



ANNUAL DISCLOSURE

YEAR 2022

**ACCORDING TO REGULATION (EU) 575/2013
/PART EIGHT – DISCLOSURE BY INSTITUTIONS/**

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This report is prepared following the requirements of the Regulation (EU) 575/2013 of the European Parliament and of The Council, Part Eight – Disclosure by Institutions and Commission Implementing Regulation (EU) 2021/637 as regard the information referred to Part Eight, Titles II and III, of Regulation (EU) 575/2013.

All amounts, unless otherwise specified, are presented in thousand Bulgarian Lev (BGN) rounded to the nearest thousand. Bulgarian Lev is the functional and reporting currency of UniCredit Bulbank AD.

Data refer to prudential scope of consolidation.

This document was prepared in accordance with specific Internal Regulation (*Rules following the Annual Disclosure of capital adequacy information of UniCredit Bulbank AD*).

The disclosure of the Annual Consolidated Financial Statements is published on the website of UniCredit Bulbank AD (<https://www.unicreditbulbank.bg/en/about-us/investors/financial-reports/>).

CROSS REFERENCE TO THE REGULATORY REQUIREMENTS OF CRR2

REGULATION (EU) 575/2013 <i>Article & Content</i>	ANNUAL DISCLOSURE <i>Section in the document</i>	REG. (EU) 2021/637 <i>Tables & Templates</i>
435. Risk management objectives and policies	Section 2/3	EU OVA EU OVB EU LIQA EU CRA EU MRA EU ORA
436. Scope of application	Section 4	EU LI1 EU LI2 EU LI3 EU LIA EU LIB EU PV1
437. Own funds	Section 5	EU CC1 EU CC2 EU CCA
438. Own Funds requirements and risk-weighted exposure amounts	Section 6	EU OV1 EU KM1 EU INS1 EU INS2 EU OVC EU CR8 EU CR10 EU CCR7 EU MR2-B
439. Exposure to counterparty credit risk	Section 7	EU CCRA EU CCR1 EU CCR2 EU CCR3 EU CCR4 EU CCR5 EU CCR6 EU CCR8
440. Countercyclical capital buffers	Section 8	EU CCyB1 EU CCyB2
441. Indicators of global systemic importance	Section 9	
442. Exposures to credit risk and dilution risk	Section 10	EU CRB EU CR1 EU CR1-A EU CR2 EU CR2a EU CQ1 EU CQ2 EU CQ3 EU CQ4 EU CQ5 EU CQ6 EU CQ7 EU CQ8
443. Encumbered and unencumbered assets	Section 14	EU AE1 EU AE2 EU AE3 EU AE4
444. Use of the Standardised Approach	Section 11	EU CRD EU CR4 EU CR5 EU CCR3
445. Exposure to market risk	Section 15	EU MR1
446. Operational risk management	Section 16	EU ORA EU OR1
448. Exposures to interest rate risk on positions not held in the trading book	Section 18	

449. Exposures to securitisation positions	Section 19	EU-SECA EU-SEC1 EU-SEC2 EU-SEC3 EU-SEC4 EU-SEC5
450. Remuneration policy	Section 22	EU REMA EU REM1 EU REM2 EU REM3 EU REM4 EU REM5
451. Leverage ratio	Section 20	EU LR1 EU LR2 EU LR3 EU LRA
451a. Liquidity requirements	Section 21	EU LIQA EU LIQ1 EU LIQB EU LIQ2
452. Use of the IRB Approach to credit risk	Section 12	EU CRE EU CR6 EU CR6-A EU CR9 EU CCR4
453. Use of credit risk mitigation techniques	Section 13	EU CRC EU CR3 EU CR4 EU CR7 EU CR7-A
454. Use of the Advanced Measurement Approaches to operational risk	Section 17	EU ORA EU OR1
455. Use of Internal Market Risk Models	Section 15	EU MRB EU MR2-A EU MR3 EU MR4

This table is a reference between the regulatory requirements set out in Reg. 575/2013, the required templates and tables as per Reg. 2021/637 and the section in this document where they are presented. The qualitative information can be found in the respective chapter while the quantitative information is published in the section Appendices at the end of the document.



1 REPORTING ENTITY

UniCredit Bulbank AD (the Bank) is an universal Bulgarian Bank established upon triple legal merger of Bulbank AD, HVB Bank Biochim AD and Hebros Bank AD. The merger was legally completed on April 27th, 2007 with retroactive effect commencing January 1st, 2007.

UniCredit Bulbank AD has a full-scope banking licence for performing commercial banking activities. It is domiciled in the Republic of Bulgaria, with registered address Sofia, 7 “Sveta Nedelya” sq.

In 2022 UniCredit Bulbank AD received BBB/Stable rating by Fitch, one of the most respectable agency in the world.

As of 1st of October 2016, UniCredit Bulbank AD is under the direct control of UniCredit S.p.A. after the transfer of the activities and ownership of the CEE Division from UniCredit Bank Austria (UCBA) to UniCredit S.p.A. (UniCredit Group/Holding Company).



2 RISK MANAGEMENT, OBJECTIVES AND POLICIES

2.1 OVERVIEW

UniCredit Bulbank possesses a full-scope banking license for performing commercial banking activities. The Bank offers a comprehensive range of banking and financial products and services to individuals and corporate customers including multinationals, public sector and institutional customers.

UniCredit Bulbank is fully integrated into UniCredit Group – a simple, successful Pan European Commercial Bank, with a fully plugged-in CIB, delivering a unique Western, Central and Eastern European network to our extensive franchise of 25 million clients.

UniCredit Group Strategy is long-term. The Group is transforming through decisive actions to lay the groundwork for the future, changing the way we work to anticipate our clients' medium-term evolution.

UniCredit continues to follow its established Service Model, closer to clients, leveraging on the increase of the usage of digital channels, committed to lead in ethical and sustainable business. UniCredit Bulbank are in line with UniCredit Group strategy, which is further confirmed by the updated Unlocked within the Multi-Year Plan 2023-2025, in support of the continuity and acceleration of the main pillars:

- Revenue Generation & Profitability
- Digitalization & Simplification
- People & Culture



2.2 RISK APETITE

The Risk Appetite Framework is defined at UniCredit Group level reflecting macro-scenarios and the Group Ambition in terms of capital, financial structure and profitability. This definition includes the Risk Appetite Statement and the set of KPIs together with their applicable thresholds. The Risk Appetite Statement expresses the overall perception for the risk boundaries and focus of activities. It is a commitment to a robust business model with low risk framework. The Risk Appetite Statement provides an indication of the strategies necessary to manage key risks within the perimeter of the Group.

The 2023 Risk Appetite of UniCredit Bulbank reflects out ambition and commitment along the following main dimensions:

Strategic mission

- UniCredit Bulbank is part of a simple, successful Pan European Commercial Bank with a fully plugged-in CIB.
- We commit to generating sustainable returns by leveraging on our unique client footprint, and developing further our excellent client franchise, maximizing productivity through continuous cost optimization and more efficient business processes, with a proven discipline in risk management and capital allocation.

Capital

- We set Capital ratio thresholds in order to ensure adequate buffers over every regulatory requirement in order to have a solid capital position in an uncertain macro scenario, to manage impacts of regulation evolution and minimize the effect of potential execution risk.
- We ensure capital adequacy under the economic perspective, also considering stressed scenarios.
- We apply a disciplined allocation of risk towards business and clients with positive risk adjusted return on capital.
- We continuously improve our models to ensure compliance with changing regulations while keeping the accuracy at highest standard, also through robust model risk management framework.

Credit Risk

- We continue to be disciplined in risk management and credit underwriting to preserve the portfolio good quality and support sound business in a controlled risk environment, with specific attention on vulnerable sectors (including energy-intensive and highly leveraged enterprises and low-income retail affected by inflation and floating rates).
- We confirm a prudent approach vs. leveraged transactions coherently with our corporate footprint, within defined limits and triggers and further enhancing its risk appetite and control framework.
- We carefully assess and limit concentration risk of all kind, in particular related to industry, bulk, and country.
- We limit our exposure to shadow banking entities, through limits and triggers at Group and Legal Entity level.

Liquidity and Interest Rate Risks

- We aim at preserving the strong Group liquidity position, by dynamically assessing in ILAAP the funding and liquidity needs through continuous monitoring of market trends .
- We execute the funding plan consistently with TLAC/MREL requirements and in order to ensure an adequate buffer on LCR and NSFR, both at Group and LE level.
- We optimize intragroup exposures, taking into account self-sufficiency strategy, internal/local MREL provisions and Group liquidity position.
- We aim at limiting NII volatility due to interest rate movements in a multiyear horizon by hedging deposits and capital also in coherence with internal models.



Market and Sovereign Risks

- We pursue a low level of risk arising from trading activities, confirming the commercial banking and client-related activities as core.
- We pursue an investment strategy aimed at ensuring an adequate level of High-Quality Liquid Assets, balancing the liquidity and profitability needs .
- We aim at limiting adverse impact of Fair Value changes on Capital.
- We keep the domestic sovereign exposures in line with the Italian and European peers.

Non Financial Risks

- In light of the unstable geopolitical context, we focus on operational resilience, with a frequent horizon scanning to adapt to external changes and threats.
- We devote utmost attention to prevent frauds, even more with the prolongation of the global crisis, that may increase fraudulent behaviors.
- We adopt adequate controls and active defenses through vulnerabilities fixing process, access rights management framework and Cyber security solutions, while ensuring a proper awareness and education for all employees, commercial partners and customers.
- We ensure data protection for all customers and protected parties complying with GDPR regulation and preventing reputational risks.
- We require third party services to be in compliance with applicable laws or regulations and appropriate risk management standards and governance.
- We ensure proper evaluation and distribution of new products, in the context where new business/products (e.g. Crypto) could negatively affect client protection.
- We foster a solid control on Reputational Risk, paying particular attention on the involvement of the Group in ESG sensitive sectors and carefully monitoring the externally perceived level of the Group's reputation as represented in the media.
- We foster a strong compliance culture, putting the clients' interest first and ensuring a clear strategy of appropriate products and offers for customer clusters with sufficient granularity to avoid miss-selling or other inappropriate sales practices.
- We have no tolerance for allowing our products or services to be used for financial crime anywhere in the world. Our strong risk culture supports timely identification and rectification of control weaknesses.
- We have no tolerance for breaching the sanctions regimes applicable to UniCredit around the world by preventing transactions being executed for the benefit of sanctioned countries, individuals and companies or the bank being involved in prohibited activities.

Climate & Environmental Risk

- We are totally committed to supporting our clients in a just and fair transition.
- We proceed in the integration of Climate & Environmental risks within Risk Management framework through several concrete actions and in line with the defined Roadmap.
- We carefully manage our exposure to climate risk considering both Transition and Physical Risk, ensuring proper origination, risk identification, monitoring and management, aiming at progressively increasing portfolio covered by the framework (in particular for credit risk assessment).

Social Lending

- We provide support to clients at risk of economic and social exclusion, targeting both Retail and Corporates, supporting projects and initiatives aiming at making a substantial social contribution on the society.



Diversity, Equity and Inclusion (DE&I)

- We foster our diverse workforce, ensuring gender parity, promoting wider ethnic and cultural diversity representation to reflect client needs.
- We are committed to nurture an inclusive, positive, and respectful environment that welcomes equity and diverse thinking for both our people and clients, with the ambition to become a fully accessible company.
- We promote DE&I principles across all organizational levels including our stakeholders and suppliers.

“Tone from the Top” and Risk Culture

- We continuously assess and ensure robustness and appropriateness of internal control system and the effective interaction between the three lines of defense.
- We strictly follow a strong Risk Culture across the organization as the core of our Group's strategy.
- As managers, we must lead by example and ensure our systems and procedure enable honest and transparent communication. As teams, we must treat mistakes as opportunities to learn together rather than placing blame. As individuals, we must take responsibility for our actions and react constructively when we are challenged ourselves.
- We pay high attention to the “Tone from the Top” through the capability to timely close the Audit and Regulatory findings. We allow replanning of deadlines only on very exceptional and justified basis and considering relevant regulator's approval/communication for regulatory findings.
- We continuously improve our Data Quality Framework, ensuring high data quality standards.

2.3 RISK GOVERNANCE BODIES AND COMMITTEES

Supervisory Board

The Supervisory Board (SB) shall perform preliminary, current and consecutive control on the compliance of the Management Board's and the Bank's activities to the applicable laws, the Statute and the decisions of the General Meeting of the shareholders in the interest of the Bank's clients and shareholders.

Management Board

The Management Board (MB) arranges, administers, supervises and solves all the problems related to the Bank's activity except from those which by the force of law or the Statute are within the competence of the General Meeting of the Shareholders or the Supervisory Board.

Risk Committee

The Risk Committee is an independent permanent advisory body appointed and dismissed by the SB of the Bank. The Risk Committee advises the Supervisory Board and the Management Board of the Bank on the Bank's overall current and future risk appetite and strategy and assist the SB and MB in overseeing the implementation of the strategy by senior management of the Bank. For avoidance of doubt the Risk Committee has advisory functions only, and the SB and MB retain overall responsibility for risks, the risk management and control.

Transactional Committee - Credit Committee Session

The Credit Committee Session is a collective body for taking credit decisions, in accordance with the Statute and the relevant resolutions of the Management Board and the Supervisory Board.

Transactional Committee - Credit Council Session

The Credit Council is a collective body for taking credit decisions in the scope of granting loans in compliance with the statutory requirements and internal bank regulations, applicable at the moment of



considering the specific loan application, and the relevant resolutions of the Management and/or Supervisory Board.

Financial and Credit Risk Committee - Credit Risk Session (FCRC - CRS)

The Financial and Credit Risk Committee - Credit Risk Session (CRS) is a standing specialized internal body, responsible for:

- Monitoring, evaluation, classification, and provisioning of risk exposures for losses from impairment, forbearance and write-off's;
- Periodical monitoring and review on credit portfolio quality, Risk Weighted Assets and Expected Loss ratios, Watch list process and dashboards on Credit Policy and Strategy;
- Proposals for changes in Credit Strategies, Retail and Corporate Credit Policy, rules, new credit products or changes and optimization in credit processes.

Financial and Credit Risk Committee – ALCO session (FCRC – ALCO)

FCRC – ALCO is equipped with decision authority in following areas:

- Integrated management of both balance sheet and off-balance sheet in given legal, regulatory and tax framework.
- Definition of boundary conditions for customer business (except credit risk and operational issues).
- Set-up of Profit centres. Development of system that generates justice, economically motivating signals. Mainly proper internal transfer pricing (FTP). Ultimately also capital should be allocated to individual Profit centres (RAROC concept).
- Risk management system in “ALCO areas” (i.e. Market Risk, Liquidity Risk).
 - Decisions within boundaries defined by Legal environment, BNB and Group.
 - Proposals in name of Bank (to change Group boundaries)

Non-Financial Risk and Controls Committee

Following a simplification initiative at Group and local level, in October 2021, the Non-Financial Risk and Controls Committee (NFRC) was established in UniCredit Bulbank. The NFRC Committee contains of four Sessions: General Session (which consist of Operational Risk Stream, Internal Control System Stream and Internal Compliance Stream); ICT Security and Cyber Risk Session; Reputational Risk Session and Third Party Risk Session.

The Non-Financial Risk and Controls Committee – General Session (NFRC-GS) – Operational Risk Stream, a successor of the former Operational and Reputational Risk Committee, is a specialized body, fundamental element of the operational risk system where current operational risk issues and developments are reported and discussed. The Committee meetings are held quarterly and attended by the Bank's senior management. The NFRC-GS acts also as a Permanent Workgroup, where current operational risk issues and developments are reported, and serves as a platform for discussion of unresolved issues for the purpose of finding risk mitigation solutions.

The Committee meets with consulting and approval functions for the following topics, evaluating and providing guidelines with reference to:

- Overseeing UniCredit Bulbank Non-Financial Risks(NFR) profile, emerging threats as well as the internal control system robustness at Local level, through the monitoring of most relevant events and incidents, weaknesses and shortcomings, also addressing and prioritizing – when needed – potential corrective actions and overall strategies for their optimization;
- External events having potential impact on UniCredit Bulbank NFRs profile, and best practices and/or lessons learned deriving from events, assessments and action plans;

- Periodical reporting provided by Risk Management on operational losses (with particular focus on events having relevant financial impacts), near misses, Risk Weighted Assets, Key Risk Indicators and Scenario Analysis, risk mitigation measures, capital at risk;
- OpRepRisk strategies, ICT and Cyber Risks assessments, Insurance Policies and Recoveries Analysis Report, Oversight of the outsourcing arrangements and third parties services, ICT project risk assessments and major Operational Risk issues etc.
- Promoting the annual managerial self-assessment processes and evaluating its results, in order to ensure a systematic approach to operational risk assessment and to the supervision of the Internal Control System;
- Compliance and Risk Management evidences on second level controls carried out, as well as on current and expected impacts of regulations monitored;
- Relevant risks/ criticalities highlighted by Internal Audit function, for specific cases and in relation to specific areas;
- Strategic guidelines and Risk Appetite proposals including capitalization targets and capital allocation criteria for Non-Financial Risks;
- Internal Validation annual Regulatory Report on operational risk;
- Deciding on possible escalation topics from Permanent Working Group (PWG) in case of delays or deviation from the expected outcomes regarding the implementation of the mitigation actions planned and approved by the competent functions. The main outcomes of the PWG meetings are reported to the local NFRC Committee;;
- Approval and controlling of the allocated provisions for Non-Financial risk activities (Legal cases, Customer complains, etc.);
- Approval of General governance policies (including Group policies and methodologies), operational limits and methodologies for the measurement, management and control for the different types of NFRs;
- Support the Management Board in the assessment of the overall Internal Control System adequacy ("System" or "ICS") in the Bank through the analysis of the critical topics, and monitoring and prioritization of the corrective actions related to ICS in order to contribute to the efficiency and effectiveness of the ICS;
- Support the Management Board by consolidating ICS relevant topics within one committee putting forward recommendations in the examination of the proper functioning of the ICS in the Bank in order to protect the needs of business and customers and ensure compliance with external regulations as well as Group guidelines and policies and intra-bank regulations;
- Support the Management Board in the assessment of the overall Internal Control System adequacy related to the Compliance Department and AML and Financial Sanctions Unit;
- Inform the Management Board for the risk exposure in Compliance area and supports the Management in taking decisions for mitigating such risks.

Non-Financial Risk and Controls Committee – Reputational Risk Session (NFRC-RRS)

The successor of the former Reputational Risk Committee, is the decision-making body for reputational risk topics and holds monthly meetings to discuss deals and issues in the scope of reputational risk; Ad-Hoc meetings may also be organized whenever a meeting is considered necessary by the Chairman, or in specific and urgent cases.

The meetings of the Non-Financial Risk and Controls Committee – Reputational Risk Session (NFRC-RRS)¹ are being performed once a month Ad-Hoc meetings may be organized whenever a meeting is

¹ Effective as of October 2021.



considered necessary by the Chairman, or in specific and urgent cases. At the meetings of NFRC-RRS are discussed rep risk deals in its competencies and other significant rep risk topics. NFRC-RRS monitors also the exposure to reputational risk, as well as identifies and proposes risk mitigation solutions.

The NFRC - RRS is a dedicated body established with the following mission and responsibility:

- To create a unique and dedicated body for discussion and decision on for all transactions/initiatives/projects referring to Reputational Risk Sensitive Sectors - as regulated by the dedicated global policies - and for all other cases on Business proposal (e.g. other relevant sectors or relevant clients).
- to ensure increased attention and proper "tone from the top" on the overall evaluation and management of Reputational Risk.

Audit Committee

The main functions of the Audit Committee are:

- To monitor the financial reporting processes in the Bank;
- To monitor the effectiveness of the Bank's internal control system and to analyze the related periodic information;
- To monitor the effectiveness of the risk management system in the Bank;
- To monitor the effectiveness of the independent financial audit in the Bank;
- To supervise the external auditing process and the registered auditors' activity;
- To evaluate the results of the work performed by the registered auditors and to examine the status of relations with them;
- To examine, at least once a year, the adequacy of accounting principles used in the process of preparation of the annual and interim financial statements on the basis of reports and information provided by the responsible Bank officers operating within the related function, and, to discuss them, at its sole discretion, with the registered auditors;
- To review the independence of the registered auditors of the Bank in accordance with the legal requirements and the Code of Ethics of professional accountants, and to monitor the provision of additional services by the registered auditors to the Bank;
- To ensure the relationship with the registered auditors, by receiving the terms of engagement, and to assess the audit findings and recommendations, as well as the ones issued by other external supervision and control authorities;
- To evaluate the findings of the Bank's Internal Audit or the examinations and/or investigations of other responsible Bank officers operating within the related Function.

2.4 INTERNAL AUDIT FUNCTION

Internal Audit is an independent function established by Governing Bodies of UniCredit Bulbank and it is an integral part of the internal controls environment. It carries out an independent, objective assurance and consulting activity in order to evaluate, add value and improve Internal Control System. Internal Audit function of UniCredit Bulbank is in charge of the internal audit activity within the local banking group, including UniCredit Bulbank and its subsidiaries.

The audit engagements are executed according to the UniCredit Group Internal Audit Framework applied in compliance with the local legal requirements and regulations and is based on the IIA International Professional Practices Framework (IPPF). UniCredit Bulbank Internal Audit is subject to an external periodic quality assessment. The latest external quality assurance review was performed in 2022 highlighting that the Internal Audit function of UniCredit Bulbank AD "Generally Conforms" to the Standards, the Core Principles, the Definition of Internal Audit and to the Code of Ethics in place.



To achieve the degree of independence necessary to effectively carry out the responsibilities of the internal audit activity, the Head of Internal Audit reports to the highest level of corporate governance of UniCredit Bulbank. The Head of Internal Audit is appointed with a resolution of the General Shareholders Meeting and reports to the Bank's Audit Committee and Supervisory Board. The Internal Audit function interacts with all management levels in the bank, the Supervisory Authorities and the External Auditors.

The Internal Audit activity is planned and carried out following a forward-looking risk-based methodology, aiming to provide objective and insightful assurance on the effectiveness of the Bank's governance, risk management and control processes. In accordance with the provisions of Ordinance 10 of BNB, reports with the results of the internal audit activity including assessment of the control systems, measures and actions undertaken are duly prepared and presented to the Governing bodies on a quarterly and annual basis.

2.5 COMPLIANCE FUNCTION

The Compliance function in UniCredit Bulbank is organized as a Compliance Department with three Units - General Compliance Unit, Anti Money Laundering and Financial Sanctions Unit and Control of the Investment Intermediary and Market Integrity Unit. Data Protection Officer is a specific, and independent function within Compliance Department performing the functions of the data protection officer and reporting to the top managerial members. The Head of the Compliance Department reports to the Chief Executive Officer of the Bank.

Among the functional range of the General Compliance Unit are to ensure compliance with regulatory requirements of the internal bank regulatory documents, to carry out the compliance risk assessment, to conduct monitoring on compliance risk (second level controls), to prepare proposals for organizational and procedural changes in order to ensure the proper management of the identified compliance risks, to advice and assists the Top Management in all matters concerning compliance risk, to analyse the compliance/reputational risk in new products and businesses, etc. This is achieved through:

- Ensuring compliance with regulatory requirements, within the following main areas: Consumer protection and transparency in banking services – consumer loans and payment services; Corruption practices prevention and whistleblowing; Competition law and unfair commercial practices; Banking secrecy; Insurance intermediation for insurances without an investment element; Financial Benchmark in benchmark usage section; Conflict of interest management (outside business interests);
- Performance of a compliance risk assessment (CRA) and second level controls in accordance with a special group methodology;
- Participation in the review, analysis and preparation of internal rules, regulations and procedures for implementation of group policies and instructions within the competencies of the unit;
- Providing opinions and consultations within the competencies of Compliance Department;
- Participates in the implementation of projects related to the activity of the Bank and its subsidiaries;
- Monitoring, review and control of activities related to the group trainings in the sphere of Compliance;
- Preparation of reports for group and local management.

Among the functional range of the Anti-Money Laundering and Financial Sanctions Unit are to conduct monitoring and where necessary approval of documentation related to customer identification for existing and new customers, to ensure timely and accurate communication with the Financial Intelligence Agency (FIA), Bulgarian National Bank and/ or law enforcement agencies (as directed by law and bank policy), etc. This is achieved through:

- Design and implementation of an effective Programme for risks mitigation related to Anti-money laundering (AML), Counter terrorist financing (CTF) and Financial Sanctions (FS), based on risk analysis;
- Design and implementation of controls for the fulfilment of the AML, CTF and FS requirements; o Reconciliation of the scope and the results of the Second level control (SLC) and Risk assessment (RA) for the AML, CTF and FS perimeter, conducted by General Compliance Unit;
- Set-up of the requirements for the organization, management and control of the activities, related to clients, their identification and the transactions ordered by them in accordance to the regulatory requirements;
- Assurance of timely and accurate communication with the law enforcement a the regulatory bodies, the Specialized Directorate Financial Intelligence of the State Agency "National Security" – (FIU – SANS), Bulgarian National Bank (BNB) and/ or other law enforcement bodies in accordance with the law requirements;
- Oversight of the activity of the UCB subsidiaries in respect to the field of activity;
- Review and analysis of the hits in Siron KYC, AML and EMBARGO tool;
- Review and analysis of the signals coming from the UCB network and the subsidiaries;
- Investigation and analysis of suspicious transactions and clients by revising documentation, account statements and other information available in internal or external sources;
- Preparation of Suspicious Activity Reports (SARs) to FIU – SANS after revising the circumstances;
- Advisory to the employees of UCB and the subsidiaries in respect to the risks in the field of activity with a focus on areas with higher inherited risk (correspondent banking, trade finance, private banking, etc.);
- Participation in the analysis of new and existing products, services, processes and internal documents for UCB and the subsidiaries, providing advisory on the risks in the scope of activity;
- Support of the local parametrization of Siron KYC and AML tool;

The scope of the activity of Control of Investment Intermediary Unit and Market Integrity (CII&MI) is to perform monitoring and control of activities of the bank as an investment intermediary .The (CII&MI) unit is an independent structure responsible for compliance with the regulatory requirements in regard to the activities of the bank as an investment intermediary pursuant to the Markets in Financial Instruments Act (MiFIA) and Section II of Ordinance No.38 of the Financial Supervision Commission (FSC) as well as the REGULATION (EU) 2017/565 supplementing Directive 2014/65/EU of the European Parliament and of the Council as regards organisational requirements and operating conditions for investment firms.

- The unit performs Compliance Risk Assessment (CRA) and Second level of control on specific areas related to the activities of the bank as an Investment intermediary to the following regulatory areas:
 - MiFIDII/MiFIR - Markets in financial instruments Directive ;
 - EMIR - European Markets Infrastructure Regulation;
 - Conflicts of interest - in the provision of investment services and activities;
 - MAR - Market abuse;
 - Central Depository;
 - Dodd Frank-Volcker rule (USA Law);
 - Public Offering;
 - Major holdings;
 - PRIIP's - Packaged retail and insurance-based investment products;
 - Benchmark - contribution of indexes;

- IDD - investment investment element;
- Covered bonds and Securitization;
- In accordance with the requirements of Ordinance No.38 of the Financial Supervision Commission (FSC), the Head of the (CII&MI) Unit elaborates and submits to the Management body and to the Supervisory body by the 15-th day of each month of a report on the monitoring of the activities of the bank as an investment intermediary.
- Once per year the (CII&MI) unit elaborates and submits to the Management body and by the January of an Annual report on the monitoring of the activities of the bank as an investment intermediary, which is delivered to the Financial Supervision Commission (FSC) after approval by MB.
- The Unit performs monitoring of potential cases of market abuse with financial instruments and monitoring of insider trading and unlawful disclosure of inside information. In case of ascertained cases of market abuse and insider trading, it draws up and sends to the market regulator FSC a Suspicious Transactions Operational Report under requirements of Regulation (EU) 596/2014 on Market abuse.
- The Unit monitors the compliance with the requirements of the Group rules for Personal account dealing. Checks the executed personal transactions of the employees. Personal account dealing (PAD) monitoring aims to prevent the risk of missing or delayed disclosure of personal transactions, thereby undermining effective identification of insider dealing.
- The Unit keeps the register of the authorised persons under Ordinance No.38 of the FSC for the activities of the bank as an Investment Intermediary and as Registration Agent.
- Checks the agreement for Registration Agent services of Ordinance No. 38, as well as the requirements of the Rules of Central Depository AD and of the internal regulations of the investment intermediary.
- Controls the transfer of shareholdings in the capital of the bank pursuant to the requirements of the Central Depository AD; submits the respective information for the shareholding structure to the competent executive bodies (the Management Board, the Bulgarian National Bank, Central Depository, the Majority Owner UniCredit S.p.A, Italy, etc.).
- Supervises the functioning of the system for handling complaints related to financial products and investment services and investment products.
- Participates in the process of new Product implementation in regard to the financial instruments and investment services pursuing the requirements of MiFID II;
- The (CII&MI) unit communicates with the local regulatory bodies – Financial Supervision Commission, Bulgarian National Bank, Central Depository AD, Bulgarian Stock Exchange - Sofia AD, in accordance with the powers given to it with regard to the activity of the Bank as an investment intermediary and registration agent.

