks.

vii. <u>Systemic risk</u>

The principal systemic risk to which the Bank is vulnerable is that of changes to Iranian laws that would prevent the Bank enforcing a claim for security in the event of default by a borrower. If Iranian law was changed, for example, to disallow shares being offered as security for external borrowing or exchange controls were imposed that prevented the conversion of Rials into hard currency then the Bank could experience difficulty in recovering funds.

There are two mitigating factors in place. Firstly, regardless of any legislative changes in Iran, a primary obligation would remain on the borrower to repay its indebtedness and secondly, it has been the Bank's policy to lend only to large, reputable, publicly owned companies.

It is not deemed necessary to allocate additional capital to cover systemic risk.

viii. <u>Pension risk</u>

The Bank is not vulnerable to pension risk. With effect from 31st January 2002, the Bank's defined benefit pension scheme, the Iran Overseas Investment Bank PLC Retirement

Benefits Scheme (the 'Scheme'), was closed and all active members became deferred pensioners.

The assets of the Scheme are nil having been used to settle the liabilities in respect of individual members' benefits by the purchase of deferred annuities from Legal & General Assurance Company, or by the payment of individual transfer values to another pension scheme or personal pension plan. The final winding up of the Scheme is now complete, the liabilities have been discharged and final accounts have been prepared. As the Scheme has been terminated, an indemnity has been given by the Bank to each trustee against any possible action by a Scheme member. The Bank has also become the sole corporate trustee of the Scheme. The costs of providing pension benefits to staff under the defined contribution scheme are charged to the profit and loss account monthly.

12 Remuneration

The Bank is a proportionality level 3 firm under the Regulator's Remuneration Code and is required to provide disclosures of both quantitative and qualitative information about decision-making policies for remuneration and links between pay and performance. The following section of the Bank's Pillar III disclosures reflects the requirements of the CRR Part 8 (Article 450).

The table below shows the remuneration awards made by the Bank in respect of 2022 and 2021 for employees who have been designated as individuals whose professional activities have a material impact on the risk profile of the Bank.

	2022 Senior Management	2022 Other Identified Staff	2022 Total	2021 Senior Management	2021 Other Identified Staff	2021 Total
	€'000	€'000	€'000	€'000	€'000	€'000
	€	€	€	€	€	€
Total remuneration	886	265	1,151	936	335	1,271
Number of Identified Staff	8	3	11	8	4	12

Total remuneration consists of base salary, allowances, pension contributions and discretionary bonus.

Decision Making Process for Remuneration Policy

The Bank has an established Remuneration & Personnel Policy Committee which meets regularly to consider the overall reward framework across the Bank. Its recommendations are submitted to the Board which is responsible for approving remuneration policy and in doing so takes into account the pay and conditions across the Bank.

During 2022 the Committee has striven to ensure that remuneration is fair and transparent and that the Bank's remuneration framework supports its business strategy whilst discouraging inappropriate risk taking and appropriately rewarding staff.

Composition of the Remuneration & Personnel Policy Committee

The members of the Committee during 2022 consisted of the two UK based independent non-executive directors, the Managing Director and the Bank's Chairman. One of the non-executive directors is the appointed chairman.

Link between Pay and Performance

Total remuneration comprises salary, allowances, annual discretionary bonus and pension contributions. In determining the level of award of variable pay (annual bonus), the Bank has a policy to assess the extent to which objectives have been achieved. The Bank does not apply a formulaic approach on the grounds that this may encourage inappropriate risk taking. The annual bonus awarded to an individual is discretionary and is dependent on an individual's performance. The Bank's remuneration policy is designed to reflect the extent to which its annual objectives have been met in the context of the risk appetite framework and competitive market practice.