The scope of the activity of the Data Protection Officer (DPO) is to monitor and to control the compliance with European and national legislation, as well as with the group and internal banking policies in the sphere of personal data protection. This is achieved through:

- Issuing advice on Data Processing Agreements and handling of the respective registers of processors and contracts;
- Maintenance and certification of the Records of Processing Activities;
- Performance of second level controls in the area of Privacy (GDPR);
- Analysis and reconciliation of group and local policies and procedures;
- Analysis of Privacy and non-privacy legislation and issuing of opinions;
- Monitoring of regulatory and court practice in the area of Privacy;



- Performance of Compliance Risk Assessment (CRA) in the area of Privacy (GDPR);
- Preparation of reports for group and local management;
- Participation in projects with Privacy impact;
- Analysis and handling of Privacy by Design (PbD) requirements for projects and initiatives;
- Drafting responses to data subjects' inquiries and requests for exercising rights;
- Provision of support for Data Protection Impact Assessment (DPIA) conduct and recording;
- Facilitating the implementation of the Accountability principle by archiving of opinions, documents and other materials ;



3 INFORMATION ON RISK MANAGEMENT, OBJECTIVES AND POLICIES BY CATEGORY OF RISKS

3.1 MARKET, COUNTERPARTY CREDIT RISK AND LIQUIDITY RISK

3.1.1 Management of Market Risks

Market risk management in UniCredit Bulbank and consolidated subsidiaries encompasses all activities in connection with Markets and Investment Banking operations and management of the balance sheet structure.

The collective Bank's body with a delegated authority by the Management Board for market and liquidity risks, as well as interest rate risk in the Banking Book management is Financial and Credit Risk Committee – ALCO (FCRC – ALCO), the former Assets and Liabilities Committee (ALCO)

Risk monitoring and measurement in the area of market and liquidity risks, as well as interest rate risk in the Banking Book, along with trading activities control is performed by Financial Risk and Modeling unit. Prudent market risk management rules and limits are explicitly defined in the Market Risk Strategy document of UniCredit Bulbank, reviewed at least annually. A product introduction process is established, in which risk managers play a decisive role in approving a new product.

UniCredit Bulbank applies uniform Group risk management procedures. Risk positions are aggregated at least daily, analyzed by the independent Financial Risk and Modeling unit and compared with the risk limits set by the Management Board and FCRC – ALCO. For internal risk management and Group compliant risk measurement, the Bank applies UniCredit Group's internal model IMOD. It is based on historical simulation with a 250-day market data time window for scenario generation and covers all major risk categories: interest rate risk and equity risk (both general and specific), currency risk and commodity position risk. Internal model also includes quantification of Stressed VaR and Incremental Risk Charge values that are monitored for information. The simulation results, supplemented with distribution metrics and limit utilization are reported on a daily basis to the Management and the responsible business units.

A set of granular sensitivity-oriented limits accross asset classes is defined as complementary to VaR measure. The most important detailed presentations include: basis point shift value (interest rate / spread changes of 0.01 % by maturity bucket), credit spread basis point value (credit spread changes of 0.01% by maturity bucket) and FX sensitivities. In the interest rate sector, the Basis-Point-Value (BPV) limit restricts the maximum open position by currency and time buckets, with valuation changes based on shift by 0.01% (1 basis point). Additional element is the loss-warning level limit, providing early indication of any accumulation of position losses.

Internal model results are complemented by various stress scenarios to identify potential effects of stressful market conditions on the Bank's earnings. The assumptions under such stress scenarios include extreme movements in prices or rates and deterioration in market liquidity. Stress results for major asset classes and portfolios (credit, rates and FX) and estimated impact on liquidity position are reported at least monthly to FCRC – ALCO.

In 2022 the Bank's Management continued prudent risk management practice with primary focus on client-driven business.

Market risks in the trading book

In accordance with the Capital Requirements Regulation, and as defined in Group policy "Eligibility Criteria for the Regulatory Trading Book assignment", Trading Book is defined as all positions in financial



instruments and commodities held either with trading intent, or in order to hedge positions held with trading intent. Books held with trading intent are composed of:

- Positions arising from client servicing and market making;
- Positions intended to be resold short term;
- Positions intended to benefit from actual or expected short-term price differences between buying and selling prices or from other price or interest rate variations.

The above defined “trading intent” is essential requirement for assignment to Regulatory Trading Book. Additionally, the following requirements have to be assessed:

- Tradability - refers to positions free of restrictions on their tradability and coherently reflected within the “Trader Mandate” of the risk-taker;
- Marketability - refers to positions for which a reliable Fair Value can be evaluated based on independently verified observable market parameters;
- Hedgeability - refers to positions for which a hedge could be put in place. The hedgeability is meant to apply for “material” risks of a position.

When opening a new book, the risk-taker makes proposal if the book should be managed as a Trading Book or a Banking Book based on the planned trading activity. The risk-taker is required to clearly declare the trading intent and therefore explain the business strategy behind.

Fundamental Review of Trading Book (FRTB)

The standardized approach for FRTB is applied in UniCredit Bulbank as a part of a groupwide implementation. Its main elements - Sensitivity Based Approach (SBA), Default Risk Charge (DRC) and Residual Risk Add-on (RRAO) are monitored on weekly basis and results are reported monthly to Regulatory Reporting.

3.1.2 Management of Counterparty Credit Risk

Counterparty credit (CCR) risk arises from exposures due to:

- transactions in derivative instruments;
- repurchase agreements;
- securities lending or borrowing transactions;
- margin lending transactions;
- long settlement transactions.

For the purpose of mitigating counterparty risk and settlement risk, the Bank applies approved credit limits for pre-settlement risk (derivatives, repo's, MM) and settlement risk.

UniCredit Bulbank employs the Group internal model method for counterparty risk measurement and limit compliance control. The limit relevant value or Conditional expected shortfall is determined as weighted average of the exposures' distribution on the counterparty's hazard rates of all scenarios higher than 87.5% scenario.

Financial Risk and Modeling unit monitors on a daily basis the exposures and escalates limit breaches for resolution.

UniCredit Bulbank mitigates Counterparty Credit risk from derivatives and other transactions exposed to CCR through the use of netting, collateralisation and Central Counterparties.

Netting allows for the aggregation of positive and negative Mark-to-Market derivative transactions with the same counterparty to be offset, hence reducing exposure if either counterparty were to default.



Collateral agreements (if legally enforceable in the jurisdiction) might be required, depending on the creditworthiness of the counterparty and the nature of the transaction.

The new standard approach for counterparty credit risk (SA-CCR) according to the capital requirement framework under Basel III was implemented and is now in use within UniCredit Bulbank (aligned with UniCredit Group). The new framework replaced both non-internal model approaches: the current exposure method (CEM) and the standardized method (SM). SA-CCR is intended to be a risk-sensitive methodology because it differentiates between margined and non-margined trades and recognizes netting benefits. SA-CCR applies to OTC derivatives, ETD derivatives and long settlement transactions.

Management of Wrong Way Risks

Both Holding Company and Legal Entities CCR control functions assess and manage the Wrong Way Risk, arising when the risk factors driving the exposure to a counterparty are positively correlated with the credit worthiness of that same counterparty. Wrong way Risk is then distinguished in Specific Wrong Way Risk (SWWR) and General Wrong Way Risk (GWWR).

Specific Wrong Way Risk arises when the exposure on a transaction is positively correlated with the counterparty's creditworthiness for a reason that is specific to the counterparty. Most commonly this kind of correlation is seen where there is similar material legal/economic ownership between collateral/reference entity and counterparty.

In detail, Specific Wrong Way transactions are likely to generate higher exposures than standard industry PFE (Potential Future Exposure) methodologies would indicate, as the latter applies to plain vanilla derivatives and assumes limited correlation. The Counterparty Credit Risk Global Policy provides a unified group wide framework for the appetite, definition, risk monitoring and management of Specific Wrong Way Risk exposures.

General Wrong Way Risk arises when the credit quality of the counterparty is correlated with a risk factor which also affects the value of the transaction with the Group. The Global policy relating to the General Wrong Way Risk (GP Counterparty Credit Risk) aims at defining the framework for analysing, monitoring and managing the potential impact of GWWR risk by product, region and industry and it also seeks to add additional levels of control to General Wrong Way Risk transactions.

3.1.3 Management of Liquidity Risks

Liquidity risk is the risk that UniCredit Bulbank is unable to meet its financial obligations as they become due.

The main goal of UniCredit Bulbank's liquidity management is to ensure an efficient level of liquidity to allow the bank to meet its payment obligation not only on an on-going basis, but also under market tensions without jeopardizing its franchise value or its brand's name, keeping the refinancing risk at a manageable level. Liquidity risk management is performed in a going concern situation and in contingency situation.

In UniCredit Bulbank the governance and control of the exposure of the liquidity risk is performed through setting and monitoring of several operating restrictions on a group of liquidity metrics, with the aim to prevent potential vulnerabilities in the bank's ability to meet its cash flow obligations. For some metrics, a monitoring only process is provided without setting specific restrictions. At least on a yearly basis, the risk limits and thresholds are reviewed and calibrated in order to align the risk appetite framework with the bank's strategy. UniCredit Bulbank has set targets and early warning indicators which, when breached, will trigger corrective actions in order to ensure that the bank remains within its risk appetite. UniCredit Bulbank's stress test framework assesses the bank's liquidity adequacy and the main objective is to determine whether it has sufficient liquid assets to ensure it is operating within the liquidity and



funding risk appetite framework. Under a managerial perspective, the bank has to keep an amount of liquidity that is such as to survive under combined scenario of the liquidity stress test.

The details of principles and rules for the control of UniCredit Bulbank's exposure to liquidity risk are included in the Global Process Regulation – Liquidity Tolerance and Contingency Liquidity Management.

In UniCredit Bulbank the monitoring of liquidity risk is performed at three levels:

- **UniCredit Group level:** the Holding Company is in charge of overseeing the Group's liquidity in terms of compliance with the consolidated limits and warning/trigger levels and with those of all the liquidity reference banks and legal entities;
- **UniCredit Bulbank:** is responsible for compliance with its own limits and warning/trigger levels and with those of the Legal Entities falling within UniCredit Bulbank Group.
- **Legal Entities within UniCredit Bulbank Group:** they are responsible for compliance with their own limits.

A thorough description of the liquidity management set up and the relations among each single component can be found in the Group Liquidity Management & Control Global Policy and relevant local documents.

Structure and organization of the liquidity risk

The main relevant functions working on managing liquidity are ALM and Funding (ALM), Client Risk Management & Treasury (Treasury), and Liquidity Risk function.

The monitoring of relevant set of Liquidity Indicators is carried out by these functions, according to their own responsibilities. They perform first and second level controls on liquidity, interest rate and exchange rate refinancing risk management.

From an organizational point of view, this system of check and balances ensures that the Bank has always sufficient liquidity to face its obligations in business as usual and stressed conditions.

From an operational perspective, this organizational framework operates both in a Going Concern situation and in a Contingency situation.

An important tool that ensures the proper working of the check and balances system in place is the set of liquidity risk metrics, defined within the Risk Function, in cooperation with ALM and Treasury structures. The liquidity risk metrics are described in the document GOR "Liquidity Risk Taxonomy" and in the annexes for its local implementation.

Measurement and reporting of liquidity risk

UniCredit Bulbank measures both short-term and structural liquidity.

The metrics included in 2022 RAF were:

- the funding gap, that measures the structural liquidity risk and the dependence from the volatility of the wholesale market;
- the 3 month gap of the operative maturity ladder, that measures the short- term liquidity risk;
- the Liquidity Coverage Ratio (LCR), a regulatory metric that measure the contingency risk;
- the Net Stable Funding Ratio (NSFR), that measures the structural liquidity risk;
- the Structural Liquidity Ratio (SLR), provides a counterbalance by the regulatory view, by taking into account the behavioural assumptions. SLR is calculated as the ratio between medium-long term liabilities and assets that maturing above one year and over 3 years;
- Net Intragroup Funding, and
- Loans to Deposits Ratio.



Through the risk appetite framework, the bank monitors and controls the evolution of the **funding gap** due to the commercial activity. This metric quantifies the difference between commercial loans and commercial sources of funding and as such it represents the amount of loans to customers to be covered via funding provided/managed exclusively by Treasury.

Short-term liquidity (**operative maturity ladder**) is the main metric used to measure the short term liquidity position and is composed of Primary Gap and Counterbalancing Capacity (CBC). The STL limits are set in order to indicate whether the Bank remains in a position to fulfil its cash payment obligations, be they expected or unexpected.

Liquidity Coverage Ratio is calculated according to the Delegated Act rules.

While the operative maturity ladder and the LCR restrictions ensure that the liquidity reserves are adequate, the respect of the **NSFR** ensures that the bank maintains an appropriate balance between assets and liabilities in the medium-long term (beyond one year), preventing additional pressure on the short term liquidity position.

Concentration of funding and liquidity sources

The Funding Plan includes the set of funding instruments (with relevant amount, maturity, timing, cost) to be realized in order to cover the expected funding needs deriving from the evolution of the liquidity uses and sources, avoiding unsustainable pressure on the short-term liquidity position and respecting internal and regulatory liquidity risk limits.

Currency mismatch

The Bank has specific restrictions in place on the foreign exchange liquidity risk. These restrictions aim to maintain the short-term liquidity gaps in foreign currency within sustainable levels, taking into account the bank's access to the specific currency on the interbank market and in the Central Bank.

A behavioural modelling of non-maturing deposits (NMDs) has been introduced in Q2 2020 in compliance with the respective EBA Guidelines. The model estimates the liquidity and interest rate characteristics the customers follow and their real behaviour, instead of the contractual/explicit profile. The modelling of NMDs (Sight and Saving deposits) aims to identify their stability (stickiness) defined as the tendency to be a permanent source of funding.



3.2 OPERATIONAL AND REPUTATIONAL RISK

Operational risk is defined as the risk of loss resulting from inadequate or failed internal processes, people and systems or from external events (including legal risk, and excluding strategic and reputational risk). Examples include compensations paid to customers for incorrect/inadequate product-related advice, IT system failures, damage to property, processing errors or fraud, subject to consolidated risk measurement and management (collection of loss data, external data, scenarios, indicators), on which the calculation of capital held for operational risk is based. Legal and compliance risk is a sub-category of operational risk: it is the risk to earnings from violations or non compliance with laws, rules, regulations, agreements, prescribed practices or ethical standards.

UniCredit Bulbank Management Board is responsible for operational risk oversight, also with the support of UniCredit Bulbank Non-Financial Risk and Controls Committee – General Session (Operational Risk Stream).

In UniCredit Bulbank the operational risk management framework is a combined set of Global policies, Global Operation Instructions and Global Process Regulations for controlling, measuring and mitigating the operational risk exposure, which includes the guidelines of UniCredit Group and local documents. An integral part of the framework is the internal regulation “Data collection procedure for the purpose of operational risk assessment in UniCredit Bulbank”.

The Bank has a dedicated function to operational risk management, which is independent from business and operational areas. The responsibilities of the organizational structure are in line with those envisaged by the Holding Company. Dedicated operational risk managers in the branch network and the Head Office, working on a decentralized basis, are responsible for loss data identification and reporting as well as for adoption of measures to reduce and prevent risks in their respective areas. The Operational Risk function as well as Reputational Risk function are within the scope of the responsibility of the Non-Financial Risk (NFR).

The main activities of the NFR in 2022 were focused on maintaining the excellence in managing the operational and reputational risks, as well as assessment and mitigation of risks and participation in dedicated bank projects initiatives and working groups.

The Operational Risk (OpRisk) tasks of the NFR function are: OpRisk Loss Data Collection and Reporting; General Ledger Analysis; Transitory and Suspense Accounts Analysis; Accounting Reconciliation; Key Risk Indicators Monitoring; Scenario Analysis; ICT Project Risk Assessment; Second-Level Controls on ICT and Security Processes; Second-Level Control on Outsourcing and Third-Party Risk Management; Operational Risk oversight Model on UniCredit Bulbank Subsidiaries; Insurance Analysis – Insurance recoveries, Annual evaluation on local insurances Operational and Reputational Risk Strategies Definition and Monitoring; Risk and Controls Self-Assessment (RCSA) including OpRisk Assessment for ICT and Cyber Risk. The RCSA, activity was defined in 2019, performed in UniCredit Bulbank on annual basis and further enhanced in the following years. Since 2022 the process covers the assessment of ICT and Cyber risks, as well. The activity's main goal is to involve process owners in performing a thorough self-assessment of key end-to-end business processes(E2E) selected at Holding level. Important element of this assessment is the role of NFR structure, by being in the driving seat in coordinating the activity and challenging the process owners in evaluating the processes from risk perspective. Based on the relevant second level control evidences (Op Risk Losses, Scenarios, KRI, ICT Threats assessment Results and Cyber SRA Results, etc.) NFR validates the Process Owner Self-Evaluation. Finally the results are shared, agreed and submitted to the NFRC Committee and to the Group.

Operational Risk Permanent WorkGroup (PWG) was established, following the Group regulations within 2022. The PWG represent an expert work group, ensuring structured and continuous cooperation among business, support and control functions, enabling a joint and widespread identification of the sources of Operational Risks aiming at reduction of the Operational Risk exposure of the Legal Entity. The main



outcomes (the mitigation actions) and escalation topics in case of delays or deviations from the expected outcomes regarding the implementation of the mitigation actions, planned and approved by the competent functions are reported to Non-Financial Risk and Control Committee - General Session – Operational Risk stream for information or for decision.

In 2022 the NFR function continued its important participation in several key business projects driving the business development of the Bank – Omnichannel project; Content Service Platform; Agent Model; Robotic Process Automation Room project; ESG Strategy and Roadmap Implementation project; as well as other important business projects. The structure participated also in regulatory projects of the bank such as GDPR, Transaction Monitoring implementation, PSD2 Bulk Payments, Instant Payments, EURO Adoption; Compliance consolidation Program and many activities related to improving Compliance systems, processes and centralizing the most risky compliance processes for registration and KYC review of the customers, with main focus to reflect the IT automation and regulatory changes. The NFR function participated in all major compliance and regulatory projects and in the significant changes in the processes of the Bank.

The Bank applies the Advanced Measurement Approach (AMA) for calculation of capital requirements of operational risk and is the first bank in Bulgaria certified to use this approach, after authorisation received by Bank of Italy (as UniCredit Group's Supervisory Authority) and BNB.

The internal AMA model developed by UniCredit Group is based on internal loss data, external loss data (consortium and public data), scenario data and risk indicators. The Group AMA capital at risk is distributed through a risk-sensitive allocation mechanism to those legal entities that are authorized for AMA use. The new AMA model guarantees an adequate level of stability, avoiding unexpected volatility in case of extraordinary loss events.

In UniCredit Bulbank operational risk reduction is accomplished with the use of insurance policies, as well as other risk transfer methods, among which outsourcing activities. The criteria for risk reduction through insurance are formalized in the Insurance Strategy of the Bank, which defines the policy of securing the bank risk profile with adequate and optimal insurance coverage, including the main inherent risk categories to the performed activities along with the overall risk exposure. As far as outsourcing as an operational risk transfer technique is concerned, examples of outsourced services in the Bank are security services (branch security and ATM full servicing), cash counting services, IT and other services maintenance.

Apart from the above mentioned, the participants in the Non-Financial Risk and Controls Committee – General Session – Operational Risk Stream on a quarterly basis identify and propose risk mitigation solutions in their respective areas of responsibility in the Bank.

The Annual Internal Audit inspection, gave Adequate overall rating to the local OpRisk management and internal control framework. No significant control deficiencies that could jeopardize the effectiveness and efficiency of the internal control system were found. Need for fine-tuning of the design of one risk indicator was identified, as to ensure that it properly reflects the underlying risk and provides basis for a complete management overview.

Reputational risk is defined as the current or prospective risk to earnings and capital decrease arising from the adverse perception of the image of the financial institution on the part of customers, counterparties (including also debt-holders, market analysts, other relevant parties, such as civil society, NGOs, media, etc.), shareholders/investors, regulators or employees (stakeholders).

Reputational risk governance activities are within the scope of the responsibilities of the Non-Financial Risk. All relevant rules and policies for the management and monitoring of the Reputational Risk exposure have been adopted in full compliance with the UniCredit Group guidelines, principles, policies and rules. Under the Reputational risk process, special attention is paid to the management and monitoring of the Bank's exposure towards economic sectors and transactions, such as Defence/Weapons, Nuclear energy, Coal sector, Water infrastructure/Dams, Mining industry, and Oil and Gas Industry Sector. The Non-



Financial Risk continued to develop the reputational risk process by implementation of the updated Group Policies and Operational Regulations and further development and regular functioning of the Non-Financial Risk and Controls Committee – Reputational Risk Session as a decision making body which decides not only reputational risk deals but discusses other significant reputational risk topics.

During 2022 the NFR Unit continued to develop the reputational risk process in compliance with the UniCredit Group principles, policies and rules for monitoring the reputational risk exposure.

The Reputational Risk Management is implemented within the Bank through a dedicated set of policies with aim to:

- Identify sources of reputational risk (e.g., when entering new markets, products or lines of activities);
- Give guidelines for reputational risk assessment and measurement, monitoring and reporting to the competent corporate Bodies (e.g., Group NFR Committee);
- Rule the necessary escalation / decision-making processes (e.g. material events escalation process).

During the Y2022, an updated Group Policy – Reputational Risk Management, and a new Policy – Reputational Risk Management in the Sensitive Sectors, were adopted and implemented. Amendments were made also in all six sensitive sectors Reputational Risk Regulations. Moreover, the risk culture has been constantly spread out throughout the organization. All the training activities, combined with methodological guidance and support to the other structures within the Bank by the Non-Financial Risk function ensure the outstanding Operational risk awareness at Bank level. With regard to Reputational Risk, a new online introductory course was uploaded for all new employees of the Bank, containing the key definitions and requirements regarding the Reputational Risk Management in UCB and the Sensitive Sectors.



3.3 CREDIT RISK

Credit risk is defined as potential losses arising from unfulfilment of any contractual obligation with regard to financial instruments receivables.

The Bank effectively manages the credit risk inherent to its trading and banking book.

The policy of the Bank related to the credit deals is determined by the principles of conformity with the law, safety, stability, profitability and liquidity.

Main Authority Bodies in the credit process are (top - down):

- The Supervisory Board
- The Management Board
- The Transactional Committee – “Credit Committee session”
- The Transactional Committee – “Credit Council Session”
- The Chief Risk Officer
- The Head of Credit Risk Department
- The Senior Managers of Corporate Credit Underwriting Unit, Retail Credit Underwriting Unit (responsible for Small Business and Individuals Credit Underwriting) within the structure of Credit Risk Department
- Senior Risk Managers

The members of the Management Board, Transactional Committee (Credit Committee and Credit Council sessions) , the executives with managing functions, persons, authorized to represent the Bank under credit deals, including employees involved in the credit process, do not participate in the negotiations, in the preparation of reports, in the discussions and do not have voting decisions under credit deals, under which they or members of their families:

- are parties under the contract with the Bank;
- have substantial commercial, financial or other type of business interest in terms of the deal/ person, who is a party under the contract with the Bank. They are obliged to declare in advance the presence of business interests.

The authorities under credit deals are exercised at full differentiation between the credit and commercial function and independently of the approved for the relevant structural unit budget.

Right to take decisions under credit deals have the authorities /bodies/ of the Bank within their relevant applicable limits in accordance with the internal rules. The level of every body is a function of the determined for it level of risk and competences for risk assessment in accordance to its place in the hierarchy of the organizational structure of the Bank.

Credit risk monitoring and management is also focused in fulfillment of statutory lending limits set in Law on Credit Institutions. Exposures to one client exceeding 10% of the capital base are treated as big exposures and has to be approved by the Management Board. Maximum amount of an exposure to one client or group of related clients must not exceed 25% of the capital base of the Bank.

In 2022 the Bank continued to perform its credit activities in compliance with the governing rules and internal policies, while at the end of February the Russian / Ukrainian conflict started, which is expected to continue in 2023. In general the business climate in the country was affected by growing prices of commodity and energy resources, but the portfolio is showing resilience for now.



- Underwriting (UW) process was focused on: (i) improving time to decision in Corporate via better organisation and control through better tracking of the applications after entering UW, (ii) increase of usage of simplified procedures for Small Corporate and (iii) introduction of automation by the annual reviews of Micro companies;
- New models for Micro companies and local Corporate has been introduced in Q1 of 2022 which introduced Joint Obligation concept in the rating/PD assessment;
- ECB leveraged transaction and strong focus any new business in this respect to be very well grounded;

Ongoing quality assurance of external appraisal companies through regular and random audit checks of valuations, where the results are reported semi-annually to the Management Board.

The objective of credit risk policies (corporate and retail) is to provide clear, measurable and applicable criteria for loan origination for both Business and Risk Management. They are formulated by UniCredit Holding, Credit Risk & Risk Oversight Management CE&EE in close cooperation and alignment with local risk management functions and the business side. Credit policies are updated annually following a structured review process that takes into consideration changes in macroeconomic outlook and market conditions, Risk Appetite and risk management strategies.

The purpose of Corporate Credit Risk Policy is to achieve sustainable and balanced portfolio industry mix while also controlling sectorial concentration. The Policy is mandatory to be followed in the credit process for the customers that are segmented as corporate based on the current segmentation criteria (including turnover higher than 1.5 MEUR).

The steering signals are qualitative indicators based on the expected development of the industry-specific risk and the size and risk structure of the corporate portfolio. They are defined during the annual budget and Group Credit Risk Strategies processes by the local Economic Research, Risk and Business functions and are subject to reconciliation with the Holding. The basis for the local Steering Signals is classification of industries according to the Sector Outlook prepared by the Economic Research Team. Below are the Steering Signals applicable for 2022.

Supporting sustainable economic growth and the transition to a low-carbon economy, the Bank is expanding its credit risk management approach through the integration of climate and environmental factors into credit risk strategies in compliance with the Group's Credit Risk Framework. Therefore, starting from 2023 the steering signals by economic sectors will be determined by additional impact consideration of so-called Climate Steering signals, defined by an applied Group methodology which is based on Transition risk score calculated on NACE code level by using several sources of guidelines e.g. EBA guidelines, EU Taxonomy, CERVED sectorial studies.

The Retail Credit Risk Policy formalize separately for private individual clients and small business general underwriting principles such as:

- Rejection criteria
- Scoring/rating
- Overruling
- Loan application and Loan contract
- Commercial real estate financing
- Maximum age of applicant



- FX lending
- Collateral
- Income confirmation
- Debt ratio calculation
- Level of dependency of the applicant's income from the company where he is a stakeholder
- Loan contract maximum expiry date
- Risk KPIs and limits per product

The Policy also specifies specific product rules regulating the maximum tenor, LTV requirements and amount depending on the particular product that could be granted to a retail client. Cost of living was updated in underwriting system twice in June 2022 and in October 2022. For 2023 no changes in LTV and DTI thresholds. The Bank applies LTV CAP for new production loans which is regularly monitored and does not exceed the CAP limit. Extraordinary risk and prohibited transactions are also defined.

The monitoring, reporting and management of exposure concentration in industries in 2022 (sectorial concentration) was addressed through the centralized Industry Credit Risk Strategy (ICRS) monitoring process. On a quarterly basis, the HC Credit Risk CEE forwards a snapshot of compliance with EAD benchmarks for each industry. These benchmarks are based on the Industry Steering Signals defined during the annual Credit risk Strategies process. Integrated Risk Control and Analytics and Corporate Credit Underwriting analyse EAD development and any deviation from benchmarks. For industries exceeding or close to the benchmark Corporate Credit Underwriting provides reasoning. Any required actions depend on materiality of breaches and classification of industries in accordance with their significance in the local and the aggregated CEE portfolio. Quarterly reports indicating breaches, reasoning and potential actions are presented to the Risk Committee.



3.4 INFORMATION ON GOVERNANCE ARRANGEMENTS

3.4.1 *Directorships held by members of the management body*

The members of the Management Board of UniCredit Bulbank AD hold the following directorship positions:

- The CEO of UniCredit Bulbank AD is holder of one directorship position as member of the Management Board of UniCredit Bulbank AD and as member of the Supervisory Boards of its wholly owned subsidiaries UniCredit Consumer Financing EAD and UniCredit Leasing EAD, and of directorship position as member of the Board of Directors Borica AD, directorship position in the Management board of Association of Banks in Bulgaria, directorship position in the Management Board of Council of women in business in Bulgaria;
- The Deputy CEO is holder of one directorship position as member of the Management Board of UniCredit Bulbank AD and as member of the Supervisory Boards of its wholly owned subsidiaries UniCredit Consumer Financing EAD and UniCredit Leasing EAD;
- Head of Retail Division is holder of one directorship position as member of the Management Board of UniCredit Bulbank AD and as member of the Supervisory Board of its wholly owned subsidiary UniCredit Consumer Financing EAD;
- Head of Corporate and Investment Banking (CIB) Division is holder of one directorship position as member of the Management Board of UniCredit Bulbank AD, as member of the Supervisory Boards of its wholly owned subsidiaries UniCredit Leasing EAD and UniCredit Consumer Financing EAD;
- CFO is holder of one directorship position as member of the Management Board of UniCredit Bulbank AD and as member of the Supervisory Boards of its wholly owned subsidiaries UniCredit Consumer Financing EAD and UniCredit Leasing EAD;
- CRO is holder of one directorship position as member of the Management Board of UniCredit Bulbank AD and as member of the Supervisory Board of its wholly owned subsidiary UniCredit Consumer Financing EAD;
- The Chief Operative Officer /formerly Head of Global Banking Services (GBS)/ is holder of one directorship position as member of the Management Board of UniCredit Bulbank AD.

3.4.2 *Recruitment policy for the selection of members of the management body*

In compliance with BNB requirements and the updated *Ordinance No. 20* on the Issuance of Approvals to the Members of the Management Board (Board of Directors) and Supervisory Board of a Credit Institution, the applicable legislation, and following the respective guidelines of the European Banking Authority (EBA) on the assessment of the suitability of members of management bodies, as well as in alignment with the adopted internal Suitability policy, the candidates are assessed on individual basis following the criteria in the aforementioned regulations (knowledge, experience, reputation, time commitment, key skills etc.) as well as collective suitability assessment is completed for the management body where the appointment is done. The candidates for Key function holder meet the requirements under Article 11, paragraph 1, items 1 and 3–8 of the *Law on Credit Institutions* and cover the suitability requirements necessary to hold the position. The candidates for MB or SB member must meet the whole requirements of abovementioned Article 11.

The bank has set a separate Nomination Committee (until 2021 the bank had “combined” Nomination and Compensation committee) which has the responsibility to identify and recommend candidates to fill management bodies vacancies (to the General meeting of shareholders for members of the Supervisory Board and to the Supervisory Board for members of the Management Board) and conducts the suitability



assessment on individual level prior appointment as well as the collective assessment of the respective management body (as per the Ordinance 20 of BNB and EBA guidelines on the assessment for suitability). UniCredit Bulbank has adopted and implemented the UniCredit Group General guidelines on the structure, composition and remuneration of the Corporate Bodies of Group Companies, as well as procedures for the appointment of corporate officers. This policy, without prejudice to local law and/or regulations application, has the aim to define the principles, guidelines and rules for the management of corporate members at Group level with regard to:

- structure of the Corporate Bodies and requirement of their Members with the aim to balance the presence of Internal and External (independent) Members, an appropriate gender balance and an adequate composition to oversee efficaciously the whole business operation for the management and control;
- remuneration for the positions assigned according to the type and economic relevance of the subsidiaries, considering – inter alia – the corporate complexity, the business activity and the connected risk profile, the customer operation and the multiplicity of the products offered.

UniCredit Bulbank has adopted also internal Suitability policy as per the regulatory requirements, that defines the procedures, requirements and responsibilities related to appointment of candidates as board members in the Management and the Supervisory Board as well as Key function holders.

UniCredit Group has a structured succession EDP (Executive Development Plan) and TMR (Talent Management Review) for identification and evaluation of potential successors for managerial positions/roles.

3.4.3 Diversity policy, including the policy on gender diversity

At the end of December 2022, the presence of Women in top and middle management positions was assessed as balanced. In terms of gender distribution (bank level) the proportion of female/male overall is ~76%/24%; the ratio for the managerial positions is quite balanced – 60%/40%, while for the top managerial positions (board level and direct reports to executive directors) the ratio is 50%/50%.

Women are 48% of the participants of the Talent management program (TMR). Gender diversity is one of the priority not only of the HR team, but is part of the managerial agenda across all functions, is included in the annual goals of the top managerial positions, and is implicated in various internal requirements and procedures, covering not only the gender balance, but also with regards to the remuneration and potential pay-gap, succession planning, talent development etc.

3.4.4 Risk Reporting to Management

Risk reporting to management body covers information for all types of risks in UniCredit Bulbank: credit, market, liquidity, operational and reputational risks. The Bank has set up a reporting system based on risk profiles/parameters and the reports are prepared on a daily, weekly, monthly, quarterly and annually basis. Recipients of the information are Management board, Supervisory Board, Risk Committee, Credit Committee, Financial and Credit Risk committee, PRC, Non-Financial Risk and Controls Committee – General Session and Reputational Risk Session, other control functions in the Bank, responsible Board members, Head of Departments, Senior Managers as well as Holding Company's competence lines.

The Credit Risk Reports

Three different reports are produced on a quarterly basis related to data quality issues including Collateral Data Quality Report for missing information for collateral (insurance, market evaluation, statutory validity, wrong rank of mortgage, etc.); Rating Data Quality Report in respect of unrated customers, Age



Restrictions, inadequate rating model used, etc.; and Tableau de Board reflecting the main issues detected during the analysis of data quality controls performed on the local PD models.

Quarterly Watch List Report is produced with the purpose to indicate endangered customers with newly detected monitoring triggers, for which Risk Mitigation strategy has to be applied. Additionally, analysis of the Watch list is presented including volume, structure, dynamics, exceptions to the maximum recommended duration for staying in Watch list under stricter monitoring.

A managerial aggregated view on client level in terms of number and volume based on the annual/ semi-annual Corporate credit review status is prepared on quarterly basis and presented at Credit Committee. A set of escalation reports related to overdue reviews and collaterals is implemented to duly inform the Management for identified issues in the monitoring process.

A monthly report on ageing restrictions – automatic rating and forthcoming application of Rating's ageing is prepared from the end of the year as well as Mitigation report based on the New Default Definition's parallel run.

Monthly Risk Report – Portfolio overview, and summarized reports by segment, Expected Loss and RWA by Segment, New Business RWA and expected loss as well as overdue credit reviews for Corporate and Small Business clients.

Quarterly Overall Risk Report is submitted with information for Gross loans, Impaired Loans ratio, Coverage on impaired portfolio, Loans evolution, Industry limits monitoring, Breakdown by Bol classes, Business segment and legal entity, net LLP change and cost of risk ratio. There is also information for EAD break down by business segment, performing/non-performing and industry, RWA by business segment, Stress tests on credit risk, RAF monitoring section as well as Default ageing summary.

There is a set of **Financial, Operational and Reputational Risk reports**, which might be differentiated by the specifics of the risk exposure:

Market Risk and Liquidity- There is a set of daily managerial reports that affect some critical Market Risk metrics like Open FX position - comparison ag. limits, calculated adjustment to the front-office Murex arising from small customer FX and bankbook, Daily Market Risk Dashboard providing overview of market risk limit utilizations – VaR limit, FX delta, Bond notionals of Sovereign exposure and of Non-Sovereign exposure, CPV sensitivity, BP01 sensitivities, Stress Test Warning Level (STWL), EV sensitivity (worst of six scenarios), NII sensitivity, RWA of Market risk and Loss Warning Level (LWL) as well as Liquidity relevant early warning indicators plus Daily Liquidity Dashboard containing managerial and RAF limits compliance report, Intraday critical payments buffer and Intraday Residual payments buffer, report on Issuer risk and average age of positions in TB.

Additionally, on a monthly basis the following reports are prepared – Summary of counterparty and issuer limit excesses, VAR limit and history by components, FX, IR, CR sensitivities overview and stress test results, important volatility dynamics, Market Conformity and Price Transparency checks of trades concluded in Treasury, PV and overdue payments on customer IRS, derivatives exposure to customers by PV/rating/MIFID category, derivative limit utilization. There are also Structural liquidity limits monitoring and Short-term liquidity stress tests (Liquidity surplus and survival period monitoring), Liquidity Coverage Ratio, Structural liquidity ratio, and Net Stable Funding Ratio. In addition is presented a detailed information about bond trading and investment portfolios, including market price vs. book value, issuer limits and CPV limits utilization. During the last year a new set of reports is introduced – quarterly checks for trading intent for all portfolios in Trading book and daily reconciliation between managerial PnL and market risk metrics (VaR and hypothetical PnL), Additional valuation adjustments, Market risk quarterly checks (incl. FX open position reconciliation, Not Risk Relevant portfolios monitoring, check of Trading book eligibility criteria and check of absence of trading intent in Banking book portfolios).

Operational and Reputational Risk – Quarterly Operational Risk analysis/reporting is prepared with information for loss data (overview of the major loss events), scenarios, KRIs, risk mitigation measures, capital at risk, major Operational Risk issues, strategies, planned and/or implemented measures,



Operational Risk Oversight Model on small subsidiaries; ICT Project Risk Assessments Reporting. Several managerial reports containing Risk and Control Self-Assessment Reporting including ICT and Cyber risks; the scenario analysis results including assessed scenario storylines, and scenario 1:10 and scenario 1:40 loss estimations compared to the highest losses registered in the bank per risk category are being prepared and submitted annually. There is also information for the annual evaluation on local insurances with focus on insurance limits and deductibles, insurance recoveries on previous year trends (split by event type and % of losses).

The Reputational Risk Monitoring report includes Reputational risk reporting to the Holding (focused on reputational risk deals; relevant transactions data and media coverage of operational and reputational risk events). The Reputational risk exposure is reported to the Management Board of the Bank (through the Non-Financial Risk and Control Committee – Reputational Risk Session) and to UC Group on a quarterly basis.



4 SCOPE OF APPLICATION

As both financial statements under the accounting scope of consolidation and financial statements under the regulatory scope of consolidation are fully IFRS based, there are only presentation differences which do not impact net assets, equity or profit or loss.

Reason for the difference between total assets and liabilities in published financial statement and regulatory reporting is that the company UniCredit Insurance Broker OOD is excluded from regulatory scope of consolidation.

At the end of 2022 UniCredit Factoring no longer existed as a separate consolidated legal entity and was part of the Bank portfolio.

The information related to the scope of application of the regulatory framework is disclosed as follows:

- ***EU LI1 – Differences between accounting and regulatory scopes of consolidation and the mapping of financial statement categories with regulatory risk categories.***
- ***EU LI2 – Main sources of differences between regulatory exposure amounts and carrying values in financial statements.***
- ***EU LI3 – Outline of the differences in the scopes of consolidation (entity by entity).***
- ***EU PV1 – Prudent valuation adjustments (PVA)***



5 OWN FUNDS

Capital Base (Own Funds) eligible for regulatory purposes include Tier I and Tier II capital as defined by Basel III regulatory framework.

In 2014, the new Directive 2013/36/EU requirements (CRD IV) were enforced in Bulgaria and Ordinance 8 of BNB was abrogated and substituted by Regulation (EU) 575/2013 of the European Parliament and of the Council.

In addition to the minimum Basel III capital requirements the combined buffer requirement includes also Capital Conservation buffer, Systemic Risk buffer and Systemic Important Institution buffer. Starting from 2019 also Countercyclical capital buffer has been introduced and capital buffer for Other Systemic Important Institution has been increased.

The detailed information regarding consolidated Own Funds of UniCredit Bulbank AD is disclosed in *Appendix 5* according to Commission Implementing Regulation (EU) No 1423/2013 and includes the following:

- ***Template EU CC1 - Composition of regulatory own funds***
- ***Template EU CC2 - reconciliation of regulatory own funds to balance sheet in the audited financial statements***
- ***Template EU CCA: Main features of regulatory own funds instruments and eligible liabilities instruments***

Additional information for specific capital positions can be found in the Consolidated Financial Statements of UniCredit Bulbank AD.



6 OWN FUNDS REQUIREMENTS AND RISK-WEIGHTED EXPOSURE AMOUNTS

The Bank's assessment of risks to capital is performed on ongoing basis and relies on comprehensive and formalized process of identification of potential material risks and their sound numerical quantification. The elements of this process are described below.

Group Risk Map

The internal definition of ICAAP regulations and application relies on the proportionality principle since UniCredit Group Pillar 2 framework has to be deployed in different ways according to the LE's risk profile and complexity. UniCredit Group LEs are therefore classified in four different classes: Large, Medium, Small-plus, and Small considering a minimum set of criteria. Large & Medium LEs have to implement the Group ICAAP and RAF frameworks. Small-plus LEs are not expected to have individual ICAAP and RAF frameworks, as related activities can be run by the owner company. The classification is performed on annual basis with reference to the September perimeter. Based on September 2022 results, UniCredit Bulbank is classified as Medium and its subsidiaries are Small-plus. Thus, UniCredit Bulbank maintains its ICAAP and RAF frameworks on local group consolidated basis.

Risk Inventory

The Risk Inventory process purpose is the identification of all the risks faced or going to be faced by the Group in a forward looking perspective. The outcome is a detailed list of risks to be considered in the ICAAP. In this regard the identification is performed at Holding and relevant Legal Entities level by analyzing the positions held and activities carried out in the respective perimeter. Every year the risks are assessed by Risk Inventory survey prepared by Group ICAAP & Stress Testing and sent to Risk Management functions of the Holding and relevant LEs.

Risk Profile Assessment

The risk profile and capital adequacy assessment require the measurement, in a forward looking manner, of all material risks and to cover those risks through a sufficient amount of high quality capital. The Bank implements two complementary internal perspectives:

- Internal Normative perspective: this is the perspective under which the institution manages its capital adequacy by ensuring that it is able to fulfil all of its capital-related legal requirements and supervisory demands.
- Internal Economic perspective: the perspective under which the institution is expected to identify and quantify all material risks (under an economic value approach) that may cause economic losses and deplete internal capital.

Both Normative and Economic perspective risk and capital assessment are performed under baseline and stressed conditions and on a multi-year horizon.

Regulatory Capital

Regulatory capital under the Pillar 1 perspective is calculated and reported according to the below approaches.

Credit Risk:



- Advanced Internal Rating Based Approach (AIRB): Corporates (excl. Specialized Lending), Retail-Small Business (including covered by residential real estates), Retail – Individuals (including covered by residential real estates), and Equity claims (Simple Approach)
- Foundation Internal Rating Based Approach (FIRB): Financial Institutions and Corporates - Specialized Lending (Slotting criteria model with regulatory defined risk weights and expected loss levels)
- Standardized Approach: Central Governments or Central Banks, Regional Governments or Local Authorities, Multilateral Development Banks, Administrative Bodies and Non-commercial Undertakings, and International Organisations, as well as all Factoring exposures for which permanent partial use (PPU) of the Standardized approach is permitted by the Regulator. The Standardized Approach is applied also for the loan portfolios of the Bank's subsidiaries².

Market Risk: Standardized Approach.

Operational Risk: Advanced Measurement Approach for the Bank and Standardized Approach for the Bank's subsidiaries.

Economic Capital

Under Pillar 2 the quantitative assessment of the risk profile is based on individual measurement of credit, market, IRRBB, operational, reputational, business, and real estate risks via VaR-based Economic Capital models. The individual risks are further aggregated to a single metric, Aggregated Economic Capital. A model risk charge is also added to the overall Economic Capital result. The below table outlines the composition of the overall Pillar 2 risk assessment.

Risk type	Risk sub-type	Definition
Credit risk	Default risk	Risk arising from credit default events
	Concentration risk	Single name default concentration risk
	Migration risk	Risk arising from rating downgrades of obligors
	Securitization risk	Risk arising from investor, sponsored and retained tranches of originated securitization
	Counterparty risk	Default risk of counterparties for OTC and Securities Financing Transactions (SFT) instruments
	Participation risk (illiquid positions)	Covers illiquid participations and funds in the banking book
	Country transfer risk	Risk that a country imposes restrictions on the conversion of foreign currencies and/or on the cross border transfer of funds
Market risk	Position risk in the TB (FVTPL)	Risk of loss on financial instruments from changes in market risk factors relevant for Trading positions
	Position risk in the BB (FVOCI)	Risk of loss on financial instruments from changes in market risk factors relevant for Banking Book positions
	Credit Value Adjustment risk	Risk stemming from valuation adjustment of the derivative portfolio with respect to counterparties' credit risk
	Funding Cost risk	Risk stemming from valuation adjustment of the derivative portfolio with respect to funding risk

² At the end of 2022 UniCredit Factoring no longer existed as a separate consolidated legal entity and was part of the Bank portfolio.

Participation risk (liquid positions)	Risk of loss on listed participations and funds in the Banking Book
IRRBB	Interest rate risk on Banking Book positions that are not classified as FVTPL nor FVOCI
Operational risk	Risk of loss resulting from inadequate or failed internal processes, people and systems or from external events.
Business risk	Covers unexpected changes in business margins/volumes not already accounted for in other risk types
Real estate risk	Covers potential losses resulting from market value fluctuations of the bank's own real estate portfolios
Reputational risk	Covers the loss of future revenues due to the media coverages of the potentially adverse reputational events
Model risk	Component for model risk in the economic capital calculations

Stress Tests

The resilience of the Bank's capital position is tested on semiannual basis via extensive stress tests which simulate all material risks (in terms of capital requirement), the capital base and the P&L in multiple adverse scenarios. The scenarios are designed by UniCredit research on the basis of different triggers and span on a three-year horizon over which all main (and country-specific) macroeconomic and market indicators are simulated. These scenario-induced indicators are translated into shocks in risk parameters (i.e. default rates, Probabilities of Default, etc.) and losses using specific methodological guidelines, models and tools. The assessment is performed for both regulatory and economic capital.

For the purposes of the Supervisory Review and Evaluation Process the Bank delivers to ECB on annual a comprehensive ICAAP package organized in the following main documents:

- Reader's Manual – a description of the Bank's business model and strategies, governance framework and bodies, internal policies, regulations, methodological and operational documents;
- Pillar1-ICAAP Reconciliation – descriptions and comparison of results, methodologies and models for the calculation for capital requirements under regulatory and internal approaches;
- Capital Adequacy Statement – the core document of the ICAAP package which is the acknowledgement of the Bank's management for the capital adequacy results in three different dimensions:
 - Retrospective (for the past year) and forward-looking (the multi-year plan);
 - Regulatory (Pillar 1) and internal (Pillar 2) view;
 - Business-as-usual and under adverse conditions/stress tests scenario.

For preparation of the regulatory reports under new Regulation (EU) 575/2013, the Bank applies Financial Collateral Comprehensive Approach for credit risk mitigation where financial collateral is used.

Capital Requirements for Credit Risk, Market Risk and Operational Risk are disclosed as follow:

- **Template EU KM1 - Key Metrics**
- **Template EU OV1 – Overview of RWAs.**

The following information is not relevant to UniCredit Bulbank:

- **Template EU INS1 - Insurance participations**
- **Template EU INS2 - Financial conglomerates information on own funds and capital adequacy ratio**



7 EXPOSURES TO COUNTERPARTY CREDIT RISK

UniCredit Bulbank employs the Group internal model method for counterparty risk measurement and limit compliance control.

Financial Risk and Modeling unit monitors on a daily basis the exposures on counterparty credit risk and escalates limit breaches for resolution.

The concept of CVA charge is adopted for risk-adjusted pricing of derivatives.

For more details related to counterparty credit risk, please refer to point 3.1.2. above in the present document.

The information related to CCR is disclosed as follows:

- ***Template EU CCR1 – Analysis of CCR exposure by approach***
- ***Template EU CCR2 – Transactions subject to own funds requirements for CVA risk***
- ***Template EU CCR3 – Standardised approach – CCR exposures by regulatory exposure class and risk weights***
- ***Template EU CCR4 – IRB approach – CCR exposures by exposure class and PD scale***
- ***Template EU CCR5 – Composition of collateral for CCR exposures***

The following information is not relevant to UniCredit Bulbank:

- ***Template EU CCR6 – Credit derivatives exposures***
- ***Template EU CCR7 – RWEA flow statements of CCR exposures under the IMM***
- ***Template EU CCR8 – Exposures to CCPs***



8 COUNTERCYCLICAL CAPITAL BUFFERS

As of 31.12.2022 the Institution-specific countercyclical capital buffer for UniCredit Bulbank is calculated at 0.96%.

The information related to CCYB is disclosed in:

- *Template EU CCyB1 - Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer*
- *Template EU CCyB2 - Amount of institution-specific countercyclical capital buffer*



9 INDICATORS OF GLOBAL SYSTEMIC IMPORTANCE

In order to ensure global consistency and uniform formats and data for the disclosure of the values used to identify Global Systemically Important Institutions (G-SIIs), the EU Parliament and the Council issues a Commission Implementing Regulation (EU) No 1030/2014 of 29 September 2014.

In December 2016, Bulgarian National Bank classified UniCredit Bulbank AD as Other Systemically Important Institutions (O-SIIs) and thus the disclosure requirements set in Regulation (EU) No 1030/2014 are not relevant to the Bank.

10 EXPOSURES TO CREDIT RISK AND DILUTION RISK

The carrying amounts of Bank's assets are regularly reviewed for assessment whether there is any objective evidence of impairment as follows:

- for loans and receivables – by the end of each month for the purposes of preparing interim financial statements reported to the Bulgarian National Bank and Management;
- for available for sale and held to maturity financial assets – semi-annually based on review performed the Bank and decision approved by FCRC – ALCO;
- for non-financial assets – by the end of each year for the purposes of preparing annual financial statements.

If any impairment indicators exist, the asset's recoverable amount is estimated. An impairment loss is recognised whenever the carrying amount of an asset or its cash-generating unit exceeds its recoverable amount. Impairment losses are recognised in the Income Statement.

In assessing the provisions Management uses expert estimates such as legal and regulatory advisors as well as credit risk specialists. Usually more conservative approach is followed in order to protect the Bank in case of adverse development of uncertain events.

According to the internal evaluation process the Bank divide customers' credit portfolio into performing loans (those without detected default events) and non-performing portfolio (those with detected default events). The basis for default event detection is the approved "Internal Rules on Default Definition and Forbearance Classification" where generally (but not exhaustive) default event is detected always when either or both of the following conditions are met:

- the Bank considers that the obligor is unlikely to pay its credit obligations to the Bank, without recourse to actions such as realising the collateral (if held);
- the obligor is past due more than 90 days on any material credit obligation to the Bank.

In UniCredit Bulbank, all exposures with more than 90 days past due are considered as defaulted / impaired.

For determination of general credit risk adjustments the bank is using the expected credit loss concept according to the requirements of IFRS 9.

For determination of specific credit risk adjustments the bank is using either collective evaluation approach or is performing individual assessment for relative big exposures.

Following the Regulation (EU) 2015/1278, UniCredit Bulbank applies below definitions for performing and non-performing forborne exposures:

1/ Performing forborne exposures:

The Bank considers an exposure as forborne performing, when the amendments in the repayment terms and conditions are NPV neutral.

2/ Non-performing forborne exposures:

Cases where as a result of declined financial standing and solvency of the obligor, the Bank has consent to distressed restructuring of the credit obligation through material forgiveness, or postponement of principal, interest, or fees which results in debt reduction (non NPV neutral).



General quantitative information on credit risk is disclosed as follows:

Template EU CR10 – Specialised lending and equity exposures under the simple riskweighted approach

- ***Template EU CR1: Performing and non-performing exposures and related provisions***
- ***Template EU CR1-A: Maturity of exposures***
- ***Template EU CR2: Changes in the stock of non-performing loans and advances***
- ***Template EU CR2a: Changes in the stock of non-performing loans and advances and related net accumulated recoveries***
- ***Template EU CQ1: Credit quality of forbome exposures***
- ***Template EU CQ2: Quality of forbearance***
- ***Template EU CQ3: Credit quality of performing and non-performing exposures by past due days***
- ***Template EU CQ4: Quality of non-performing exposures by geography***
- ***Template EU CQ5: Credit quality of loans and advances by industry***
- ***Template EU CQ6: Collateral valuation - loans and advances***
- ***Template EU CQ7: Collateral obtained by taking possession and execution processes***
- ***Template EU CQ8: Collateral obtained by taking possession and execution processes – vintage breakdown***
- ***Template EU CR10 – Specialised lending and equity exposures under the simple riskweighted approach***



11 USE OF THE STANDARDISED APPROACH FOR CREDIT RISK

Following the requirements of Article 113 of the Regulation (EU) 575/2013, UniCredit Bulbank uses Standard & Poor's Agency ratings for calculating risk weights of its asset and off-balance sheet exposures.

The calculation methodology follows strictly the requirements listed in Article 138, Article 139, Article 140 and Article 141 of the Regulation (EU) 575/2013.

Asset Classes where ECAI are used are as follows:

- Claims or contingent claims on central governments;
- Claims or contingent claims on multilateral development banks;
- Claims or contingent claims on institutions (providing unavailability of internal rating);
- Claims or contingent claims on regional governments or local authorities;
- Short-term claims on institutions and corporates (providing unavailability of internal rating).

More information about the part of the credit portfolio under Standardised approach can be found in

- ***Template EU CR4 – standardised approach – Credit risk exposure and CRM effects***
- ***Template EU CR5 – standardised approach***



12 USE OF THE INTERNAL RATING BASED APPROACH TO CREDIT RISK

12.1 OVERVIEW

Starting from July 2016, UniCredit Bulbank AD applies Advanced Internal Rating Based Approach (AIRB) for calculation of capital requirements of credit risk for Corporate (excluding Specialised Lending) and Retail (Small Business and Individuals) clients' exposure. Financial Institutions and Specialised Lending clients remain at Foundation Internal Rating Based Approach (F-IRB) and exposures to Public Sector Entities, Multilateral Development Banks and Municipalities are treated under Standardised Approach. UniCredit Bulbank is the first bank in Bulgaria certified by the European Central Bank (joint decision with Bank of Italy and BNB) to use A-IRB Approach for locally developed internal models for Probability of Default (PD), Exposure at Default (EAD) and Loss Given Default (LGD).

When applying Internal Rating Based Approach for calculation of capital requirements for credit risk, UniCredit Bulbank uses several rating models³ in order to carry out clients' creditworthiness analyses. Rating models can be generally summarized as:

Group-wide rating models (GWM)

Group wide rating models⁴ are used for group wide client segments or transactions, whose risk factors are independent from the counterpart's geographic location, local market characteristics, business lines and processes used. UniCredit Bulbank uses group wide rating model for creditworthiness analyses for: Multinational Companies⁵; Security Industry Companies; and Financial Institutions.

Local rating models

➤ *Corporate rating model*

The model is used for corporate clients (using full accounting) with a turnover < 500 Mio EUR (except for Specialized lending).

For risk parameters EAD and LGD UniCredit Bulbank uses internally developed models.

➤ *Slotting Criteria Model*

The model is used for assessment of capital requirements and expected loss for exposures clasifed as Specialized Lending.

As Risk parameters: EAD and LGD, UniCredit Bulbank uses regulatory defined parameters in Regulation (EU) 575/2013.

➤ *Retail Scoring Models*

The Bank uses two scoring models: Scoring model for Small Business and Scoring Model for Private Individuals.

For risk parameters EAD and LGD UniCredit Bulbank uses internally developed models.

³ UniCredit Bulbank uses master scale for rating result competability.

⁴ Group wide rating models are developed by UCI Holding Company (HC) and are adopted by UniCredit Bulbank.

⁵ Companies with turnover over 500 mln euro.



The established internal risk control environment is sound and reliable and is an integral part of the operative working process within the Bank. Risk control functions ensure:

- minimum yearly validation of the rating systems in used; maintenance of relevant model and validation documentation;
- maintenance of all necessary data for management and assessment of the credit risk;
- periodic assessment of the accuracy, completeness, and appropriateness of model inputs and results.

The customer rating is not only the basis for a risk-related credit decision but, for example, also for:

- Credit conditions (interest rates, security)
- Credit risk control (reporting, watch list, early warning instruments)
- Credit risk trade (securitization)
- Cost of risk (impairment, loan loss provision)
- Calculation of capital required under Basel III (capital requirements, capital adequacy)
- Portfolio analysis (credit portfolio steering)

Cases Occasioning a Rating:

- Provision of financial statements
- Application for credit/ lending of credit
- Credit risk control/ prolongation
- Change in soft facts and warning signals relevant to creditworthiness
- Change relevant to creditworthiness in connection with the overruling of a customer rating
- Removal of a rating recipient from a rating group and break-up of the entire rating group
- Existence of a warning signal
- Existence of an aging restriction
- Elimination of a default event
- New Nostro/ Loro account; MM placement/ Repo deals/ Other obligations counterparties (esp. Banks)
- New Issuer of a personal guarantee (esp. Bank or Company Guarantee/ contra-guarantee received in favour of a customer)

If there are rating relevant changes of hard/soft facts or warning signals, a new rating assessment is required.

Notwithstanding the above factors, rating is renewed each year, whereas customers with high risk and problem exposures must be checked in shorter intervals.

The historical losses for the previous period are defined based on occurred default events in accordance with the applied Default Methodology.

12.2 QUALITATIVE INFORMATION RELATED TO LOCAL IRB MODELS

Locally developed internal models for Probability of Default (PD), Exposure at Default (EAD) and Loss Given Default (LGD) that are used for regulatory calculation of capital requirements for credit risk with their main characteristics are:

➤ **Corporate PD model:**

In 2022 (February) a new version of the Corporate PD model was introduced, reflecting the requirements of EBA Guidelines on PD estimation, LGD estimation and the treatment of defaulted exposures and in line



with the new definition of default as well. The model has been approved for application by ECB/BNB team and covers information in 4 directions: financial, qualitative, internal behavioral, Central credit register. Based on PD value the customers are ranked using a 23 notches rating master scale.

➤ **SME PD model:**

In 2022 (February) a new version of the SME PD model was introduced, reflecting the requirements of EBA Guidelines on PD estimation, LGD estimation and the treatment of defaulted exposures and in line with the new definition of default as well. The model has been approved for application by ECB/BNB team and covers information in 3 directions: financial, internal behavioral, Central credit register.

Based on the PD value the customers are ranked using a 23 notches rating master scale.

➤ **Private Individuals PD model:**

Private Individuals PD model is internally developed statistical regression model, developed on a data covering the period 2009-2014. The applicable floor is related to the PD of Bulgarian country and there is an additional conservative floor of 0.12%.

PD model covers the origination and monitoring phase with application and behavioral score calculation. The model considers financial factors, qualitative factors and behavioral ones.

Based on the PD value the customers are ranked using a 23 notches rating master scale.

In 2021 the Bank has submitted a new version of the PI PD model was introduced, reflecting the requirements of EBA Guidelines on PD estimation, LGD estimation and the treatment of defaulted exposures and in line with the new definition of default as well. The model has been approved for application by ECB/BNB team and covers information in 3 directions: financial, internal behavioral, Central credit register.

➤ **Specialised Lending Slotting Criteria model:**

In 2022 (February) a new version of the IPRE slotting model in line with the requirements of EBA Guidelines on PD estimation, LGD estimation and the treatment of defaulted exposures and in line with the new definition of default as well.

After a positive decision of ECB/BNB team, the model is expected to be introduced in production in 2023.

As an outcome of the model the transactions are assigned to one of 4 possible slots - Strong, Good, Satisfactory, Weak.

➤ **LGD model:**

LGD model is developed on a data covering the period 2008-2014. The result of the model is a decision tree, splitting the exposures on the base of customer segment, product type and EAD. As part of the model internal haircuts for eligible collaterals are calculated as well.

Relevant downturn analysis is performed as well, showing positive correlation between the downturn periods and LGD estimations.

In 2019 Expected Loss Best Estimate component was introduced as well. The component is used in the calculation of the Risk Weighted Assets of Defaulted assets.

In 2022 the Bank has submitted a fully refined LGD model in line with the requirements of EBA Guidelines on PD estimation, LGD estimation and the treatment of defaulted exposures and in line with the new definition of default as well.



➤ **EAD model:**

EAD model is developed on a data covering the period 2007-2013. The result of the model is a decision tree, splitting the exposures on the base of customer segment, revolving/non-revolving type of exposure, product type and additional model specific parameters.

Relevant downturn analysis is performed as well, not showing positive correlation between the downturn periods and EAD estimations.

The Bank is working on full refinement of the model in line with the requirements of EBA Guidelines on PD estimation, LGD estimation and the treatment of defaulted exposures and in line with the new definition of default as well.

Internal credit risk models are developed by Credit Risk Models and Systems Unit within Risk Management Division. Each model is being annually validated and as part of the internal controls environment, the Internal Audit of the UniCredit Bulbank performs regular audits (on annual basis) on AIRB local models and validations.

The internal models are initially validated by an independent structure, not involved in the development of the model and the Group Internal Validation (GIV⁶) function at Holding level performs quality assurance of the validation reports of the local models. In order to achieve more independence of the function in charge of the model review from the functions responsible for model development, starting from 2018 a dedicated Internal Validation Center is in place that is directly reporting to Chief Risk Officer of the UniCredit Bulbank and to the GIV.

All locally developed models (model changes) and respective validations are subject to approval by the Management Board of the Bank, including information on the models' development and validation conclusions, fulfilment of the recommendations given, the performance of the models, areas for improvement etc.

The process of modelling and validation activities planning is defined in the Group Guidelines and in the local Methodological Framework for the maintenance of the Risk Models applied in UniCredit Bulbank which stipulates in detail the roles and responsibilities of the local parties. The annual validation plan is based on 3 years perspective.

Quantitative information on the use of the IRB approach is disclosed as follows:

- ***Template EU CR6 – IRB approach – Credit risk exposures by exposure class and PD range***
- ***Template EU CR6-A – Scope of the use of IRB and SA approaches***
- ***Template EU CR8 – RWEA flow statements of credit risk exposures under the IRB approach***
- ***Template CR9 –IRB approach – Back-testing of PD per exposure class (fixed PD scale)***

The following information is not relevant to UniCredit Bulbank:

- ***Template CR9.1 – IRB approach – Back-testing of PD per exposure class (only for PD estimates according to point (f) of Article 180(1) CRR)***

⁶ GIV is the function in charge of the validation of the Group models.

13 CREDIT RISK MITIGATION TECHNIQUES

When granting loans the Bank accepts collaterals as follows:

- Property – all types of real estates and relevant real rights;
- Pledge on movables properties;
- Pledges of all enterprise assets and shares;
- Tangible assets;
- Securities;
- Cash and receivables;
- Precious Metals;
- Surety and Guarantee;
- Other collaterals stipulated in the law

When negotiating the collateral the following general principles should be met:

- **Reality** – existence and perfect documentation;
- **Identity** – the collateral should be clearly concretized;
- **Exclusivity** – the Bank should be the only bearer of the rights over the collaterals or privileged lender;
- **Sufficiency** – the amount of the collateral should be enough to cover (to preliminary defined extent) the debtor's liabilities throughout the whole period of the loan;
- **Liquidity** – the collateral itself should allow the possibility for fast sale.

The obligations regarding the collateral are stipulated in written form with collateral contract.

Accepted collaterals are valued at Market Value. The value of the Properties is determined periodically by an independent registered appraiser. The value of the real estate collaterals is regularly monitored as well as the presence of their respective insurance.

Within UniCredit Bulbank exists specialised unit responsible for supporting the process of real estate financing, where cash flow predominantly originates from renting and/or sales of real estate properties and the loan is being repaid from this cash flow.

UniCredit Bulbank uses only part of the abovementioned types of collaterals when applying credit risk mitigation techniques in accordance with Regulation (EU) 575/2013:

- Financial collaterals – blocked cash and securities, strictly observing the requirements of Chapter Four *Credit Risk Mitigation* of the Regulation (EU) 575/2013. For calculation of capital requirements for credit risk under IRB approach, Financial collaterals are treated like LGD- reducing collaterals (in accordance with the Regulation (EU) 575/2013;
- Guarantees that meet the requirements of Chapter Four *Credit Risk Mitigation* of the Regulation (EU) 575/2013. For calculation of capital requirements for credit risk under IRB approach, Guarantees are treated like PD- reducing collaterals;
- Real Estate Properties that meet the requirements of Article 124, Article 125 and Article 126 of the Regulation (EU) 575/2013. For calculation of capital requirements for credit risk under IRB approach, Real Estate collaterals are treated like LGD- reducing collaterals



(in accordance with the Regulation (EU) 575/2013. For exposures treated under A-IRB Approach, UniCredit Bulbank uses internally developed discount factors (part of LGD model) for eligible real estate collaterals.

The Bank is monitoring the principles for low correlation, legal certainty and all operative requirements. The Bank does not apply the netting technique for calculation of its risk-weighted assets for the purposes of the Regulation (EU) 575/2013.

Quantitative information related to Credit Risk Mitigation is disclosed as follows:

- ***Template EU CR3 – CRM techniques overview: Disclosure of the use of credit risk mitigation techniques***
- ***Template EU CR7-A – IRB approach – Disclosure of the extent of the use of CRM techniques***



14 ENCUMBERED AND UNENCUMBERED ASSETS

As of 31.12.2022 the assets are pledged on the following deals:

- For budget holders' account service the Bank has pledged a loan issued by BG Government (Schuldscheindarlehen) and government securities.
- UCB has pledged cash on margin account for derivative deals.
- Government bonds are pledged for REPO deals.

Regulator require budget liabilities and margin account for derivatives deals to be covered by encumbered bank assets. Repo deals are concluded aiming liquidity management.

Quantitative information related to Encumberen and unencumbered assets is disclosed as follows:

- *Template EU AE1 - Encumbered and unencumbered assets*
- *Template EU AE2 - Collateral received and own debt securities issued*
- *Template EU AE3 - Sources of encumbrance*



15 EXPOSURE TO MARKET RISK

UniCredit Bulbank calculates its Own funds requirements for market risk under the Standardised Approach.

The Bank does not apply internal models for calculating capital requirements for market risks within the reporting cycle to the local regulator.

The Group-wide internal market risk model is applied for risk management and control purposes, and for consolidated requirements reporting at UniCredit Group level.

For more details, please refer to point 3.1.1. above in the present document.

The Capital requirements and RWAs for market risk under the Standardised Approach are disclosed in *Template EU MR1 - Market risk under the standardised approach*

The following information is not relevant to UniCredit Bulbank:

- *Template EU MR2-A - Market risk under the internal Model Approach (IMA)*
- *Template EU MR2-B - RWEA flow statements of market risk exposures under the IMA*
- *Template EU MR3 - IMA values for trading portfolios*
- *Template EU MR4 - Comparison of VaR estimates with gains/losses*

16 OPERATIONAL RISK MANAGEMENT

For the purpose of reporting Capital Adequacy in accordance with Regulation (EU) 575/2013 of The European Parliament and of The Council, UniCredit Bulbank applies Advanced Measurement Approach (AMA) for the capital calculation of Operational Risk.

In order to better represent the operational risk exposure, the combination of the seven event types and the product associated to each operational event generates the twelve model risk categories.

Operational risk events are attributed exclusively to seven classes (or event types).

1. *Internal frauds* are acts intended to defraud, misappropriate property or circumvent regulations, the law or Company policy (excluding diversity or discrimination events) involving at least one internal party and excluding malicious damage. The internal fraud is originated inside the Company and the internal nature of the event must be definitely ascertained, otherwise it should be considered as external fraud. In many cases, an internal audit report may clarify this point.
2. *External frauds* are acts intended to defraud, misappropriate property or circumvent the law committed by a third party, without the assistance of an employee and excluding malicious damage:
 - 2.1. External frauds – Payments. This model risk category includes frauds on all payment systems, in order to have evidence of all phenomena involved in money transfer, to highlight any anomalies and deficiencies in security measures. Payment system meaning client management of cash inflows/outflows; all forms of payments; clearing, settlement and exchange services.
 - 2.2. External frauds – Others. This model risk category includes all events associated to all others products or non banking products (other products/services not generally considered part of a bank or investment bank's offering, e.g. insurance) or non-product related (for situations where no specific process was involved).
3. *Employment practices and workplace safety* are events resulting from violating employment or health or safety laws and agreements, personal injury claims or diversity discrimination events.
4. *Clients, products and business practices* are unintentional or negligent failure to meet obligations to clients (including fiduciary and suitability requirements) or from the features of a product. The events where the Company committed an improper business act fall into this category, likewise when it has been the victim of similar practices by another Company:
 - 4.1. Clients, products and business practices – Derivatives. This model risk category includes all derivative products, selling either via an exchange or over the counter; they have been isolated from all others financial instruments to better represent the phenomena;
 - 4.2. Clients, products and business practices - Financial Instruments. This model risk category includes all others financial instruments, selling either via an exchange or over the counter;
 - 4.3. Clients, products and business practices – Others. This class includes all events associated to all others products or no banking products (Other products/services not generally considered part of a bank or investment bank's offering, e.g. insurance) or non-product related (for situations where no specific process was involved).
5. *Damages to physical assets* are events caused by natural disaster or other similar event type.
6. *Business disruption and system failures* are losses caused by technology problems.
7. *Execution, delivery and process management* are failed transactions processing or process management, or losses coming from relations with counterparties and vendors. These events are not intentional and involve documenting or completing business transactions (typically, operational risk events that occur in back office areas fall in this category):



7.1. Execution, delivery and process management – Financial Instruments. This model risk category includes all derivative products and financial instruments, selling either via an exchange or over the counter; they have been isolated to better represent the phenomena. This model risk category includes all others financial instruments, selling either via an exchange or over the counter;

7.2. Execution, delivery and process management – Payments. This model risk category includes events connected with all payment system, in order to have evidence of all phenomena involved in money transfer. Payment system meanings client management of cash inflows/outflows, all forms of payments; clearing, settlement and exchange services;

7.3. Execution, delivery and process management – Others. This model risk category includes all events associated to all others products or no banking products (Other products/services not generally considered part of a bank or investment bank's offering, e.g. insurance) or non-product related (for situations where no specific process was involved).



17 USE OF THE ADVANCED MANAGEMENT APPROACH TO OPERATIONAL RISK

Since 2011 UniCredit Bulbank applies the Advanced Measurement Approach (AMA) for the capital calculation of Operational Risk.

AMA capital requirement is calculated, at Group level by UniCredit Holding, considering data split by the Model Risk Categories (MRC) listed in p. 16 above, i.e. data-homogeneous risk classes. For each MRC, the loss severity and frequency probability distributions are estimated and then combined, in order to obtain the annual loss distribution. The annual loss distributions of the Model Risk Categories are combined, considering the correlation among them, in order to obtain the overall annual loss distribution. The overall annual loss distribution is adjusted for insurance coverage. Group AMA capital requirement is calculated on the overall annual loss distribution with the confidence level 99,9% for regulatory purpose and with that defined for economic capital calculation purposes, taking into consideration deduction for expected losses. The capital requirement measurement activities are performed, on a quarterly basis, at UniCredit consolidated level, i.e. the Holding Company is responsible for the overall process at Group level.

Under the Advanced Measurement Approach ("AMA"), capital for operational risk is obtained by modelling internal loss data, integrated with external loss data, scenario generated data and key operational risk indicators.

For each Legal Entity of the Group, that adopts the internal model (AMA), capital requirements are obtained through an allocation mechanism which reflects their operational risks exposure. UniCredit Bulbank's subsidiaries contribute to the Operational Risk capital calculation using the Standardized Approach (TSA). In the TSA the capital requirement is the average of the last three years to date TSA calculation. For each year, the capital requirement is obtained by summing the relevant indicators referred to the end of financial year for each Business Line multiplied by the regulatory rates. The relevant indicator of a Business Line will be included in the calculation also when negative. Whenever the overall capital requirement for Operational Risk in a certain year results to be negative, then the capital requirement for that year has to be considered as zero while it contributes to the calculation of the three-years average.

Capital requirements for Operational risk are disclosed in *Template EU OR1 - Operational risk own funds requirements and risk-weighted exposure amounts*.



18 INTEREST RATE RISK IN THE BANKING BOOK

Exposure to interest rate risk in the banking book is captured and measured on daily basis in the market risk management systems. The managerial limit-relevant risk metrics includes daily basis point value sensitivity, weekly stress test warning level and monthly reporting of regulatory required variation in economic value (instantaneous Supervisory Outlier Test interest rate shock as percentage of equity) and variation in earnings (net interest income simulation using + 100 bps/-25 bps shock of interest rates and hypothesis of constant balance sheet as percentage of budgeted Net Interest Income, as well as an instantaneous Supervisory Outlier Test interest rate shock as percentage of equity). Executive summary is reported in each monthly FCRC – ALCO session.

According to Article 434, para 2 of the Regulation (EU) 575/2013, equivalent disclosure is made in the Annual Consolidated Financial Statements of UniCredit Bulbank AD.



19 EXPOSURE TO SECURITISATION POSITIONS

Synthetic Securitization

In 2022 UniCredit Bulbank structured a synthetic securitization transaction on a portfolio of SME and corporate exposures originated by the Bank in its usual course of business. The risk transfer was achieved through a financial guarantee by the European Investment Fund (EIF). The structure of the transaction involves a fully retained senior tranche and a fully sold junior tranche. The transaction provides first-loss protection over the securitized portfolio and is designed to achieve Significant Risk Transfer (SRT) as per EU Regulation 2401/2017 and to be compliant with relevant prescriptions of EU Regulation 2402/2017 as amended from time to time (together, the “Securitisations Regulation”). The securitization has a confirmed STS status within the meaning of article 18 of Regulation (EU) 2402/2017. As this is a private securitization where no prospectus had to be drawn up in compliance with Regulation (EU) 2017/1129 and no information had to be made available via a securitization repository according to Regulation (EU) 2017/2402.

Role	Party
Originator	UniCredit Bulbank AD
Junior Tranche Guarantor	European Investment Fund
Originator Legal Counsel	Clifford Chance LLP & Wolf Theiss Attorney Company
Guarantor Legal Counsel	Linklaters LLP
STS Verification Agent	Prime Collateralised Securities (PCS) EU SAS
Credit Event Verification Agent	Deloitte Audit OOD

The assets pooled in the securitization exclusively consist of performing secured and unsecured loans originated by, owned by and carried as an asset of the Bank, being all such loans granted to SME and Corporate customers located in Bulgaria and denominated in EUR and BGN. For Regulatory reporting purposes all loans are treated under the Advanced-IRB approach.

In accordance with the Financial Guarantee, the underlying portfolio includes in whole or in part also loans arising under revolving credit and/or overdraft facilities whereby the reference obligation notional amount refers to the sum of (a) the maximum undrawn commitment granted by the originator under such facilities and (b) all drawn amounts under such facilities.

As an originator of the reference portfolio the Bank retains, on an unhedged and unguaranteed basis, an exposure to each loan which will be at all times at least 5% of the notional amount and which will not benefit from the Guarantee (the “Retained Exposure Amount”) in compliance with Art. 6(3)(a) of Regulation (EU) 2017/2402.

The main characteristics of the Updated Reference Obligation Portfolio with reference to 31st December 2022 are the following:

- Outstanding securitized amount (Reference Portfolio Notional Amount) BGN 1 866 812 962;
- RWA without securitization: BGN 1 158 888 175 (62.08% of the securitized portfolio);
- Expected Loss without securitization: BGN 9 890 576 (0.53% of the securitized portfolio);
- RWA after application of securitization framework: BGN 169 879 979 (9.1% of the securitized portfolio);



- Expected Loss after application of securitization framework: BGN 0;
- Weighted average PD of 1.21%;
- Weighted average LGD of 49.68%.

Transaction structure

The Financial guarantee has following structure (as at 31.12.2022) with Pro-Rata Amortization with relevant switches to Sequential Amortization.

Tranche	BGN Nominal Amount	Thickness	Attach	Detach	Guaranteed	Retained %	Amortization Typology
Senior	1 698 799 795	91.00%	9%	100%	0%	100%	Pro-Rata +
Junior (Commitment)	168 013 167	9.00%	0%	9%	100%	0%	Sequential

The transaction encompasses, inter alia, the following customary call options in favour of the Originator:

- Clean-Up Call meets the requirements of Art. 245(4)(f) of the Regulation (EU) 2017/2401
- Time Call can be exercised just after a period of time (measured from the Closing Date) equal to the initial portfolio weighted average life without considering any prepayment rate or default rate ("Early Termination Threshold Date")
- Regulatory Change, being a change of law or regulation which leads to a less favourable regulatory capital treatment for the Originator
- Significant Risk Transfer Failure
- Tax Event

The Credit Events that qualify a loan as a defaulted exposure and hence trigger a payment under the Financial Guarantee are the following (in accordance with the Financial Guarantee):

- Failure to Pay \geq 90 days past due
- Bankruptcy of the reference obligor
- Restructuring
- Default

The transaction achieved Significant Risk Transfer starting from November 2022, by complying with Article 245(2)(b) of Regulation (EU) 2017/2401, since the transaction was structured to transfer the whole Junior tranche to third parties and complying with risk retention requirements set forth in Article 6 of Regulation (EU) 2017/2402 through the retention of not less than 5% of the nominal value of each securitized exposure. The regulatory treatment applied to the transaction is that for STS transactions envisaged by the article 260 of the Regulation (EU) 2017/2401.

Other securitization deals

In 2011 Bank has signed First Loss Guarantee Agreement (FLPG) with European Investment Fund, covering newly disbursed SME loans. In 2012 upon agreement for the regulatory treatment with Bulgarian National Bank, the above mentioned transaction is presented as synthetic securitization under STA for the purposes of allocating capital for credit risk under Basel III. From October 2016 the Bank applies Supervisory Formula Method for calculation for capital allocation purposes. Summary of FLPG as of December 31, 2022 is presented in the table below:



NAME	EIF JEREMIE
Type of securitization:	First Loss Portfolio Guarantee
Originator:	UniCredit Bulbank
Issuer:	European Investment Fund
Target transaction:	Capital Relief and risk transfer
Type of asset:	Highly diversified and granular pool of newly granted SME loans
Quality of Assets as of December 31, 2022	Performing loans
Agreed maximum portfolio volume:	EUR 85,000 thousand
Nominal Value of reference portfolio:	BGN 1 359 thousand
Issued guarantees by third parties:	First loss cash coverage by EIF
Amount and Condition of tranching:	
Reference Position Junior Tranche as of December 31, 2022	BGN 538 thousand

Quantitative information regarding securitization positions is disclosed as follows:

- ***Template EU-SEC1 - Securitisation exposures in the non-trading book***
- ***Template EU-SEC3 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as originator or as sponsor***
- ***Template EU-SEC5 - Exposures securitised by the institution - Exposures in default and specific credit risk adjustments***

The following information is not relevant to UniCredit Bulbank:

- ***Template EU-SEC2 - Securitisation exposures in the trading book***
- ***Template EU-SEC4 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as investor***



20 LEVERAGE

In compliance with Article 451 of Regulation (EU) 575/2013, UniCredit Bulbank disclose the information regarding the leverage ratio and the management of the risk of excessive leverage.

The Basel III framework introduces the leverage ratio as a credible supplementary measure to the risk-based capital requirements which is defined as the Capital Measure divided by the Exposure Measure. The Capital Measure is the Tier 1 capital and the Exposure Measure is the sum of on-balance sheet exposures; derivative exposures; securities financing transaction exposures; and off-balance sheet items.

The Basel III Leverage Ratio is one of the Risk Appetite KPI of UniCredit Bulbank which is subject to quarterly monitoring against the approved Risk Appetite thresholds (target, trigger and limit levels). Leverage ratio Target is set consistently with the Tier 1 ratio Target, in order to embed impacts from stress testing, potential risks to be faced and business-as-usual volatility. In addition, in coherence with Group strategies defined within Budget/MYP processes and in line with the desired long-term sustainability of the balance sheet, a conservative, but still “going concern”/“ordinary”, maximum ratio between “risk weighted asset” and “unweighted total exposures” (LR total exposures) is identified, to translate the T1 ratio target into Leverage ratio target.

The factors that had an impact on the leverage ratio during the period to which the disclosed leverage ratio refers are mainly the dynamics from on balance sheet exposures as Tier 1 and Off-balance sheet items are relatively stable.

UniCredit Bulbank discloses the Leverage ratio according to article 499, 1 (a) of Regulation (EU) 575/2013 and Commission Implementing Regulation (EU) 2016/200 of 15 February 2016.

Detailed information is disclosed in

- ***Template EU LR1 - LRSum: Summary reconciliation of accounting assets and leverage ratio exposures***
- ***Template EU LR2 - LRCom: Leverage ratio common disclosure***
- ***Template EU LR3 - LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)***

21 LIQUIDITY REQUIREMENTS

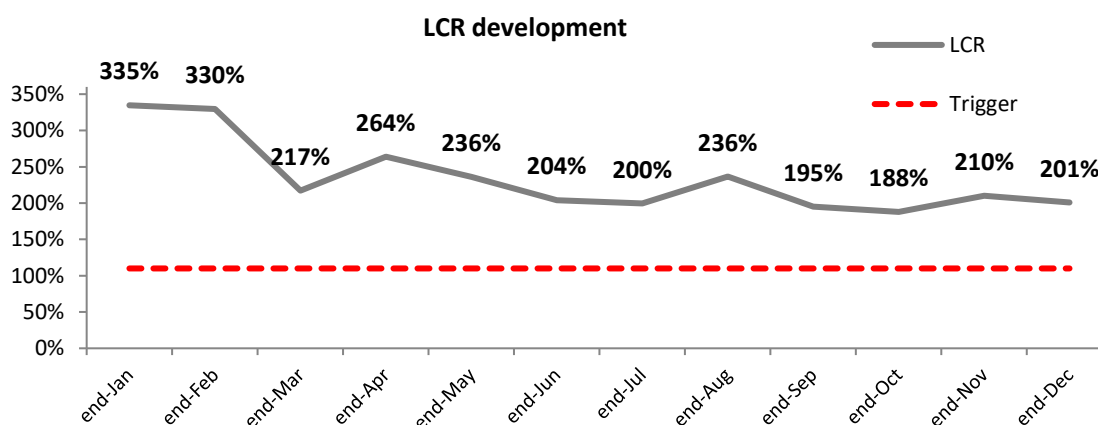
Following the EBA/GL/2017/01 Guidelines on LCR disclosure to complement the disclosure of liquidity risk management under Article 435 of Regulation (EU) 575/2013, the information related to *Templates EU LIQ1: LCR disclosure template and the template on qualitative information on the LCR* is presented below.

The LCR disclosure template on quantitative information of LCR is presented in **APPENDIX 1 – EU LIQ1: LCR disclosure template on quantitative information** (*Template EU LIQ1, EBA/GL/2017/01*).

The qualitative information on LCR, which complements the LCR disclosure template (EU LIQ 1) is described below

During 2022, UniCredit Bulbank's Liquidity Coverage Ratio (LCR) was always well above the Risk Appetite Framework trigger of 110% confirming the adequacy of the liquidity buffer from a regulatory perspective.

Liquidity Coverage Ratio in 2022



In general, abundant market liquidity and precautionary stance in light of uncertainties posed by the pandemic, has resulted, for the banking system as a whole, in liquidity levels well above regulatory limits.

For UniCredit Bulbank, the LCR was at even higher levels, consistently above internal targets. The Bank is well situated for organic growth and adequately prepared to face new liquidity challenges, as a result of world political instability and climate changes. This will also help ease the burden of the cost of such excess of liquidity, while maintaining liquidity buffers well above internal and regulatory thresholds.

The monthly trend in the LCR is defined primarily by the main pillars of the liquidity strategy applied by the bank, namely targeting optimal risk-return profile of the investments in the view of generating added value, acting on both revenues and capital absorption layers thus generating sustainable returns. In this respect the LCR is influenced by:

- Reallocation of funds from placements in Central Bank to placements in other commercial banks
- Blend of maturities of placements: short-term up to 1Mo and long-term above 1Mo



The drop in LCR ratio in Mar is related to the above mentioned re-allocation of liquidity between placements in Central Bank, while the drop in May is influenced in addition by the paid dividend to the parent company.

In 2022 banking book liquidity was extremely strong, with deposits growth overpassing lending growth supporting high LCR levels throughout the year.

In 2022 UniCredit Bulbank continue to fund it's lending growth primarily through customer deposits. After the change in ECB monetary policy and transition to positive rates, UniCredit Bulbnk abolished the excess liquidity fee (since Aug'22) which on top of the solid reputation of the bank, boosted further the growth in customer deposits and they reached record level of BGN 23.2 bln., +17.3% y/y. Respectively the Net/Loan Deposits Ratio remained significantly below 100%: at 66.8% (consolidated perimeter) positioning the bank well for utilizing further growth opportunities.

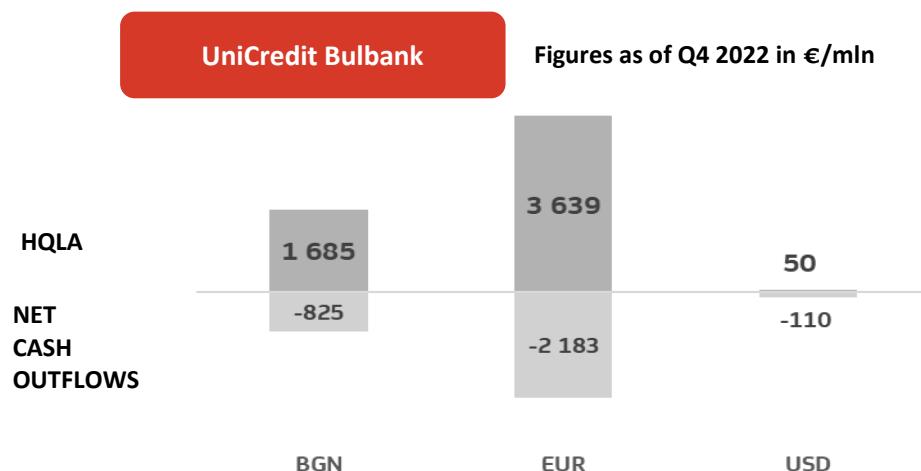
Overall, UniCredit Bulbank displays a balanced funding structure, with deposits from customers representing 92% of the external liabilities by the end of 2022 and the residual components made of bank deposits (6%) and Debt securities issued e.g. iMrel (2%). The customer deposits are diversified in terms of clients (56% retail, 39% corporate and 5% private) and currencies (64% BGN, 29% EUR, 7% USD and 1% Other).

As reported to Bulgarian National Bank, UniCredit Bulbank has about EUR 5.4bn of unencumbered aggregate liquidity resources as of December 31st 2022, registering an insignificant increase compared to EUR 5.3bn in 2021, which is mainly explained by the increase in customer liquidity, complemented by the transfer of funds from interbank placements to the Level 1 Assets.

The significant portion of the bank's liquidity resources (63% of total HQLA / 2021 60%) are held at the CB account. The driving force for which was also mid-year change at ECB monetary policy and positive revers central interest rates followed shortly by Bulgarian Central Bank (BNB) interest rates for commercial banks funds.

In addition, the Bank holds a portfolio of highly liquid sovereign bonds (33% from HQLA) issued by the governments of Bulgaria, Italy, Poland, Spain, Romania and USA. The Level 1 HQLA has the following structure by currency: 44,5% of the bond portfolio is denominated in EUR, 47,2% of liquid assets are denominated in BGN and 2,5% in USD.

The Bank's ability to easily swap currencies and raise funds in foreign currency markets may be constrained during stressed conditions, thus Article 8(6) of the LCR Delegated Regulation requires banks to ensure that the currency denomination of their liquid assets is consistent with the distribution by currency of their net liquidity outflows. Respectively, Bulbank is monitoring of the LCR in different currencies:



It shows the LCR of Bulbank in BGN and EUR is well above 100%, with HQLA denominated in the respective currency exceeding net outflows. The main Outflow components are:

- For BGN-denominated positions - the Outflows from Retail deposits, the Outflows from unsecured deposits (non-operational deposits from NFC mainly) and Committed facilities
- For EUR-denominated positions the Outflows from Derivatives payable, the Outflows from Retail deposits, the Outflows from unsecured deposits (non-operational deposits from NFC mainly) and Committed facilities
- For USD-denominated positions - the Outflows from Derivatives payable, Outflows from Retail deposits

As for the LCR in USD, although the metric is material in terms of the internal quantitative criterion, Bulbank monitors it without a specific trigger level (as part of the granular set of limitations) due to the fact that the major part of USD funding is composed of stable customer deposits with the full liquidity potential being preserved by exploring the most liquid swaps markets. Moreover, the current limitations on internal metrics Funding gap and Operative Maturity Ladder in USD (the exposure is strictly positive for both metrics) are deemed enough and efficient to steer the USD liquidity position in the bank.

The collaterals calls have immaterial impact on Bulbanks's LCR and there are no other items that could affect materially the LCR levels besides the one disclosed in the template.

More information on liquidity requirements is disclosed in:

- *Template EU LIQ1 - Quantitative information of LCR*
- *Template EU LIQ2: Net Stable Funding Ratio*



22 REMUNERATION POLICY

The Remuneration policy of UniCredit Bulbank AD is approved by the Supervisory Board of the Bank. The Policy is consistent with UniCredit Group's policy to attract, retain and motivate a highly qualified workforce and its main pillars are in compliance with the principles set by the Group remuneration policy, and also apply to Bank's subsidiaries. The main principles (pillars) of the Policy are: Clear and transparent governance, Compliance with the regulatory requirements and principles of good business conduct, Continuous monitoring of the market trends and practices, Sustainable pay for sustainable performance, Motivation and retention of all employees, with particular focus on talents and mission-critical resources. The key pillars of Remuneration policy ensure correct definition of competitive compensation levels, internal equity and transparency.

The Remuneration committee is responsible for the preparation of decisions on remuneration to be taken by the Supervisory Board, including the remuneration of the members of the management board of the Bank and the Executive Directors. The Remuneration committee consists of three members – Supervisory board members and 2 of them are independent thus complying with the requirements of the Credit Institutions Act. Members of the Remuneration committee (2 independent members and 1 “non-independent”) are appointed for a mandate of 3 years as per the rules for the work of the Remuneration committee. The Remuneration committee meetings in terms of time-line follow the compensation processes withing the UniCredit Group and roughly include dedicated meetings in February/March for reviewing the bank's performance and the individual proposals for remuneration of the Material risk takers, in March/April for approving the total country bonus pool, in July for approving the Remuneration policy, the goals of the Material risk takers and the Group Incentive System rules, as well as ad-hoc meetings related to other matters like update of the Performance management rules, gender pay-gap status, result of the identification process for Material risk takers and similar. The proposals of the Remuneration committee are then provided for Supervisory board approval on the preliminary planned meetings or in case of targteing certain deadlines, even through per-rollam approvals. In year 2022 the RemCo had 4 Meetings on the topics mentioned above. No external consultants were used, apart of information on the market remuneration for certain Group material risk takers roles, provided in a centralized manner by UniCredit Group.

Main requirement of the Incentive Systems applicable to all categories employees at all levels, is to contribute to the sustainability of the Bank and to the Group by aligning individual goals and behaviors to the long-term mission of the Group and the Bank while avoiding taking a risk that exceeds the general level of risk tolerated by the Bank. Following the UniCredit Group's Policy, UniCredit Bulbank applies the principle of “Sustainable pay for sustainable performance” when determining the results and behaviors which aim to reward.

Sustainable pay is a principle that ensures a continuous link between pay and performance as well as binds the rewards to the long-term value creation for the organization and to the sound and effective risk management through a variable payment connected to the achieved short-term and long-term results. The variable remuneration linked to the achieved results of the employee and to the individual contribution is supplementing the fixed salary contracted according to individual's professional qualification, experience and skills. In this way the Bank ensures an adequate balance between the fixed and the variable part of the total compensation package in order to ensure sound and effective risk management. This excludes encouraging of behaviors not aligned to the Bank's sustainable business



results as well as rewarding single employees for taking risks which exceed those acceptable for the institution.

The alignment between the incentive payout levels with the overall economic results of the Bank is guaranteed by the adopted flexible and adaptive incentive systems. In compliance with the policy and practices of UniCredit Group these systems ensure a direct link between the individual incentive payout levels on one hand and the overall achieved team and individual results for the Bank on the other.

The Performance Management and Incentive System is set in order to create a strong link between actual results and annual bonus, as for the purpose UniCredit Bulbank adopts a "Bonus Pool" approach, which is based on "Solidarity" principle - local overall amount for bonus allocation is subject not only to country achievement of Bank targets and results, but also to CE/EE Division and Group results.

In order to avoid payment of guaranteed bonuses not linked to the achieved results, the implemented Incentive Systems introduce minimum performance thresholds below which zero bonus is paid, thereby avoiding payment of guaranteed additional financial rewards (bonuses) that do not correspond to the achieved results. In compliance with the regulatory requirements - for the personnel belonging to the business functions, including Material risk takers, is applicable a maximum ratio between variable and fixed remuneration of 2:1. For the rest of the staff it is a maximum ratio between the variable and the fixed components of the remuneration equal to 1:1, except for the staff of the Company Control Functions and People&Culture, for which it is expected that the fixed remuneration is a predominant component of the total remuneration and the incentive mechanisms are consistent with the assigned tasks as well as being independent of results from areas under their control.

Labor employment/civil contract with the Bank, including management contract, do not guarantee additional remuneration (bonus). The Incentive systems and the corresponding remuneration are constructed in accordance to the objectives stated in the Strategic plan of UniCredit Group and UniCredit Bulbank. Through the compensation systems the variable remuneration payment is aligned with performance of the goals at Bank level, performance of the goals of the respective structure and the individual contribution of the employee.

The overall evaluation of the results from the activity is based not only on the sole basis of short-term results but also on their long-term impact on company's achievements. This is ensured through setting the annual goals targeted to sustainable value creation for the company with particular reference to risk. The additional rewards (bonuses) are subject of achieving certain entry conditions on Group, Division and Country level, which conditions are related not only to the profitability, but also to the long-term sustainability through assigning sets of KPIs related to capital and liquidity, providing opportunity for adjustment related to the risk performance. The annual goals are set by implementation of key performance indicators (KPIs) that include besides profitability other drivers of sustainable business development including reference to risk, and efficiency, customer satisfaction, quality of internal interaction between business lines, sustainable transfer of knowledge and ensuring business continuity and process management. Performance is measured and rewarded not only on the sole basis of achieving financially-based objectives but also on other criteria for example - risk management, adherence to group values and standards of consistently ethical behavior.

Evaluating the activity of the control functions and defining the remuneration is based on the principle of independence of the structural units that they control. This is achieved by not setting financial goals of the control functions that are related to the achievement of financial and business goals of the structures that they control.



UniCredit Bulbank performed in the beginning of 2022 the local assessment of its and its subsidiaries Material Risk Takers for the Bulgarian legal entities, part of UniCredit Group. Local People and Culture, local Risk Management and local Compliance functions are appropriately involved in the assessment.

According to the Bulgarian and the European legislation, UniCredit Bulbank introduces the Material Risk Takers (identified staff) category for which the principles of deferred variable compensation payout in cash and equity apply. Material Risk Takers (identified staff) are divided into two groups. Group Material Risk Takers - responsible for the daily management of the bank (which positions belong to the Group SVP band or above) and heads of independent control functions. Local Material Risk Taker - all other employees in selected roles which meet the European quantitative and qualitative criteria and consistent with the governance structure of UniCredit Bulbank. For Identified staff are determined certain specific performance indicators, through the measurement of which is guaranteed that in case of poor performance, reduction of deferred remuneration will apply (so-called Malus conditions / Zero Factor, which could completely cancel the payment of variable remuneration in case of unsatisfactory results). The variable compensation of the Material Risk Takers is paid within a predetermined four to six year period. Bonus payouts are made in separate parts through a balanced structure of upfront (following the moment of performance evaluation) and deferred payouts in cash and instruments (shares). A retention period applies to the remuneration in shares.

For 2022 year this group includes the members of the Supervisory Board of the Bank, the Chief Executive Officer and the General Manager of UniCredit Bulbank, the Members of the Management board of the Bank, the Managers of Control functions, UniCredit Leasing Management Board members, UniCredit Consumer Financing Management Board members, employees in Markets and Brokerage Department depending on their individual limits for transactions incl. Head of Markets and Brokerage Department, members of Credit council/ Credit Committee, employees in Risk Management Division with individual limits for approval of loans exceeding the quantitative criteria. The criteria for inclusion in the category of Material Risk Takers follow the detailed criteria of the European Banking Authority and are consistent with the approach of UniCredit Group, taking into account the powers of individual material impact.

For every Material Risk Takers, for every particular year, the payment of the Bonus shall be subject to the assessment, which may confirm, reduce or cancel eligibility to the Bonus Instalment. For Material Risk Takers is applied the threshold for variable remuneration of 50 000 Euro or one third of the total annual remuneration, below which variable remuneration is not deferred.

With reference to payout structure, the Material Risk Taker population is differentiated into several clusters, using a combined approach of position and compensation. The payout of incentives is done through upfront and deferred instalments, in cash or in UniCredit ordinary shares/UniCredit "phantom shares", over a multi-year period as per the respective deferral schemes valid for different clusters of population. Each share tranche is subject to a 1-year retention period for both upfront and deferred shares, as foreseen by regulation. All the instalments are subject to the application of claw-back conditions, as legally enforceable.

The overall number of identified staff, who received variable remuneration below the threshold for deferral of 50 000 EUR or 1/3rd of the total remuneration on individual level, is 93. The total amount of variable payments for these employees is 1188 TEUR and the total amount of the fixed remuneration is 4299 TEUR, thus summing up to a total remuneration of 5487 TEUR.



Quantitative information about remuneration is disclosed in:

- ***Template EU REM1 - Remuneration awarded for the financial year***
- ***Template EU REM3 - Deferred remuneration***
- ***Template EU REM5 - Information on remuneration of staff whose professional activities have a material impact on institutions' risk profile (identified staff)***

The following information is not relevant to UniCredit Bulbank:

- ***Template EU REM2 - Special payments to staff whose professional activities have a material impact on institutions' risk profile (identified staff)***
- ***Template EU REM4 - Remuneration of 1 million EUR or more per year***

APPENDICES

Template EU KM1 - Key Metrics

In thousands of BGN

		a	b	c	d	e
		31.12.2022	30.09.2022	30.06.2022	31.03.2022	31.12.2021
	Available own funds (amounts)					
1	Common Equity Tier 1 (CET1) capital	3 111 187	3 074 386	3 163 314	3 237 189	3 301 187
2	Tier 1 capital	3 111 187	3 074 386	3 163 314	3 237 189	3 301 187
3	Total capital	3 158 879	3 131 081	3 219 476	3 289 966	3 345 702
	Risk-weighted exposure amounts					
4	Total risk exposure amount	12 236 447	13 588 835	13 377 979	12 667 022	11 262 227
	Capital ratios (as a percentage of risk-weighted exposure amount)					
5	Common Equity Tier 1 ratio (%)	25.43%	22.62%	23.65%	25.56%	29.31%
6	Tier 1 ratio (%)	25.43%	22.62%	23.65%	25.56%	29.31%
7	Total capital ratio (%)	25.82%	23.04%	24.07%	25.97%	29.71%
	Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)					
EU 7a	Additional own funds requirements to address risks other than the risk of excessive leverage (%)	9.75%	9.75%	9.75%	9.75%	8.00%
EU 7b	of which: to be made up of CET1 capital (percentage points)	6.25%	5.48%	5.48%	5.48%	4.50%
EU 7c	of which: to be made up of Tier 1 capital (percentage points)	7.75%	7.31%	7.31%	7.31%	6.00%
EU 7d	Total SREP own funds requirements (%)	9.75%	9.75%	9.75%	9.75%	8.00%
	Combined buffer and overall capital requirement (as a percentage of risk-weighted exposure amount)					
8	Capital conservation buffer (%)	2.50%	2.50%	2.50%	2.50%	2.50%
EU 8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	0.00%	0.00%	0.00%	0.00%	0.00%
9	Institution specific countercyclical capital buffer (%)	0.96%	0.48%	0.49%	0.49%	0.49%
EU 9a	Systemic risk buffer (%)	2.75%	2.84%	2.80%	2.80%	2.77%
10	Global Systemically Important Institution buffer (%)	0.00%	0.00%	0.00%	0.00%	0.00%
EU 10a	Other Systemically Important Institution buffer (%)	1.00%	1.00%	1.00%	1.00%	1.00%
11	Combined buffer requirement (%)	7.21%	6.82%	6.79%	6.79%	6.76%
EU 11a	Overall capital requirements (%)	16.96%	16.57%	16.54%	16.54%	14.76%
12	CET1 available after meeting the total SREP own funds requirements (%)	16.07%	13.29%	14.32%	16.22%	21.71%
	Leverage ratio					
13	Total exposure measure	32 398 438	30 825 963	29 399 603	29 509 282	27 868 190
14	Leverage ratio (%)	9.60%	9.97%	10.76%	10.97%	11.85%
	Additional own funds requirements to address the risk of excessive leverage (as a percentage of total exposure measure)					
EU 14a	Additional own funds requirements to address the risk of excessive leverage (%)	0.00%	0.00%	0.00%	0.00%	0.00%
EU 14b	of which: to be made up of CET1 capital (percentage points)					
EU 14c	Total SREP leverage ratio requirements (%)	3.00%	3.00%	3.00%	3.00%	3.00%
	Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)					
EU 14d	Leverage ratio buffer requirement (%)	0.00%	0.00%	0.00%	0.00%	0.00%
EU 14e	Overall leverage ratio requirement (%)	3.00%	3.00%	3.00%	3.00%	3.00%
	Liquidity Coverage Ratio					
15	Total high-quality liquid assets (HQLA) (Weighted value - average)	10 511 366	9 876 632	9 330 994	10 535 591	10 341 689
EU 16a	Cash outflows - Total weighted value	9 649 411	8 911 743	8 888 546	8 279 957	7 548 248
EU 16b	Cash inflows - Total weighted value	4 420 717	3 848 811	4 303 662	3 415 082	3 288 707
16	Total net cash outflows (adjusted value)	5 228 694	5 062 932	4 584 884	4 864 875	4 259 541
17	Liquidity coverage ratio (%)	201.03%	195.08%	203.52%	216.56%	242.79%
	Net Stable Funding Ratio					
18	Total available stable funding	21 488 850	20 557 802	19 666 863	19 908 337	19 237 682
19	Total required stable funding	11 825 832	11 505 054	10 908 300	10 329 029	9 693 099
20	NSFR ratio (%)	181.71%	178.68%	180.29%	192.74%	198.47%



EU OV1 - OVERVIEW OF RWAs

In thousands of BGN

		Total risk exposure amounts (TREA)		Total own funds requirements
		a	b	c
		31.12.2022	31.12.2021	31.12.2022
1	Credit risk (excluding CCR)	10 732 103	9 882 596	858 568
2	Of which the standardised approach	2 954 965	2 633 356	236 397
3	Of which the Foundation IRB (F-IRB) approach	769 014	828 698	61 521
4	Of which slotting approach	1 140 835	997 809	91 267
EU 4a	Of which equities under the simple riskweighted approach	41 799	39 612	3 344
5	Of which the Advanced IRB (A-IRB) approach	5 796 892	5 354 523	463 751
6	Counterparty credit risk - CCR	209 925	177 917	16 794
7	Of which the standardised approach	167 202	171 837	13 376
8	Of which internal model method (IMM)	0	0	0
EU 8a	Of which exposures to a CCP	0	0	0
EU 8b	Of which credit valuation adjustment - CVA	33 600	3 788	2 688
9	Of which other CCR	9 123	2 292	730
10	Not applicable			0
11	Not applicable			0
12	Not applicable			0
13	Not applicable			0
14	Not applicable			0
15	Settlement risk	0	0	0
16	Securitisation exposures in the non-trading book (after the cap)	169 880	0	13 590
17	Of which SEC-IRBA approach			0
18	Of which SEC-ERBA (including IAA)			0
19	Of which SEC-SA approach			0
EU 19a	Of which 1250% / deduction			0
20	Position, foreign exchange and commodities risks (Market risk)	8 376	91 651	670
21	Of which the standardised approach	8 376	91 651	670
22	Of which IMA	0	0	0
EU 22a	Large exposures	33 600	3 788	2 688
23	Operational risk	1 116 163	1 110 063	89 293
EU 23a	Of which basic indicator approach	0	0	0
EU 23b	Of which standardised approach	0	0	0
EU 23c	Of which advanced measurement approach	1 116 163	1 110 063	89 293
24	Amounts below the thresholds for deduction (subject to 250% risk weight)	0	10 055	0
25	Not applicable			0
26	Not applicable			0
27	Not applicable			0
28	Not applicable			0
29	Total	12 270 047	11 266 015	981 604



TEMPLATE EU LI1 - DIFFERENCES BETWEEN THE ACCOUNTING SCOPE AND THE SCOPE OF PRUDENTIAL CONSOLIDATION AND MAPPING OF FINANCIAL STATEMENT CATEGORIES WITH REGULATORY RISK CATEGORIES

In thousands of BGN

		a	b	c	d	e	f	g
		Carrying values as reported in published financial statements (*)	Carrying values under scope of prudential consolidation (*)	Carrying values of items (**)				
				Subject to the credit risk framework	Subject to the CCR framework	Subject to the securitisation framework	Subject to the market risk framework	Not subject to own funds requirements or subject to deduction from own funds (***)
	Breakdown by asset classes according to the balance sheet in the published financial statements							
1	Cash and balances with Central Bank	7 070 405	7 070 405	7 070 405				
2	Non-derivative financial assets held for trading	2 828	2 828				2 828	
3	Derivatives held for trading	116 097	116 097		116 097		113 225	
4	Derivatives held for hedging	131 468	131 468		131 468			
5	Loans and advances to banks and debt securities at amortised cost	1 282 131	1 282 131	367 131	915 000			
6	there of Reverse Repos	915 000	915 000		915 000			
7	Loans and advances to customers and debt securities at amortised cost	16 491 066	16 491 067	15 176 368		1 867 351		
8	Pledged debt securities at amortised cost	180 384	180 384	180 384				
9	Finance leases	936 872	936 872	936 872				
10	Investment securities	1 471 666	1 471 666	1 471 666				
11	Pledged investment securities	1 062 591	1 062 591	1 062 591				
12	Investments in associates	3 885	3 890	3 890				
13	Property, plant, equipment, right of use assets and investment properties	339 770	332 940	332 940				
14	Intangible assets	98 671	98 671	44 931				53 740
15	Current tax assets	1 687	1 687	1 687				0
16	Deferred tax assets	3 686	3 674	3 766				0
17	Other assets	108 793	114 134	114 134				0
	Total assets	30 217 000	30 215 505	26 766 765	2 077 565	1 867 351	116 053	53 740



	Breakdown by liability classes according to the balance sheet in the published financial statements							
1	Financial liabilities held for trading	159 306	159 306		159 306		142 220	0
2	Derivatives used for hedging	132 160	132 160		132 160			0
3	Deposits from banks	1 613 792	1 613 792		1 240 386			373 406
4	<i>there of Repos</i>	1 240 386	1 240 386		1 240 386			0
5	Deposits from customers and other financial liabilities at amortized cost	23 222 863	23 229 191		477 521			22 751 670
6	Debt securities issued	313 701	313 701					313 701
7	Provisions	139 984	139 984					139 984
8	Current tax liabilities	618	562					562
9	Deferred tax liabilities	9 420	8 914					8 914
10	Other liabilities	133 550	133 521					133 521
	Total liabilities	25 725 394	25 731 131	0	2 009 373	0	142 220	23 721 758

Notes:

(*) The differences between the amounts under the columns a) and b) substantially depend on the composition of IAS/IFRS versus regulatory perimeters (ref. Annex 3 - Template EU LI3 - Outline of the differences in the scopes of consolidation). Shareholder's equity items are not reported among the balance sheet liabilities of this template as they are already disclosed in template EU CC2 - Reconciliation of regulatory Own Funds to balance sheet in the audited financial statements, of the chapter Own Funds of the present document.

(**) The allocation of the amount in column b) across columns from c) to g) is based on the following approach:

- for balance sheet assets' items such amount depends on the risk categories, they may be subject to, including also those items which do not involve capital requirement;
- for balance sheet liabilities' items such amount includes the amount of liabilities relevant for the calculation of risk-weighted assets or for offsetting balance sheet assets' items;
- The sum of amounts disclosed in columns from c) to g) may be different than the total amount in column b) for the following reasons:
 - some items may be subject to capital requirements for more than one risk under the regulatory framework (e.g. derivative instruments classified in item "Financial assets held for trading");
 - with reference to tax assets and liabilities the amounts disclosed in columns c) and g) are calculated net of deferred tax liabilities according to CRR netting rules, which are different from the accounting netting rules reflected into the carrying values under column b)

(***)

- for intangible assets the deduction of software is represented gross of deferred tax liabilities;
- for items under the balance sheet liabilities side the column includes the liabilities which are not included in the regulatory framework for RWA and deferred tax liabilities (4 463 TBNG) reducing the deduction for intangible assets


TEMPLATE EU LI2 - MAIN SOURCES OF DIFFERENCES BETWEEN REGULATORY EXPOSURE AMOUNTS AND CARRYING VALUES IN FINANCIAL STATEMENTS
In thousands of BGN

		a	b	c	d	e
		Total (*)	Items subject to			
			Credit risk framework	Securitisation framework	CCR framework	Market risk framework
1	Assets carrying value amount under the scope of prudential consolidation (as per template LI1) (**)	30 711 681	26 766 765	1 867 351	2 077 565	116 053
2	Liabilities carrying value amount under the scope of prudential consolidation (as per template LI1) (***)	2 009 373	0	0	2 009 373	142 220
3	Total net amount under the scope of prudential consolidation (****)	30 711 681	26 766 765	1 867 351	2 077 565	116 053
4	Off-balance-sheet amounts	7 993 705	7 993 705			
5	<i>Differences in valuations</i>	-3 541	-2 981		-560	
6	<i>Differences due to different netting rules, other than those already included in row 2</i>	-468 601	-468 601			
7	<i>Differences due to consideration of provisions</i>	-768 154	-768 154			
8	<i>Differences due to the use of credit risk mitigation techniques (CRMs)</i>	-490 921	-490 921			
9	<i>Differences due to credit conversion factors</i>	-4 238 059	-4 238 059			
10	<i>Differences due to Securitisation with risk transfer</i>	-168 551	-168 551			
11	<i>Other differences</i>	0				
12	Exposure amounts considered for regulatory purposes (*****)	32 567 559	28 623 203	1 867 351	2 077 005	5 890

Notes:

(*) With reference to the column a), the amounts correspond to the carrying value under the regulatory scope of consolidation calculated as sum of column from b) to d) of this template, while amount reported in column e) related to carrying values subject to the market risk framework is not included.

(**) With reference to the row 1, the amounts disclosed in columns from b) to e) correspond to the carrying value under the scope of regulatory consolidation of the balance sheet assets, as reported in columns from c) to f) of template EU LI1 in the present section.

(***) With reference to the row 2, the amounts disclosed under the columns from b) to e) correspond to the carrying value under the scope of regulatory consolidation of the balance sheet liabilities reported respectively under the columns from c) to f) of template EU LI1 in the present section.

(****) The amount disclosed in row 3 coincides with the row 1 since any applicable on-balance sheet netting of assets and liabilities are already reflected in the amounts reported in row 1.

(*****) The amount disclosed in row 12, column e) refers to the “Positions subject to capital charge” for market risk position under the Standardized Approach.


TEMPLATE EU LI3 - OUTLINE OF THE DIFFERENCES IN THE SCOPES OF CONSOLIDATION (ENTITY BY ENTITY)

a	b	c	d	e	f	g	h
Name of the entity	Method of accounting consolidation	Method of prudential consolidation					Description of the entity
		Full consolidation	Proportional consolidation	Equity method	Neither consolidated nor deducted	Deducted	
<i>UniCredit Leasing EAD</i>	<i>Full consolidation</i>	<i>X</i>					Leasing activities
<i>UniCredit Consumer Financing EAD</i>	<i>Full consolidation</i>	<i>X</i>					Consumer lending and other similar activities in line with the applicable law and regulations
<i>UniCredit Fleet Management EOOD</i>	<i>Full consolidation</i>	<i>X</i>					Transport services
Cash Service Company AD	<i>Equity method</i>			<i>X</i>			Accepting, processing, safekeeping and delivering of valuable consignments with banknotes and coins to the banks
<i>UniCredit Insurance Broker OOD</i>	<i>Full consolidation</i>				<i>X</i>		Insurance entity


TEMPLATE EU PV1 - PRUDENT VALUATION ADJUSTMENTS (PVA)
In thousands of BGN

		a	b	c	d	e	EU e1	EU e2	f	g	h
		Risk category					Category level AVA - Valuation uncertainty		Total category level post-diversification		
		Equity	Interest Rates	Foreign exchange	Credit	Commodities	Unearned credit spreads AVA	Investment and funding costs AVA		Of which: Total core approach in the trading book	Of which: Total core approach in the banking book
1	Market price uncertainty	0	22	51	735	0	20	5	416	314	102
2	Not applicable										
3	Close-out cost	0	10	79	1 259	0	109	67	762	226	536
4	Concentrated positions	0	0	0	2 340	0	0	0	2 340	0	2 340
5	Early termination	0	0	0	0	0	0	0	0	0	0
6	Model risk	0	0	0	44	0	0	2	23	20	3
7	Operational risk	0	0	0	0	0	0	0	0	0	0
8	Not applicable										
9	Not applicable										
10	Future administrative costs	0	0	0	0	0	0	0	0	0	0
11	Not applicable										
12	Total Additional Valuation Adjustments (AVAs)	-	-	-	-	-	-	-	3 541	560	2 981


TEMPLATE EU CC1 - COMPOSITION OF REGULATORY OWN FUNDS
In thousands of BGN

		(a)	(b)
		Amounts	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
Common Equity Tier 1 (CET1) capital: Instruments and reserves			
1	Capital instruments and the related share premium accounts	285 777	3
	of which: ordinary shares	285 777	
	of which: Instrument type 2		
	of which: Instrument type 3		
2	Retained earnings	2 968 471	9
3	Accumulated other comprehensive income (and other reserves)	-145 055	4-5-6-7-8-10
EU-3a	Funds for general banking risk	0	
4	Amount of qualifying items referred to in Article 484 (3) CRR and the related share premium accounts subject to phase out from CET1	0	
5	Minority interests (amount allowed in consolidated CET1)	0	
EU-5a	Independently reviewed interim profits net of any foreseeable charge or dividend	0	
6	Common Equity Tier 1 (CET1) capital before regulatory adjustments	3 109 193	
Common Equity Tier 1 (CET1) capital: regulatory adjustments			
7	Additional value adjustments (negative amount)	0	
8	Intangible assets (net of related tax liability) (negative amount)	-49 277	1- 2
9	Not applicable	0	
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)	0	
11	Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value	71 689	4-7
12	Negative amounts resulting from the calculation of expected loss amounts	-172	12
13	Any increase in equity that results from securitised assets (negative amount)	0	

14	Gains or losses on liabilities valued at fair value resulting from changes in own credit standing	0	
15	Defined-benefit pension fund assets (negative amount)	0	
16	Direct, indirect and synthetic holdings by an institution of own CET1 instruments (negative amount)	0	
17	Direct, indirect and synthetic holdings of the CET 1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	0	
18	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	0	
19	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	0	
20	Not applicable	0	
EU-20a	Exposure amount of the following items which qualify for a RW of 1250%, where the institution opts for the deduction alternative	0	
EU-20b	of which: qualifying holdings outside the financial sector (negative amount)	0	
EU-20c	of which: securitisation positions (negative amount)	0	
EU-20d	of which: free deliveries (negative amount)	0	
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in Article 38-(3) CRR are met) (negative amount)	0	
22	Amount exceeding the 17,65% threshold (negative amount)	0	
23	of which: direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities	0	
24	Not applicable	0	
25	of which: deferred tax assets arising from temporary differences	0	
EU-25a	Losses for the current financial year (negative amount)	0	
EU-25b	Foreseeable tax charges relating to CET1 items except where the institution suitably adjusts the amount of CET1 items insofar as such tax charges reduce the amount up to which those items may be used to cover risks or losses (negative amount)	0	

26	Not applicable	0	
27	Qualifying AT1 deductions that exceed the AT1 items of the institution (negative amount)	0	
27a	Other regulatory adjustments	-20 246	13-14-15
28	Total regulatory adjustments to Common Equity Tier 1 (CET1)	1 994	
29	Common Equity Tier 1 (CET1) capital	3 111 187	
Additional Tier 1 (AT1) capital: instruments			
30	Capital instruments and the related share premium accounts	0	
31	of which: classified as equity under applicable accounting standards	0	
32	of which: classified as liabilities under applicable accounting standards	0	
33	Amount of qualifying items referred to in Article 484 (4) CRR and the related share premium accounts subject to phase out from AT1	0	
EU-33a	Amount of qualifying items referred to in Article 494a(1) CRR subject to phase out from AT1	0	
EU-33b	Amount of qualifying items referred to in Article 494b(1) CRR subject to phase out from AT1	0	
34	Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties	0	
35	of which: instruments issued by subsidiaries subject to phase out	0	
36	Additional Tier 1 (AT1) capital before regulatory adjustments	0	
Additional Tier 1 (AT1) capital: regulatory adjustments			
37	Direct, indirect and synthetic holdings by an institution of own AT1 instruments (negative amount)	0	
38	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	0	
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)	0	
40	Direct, indirect and synthetic holdings by the institution of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	0	
41	Not applicable	0	



42	Qualifying T2 deductions that exceed the T2 items of the institution (negative amount)	0	
42a	Other regulatory adjustments to AT1 capital	0	
43	Total regulatory adjustments to Additional Tier 1 (AT1) capital	0	
44	Additional Tier 1 (AT1) capital	0	
45	Tier 1 capital (T1 = CET1 + AT1)	3 111 187	
Tier 2 (T2) capital: instruments			
46	Capital instruments and the related share premium accounts	0	
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	0	
EU-47a	Amount of qualifying items referred to in Article 494a(2) CRR subject to phase out from T2	0	
EU-47b	Amount of qualifying items referred to in Article 494b(2) CRR subject to phase out from T2	0	
48	Qualifying own funds instruments included in consolidated T2 capital (including minority interests and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties	0	
49	of which: instruments issued by subsidiaries subject to phase out	0	
50	Credit risk adjustments	47 692	16
51	Tier 2 (T2) capital before regulatory adjustments	47 692	
Tier 2 (T2) capital: regulatory adjustments			
52	Direct, indirect and synthetic holdings by an institution of own T2 instruments and subordinated loans (negative amount)	0	
53	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	0	
54	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	0	
54a	Not applicable	0	



55	Direct, indirect and synthetic holdings by the institution of the T2 instruments and subordinated loans of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	0	
56	Not applicable	0	
EU-56a	Qualifying eligible liabilities deductions that exceed the eligible liabilities items of the institution (negative amount)	0	
EU-56b	Other regulatory adjustments to T2 capital	0	
57	Total regulatory adjustments to Tier 2 (T2) capital	0	
58	Tier 2 (T2) capital	47 692	
59	Total capital (TC = T1 + T2)	3 158 879	
60	Total Risk exposure amount	12 236 447	
Capital ratios and requirements including buffers			
61	Common Equity Tier 1 capital	25.43%	
62	Tier 1 capital	25.43%	
63	Total capital	25.82%	
64	Institution CET1 overall capital requirements	13.46%	
65	of which: capital conservation buffer requirement	2.50%	
66	of which: countercyclical capital buffer requirement	0.96%	
67	of which: systemic risk buffer requirement	2.75%	
EU-67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer requirement	1.00%	
EU-67b	of which: additional own funds requirements to address the risks other than the risk of excessive leverage	1.75%	
68	Common Equity Tier 1 capital (as a percentage of risk exposure amount) available after meeting the minimum capital requirements	16.07%	
National minima (If different from Basel III)			
69	Not applicable		
70	Not applicable		
71	Not applicable		
Amounts below the thresholds for deduction (before risk weighting)			
72	Direct and indirect holdings of own funds and eligible liabilities of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions)	0	



73	Direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 17.65% thresholds and net of eligible short positions)	0	
74	Not applicable		
75	Deferred tax assets arising from temporary differences (amount below 17,65% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met)	0	
Applicable caps on the inclusion of provisions in Tier 2			
76	Credit risk adjustments included in T2 in respect of exposures subject to standardised approach (prior to the application of the cap)	0	
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach	0	
78	Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)	423 893	
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach	47 692	
<i>Capital Instruments subject to phase-out arrangements (only applicable between 1 Jan 2014 and 1 Jan 2022)</i>			
80	Current cap on CET1 instruments subject to phase out arrangements	0	
81	Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)	0	
82	Current cap on AT1 instruments subject to phase out arrangements	0	
83	Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)	0	
84	Current cap on T2 instruments subject to phase out arrangements	0	
85	Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)	0	


TEMPLATE EU CC2 - RECONCILIATION OF REGULATORY OWN FUNDS TO BALANCE SHEET IN THE AUDITED FINANCIAL STATEMENTS
In thousands of BGN

		a	b	Amounts relevant for Own Funds purposes		c
		Balance sheet as in published financial statements	Under regulatory scope of consolidation	Common equity Tier 1 (CET 1)	Tier 2 (T2)	Reference to template EU CC1
		As at period end	As at period end			
BALANCE SHEET - ASSETS						
1	Intangible assets	98 671	98 671	(53 740)		8
BALANCE SHEET -LIABILITIES AND SHAREHOLDERS' EQUITY						
2	Deferred tax liabilities	9 420	8 914	4 463		8
3	Share capital	285 777	285 777	285 777		1
4	Revaluation reserves of which:	(146 957)	(146 957)	(75 268)		3
5	- Revaluation reserves of debt and capital instrumenta at fair value through OCI	(138 174)	(138 174)	(138 174)		3
6	-Revaluation reserve of tangible assets	64 547	64 547	64 547		3
7	-Cash flow hedge reserves	(71 689)	(71 689)			03-11
8	-Revaluation reserves on actuarial net losses	(1 641)	(1 641)	(1 641)		3
9	Retained earnings	2 975 453	2 968 471	2 968 471		2
10	Other reserves	1 902	1 902	1 902		3
11	Profit for the year	460 431	460 181			
OTHER ELEMENTS FOR RECONCILIATION WITH OWN FUNDS						
12	Shortfall of expected losses vs provisions (IRB models)			(172)		12
13	Fair value gains and losses arising from the institution's own credit risk related to derivative liabilities			(6 609)		27a
14	Insufficient coverage for non-performing exposures			(4)		27a
15	Other regularory adjustments			(13 633)		27a
16	Excess of provisions vs expected losses (IRB models)				47 692	50
	Total own funds			3 111 187	47 692	



**TEMPLATE EU CCA: MAIN FEATURES OF REGULATORY OWN FUNDS INSTRUMENTS AND ELIGIBLE LIABILITIES
INSTRUMENTS – OWN FUNDS**

IN THOUSANDS OF BGN

		a
		Qualitative or quantitative information - Free format
1	Issuer	UniCredit Bulbank AD
2	Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	ISIN BG1100001061
2a	Public or private placement	private
3	Governing law(s) of the instrument	Bulgarian
3a	Contractual recognition of write down and conversion powers of resolution authorities	No
<i>Regulatory treatment</i>		
4	Current treatment taking into account, where applicable, transitional CRR rules	Common Equity Tier 1
5	Post-transitional CRR rules	Common Equity Tier 1
6	Eligible at solo/(sub-)consolidated/ solo&(sub-)consolidated	solo&(sub-)consolidated
7	Instrument type (types to be specified by each jurisdiction)	ordinary dematerialized registered voting shares with face value of BGN 1 each
8	Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	285 777
9	Nominal amount of instrument	285 777
EU-9a	Issue price	100 per cent
EU-9b	Redemption price	100 per cent
10	Accounting classification	Shareholders' equity
11	Original date of issuance	30.05.2007
12	Perpetual or dated	Perpetual
13	Original maturity date	N/A
14	Issuer call subject to prior supervisory approval	Yes
15	Optional call date, contingent call dates and redemption amount	N/A
16	Subsequent call dates, if applicable	N/A
<i>Coupons / dividends</i>		
17	Fixed or floating dividend/coupon	N/A
18	Coupon rate and any related index	N/A
19	Existence of a dividend stopper	no
EU-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Fully discretionary
EU-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Fully discretionary
21	Existence of step up or other incentive to redeem	No
22	Noncumulative or cumulative	Noncumulative
23	Convertible or non-convertible	Nonconvertible
24	If convertible, conversion trigger(s)	N/A
25	If convertible, fully or partially	N/A
26	If convertible, conversion rate	N/A
27	If convertible, mandatory or optional conversion	N/A



28	If convertible, specify instrument type convertible into	N/A
29	If convertible, specify issuer of instrument it converts into	N/A
30	Write-down features	No
31	If write-down, write-down trigger(s)	N/A
32	If write-down, full or partial	N/A
33	If write-down, permanent or temporary	N/A
34	If temporary write-down, description of write-up mechanism	N/A
34a	Type of subordination (only for eligible liabilities)	N/A
EU-34b	Ranking of the instrument in normal insolvency proceedings	17
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Upon dissolution of the Bank it shall be declared in liquidation and the surplus assets of the Bank after discharge of its liabilities to the creditors it shall be distributed between the shareholders pro ratio to the shares held by them. The consequences of the declaration of the Bank in bankruptcy shall be regulated by the applicable law
36	Non-compliant transitioned features	No
37	If yes, specify non-compliant features	N/A
37a	Link to the full term and conditions of the instrument (signposting)	N/A

**TEMPLATE EU CCA: MAIN FEATURES OF REGULATORY OWN FUNDS INSTRUMENTS AND ELIGIBLE LIABILITIES
INSTRUMENTS – ELIGIBLE LIABILITIES**
IN THOUSANDS OF BGN

		a
		Qualitative or quantitative information - Free format
1	Issuer	UniCredit Bulbank AD
2	Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	XS2417110132
2a	Public or private placement	Private
3	Governing law(s) of the instrument	Italian Law
4	Current treatment taking into account, where applicable, transitional CRR rules	N/A
5	Post-transitional CRR rules	eligible liabilities
6	Eligible at solo/(sub-)consolidated/ solo&(sub-)consolidated	solo&(sub-)consolidated
7	Instrument type (types to be specified by each jurisdiction)	SNP
8	Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	313 mio BGN recognised in eligible liabilities
9	Nominal amount of instrument	312 933
EU-9a	Issue price	100
EU-9b	Redemption price	100
10	Accounting classification	Financial liabilities measured at amortised cost
11	Original date of issuance	06/12/2021
12	Perpetual or dated	dated
13	Original maturity date	06/12/2027
14	Issuer call subject to prior supervisory approval	Yes
15	Optional call date, contingent call dates and redemption amount	07.12.2026 tax or regulatory call event
16	Subsequent call dates, if applicable	N/A
	<i>Coupons / dividends</i>	
17	Fixed or floating dividend/coupon	floating
18	Coupon rate and any related index	3M EURIBOR + 1.62%
19	Existence of a dividend stopper	No
EU-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Mandatory
EU-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Mandatory
21	Existence of step up or other incentive to redeem	No
22	Noncumulative or cumulative	Cumulative
23	Convertible or non-convertible	Non-convertible
24	If convertible, conversion trigger(s)	N/A



25	If convertible, fully or partially	N/A
26	If convertible, conversion rate	N/A
27	If convertible, mandatory or optional conversion	N/A
28	If convertible, specify instrument type convertible into	N/A
29	If convertible, specify issuer of instrument it converts into	N/A
30	Write-down features	No
31	If write-down, write-down trigger(s)	N/A
32	If write-down, full or partial	N/A
33	If write-down, permanent or temporary	N/A
34	If temporary write-down, description of write-up mechanism	N/A
34a	Type of subordination (only for eligible liabilities)	Statutory
EU-34b	Ranking of the instrument in normal insolvency proceedings	Rank 05
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Senior Obligations means any senior obligations of, or other indebtedness of the Issuer, which constitute direct, unconditional, unsubordinated and unsecured obligations of the Issuer
36	Non-compliant transitioned features	No
37	If yes, specify non-compliant features	N/A
37a	Link to the full term and conditions of the instrument (signposting)	

TEMPLATE EU CCYB1 - GEOGRAPHICAL DISTRIBUTION OF CREDIT EXPOSURES RELEVANT FOR THE CALCULATION OF THE COUNTERCYCLICAL BUFFER
In thousands of BGN

		a	b	c	d	e	f	g	h	i	j	k	l	m
		General credit exposures		Relevant credit exposures – Market risk		Securitisation exposures Exposure value for non-trading book	Total exposure value	Own fund requirements				Risk-weighted exposure amounts	Own fund requirements weights (%)	Countercyclical buffer rate (%)
		Exposure value under the standardised approach	Exposure value under the IRB approach	Sum of long and short positions of trading book exposures for SA	Value of trading book exposures for internal models			Relevant credit risk exposures – Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book	Total			
010	Breakdown by country:													
	Country: UNITED ARAB EMIRATES	0	29	0	0	0	29	1	0	0	1	9	0.00%	0.00%
	Country: ALBANIA	0	4	0	0	0	4	0	0	0	0	0	0.00%	0.00%
	Country: ARMENIA	0	31	0	0	0	31	0	0	0	0	0	0.00%	0.00%
	Country: ARGENTINA	0	2	0	0	0	2	0	0	0	0	0	0.00%	0.00%
	Country: AUSTRIA	0	260	0	0	0	260	2	0	0	2	23	0.00%	0.00%
	Country: AUSTRALIA	0	105	0	0	0	105	0	0	0	0	0	0.00%	0.00%
	Country: BELGIUM	0	147	0	0	0	147	0	0	0	0	0	0.00%	0.00%
	Country: BULGARIA	3 505 618	13 297 977	12 416	0	1 867 351	16 816 011	764 542	452	169 880	934 874	9 556 781	95.84%	1.00%
	Country: BRAZIL	0	26	0	0	0	26	0	0	0	0	1	0.00%	0.00%
	Country: BELARUS	0	11	0	0	0	11	0	0	0	0	0	0.00%	0.00%
	Country: CANADA	0	9 312	0	0	0	9 312	75	0	0	75	942	0.01%	0.00%
	Country: SWITZERLAND	0	3 833	0	0	0	3 833	41	0	0	41	510	0.00%	0.00%
	Country: CZECH REPUBLIC	0	759	0	0	0	759	12	0	0	12	154	0.00%	1.50%
	Country: GERMANY	11 019	12 281	0	0	0	23 300	1 180	0	0	1 180	14 750	0.12%	0.00%
	Country: DENMARK	0	6	0	0	0	6	0	0	0	0	0	0.00%	2.00%
	Country: ALGERIA	0	2 144	0	0	0	2 144	297	0	0	297	3 707	0.03%	0.00%
	Country: ESTONIA	0	71	0	0	0	71	1	0	0	1	8	0.00%	1.00%
	Country: EGYPT	0	45 961	0	0	0	45 961	6 325	0	0	6 325	79 068	0.65%	0.00%



Country: SPAIN	0	122	0	0	0	122	1	0	0	1	7	0.00%	0.00%
Country: FRANCE	1 059	3 364	0	0	0	4 423	144	0	0	144	1 795	0.01%	0.00%
Country: UNITED KINGDOM	11 441	17 445	0	0	0	28 886	3 203	0	0	3 203	40 039	0.33%	1.00%
Country: GEORGIA	0	12	0	0	0	12	1	0	0	1	7	0.00%	0.00%
Country: GREECE	57	32	0	0	0	89	4	0	0	4	54	0.00%	0.00%
Country: CROATIA	0	88 133	0	0	0	88 133	3 443	0	0	3 443	43 032	0.35%	0.00%
Country: HUNGARY	139	1	0	0	0	140	8	0	0	8	106	0.00%	0.00%
Country: INDONESIA	0	15	0	0	0	15	0	0	0	0	3	0.00%	0.00%
Country: IRELAND	0	61	0	0	0	61	0	0	0	0	0	0.00%	0.00%
Country: ISRAEL	0	7 745	0	0	0	7 745	174	0	0	174	2 174	0.02%	0.00%
Country: INDIA	0	6	0	0	0	6	0	0	0	0	0	0.00%	0.00%
Country: IRAN, ISLAMIC REPUBLIC OF	0	0	0	0	0	0	0	0	0	0	0	0.00%	0.00%
Country: ITALY	3 248	9 394	0	0	0	12 642	603	0	0	603	7 541	0.06%	0.00%
Country: KYRGYZSTAN	0	128	0	0	0	128	0	0	0	0	0	0.00%	0.00%
Country: KOREA, REPUBLIC OF	0	0	0	0	0	0	0	0	0	0	0	0.00%	0.00%
Country: KUWAIT	0	57	0	0	0	57	2	0	0	2	28	0.00%	0.00%
Country: KAZAKHSTAN	0	39	0	0	0	39	0	0	0	0	1	0.00%	0.00%
Country: LATVIA	0	57	0	0	0	57	0	0	0	0	0	0.00%	0.00%
Country: MOROCCO	0	269	0	0	0	269	18	0	0	18	219	0.00%	0.00%
Country: MOLDOVA, REPUBLIC OF	0	1	0	0	0	1	0	0	0	0	0	0.00%	0.00%
Country: MACEDONIA, THE FORMER YUGOSLAV REPUBLIC OF	0	18	0	0	0	18	1	0	0	1	7	0.00%	0.00%
Country: MALTA	0	10	0	0	0	10	1	0	0	1	15	0.00%	0.00%
Country: NETHERLANDS	0	254 516	0	0	0	254 516	18 110	0	0	18 110	226 379	1.86%	0.00%
Country: NORWAY	0	47	0	0	0	47	0	0	0	0	0	0.00%	2.00%
Country: OMAN	0	11	0	0	0	11	0	0	0	0	0	0.00%	0.00%
Country: OTHER COUNTRIES	172 822	0	0	0	0	172 822	5 498	0	0	5 498	68 719	0.56%	0.00%
Country: PAKISTAN	5	29	0	0	0	34	0	0	0	0	5	0.00%	0.00%
Country: POLAND	0	4	0	0	0	4	0	0	0	0	0	0.00%	0.00%
Country: PALESTINIAN TERRITORY, OCCUPIED	0	4	0	0	0	4	0	0	0	0	0	0.00%	0.00%
Country: PORTUGAL	0	8	0	0	0	8	0	0	0	0	2	0.00%	0.00%



	Country: ROMANIA	1 956	12	0	0	0	1 968	138	0	0	138	1 719	0.01%	0.50%
	Country: SERBIA	0	13	0	0	0	13	0	0	0	0	0	0.00%	0.00%
	Country: RUSSIAN FEDERATION	0	5 478	0	0	0	5 478	581	0	0	581	7 265	0.06%	0.00%
	Country: SAUDI ARABIA	0	24	0	0	0	24	0	0	0	0	2	0.00%	0.00%
	Country: SWEDEN	0	0	0	0	0	0	0	0	0	0	0	0.00%	1.00%
	Country: SLOVENIA	0	1	0	0	0	1	0	0	0	0	0	0.00%	0.00%
	Country: SLOVAKIA	0	235	0	0	0	235	4	0	0	4	54	0.00%	1.00%
	Country: SYRIAN ARAB REPUBLIC	0	53	0	0	0	53	0	0	0	0	1	0.00%	0.00%
	Country: TUNISIA	0	88	0	0	0	88	16	0	0	16	199	0.00%	0.00%
	Country: TURKEY	2	1	0	0	0	3	0	0	0	0	2	0.00%	0.00%
	Country: TAIWAN, PROVINCE OF CHINA	6	0	0	0	0	6	0	0	0	0	1	0.00%	0.00%
	Country: UKRAINE	0	138	0	0	0	138	0	0	0	0	0	0.00%	0.00%
	Country: UNITED STATES	1 134	7 901	0	0	0	9 035	690	0	0	690	8 621	0.07%	0.00%
	Country: VENEZUELA, BOLIVARIAN REPUBLIC OF	0	7	0	0	0	7	0	0	0	0	1	0.00%	0.00%
	Country: VIRGIN ISLANDS, BRITISH	0	1	0	0	0	1	0	0	0	0	0	0.00%	0.00%
	Country: VIET NAM	0	223	0	0	0	223	12	0	0	12	156	0.00%	0.00%
	Country: VANUATU	0	0	0	0	0	0	0	0	0	0	0	0.00%	0.00%
020	Total	3 708 506	13 768 662	12 416	0	1 867 351	17 489 584	805 128	452	169 880	975 460	10 064 107	100%	-

TEMPLATE EU CCYB2 - AMOUNT OF INSTITUTION-SPECIFIC COUNTERCYCLICAL CAPITAL BUFFER

In thousands of BGN

		a
1	Total risk exposure amount	12 236 447
2	Institution specific countercyclical capital buffer rate	0.96%
3	Institution specific countercyclical capital buffer requirement	117 470


TEMPLATE EU CR10 – SPECIALISED LENDING AND EQUITY EXPOSURES UNDER THE SIMPLE RISKWEIGHTED APPROACH
In thousands of BGN
Template EU CR10.1

Specialised lending : Project finance (Slotting approach)							
Regulatory categories	Remaining maturity	On-balancesheet exposure	Off-balancesheet exposure	Risk weight	Exposure value	Risk weighted exposure amount	Expected loss amount
		a	b	c	d	e	f
Category 1	Less than 2.5 years	10 568	2 648	50%	12 353	5 324	0
	Equal to or more than 2.5 years	430 679	41 044	70%	433 885	236 388	1 736
Category 2	Less than 2.5 years	17 435	9 892	70%	18 859	12 452	75
	Equal to or more than 2.5 years	118 967	67 263	90%	167 155	147 388	1 337
Category 3	Less than 2.5 years	2 453	780	115%	2 453	2 596	63
	Equal to or more than 2.5 years	744	0	115%	744	641	21
Category 4	Less than 2.5 years	0	0	250%	0	0	0
	Equal to or more than 2.5 years	0	0	250%	0	0	0
Category 5	Less than 2.5 years	5 098	0	-	5 098	0	2 549
	Equal to or more than 2.5 years	0	0	-	0	0	0
Total	Less than 2.5 years	35 554	13 320		38 763	20 372	2 687
	Equal to or more than 2.5 years	550 390	108 307		601 784	384 417	3 094

Template EU CR10.2

Specialised lending : Income-producing real estate and high volatility commercial real estate (Slotting approach)							
Regulatory categories	Remaining maturity	On-balancesheet exposure	Off-balancesheet exposure	Risk weight	Exposure value	Risk weighted exposure amount	Expected loss amount
		a	b	c	d	e	f
Category 1	Less than 2.5 years	69 973	5 901	50%	72 234	36 117	0
	Equal to or more than 2.5 years	386 672	72 318	70%	419 620	293 637	1 678
Category 2	Less than 2.5 years	91 222	11 970	70%	99 085	69 360	396
	Equal to or more than 2.5 years	211 280	139 003	90%	307 006	276 197	2 455
Category 3	Less than 2.5 years	83	79	115%	143	164	4
	Equal to or more than 2.5 years	10 082	401	115%	10 383	11 940	291
Category 4	Less than 2.5 years	17 192	885	250%	17 196	42 989	1 375
	Equal to or more than 2.5 years	2 257	0	250%	2 256	5 642	181
Category 5	Less than 2.5 years	86 125	1 563	-	86 125	0	43 063
	Equal to or more than 2.5 years	10 054	0	-	10 054	0	5 027
Total	Less than 2.5 years	264 595	20 398		274 783	148 630	44 838
	Equal to or more than 2.5 years	620 345	211 722		749 319	587 416	9 632

Note:

UniCredit Bulbank does not have object finance and commodities finance exposures part of the specialized lending asset class.

Template EU CR10.5

Equity exposures under the simple risk-weighted approach						
Categories	On-balancesheet exposure	Off-balancesheet exposure	Risk weight	Exposure value	Risk weighted exposure amount	Expected loss amount
	a	b	c	d	e	f
Private equity exposures	20 336	0	190%	20 336	38 638	163
Exchange-traded equity exposures	1 090	0	290%	1 090	3 161	9
Other equity exposures	0	0	370%	0	0	0
Total						



Template EU CCR1 – Analysis of CCR exposure by approach

In thousands of BGN

		a	b	c	d	e	f	g	h
		Replacement cost (RC)	Potential future exposure (PFE)	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre-CRM	Exposure value post-CRM	Exposure value	RWEA
EU-1	EU - Original Exposure Method (for derivatives)	0	0		1.4	0	0	0	0
EU-2	EU - Simplified SA-CCR (for derivatives)	0	0		1.4	0	0	0	0
1	SA-CCR (for derivatives)	70 744	164 885		1.4	371 181	329 881	329 881	167 202
2	IMM (for derivatives and SFTs)			0	0	0	0	0	0
2a	<i>Of which securities financing transactions netting sets</i>			0		0	0	0	0
2b	<i>Of which derivatives and long settlement transactions netting sets</i>			0		0	0	0	0
2c	<i>Of which from contractual cross-product netting sets</i>			0		0	0	0	0
3	Financial collateral simple method (for SFTs)					0	0	0	0
4	Financial collateral comprehensive method (for SFTs)					32 648	32 648	32 648	9 123
5	VaR for SFTs					0	0	0	0
6	Total					403 829	362 529	362 529	176 325

Template EU CCR2 – Transactions subject to own funds requirements for CVA risk

In thousands of BGN

		a	b
		Exposure value	RWEA
1	Total transactions subject to the Advanced method	0	0
2	(i) VaR component (including the 3× multiplier)		0
3	(ii) stressed VaR component (including the 3× multiplier)		0
4	Transactions subject to the Standardised method	39 400	33 600
EU-4	Transactions subject to the Alternative approach (Based on the Original Exposure Method)	0	0
5	Total transactions subject to own funds requirements for CVA risk	39 400	33 600



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

In thousands of BGN

	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	
1	Central governments or central banks												0
2	Regional government or local authorities												0
3	Public sector entities												0
4	Multilateral development banks												0
5	International organisations												0
6	Institutions												0
7	Corporates									4 718	1		4719
8	Retail												0
9	Institutions and corporates with a short-term credit assessment												0
10	Other items												0
11	Total exposure value	0	0	0	0	0	1	1	1	4 719	3	0	4 719



Template EU CCR4 – IRB approach – CCR exposures by exposure class and PD scale

In thousands of BGN

		a	b	c	d	e	f	g
	PD scale	Exposure value	Exposure weighted average PD (%)	Number of obligors	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	RWEA	Density of risk weighted exposure amounts
1 ... x	Exposure class Institutions (F-IRB)							
1	0.00 to <0.15	282 179	0.27%	12	88.01%	4	134 102	0
2	0.15 to <0.25	187	0.47%	1	88.01%	0	96	1
3	0.25 to <0.50	0	0.00%	0	0.00%	0	0	0
4	0.50 to <0.75	6 365	1.46%	2	88.01%	0	5 580	1
5	0.75 to <2.50	0	0.00%	0	0.00%	0	0	0
6	2.50 to <10.00	0	0.00%	0	0.00%	0	0	0
7	10.00 to <100.00	0	0.00%	0	0.00%	0	0	0
8	100.00 (Default)	0	0.00%	0	0.00%	0	0	0
x	Sub-total Institutions (F-IRB))	288 731	0.30%	15	88.01%	3	139 778	0

		a	b	c	d	e	f	g
	PD scale	Exposure value	Exposure weighted average PD (%)	Number of obligors	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	RWEA	Density of risk weighted exposure amounts
1 ... x	Exposure class Corporate (F-IRB)							
1	0.00 to <0.15	3 867	0.19%	1	88.01%	1	1 593	0
2	0.15 to <0.25							
3	0.25 to <0.50							
4	0.50 to <0.75							
5	0.75 to <2.50							
6	2.50 to <10.00							
7	10.00 to <100.00							
8	100.00 (Default)							
x	Sub-total Corporate (F-IRB)	3 867	0.00%	1	88.01%	1	1 593	0



			a	b	c	d	e	f	g
		PD scale	Exposure value	Exposure weighted average PD (%)	Number of obligors	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	RWEA	Density of risk weighted exposure amounts
1 ... x	Exposure class Corporates (A-IRB)								
1		0.00 to <0.15	50 666	0.13%	4	53.89%	3	15 935	0
2		0.15 to <0.25	35	0.24%	4	57.53%	9	22	1
3		0.25 to <0.50	1 655	0.28%	11	57.53%	5	1 154	1
4		0.50 to <0.75	677	0.59%	13	57.53%	2	528	1
5		0.75 to <2.50	9 539	1.25%	30	57.53%	2	10 535	1
6		2.50 to <10.00	334	4.03%	15	57.53%	5	407	1
7		10.00 to <100.00	23	10.60%	1	57.53%	10	44	2
8		100.00 (Default)	0	0.00%	0	0.00%	0	0	0
x		Sub-total Corporates (A-IRB)	62 929	0.33%	78	54.60%	3	28 625	0

			a	b	c	d	e	f	g
		PD scale	Exposure value	Exposure weighted average PD (%)	Number of obligors	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	RWEA	Density of risk weighted exposure amounts
1 ... x	Exposure class Retail (A-IRB)								
1		0.00 to <0.15	0	0.00%	0	0.00%	0	0	0
2		0.15 to <0.25	0	0.00%	0	0.00%	0	0	0
3		0.25 to <0.50	0	0.00%	0	0.00%	0	0	0
4		0.50 to <0.75	0	0.00%	0	0.00%	0	0	0
5		0.75 to <2.50	5	1.66%	1	112.52%	10	2	0
6		2.50 to <10.00	0	0.00%	0	0.00%	0	0	0
7		10.00 to <100.00	0	0.00%	0	0.00%	0	0	0
8		100.00 (Default)	0	0.00%	0	0.00%	0	0	0
x		Sub-total Retail (A-IRB)	5	1.66%	1	112.52%	10	2	0
y	Total (all CCR relevant exposure classes)		355 532	0.18%	95	46.70%	3	169 998	0



Template EU CCR5 – Composition of collateral for CCR exposures

In thousands of BGN

	Collateral type	a	b	c	d	e	f	g	h
		Collateral used in derivative transactions				Collateral used in SFTs			
		Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral	
		Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated
1	Cash – domestic currency								
2	Cash – other currencies		5 131		11 714				
3	Domestic sovereign debt								1 227 862
4	Other sovereign debt						901 116		
5	Government agency debt								
6	Corporate bonds								
7	Equity securities								
8	Other collateral								
9	Total	0	5 131	0	11 714	0	901 116	0	1 227 862



Template EU CR1: Performing and non-performing exposures and related provisions

In thousands of BGN

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
		Gross carrying amount/nominal amount						Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						Accumulat ed partial write-off	Collateral and financial guarantees received	
		Performing exposures			Non-performing exposures			Performing exposures – accumulated impairment and provisions			Non-performing exposures – accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions				On performing exposures	On non- performing exposures
005	Cash balances at central banks and other demand deposits	6 706 849	6 706 849	0	0	0	0	-39	-39	0	0	0	0	0	0	0
010	Loans and advances	16 790 074	13 539 657	3 250 417	677 626	0	677 626	-355 473	-73 613	-281 860	-546 506	0	-546 506	3 895	12 408 135	104 207
020	Central banks	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
030	General governments	354 181	352 317	1 864	0	0	0	-153	-152	-1	0	0	0	0	99 182	0
040	Credit institutions	1 099 729	1 099 729	0	0	0	0	-168	-168	0	0	0	0	0	84 999	0
050	Other financial corporations	135 996	127 087	8 909	7 521	0	7 521	-768	-324	-444	-7 330	0	-7 330	0	124 593	191
060	Non-financial corporations	9 478 833	7 618 022	1 860 811	497 752	0	497 752	-275 563	-55 717	-219 846	-417 377	0	-417 377	2 562	8 642 817	80 182
070	Of which SMEs	6 013 110	4 576 660	1 436 450	421 239	0	421 239	-217 460	-39 482	-177 978	-360 086	0	-360 086	2 325	5 628 722	60 250
080	Households	5 721 335	4 342 502	1 378 833	172 353	0	172 353	-78 821	-17 252	-61 569	-121 799	0	-121 799	1 333	3 456 544	23 834
090	Debt securities	4 752 868	4 743 723	9 145	0	0	0	-7 607	-1 713	-5 894	0	0	0	0	0	0
100	Central banks	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
110	General governments	4 533 829	4 533 829	0	0	0	0	-614	-614		0	0	0	0	0	0
120	Credit institutions	155 761	146 616	9 145	0	0	0	-5 911	-17	-5 894	0	0	0	0	0	0
130	Other financial corporations	22 448	22 448	0	0	0	0	-996	-996	0	0	0	0	0	0	0
140	Non-financial corporations	40 830	40 830	0	0	0	0	-86	-86	0	0	0	0	0	0	0
150	Off-balance-sheet exposures	7 950 708	6 621 216	1 329 492	42 997	0	42 997	-47 592	-23 700	-23 892	-35 614	0	-35 614	0	5 368 261	5 686
160	Central banks	0	0	0	0	0	0	0	0	0	0	0	0		0	0
170	General governments	38 032	38 032	0	0	0	0	0	0	0	0	0	0		37 495	0
180	Credit institutions	862 471	862 471	0	0	0	0	-274	-274	0	0	0	0		0	0



190	Other financial corporations	50 564	50 532	32	237	0	237	-622	-622	0	-237	0	-237		49 778	0
200	Non-financial corporations	6 603 996	5 398 950	1 205 046	41 644	0	41 644	-45 216	-22 243	-22 973	-34 368	0	-34 368		5 183 637	5 676
210	Households	395 645	271 231	124 414	1 116	0	1 116	-1 480	-561	-919	-1 009	0	-1 009		97 351	10
220	Total	36 200 499	31 611 445	4 589 054	720 623	0	720 623	-410 711	-99 065	-311 646	-582 120	0	-582 120	3 895	17 776 396	109 893

Template EU CR1-A: Maturity of exposures

In thousands of BGN

		a	b	c	d	E	f
		Net exposure value					
		On demand	<= 1 year	> 1 year <= 5 years	> 5 years	No stated maturity	Total
1	Loans and advances	407 253	4 155 641	5 024 913	6 977 914	0	16 565 721
2	Debt securities	0	643 628	2 024 894	2 076 739	0	4 745 261
3	Total	407 253	4 799 269	7 049 807	9 054 653	0	21 310 982
4	Off-balance-sheet exposures	37 285	4 147 915	2 948 684	776 615	0	7 910 499

Template EU CR2: Changes in the stock of non-performing loans and advances

In thousands of BGN

		a
		Gross carrying amount
010	Initial stock of non-performing loans and advances	708 392
020	Inflows to non-performing portfolios	291 929
030	Outflows from non-performing portfolios	-322 695
040	Outflows due to write-offs	-40 109
050	Outflow due to other situations	-282 586
060	Final stock of non-performing loans and advances	677 626



Template EU CR2a: Changes in the stock of non-performing loans and advances and related net accumulated recoveries

In thousands of BGN

		a	b
		Gross carrying amount	Related net accumulated recoveries
010	Initial stock of non-performing loans and advances	708 392	
020	Inflows to non-performing portfolios		
030	Outflows from non-performing portfolios	-322 695	
040	Outflow to performing portfolio	-46 155	
050	Outflow due to loan repayment, partial or total	-115 165	
060	Outflow due to collateral liquidations	-24 569	0
070	Outflow due to taking possession of collateral	0	0
080	Outflow due to sale of instruments	-38 533	7 555
090	Outflow due to risk transfers	0	0
100	Outflows due to write-offs	-40 109	
110	Outflow due to other situations	-58 164	
120	Outflow due to reclassification as held for sale	0	
130	Final stock of non-performing loans and advances	385 697	



Template EU CQ1: Credit quality of forborne exposures

In thousands of BGN

		a	b	c	d	e	f	g	h
		Gross carrying amount/nominal amount of exposures with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collateral received and financial guarantees received on forborne exposures	
		Performing forborne	Non-performing forborne		On performing forborne exposures	On non-performing forborne exposures			
Of which defaulted	Of which impaired		Of which collateral and financial guarantees received on non-performing exposures with forbearance measures						
005	Cash balances at central banks and other demand deposits	0	0	0	0	0	0	0	0
010	Loans and advances	190 966	295 077	295 077	295 077	-24 339	-261 465	196 285	30 053
020	Central banks	0	0	0	0	0	0	0	0
030	General governments	1 864	0	0	0	-1	0	1 863	0
040	Credit institutions	0	0	0	0	0	0	0	0
050	Other financial corporations	0	7 438	7 438	7 438	0	-7 246	192	192
060	Non-financial corporations	168 476	240 951	240 951	240 951	-23 352	-217 057	168 542	23 705
070	Households	20 626	46 688	46 688	46 688	-986	-37 162	25 688	6 156
080	Debt Securities	0	0	0	0	0	0	0	0
090	Loan commitments given	3 716	3 198	3 198	3 198	-82	-2 874	3 956	323
100	Total	194 682	298 275	298 275	298 275	-24 421	-264 339	200 241	30 376

Template EU CQ2: Quality of forbearance

In thousands of BGN

		a
		Gross carrying amount of forborne exposures
010	Loans and advances that have been forborne more than twice	207 481
020	Non-performing forborne loans and advances that failed to meet the non-performing exit criteria	14 362



Template EU CQ3: Credit quality of performing and non-performing exposures by past due days

In thousands of BGN

		a	b	c	d	e	f	g	h	i	j	k	l
		Gross carrying amount/nominal amount											
		Performing exposures			Non-performing exposures								
			Not past due or past due ≤ 30 days	Past due > 30 days ≤ 90 days		Unlikely to pay that are not past due or are past due ≤ 90 days	Past due > 90 days ≤ 180 days	Past due > 180 days ≤ 1 year	Past due > 1 year ≤ 2 years	Past due > 2 years ≤ 5 years	Past due > 5 years ≤ 7 years	Past due > 7 years	Of which defaulted
005	Cash balances at central banks and other demand deposits	6 706 849	6 706 849	0	0	0	0	0	0	0	0	0	0
010	Loans and advances	16 790 074	16 754 045	36 029	677 626	468 107	40 631	35 681	54 972	43 878	4 871	29 486	677 626
020	Central banks	0	0	0	0	0	0	0	0	0	0	0	0
030	General governments	354 181	354 181	0	0	0	0	0	0	0	0	0	0
040	Credit institutions	1 099 729	1 099 729	0	0	0	0	0	0	0	0	0	0
050	Other financial corporations	135 996	135 996	0	7 521	7 519	0	2	0	0	0	0	7 521
060	Non-financial corporations	9 478 833	9 465 745	13 088	497 752	344 342	20 239	28 235	48 959	32 783	1 255	21 939	497 752
070	Of which SMEs	6 013 110	6 002 798	10 312	421 239	285 197	20 038	28 168	35 516	32 278	1 255	18 787	421 239
080	Households	5 721 335	5 698 394	22 941	172 353	116 246	20 392	7 444	6 013	11 095	3 616	7 547	172 353
090	Debt securities	2 512 591	2 512 591	0	0	0	0	0	0	0	0	0	0
100	Central banks	0	0	0	0	0	0	0	0	0	0	0	0
110	General governments	2 391 373	2 391 373	0	0	0	0	0	0	0	0	0	0
120	Credit institutions	57 940	57 940	0	0	0	0	0	0	0	0	0	0
130	Other financial corporations	22 448	22 448	0	0	0	0	0	0	0	0	0	0
140	Non-financial corporations	40 830	40 830	0	0	0	0	0	0	0	0	0	0
150	Off-balance-sheet exposures	7 950 708			42 997								42 997
160	Central banks	0			0								0
170	General governments	38 032			0								0
180	Credit institutions	862 471			0								0
190	Other financial corporations	50 564			237								237
200	Non-financial corporations	6 603 996			41 644								41 644
210	Households	395 645			1 116								1 116
220	Total	33 960 222	25 973 485	36 029	720 623	468 107	40 631	35 681	54 972	43 878	4 871	29 486	720 623



Template EU CQ4: Quality of non-performing exposures by geography

In thousands of BGN

		a	b	c	d	e	f	g
		Gross carrying/nominal amount				Accumulated impairment	Provisions on off-balance-sheet commitments and financial guarantees given	Accumulated negative changes in fair value due to credit risk on non-performing exposures
				Of which defaulted				
010	On-balance-sheet exposures	17 467 700	677 626	677 626	17 464 318	900 341		1 638
020	BULGARIA	16 041 417	657 843	657 843	16 038 035	878 215		1 638
070	Other countries	1 426 283	19 783	19 783	1 426 283	22 126		0
080	Off-balance-sheet exposures	7 993 705	42 997	42 997			83 206	
090	BULGARIA	7 008 205	38 995	38 995			78 884	
140	Other countries	985 500	4 002	4 002			4 322	
150	Total	25 461 405	720 623	720 623	17 464 318	900 341	83 206	1 638



Template EU CQ5: Credit quality of loans and advances to non-financial corporations by industry

In thousands of BGN

		a	b	c	d	e	f
			Gross carrying amount			Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures
			Of which non-performing	Of which loans and advances subject to impairment			
				Of which defaulted			
010	Agriculture, forestry and fishing	655 844	12 565	12 565	655 844	-26 849	0
020	Mining and quarrying	6 547	463	463	6 547	-715	0
030	Manufacturing	2 222 848	62 371	62 371	2 222 256	-103 685	-531
040	Electricity, gas, steam and air conditioning supply	664 544	14 363	14 363	664 544	-81 230	0
050	Water supply	20 285	3 370	3 370	20 285	-3 723	0
060	Construction	608 780	60 996	60 996	608 780	-79 701	0
070	Wholesale and retail trade	2 931 359	95 499	95 499	2 931 359	-136 505	0
080	Transport and storage	737 373	17 185	17 185	737 373	-31 206	0
090	Accommodation and food service activities	294 807	59 186	59 186	294 807	-65 829	0
100	Information and communication	125 459	2 189	2 189	122 669	-6 757	-1 107
110	Financial and insurance activities	171 237	34 249	34 249	171 237	-22 209	0
120	Real estate activities	1 134 282	106 897	106 897	1 134 282	-104 440	0
130	Professional, scientific and technical activities	164 339	7 535	7 535	164 339	-12 167	0
140	Administrative and support service activities	186 899	16 331	16 331	186 899	-11 119	0
150	Public administration and defense, compulsory social security	210	0	0	210	-2	0
160	Education	3 585	29	29	3 585	-85	0
170	Human health services and social work activities	20 228	470	470	20 228	-837	0
180	Arts, entertainment and recreation	8 561	212	212	8 561	-417	0
190	Other services	19 398	3 842	3 842	19 398	-3 826	0
200	Total	9 976 585	497 752	497 752	9 973 203	-691 302	-1 638



Template EU CQ6: Collateral valuation - loans and advances

In thousands of BGN

		a	b	c	d	e	f	g	h	i	j	k	l
		Loans and advances											
		Performing	Non-performing										
			Of which past due > 30 days ≤ 90 days	Unlikely to pay that are not past due or are past due ≤ 90 days	Past due > 90 days								
			Of which past due > 90 days ≤ 180 days		Of which: past due > 180 days ≤ 1 year	Of which: past due > 1 years ≤ 2 years	Of which: past due > 2 years ≤ 5 years	Of which: past due > 5 years ≤ 7 years	Of which: past due > 7 years				
010	Gross carrying amount	17 467 700	16 790 074	37 584	677 626	468 107	209 519	40 631	35 681	54 972	43 878	4 871	29 486
020	Of which secured	10 011 978	9 489 926	19 116	522 052	378 892	143 160	19 744.00	30 590.00	46 536.00	35 260.00	3 527.00	7 503.00
030	Of which secured with immovable property	8 716 712	8 317 281	9 245	399 431	296 037	103 394	15 066	21 994	36 069	21 037	2 452	6 776
040	Of which instruments with LTV higher than 60% and lower or equal to 80%	2 118 909	2 040 694		78 215	45 823	32 392						
050	Of which instruments with LTV higher than 80% and lower or equal to 100%	3 584 487	3 445 806		138 681	82 915	55 766						
060	Of which instruments with LTV higher than 100%	0	0		0	0	0						
070	Accumulated impairment for secured assets	-680 009	-259 888	-3 260	-420 121	-286 295	-133 826	-14 860	-27 907	-44 975	-35 054	-3 527	-7 503
080	Collateral												
090	Of which value capped at the value of exposure	11 331 608	11 234 535	1 088 699	97 073	92 048	5 736	3 442	1 112	780	108	0	294
100	Of which immovable property	7 225 831	7 152 416	7 052	73 415	68 168	5 247	3 354	1 008	778	107	0	0
110	Of which value above the cap	20 337 299	19 382 468	12 990	954 831	861 081	93 006	7 015	9 440	38 852	37 699	0	0
120	Of which immovable property	13 395 171	12 736 637	5 098	658 534	565 755	92 778	6 812	9 453	38 831	37 682	0	0
130	Financial guarantees received	1 180 734	1 173 600	2 997	7 134	3 247	3 887	1 423	1 588	778	98	0	0
140	Accumulated partial write-off	-3 895	0	0	-3 895	-602	-3 292	-123	-437	-1 023	-1 062	-108	-539



Template EU CQ7: Collateral obtained by taking possession and execution processes

In thousands of BGN

		a	b
		Collateral obtained by taking possession	
		Value at initial recognition	Accumulated negative changes
010	Property, plant and equipment (PP&E)	0	0
020	Other than PP&E	26 385	-6 068
030	Residential immovable property	3 947	-734
040	Commercial immovable property	22 424	-5 334
050	Movable property (auto, shipping, etc.)	14	0
060	Equity and debt instruments		
070	Other collateral		
080	Total	26 385	-6 068

Template EU CQ8: Collateral obtained by taking possession and execution processes – vintage breakdown

In thousands of BGN

		a	b	c	d	e	f	g	h	i	j	k	l
		Debt balance reduction		Total collateral obtained by taking possession									
				Foreclosed ≤ 2 years		Foreclosed > 2 years ≤ 5 years		Foreclosed > 5 years		Of which non-current assets held-for-sale			
		Gross carrying amount	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes
010	Collateral obtained by taking possession classified as PP&E	2 718	-2 718	1 896	-1 269								
020	Collateral obtained by taking possession other than that classified as PP&E	25 582	-25 582	26 385	-6 068	3 656	0	3 353	-903	19 376	-5 165		
030	Residential immovable property	3 770	-3 770	3 947	-734	2 072	0	214	-34	1 661	-700		
040	Commercial immovable property	21 799	-21 799	22 424	-5 334	1 584	0	3 139	-869	17 701	-4 465		
050	Movable property (auto, shipping, etc.)	13	-13	14	0	0	0	0	0	14	0		
060	Equity and debt instruments												
070	Other collateral												
080	Total	28 300	-28 300	28 281	-7 337	3 656	0	3 353	-903	19 376	-5 165		



Template EU AE1 - Encumbered and unencumbered assets

In thousands of BGN

		Carrying amount of encumbered assets		Fair value of encumbered assets		Carrying amount of unencumbered assets		Fair value of unencumbered assets	
			of which notionally eligible EHQLA and HQLA		of which notionally eligible EHQLA and HQLA		of which EHQLA and HQLA		of which EHQLA and HQLA
		010	030	040	050	060	080	090	100
010	Assets of the disclosing institution	1 997 024	1 730 446			27 144 042	9 699 470		
030	Equity instruments					31 559		31 559	0
040	Debt securities	1 730 446	1 730 446	1 730 446	1 730 446	2 849 833	2 629 067	2 617 709	2 406 438
050	of which: covered bonds					97 869		97 763	0
060	of which: securitisations					0		0	0
070	of which: issued by general governments	1 730 446	1 730 446	1 730 446	1 730 446	2 629 067	2 629 067	2 406 438	2 406 438
080	of which: issued by financial corporations					172 374		172 112	0
090	of which: issued by non-financial corporations					40 743		40 743	0
120	Other assets	266 578		-	-	24 262 650	7 070 403	-	-



Template EU AE2 - Collateral received and own debt securities issued

In thousands of BGN

		Fair value of encumbered collateral received or own debt securities issued		Unencumbered	
				Fair value of collateral received or own debt securities issued available for encumbrance	
			of which notionally eligible EHQLA and HQLA		of which EHQLA and HQLA
		010	030	040	060
130	Collateral received by the disclosing institution			712 317	712 317
140	Loans on demand			0	0
150	Equity instruments			0	0
160	Debt securities			712 317	712 317
170	of which: covered bonds			0	0
180	of which: securitisations			0	0
190	of which: issued by general governments			712 317	712 317
200	of which: issued by financial corporations			0	0
210	of which: issued by non-financial corporations			0	0
220	Loans and advances other than loans on demand			0	0
230	Other collateral received			0	0
240	Own debt securities issued other than own covered bonds or securitisations				
241	Own covered bonds and securitisations issued and not yet pledged				
250	TOTAL COLLATERAL RECEIVED AND OWN DEBT SECURITIES ISSUED				

Template EU AE3 - Sources of encumbrance

In thousands of BGN

		Matching liabilities, contingent liabilities or securities lent	Assets, collateral received and own debt securities issued other than covered bonds and securitisations encumbered
		010	030
010	Carrying amount of selected financial liabilities	1 915 910	1 993 381



Template EU CR4 – standardised approach – Credit risk exposure and CRM effects

In thousands of BGN

	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 exposures	RWAs	RWAs density (%)
		a	b	c	d	e	f
1	Central governments or central banks	11 453 946	5 779	11 453 946	156	9 415	0
2	Regional government or local authorities	60 718	32 253	60 718	15 176	12 144	3 035
3	Public sector entities	485	841	2 152	220	980	220
4	Multilateral development banks	0	4 369	430 476	22 442	0	0
5	International organisations	0	0	0	0	0	0
6	Institutions	3 273	1 077	3 273	215	1 636	108
7	Corporates	1 145 557	343 976	1 146 372	38 646	1 044 170	35 650
8	Retail	2 350 152	123 845	2 349 529	64 838	1 741 514	46 979
9	Secured by mortgages on immovable property	70 801	953	70 801	415	24 827	152
10	Exposures in default	34 961	377	33 006	180	33 938	197
11	Exposures associated with particularly high risk	0	0	0	0	0	0
12	Covered bonds	0	0	0	0	0	0
13	Institutions and corporates with a short-term credit assessment	0	0	0	0	0	0
14	Collective investment undertakings	0	0	0	0	0	0
15	Equity	0	0	0	0	0	0
16	Other items	0	0	0	0	0	0
17	TOTAL	15 119 893	513 470	15 550 273	142 288	2 868 624	86 341



Template EU CR5 – standardised approach

In thousands of BGN

	Exposure classes	Risk weight															Total	Of which unrated
		0%	2%	4%	10%	20%	35%	50%	70%	75%	100%	150%	250%	370%	1250%	Other s		
		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q
1	Central governments or central banks	11 450 336											3 766				11 454 102	
2	Regional government or local authorities					75 894											75 894	
3	Public sector entities	361						1 311			700						2 372	
4	Multilateral development banks	452 918															452 918	
5	International organisations																0	
6	Institutions							3 488									3 488	
7	Corporates					774		98 570			1 090 392						1 189 736	1 189 736
8	Retail exposures									2 414 367							2 414 367	2 414 367
9	Exposures secured by mortgages on immovable property						70 861	355									71 216	71 216
10	Exposures in default										31 289	1 898					33 187	33 187
11	Exposures associated with particularly high risk																0	
12	Covered bonds																0	
13	Exposures to institutions and corporates with a short-term credit assessment																0	
14	Units or shares in collective investment undertakings																0	
15	Equity exposures																0	
16	Other items																0	
17	TOTAL	11 903 615	0	0	0	76 668	70 861	103 724	0	2 414 367	1 122 381	1 898	3 766	0	0	0	15 697 280	3 708 506



Template EU CR6 – IRB approach – Credit risk exposures by exposure class and PD range

In thousands of BGN

A-IRB	PD range	On-balance sheet exposures	Off-balance- sheet exposures pre-CCF	Exposure weighted average CCF	Exposure post CCF and post CRM	Exposure weighted average PD (%)	Number of obligors	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	Risk weighted exposure amount after supporting factors	Density of risk weighted exposure amount	Expected loss amount	Value adjust- ments and provisions
	a	b	c	d	e	f	g	h	i	j	k	l	m
Exposure class Corporates - SME													
	0.00 to <0.15	2 721	40 311	0.39	16 602	0.00%	301	0.37%	4	2 301	0.14	6	-33
	0.00 to <0.10	1 291	11 677	0.46	6 015	0.00%	115	0.47%	4	806	0.13	2	-3
	0.10 to <0.15	1 430	28 634	0.35	10 587	0.00%	186	0.31%	4	1 495	0.14	4	-30
	0.15 to <0.25	79 860	152 520	0.61	142 459	0.00%	370	0.41%	5	42 049	0.30	122	-1 271
	0.25 to <0.50	198 623	412 345	0.62	377 564	0.00%	598	0.41%	5	162 219	0.43	586	-2 356
	0.50 to <0.75	274 424	220 398	0.74	368 370	0.01%	709	0.36%	5	158 420	0.43	862	-2 551
	0.75 to <2.50	1 271 237	747 161	0.78	1 573 939	0.01%	2 049	0.38%	5	1 008 572	0.64	8 398	-25 682
	0.75 to <1.75	968 883	579 294	0.78	1 213 568	0.01%	1 351	0.39%	5	771 192	0.64	5 643	-19 200
	1.75 to <2.5	302 354	167 867	0.77	360 371	0.02%	698	0.37%	5	237 380	0.66	2 755	-6 482
	2.50 to <10.00	761 702	381 980	0.77	883 143	0.04%	1 448	0.34%	6	654 085	0.74	12 545	-42 135
	2.5 to <5	542 490	299 677	0.77	652 295	0.03%	984	0.34%	6	471 930	0.72	7 570	-22 377
	5 to <10	219 212	82 303	0.77	230 848	0.07%	464	0.32%	6	182 155	0.79	4 975	-19 758
	10.00 to <100.00	79 333	59 064	0.71	97 917	0.20%	301	0.37%	5	122 284	1.25	7 063	-20 318
	10 to <20	63 456	13 802	0.90	69 697	0.14%	121	0.34%	5	74 962	1.08	3 030	-7 851
	20 to <30	7 497	17 834	0.49	12 482	0.24%	47	0.53%	6	27 101	2.17	1 596	-8 196
	30.00 to <100.00	8 380	27 428	0.44	15 738	0.44%	133	0.36%	4	20 221	1.28	2 437	-4 271
	100.00 (Default)	240 438	21 039	0.98	255 779	1.00%	291	0.52%	4	47 831	0.19	141 212	-235 559
Subtotal (exposure class)		2 908 338	2 034 818	0.75	3 715 773	8.70%	6 067	36.78%	3	2 197 761	0.59	170 794	-329 905
Exposure class Corporates - Other													



	0.00 to <0.15	450 230	662 483	0.65	718 305	0.00%	60	0.45%	0	279 430	0.39	-1 875	0
	0.00 to <0.10	347 263	305 850	0.70	458 654	0.00%	33	0.40%	0	169 127	0.37	-718	0
	0.10 to <0.15	102 967	356 633	0.56	259 651	0.00%	27	0.55%	0	110 303	0.42	-1 157	0
	0.15 to <0.25	323 791	174 679	0.82	408 921	0.00%	65	0.38%	0	166 009	0.41	-1 023	0
	0.25 to <0.50	515 150	781 990	0.67	872 948	0.00%	125	0.49%	0	619 725	0.71	-3 245	0
	0.50 to <0.75	287 677	538 356	0.65	533 154	0.01%	92	0.52%	0	461 997	0.87	-2 532	0
	0.75 to <2.50	881 104	372 678	0.77	962 913	0.01%	144	0.49%	0	1 000 240	1.04	-20 542	0
	0.75 to <1.75	729 848	352 612	0.78	848 940	0.01%	81	0.50%	0	891 150	1.05	-17 703	0
	1.75 to <2.5	151 256	20 066	0.67	113 973	0.02%	63	0.38%	0	109 090	0.96	-2 839	0
	2.50 to <10.00	71 836	614 916	0.47	324 783	0.05%	99	0.26%	0	268 229	0.83	-23 972	0
	2.5 to <5	71 829	72 610	0.68	97 841	0.04%	76	0.40%	0	122 782	1.25	-12 735	0
	5 to <10	7	542 306	0.42	226 942	0.05%	23	0.20%	0	145 447	0.64	-11 237	0
	10.00 to <100.00	876	6 436	0.32	2 375	0.27%	32	0.31%	0	4 010	1.69	-59	0
	10 to <20	871	76	0.96	908	0.11%	7	0.02%	0	73	0.08	-45	0
	20 to <30	0	22	0.41	9	0.24%	7	0.55%	0	27	3.00	-5	0
	30.00 to <100.00	5	6 338	0.23	1 458	0.37%	18	0.49%	0	3 910	2.68	-9	0
	100.00 (Default)	44 400	9 710	0.96	52 178	1.00%	19	0.17%	0	2 912	0.06	-33 682	0
Subtotal (exposure class)		2 575 064	3 161 248	0.68	3 875 577	2.22%	636	45.52%	3	2 802 552	0.72	-86 930	0
Exposure class Retail - Secured by real estate SME													
	0.00 to <0.15	4 153	3 654	0.75	5 869	0.00%	57	0.21%	7	227	0.04	-23	0
	0.00 to <0.10	1 344	2 208	0.66	2 348	0.00%	37	0.24%	7	65	0.03	-21	0
	0.10 to <0.15	2 809	1 446	0.83	3 521	0.00%	20	0.20%	8	162	0.05	-2	0
	0.15 to <0.25	7 901	2 983	0.89	9 682	0.00%	72	0.13%	7	401	0.04	-16	0
	0.25 to <0.50	25 187	7 061	0.90	29 020	0.00%	263	0.14%	6	2 166	0.07	-279	0
	0.50 to <0.75	34 383	3 367	0.96	36 172	0.01%	303	0.15%	7	4 083	0.11	-311	0
	0.75 to <2.50	82 698	10 312	0.94	87 413	0.01%	644	0.16%	6	16 897	0.19	-1 137	0
	0.75 to <1.75	63 889	8 627	0.94	68 178	0.01%	472	0.16%	6	11 904	0.17	-707	0
	1.75 to <2.5	18 809	1 685	0.94	19 235	0.02%	172	0.16%	5	4 993	0.26	-430	0
	2.50 to <10.00	24 232	1 759	0.95	24 690	0.04%	234	0.16%	5	9 513	0.39	-731	0



	2.5 to <5	17 867	1 072	0.95	17 945	0.03%	170	0.16%	5	6 420	0.36	-485	0
	5 to <10	6 365	687	0.96	6 745	0.07%	64	0.15%	6	3 093	0.46	-246	0
	10.00 to <100.00	17 032	2 411	0.95	18 438	0.40%	152	0.20%	5	15 237	0.83	-1 609	0
	10 to <20	4 361	433	0.96	4 584	0.16%	36	0.19%	5	3 825	0.83	-324	0
	20 to <30	2 070	53	1.00	2 114	0.24%	15	0.26%	6	2 524	1.19	-241	0
	30.00 to <100.00	10 601	1 925	0.94	11 740	0.53%	101	0.19%	5	8 888	0.76	-1 044	0
	100.00 (Default)	13 979	12	0.96	13 404	1.00%	131	0.22%	4	695	0.05	-9 399	0
Subtotal (exposure class)		209 565	31 559	0.93	224 688	10.27%	1 856	16.07%	3	49 219	0.22	-13 505	0
Exposure class Retail - Secured by real estate non-SME													
	0.00 to <0.15	532 781	6 471	1.02	547 623	0.00%	5 131	0.12%	10	19 011	0.03	-2 424	0
	0.00 to <0.10	1 162	105	0.99	1 254	0.00%	8	0.11%	10	18	0.01	-18	0
	0.10 to <0.15	531 619	6 366	1.02	546 369	0.00%	5 123	0.12%	10	18 993	0.03	-2 406	0
	0.15 to <0.25	453 105	6 525	1.01	466 400	0.00%	4 484	0.12%	10	24 159	0.05	-2 258	0
	0.25 to <0.50	686 987	10 596	1.01	707 437	0.00%	7 491	0.11%	10	52 499	0.07	-3 379	0
	0.50 to <0.75	350 254	4 760	1.01	360 275	0.01%	4 038	0.11%	10	39 106	0.11	-2 476	0
	0.75 to <2.50	749 656	12 199	1.01	772 422	0.01%	7 379	0.12%	10	142 478	0.18	-8 615	0
	0.75 to <1.75	591 853	10 761	1.01	610 570	0.01%	5 593	0.12%	10	101 777	0.17	-5 833	0
	1.75 to <2.5	157 803	1 438	1.02	161 852	0.02%	1 786	0.12%	10	40 701	0.25	-2 782	0
	2.50 to <10.00	270 545	1 990	1.02	277 090	0.05%	3 557	0.11%	10	103 045	0.37	-9 114	0
	2.5 to <5	171 502	1 568	1.02	175 896	0.04%	2 171	0.12%	10	59 051	0.34	-4 397	0
	5 to <10	99 043	422	1.02	101 194	0.07%	1 386	0.11%	10	43 994	0.43	-4 717	0
	10.00 to <100.00	92 696	409	1.02	94 699	0.21%	1 430	0.10%	10	50 180	0.53	-10 461	0
	10 to <20	57 522	272	1.02	58 789	0.14%	800	0.10%	10	31 977	0.54	-4 867	0
	20 to <30	21 366	0	1.02	21 758	0.24%	388	0.09%	10	11 816	0.54	-2 838	0
	30.00 to <100.00	13 808	137	1.01	14 152	0.45%	242	0.09%	10	6 387	0.45	-2 756	0
	100.00 (Default)	70 023	0	1.00	70 024	1.00%	2 160	0.16%	8	1 637	0.02	-48 896	0
Subtotal (exposure class)		3 206 047	42 950	1.01	3 295 970	3.64%	35 670	11.66%	5	432 115	0.13	-87 623	0



Exposure class Retail - Qualifying revolving													
	0.00 to <0.15	5 729	74 421	0.67	53 457	0.00%	26 608	0.32%	3	1 294	0.02	-125	0
	0.00 to <0.10	0	0	0.00	0	0.00%	0	0.00%	0	0	0.00	0	0
	0.10 to <0.15	5 729	74 421	0.67	53 457	0.00%	26 608	0.32%	3	1 294	0.02	-125	0
	0.15 to <0.25	5 057	22 572	0.72	19 767	0.00%	12 949	0.32%	4	722	0.04	-59	0
	0.25 to <0.50	8 467	24 085	0.74	23 953	0.00%	14 903	0.33%	4	1 428	0.06	-93	0
	0.50 to <0.75	6 350	12 720	0.76	14 444	0.01%	8 713	0.33%	4	1 338	0.09	-72	0
	0.75 to <2.50	21 627	35 139	0.77	43 711	0.01%	23 293	0.34%	4	7 711	0.18	-422	0
	0.75 to <1.75	15 244	25 775	0.77	31 383	0.01%	16 160	0.34%	4	4 783	0.15	-251	0
	1.75 to <2.5	6 383	9 364	0.78	12 328	0.02%	7 133	0.34%	3	2 928	0.24	-171	0
	2.50 to <10.00	22 642	16 805	0.84	33 220	0.05%	22 773	0.34%	3	14 290	0.43	-1 070	0
	2.5 to <5	11 895	11 261	0.82	19 017	0.04%	14 060	0.34%	3	6 620	0.35	-465	0
	5 to <10	10 747	5 544	0.87	14 203	0.07%	8 713	0.34%	3	7 670	0.54	-605	0
	10.00 to <100.00	9 657	3 027	0.91	11 585	0.18%	7 311	0.34%	3	9 650	0.83	-1 233	0
	10 to <20	7 365	2 304	0.91	8 828	0.14%	5 706	0.34%	3	6 995	0.79	-732	0
	20 to <30	1 869	476	0.93	2 183	0.24%	1 377	0.33%	4	2 119	0.97	-315	0
	30.00 to <100.00	423	247	0.86	574	0.57%	228	0.36%	3	536	0.93	-186	0
	100.00 (Default)	2 054	896	0.88	2 599	1.00%	3 114	0.58%	4	350	0.13	-2 904	0
	Subtotal (exposure class)	81 583	189 665	0.75	202 736	3.57%	119 664	33.33%	2	36 783	0.18	-5 978	0
Exposure class Retail - Other SME													
	0.00 to <0.15	11 950	28 981	0.64	26 376	0.00%	2 628	0.56%	3	2 626	0.10	-39	0
	0.00 to <0.10	6 127	14 377	0.67	13 782	0.00%	400	0.56%	3	926	0.07	-16	0
	0.10 to <0.15	5 823	14 604	0.62	12 594	0.00%	2 228	0.56%	3	1 700	0.13	-23	0
	0.15 to <0.25	19 794	23 152	0.73	31 535	0.00%	1 323	0.57%	3	5 902	0.19	-185	0
	0.25 to <0.50	36 944	35 413	0.70	50 677	0.00%	2 353	0.58%	4	14 012	0.28	-602	0
	0.50 to <0.75	44 720	20 715	0.75	49 379	0.01%	2 031	0.59%	4	19 214	0.39	-812	0
	0.75 to <2.50	164 273	52 111	0.80	172 889	0.01%	8 236	0.60%	4	94 598	0.55	-4 914	0
	0.75 to <1.75	122 559	40 862	0.79	129 874	0.01%	5 954	0.60%	4	67 227	0.52	-3 096	0



	1.75 to <2.5	41 714	11 249	0.81	43 015	0.02%	2 282	0.61%	4	27 371	0.64	-1 818	0
	2.50 to <10.00	57 061	17 397	0.82	60 825	0.05%	4 065	0.60%	3	43 250	0.71	-5 459	0
	2.5 to <5	35 491	12 273	0.80	38 020	0.04%	3 004	0.60%	4	26 128	0.69	-2 670	0
	5 to <10	21 570	5 124	0.85	22 805	0.07%	1 061	0.60%	3	17 122	0.75	-2 789	0
	10.00 to <100.00	58 690	25 730	0.83	69 871	0.44%	1 917	0.59%	4	70 850	1.01	-20 353	0
	10 to <20	14 698	3 299	0.85	15 283	0.14%	634	0.60%	3	14 169	0.93	-3 353	0
	20 to <30	4 502	749	0.87	4 577	0.25%	224	0.61%	3	5 405	1.18	-1 584	0
	30.00 to <100.00	39 490	21 682	0.82	50 011	0.55%	1 059	0.59%	4	51 276	1.03	-15 416	0
	100.00 (Default)	38 763	1 781	0.96	38 850	1.00%	3 334	0.78%	2	11 271	0.29	-36 595	0
Subtotal (exposure class)		432 195	205 280	0.78	500 402	13.91%	25 887	55.92%	2	261 723	0.52	-68 959	0
Exposure class Retail - Other non-SME													
	0.00 to <0.15	6 421	10 087	0.78	12 896	0.00%	953	0.25%	6	985	0.08	-85	0
	0.00 to <0.10	0	0	0.00	0	0.00%	0	0.00%	0	0	0.00	0	0
	0.10 to <0.15	6 421	10 087	0.78	12 896	0.00%	953	0.25%	6	985	0.08	-85	0
	0.15 to <0.25	7 654	2 281	0.93	9 199	0.00%	549	0.19%	6	740	0.08	-35	0
	0.25 to <0.50	5 034	6 584	0.77	8 944	0.00%	595	0.27%	6	1 557	0.17	-93	0
	0.50 to <0.75	4 617	3 856	0.82	6 976	0.01%	624	0.28%	7	1 664	0.24	-67	0
	0.75 to <2.50	13 187	8 607	0.62	13 419	0.01%	1 548	0.28%	7	4 441	0.33	-353	0
	0.75 to <1.75	8 239	6 095	0.67	9 664	0.01%	971	0.26%	6	2 875	0.30	-211	0
	1.75 to <2.5	4 948	2 512	0.50	3 755	0.02%	577	0.31%	7	1 566	0.42	-142	0
	2.50 to <10.00	12 858	1 945	0.32	4 749	0.05%	1 655	0.30%	7	2 188	0.46	-319	0
	2.5 to <5	7 228	1 804	0.37	3 314	0.04%	854	0.27%	7	1 361	0.41	-148	0
	5 to <10	5 630	141	0.25	1 435	0.07%	801	0.35%	8	827	0.58	-171	0
	10.00 to <100.00	10 212	983	0.33	3 687	0.21%	1 761	0.34%	8	2 859	0.78	-1 457	0
	10 to <20	6 336	979	0.30	2 196	0.14%	917	0.32%	8	1 412	0.64	-560	0
	20 to <30	2 899	2	0.33	965	0.25%	636	0.38%	8	938	0.97	-537	0
	30.00 to <100.00	977	2	0.54	526	0.40%	208	0.36%	9	509	0.97	-360	0
	100.00 (Default)	18 033	10	1.00	18 032	1.00%	9 038	0.71%	3	2 305	0.13	-16 607	0
Subtotal (exposure class)		78 016	34 353	0.69	77 902	19.13%	16 723	28.35%	3	16 739	0.21	-19 016	0
Total (all exposures classes)		9 490 808	5 699 873	0.78	11 893 048	5.50%	206 503	33.20%	3	5 796 892	0.49	-111 217	-329 905

F-IRB	PD range	On-balance sheet exposures	Off-balance-sheet exposures pre-CCF	Exposure weighted average CCF	Exposure post CCF and post CRM	Exposure weighted average PD (%)	Number of obligors	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	Risk weighted exposure amount after supporting factors	Density of risk weighted exposure amount	Expected loss amount	Value adjustments and provisions
	a	b	c	d	e	f	g	h	i	j	k	l	m
Exposure class Institutions													
	0.00 to <0.15	344 602	647 834	0.42	415 524	0.00%	40	0.37%	5	125 564	0.30	-86	0
	0.00 to <0.10	196 582	209 077	0.51	208 900	0.00%	26	0.45%	4	57 151	0.27	-18	0
	0.10 to <0.15	148 020	438 757	0.35	206 624	0.00%	14	0.29%	5	68 413	0.33	-68	0
	0.15 to <0.25	2 204	43 112	0.14	6 424	0.00%	10	0.45%	5	3 054	0.48	-8	0
	0.25 to <0.50	0	13 821	0.48	6 642	0.00%	3	0.45%	5	3 093	0.47	-3	0
	0.50 to <0.75	2 445	1 387	2.15	8 241	0.01%	3	0.45%	5	4 651	0.56	-1	0
	0.75 to <2.50	7 208	3 517	3.27	35 064	0.02%	4	0.45%	5	16 667	0.48	-13	0
	0.75 to <1.75	3 070	153	6.44	20 771	0.01%	1	0.45%	5	7 338	0.35	-2	0
	1.75 to <2.5	4 138	3 364	1.91	14 293	0.02%	3	0.45%	5	9 329	0.65	-11	0
	2.50 to <10.00	9 567	584	4.73	48 049	0.05%	5	0.45%	5	29 082	0.61	-12	0
	2.5 to <5	9 567	584	3.26	33 071	0.03%	5	0.45%	5	24 301	0.73	-12	0
	5 to <10	0	0	0.00	14 978	0.08%	0	0.45%	5	4 781	0.32	0	0
	10.00 to <100.00	0	0	0.00	10 342	0.22%	0	0.45%	5	2 878	0.28	0	0
	10 to <20	0	0	0.00	6 212	0.14%	0	0.45%	5	1 482	0.24	0	0
	20 to <30	0	0	0.00	2 414	0.26%	0	0.45%	5	586	0.24	0	0
	30.00 to <100.00	0	0	0.00	1 716	0.44%	0	0.45%	5	810	0.47	0	0
	100.00 (Default)	0	0	0.00	7	1.00%	1	0.00%	5	2	0.29	0	0
Subtotal (exposure class)		366 026	710 255	0.49	530 293	0.21%	66	37.60%	3	184 991	0.35	-123	0
Exposure class Corporates - Other													



0.00 to <0.15	821	137 211	0.07	9 886	0.00%	18	0.45%	5	3 022	0.31	-2	0
0.00 to <0.10	821	49 014	0.19	9 584	0.00%	11	0.45%	5	2 892	0.30	-1	0
0.10 to <0.15	0	88 197	0.00	302	0.00%	7	0.45%	8	130	0.43	-1	0
0.15 to <0.25	0	0	0.00	0	0.00%	0	0.00%	0	0	0.00	0	0
0.25 to <0.50	0	980	0.50	490	0.00%	3	0.45%	5	375	0.77	0	0
0.50 to <0.75	0	37	0.19	7	0.01%	1	0.45%	5	6	0.86	0	0
0.75 to <2.50	0	0	0.00	0	0.00%	0	0.00%	0	0	0.00	0	0
0.75 to <1.75	0	0	0.00	0	0.00%	0	0.00%	0	0	0.00	0	0
1.75 to <2.5	0	0	0.00	0	0.00%	0	0.00%	0	0	0.00	0	0
2.50 to <10.00	49 013	4 853	0.95	51 440	0.03%	4	0.45%	5	87 702	1.70	-106	0
2.5 to <5	49 013	4 677	0.96	51 352	0.03%	3	0.45%	5	87 503	1.70	-105	0
5 to <10	0	176	0.50	88	0.08%	1	0.45%	5	199	2.26	-1	0
10.00 to <100.00	155	3 668	0.23	889	0.18%	2	0.45%	5	2 512	2.83	-163	0
10 to <20	155	3 668	0.23	889	0.18%	2	0.45%	5	2 512	2.83	-163	0
20 to <30	0	0	0.00	0	0.00%	0	0.00%	0	0	0.00	0	0
30.00 to <100.00	0	0	0.00	0	0.00%	0	0.00%	0	0	0.00	0	0
100.00 (Default)	0	0	0.00	0	0.00%	0	0.00%	0	0	0.00	0	0
Subtotal (exposure class)	49 989	146 749	0.32	62 712	3.12%	28	45.00%	3	93 617	1.49	-271	0
Total (all exposures classes)	416 015	857 004	0.47	593 005	0.57%	94	38.51%	3	278 608	0.47	-394	0



Template EU CR6-A – Scope of the use of IRB and SA approaches

In thousands of BGN

		Exposure value as defined in Article 166 CRR for exposures subject to IRB approach	Total exposure value for exposures subject to the Standardised approach and to the IRB approach	Percentage of total exposure value subject to the permanent partial use of the SA (%)	Percentage of total exposure value subject to IRB Approach (%)	Percentage of total exposure value subject to a roll-out plan (%)
		a	b	c	d	e
1	Central governments or central banks	0	11 529 813	99.33%	0.00%	0.67%
1.1	<i>Of which Regional governments or local authorities</i>	0	75 895	0.00%	0.00%	100.00%
1.2	<i>Of which Public sector entities</i>	0	1 325	0.00%	0.00%	100.00%
2	Institutions	1 365 013	793 238	0.00%	99.56%	0.44%
3	Corporates	11 556 778	12 812 345	8.15%	75.25%	16.60%
3.1	<i>Of which Corporates - Specialised lending, excluding slotting approach</i>		0	0.00%	100.00%	0.00%
3.2	<i>Of which Corporates - Specialised lending under slotting approach</i>		1 444 783	0.00%	100.00%	0.00%
4	Retail	4 421 250	4 221 372	0.00%	97.56%	2.44%
4.1	<i>of which Retail – Secured by real estate SMEs</i>		224 382	0.00%	100.00%	0.00%
4.2	<i>of which Retail – Secured by real estate non-SMEs</i>		3 139 899	0.00%	97.73%	2.27%
4.3	<i>of which Retail – Qualifying revolving</i>		148 836	0.00%	100.00%	0.00%
4.4	<i>of which Retail – Other SMEs</i>		632 355	0.00%	99.70%	0.30%
4.5	<i>of which Retail – Other non-SMEs</i>		75 899	0.00%	60.54%	39.46%
5	Equity	81 453	81 453	0.00%	100.00%	0.00%
6	Other non-credit obligation assets	826 465	826 465	0.00%	100.00%	0.00%
7	Total	18 250 959	30 264 686	3.53%	50.74%	45.73%



Template EU CR7-A – IRB approach – Disclosure of the extent of the use of CRM techniques

In thousands of BGN

A-IRB		Total exposures	Credit risk Mitigation techniques										Credit risk Mitigation methods in the calculation of RWEAs		
			Funded credit Protection (FCP)								Unfunded credit Protection (UFCP)		RWEA without substitution effects (reduction effects only)	RWEA with substitution effects (both reduction and substitution effects)	
			Part of exposures covered by Financial Collaterals (%)	Part of exposures covered by Other eligible collaterals (%)				Part of exposures covered by Other funded credit protection (%)				Part of exposures covered by Guarantees (%)			Part of exposures covered by Credit Derivatives (%)
					Part of exposures covered by Immovable property Collaterals (%)	Part of exposures covered by Receivables (%)	Part of exposures covered by Other physical collateral (%)		Part of exposures covered by Cash on deposit (%)	Part of exposures covered by Life insurance policies (%)	Part of exposures covered by Instruments held by a third party (%)				
		a	b	c	d	e	f	g	h	i	j	k	l	m	n
1	Central governments and central banks														
2	Institutions														
3	Corporates	7 879 315	1.03%	23.31%	23.31%		5.58%	5.58%			4.06%		5 393 823	5 020 239	
3.1	Of which Corporates – SMEs	3 898 325	0.41%	33.95%	33.95%		2.73%	2.73%			5.10%		2 454 951	2 215 910	
3.2	Of which Corporates – Specialised lending														
3.3	Of which Corporates – Other	3 980 990	1.63%	12.89%	12.89%		8.36%	8.36%			3.04%		2 938 872	2 804 330	
4	Retail	4 372 246	0.00%	57.20%	57.20%		0.67%	0.67%			1.60%		853 178	804 423	
4.1	Of which Retail – Immovable property SMEs	228 638	0.00%	82.88%	82.88%		0.18%	0.18%			1.74%		52 889	49 224	
4.2	Of which Retail – Immovable property non-SMEs	3 295 970	0.00%	70.13%	70.13%		0.13%	0.13%			0.00%		432 115	432 115	
4.3	Of which Retail – Qualifying revolving	202 736	0.00%	0.00%	0.00%		0.00%	0.00%			0.00%		36 784	36 784	
4.4	Of which Retail – Other SMEs	543 908	0.00%	0.00%	0.00%		2.55%	2.55%			8.00%		295 093	263 936	
4.5	Of which Retail – Other non-SMEs	100 995	0.00%	0.00%	0.00%		10.60%	10.60%			22.42%		36 298	22 365	
5	Total	12 251 561	0.66%	35.40%	35.40%		3.82%	3.82%			3.18%		6 247 001	5 824 663	

F-IRB		Total exposures	Credit risk Mitigation techniques											Credit risk Mitigation methods in the calculation of RWEAs	
			Funded credit Protection (FCP)									Unfunded credit Protection (UFCP)		RWEA without substitution effects (reduction effects only)	RWEA with substitution effects (both reduction and substitution effects)
			Part of exposures covered by Financial Collaterals (%)	Part of exposures covered by Other eligible collaterals (%)				Part of exposures covered by Other funded credit protection (%)				Part of exposures covered by Guarantees (%)	Part of exposures covered by Credit Derivatives (%)		
					Part of exposures covered by Immovable property Collaterals (%)	Part of exposures covered by Receivables (%)	Part of exposures covered by Other physical collateral (%)		Part of exposures covered by Cash on deposit (%)	Part of exposures covered by Life insurance policies (%)	Part of exposures covered by Instruments held by a third party (%)				
		a	b	c	d	e	f	g	h	i	j	k	l	m	n
1	Central governments and central banks														
2	Institutions	446 298	0.00%	0.00%	0.00%			0.00%	0.00%			0.00%		157 220	157 220
3	Corporates	1 725 084	0.00%	0.00%	0.00%			0.07%	0.07%			0.00%		1 232 845	1 232 845
3.1	Of which Corporates – SMEs														
3.2	Of which Corporates – Specialised lending	1 662 372	0.00%	0.00%	0.00%			0.07%	0.07%			0.00%		1 139 227	1 139 227
3.3	Of which Corporates – Other	62 712	0.00%	0.00%	0.00%			0.00%	0.00%			0.00%		93 618	93 618
4	Total	2 171 382	0.00%	0.00%	0.00%			0.05%	0.05%			0.00%		1 390 065.68	1 390 065.68



Template EU CR8 – RWEA flow statements of credit risk exposures under the IRB approach

In thousands of BGN

		Risk weighted exposure amount 31.12.2022	Risk weighted exposure amount 30.09.2022	Risk weighted exposure amount 30.06.2022	Risk weighted exposure amount 31.03.2022
		a	b	c	d
1	Risk weighted exposure amount as at the end of the previous reporting period	9 284 629	9 207 182	8 604 691	7 317 616
2	Asset size (+/-)	-223 363	417 784	96 445	271 167
3	Asset quality (+/-)	-18 244	-324 761	170 195	137 640
4	Model updates (+/-)	0	0	0	937 944
5	Methodology and policy (+/-)	0	0	0	48 213
6	Acquisitions and disposals (+/-)	0	0	0	0
7	Foreign exchange movements (+/-)	0	0	0	0
8	Other (+/-)	-1 124 602	-15 576	335 851	-107 889
9	Risk weighted exposure amount as at the end of the reporting period	7 918 420	9 284 629	9 207 182	8 604 691



Template CR9 –IRB approach – Back-testing of PD per exposure class (fixed PD scale)

In thousands of BGN

A-IRB

Exposure class Corporates - SME	PD range	Number of obligors at the end of previous year		Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
			Of which number of obligors which defaulted in the year				
a	b	c	d	e	f	g	h
	0.00 to <0.15	131	1	0.01%	0.00%	0.00%	0.00%
	0.00 to <0.10	61	1	0.02%	0.00%	0.00%	0.00%
	0.10 to <0.15	70	0	0.00%	0.00%	0.00%	0.00%
	0.15 to <0.25	224	0	0.00%	0.00%	0.00%	0.00%
	0.25 to <0.50	778	1	0.00%	0.00%	0.00%	0.00%
	0.50 to <0.75	546	0	0.00%	0.01%	0.01%	0.00%
	0.75 to <2.50	1 676	2	0.00%	0.01%	0.01%	0.01%
	0.75 to <1.75	1 219	2	0.00%	0.01%	0.01%	0.00%
	1.75 to <2.5	457	0	0.00%	0.02%	0.02%	0.01%
	2.50 to <10.00	982	4	0.00%	0.04%	0.04%	0.02%
	2.5 to <5	802	3	0.00%	0.03%	0.04%	0.01%
	5 to <10	180	1	0.01%	0.07%	0.07%	0.03%
	10.00 to <100.00	77	7	0.09%	0.20%	0.13%	0.11%
	10 to <20	71	6	0.08%	0.14%	0.11%	0.11%
	20 to <30	5	1	0.20%	0.24%	0.24%	0.14%
	30.00 to <100.00	1	0	0.00%	0.44%	0.34%	0.00%
	100.00 (Default)	364	0	0.00%	1.00%	1.00%	0.00%



Exposure class Corporates - Other	PD range	Number of obligors at the end of previous year		Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
			Of which number of obligors which defaulted in the year				
a	b	c	d	e	f	g	h
	0.00 to <0.15	68	0	0.00%	0.00%	0.00%	0.00%
	0.00 to <0.10	37	0	0.00%	0.00%	0.00%	0.00%
	0.10 to <0.15	31	0	0.00%	0.00%	0.00%	0.00%
	0.15 to <0.25	53	0	0.00%	0.00%	0.00%	0.00%
	0.25 to <0.50	100	0	0.00%	0.00%	0.00%	0.00%
	0.50 to <0.75	28	0	0.00%	0.01%	0.01%	0.00%
	0.75 to <2.50	102	0	0.00%	0.01%	0.01%	0.01%
	0.75 to <1.75	80	0	0.00%	0.01%	0.01%	0.01%
	1.75 to <2.5	22	0	0.00%	0.02%	0.02%	0.03%
	2.50 to <10.00	47	1	0.02%	0.05%	0.04%	0.02%
	2.5 to <5	41	1	0.02%	0.04%	0.03%	0.01%
	5 to <10	6	0	0.00%	0.05%	0.08%	0.03%
	10.00 to <100.00	8	2	0.25%	0.27%	0.15%	0.09%
	10 to <20	6	2	0.33%	0.11%	0.11%	0.10%
	20 to <30	1	0	0.00%	0.24%	0.23%	0.03%
	30.00 to <100.00	1	0	0.00%	0.37%	0.34%	0.02%
	100.00 (Default)	106	0	0.00%	1.00%	1.00%	0.00%

Exposure class Retail - Secured by real estate SME	PD range	Number of obligors at the end of previous year		Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
			Of which number of obligors which defaulted in the year				
a	b	c	d	e	f	g	h
	0.00 to <0.15	100	0	0.00%	0.00%	0.00%	0.00%
	0.00 to <0.10	0	0	0.00%	0.00%	0.00%	0.00%
	0.10 to <0.15	100	0	0.00%	0.00%	0.00%	0.00%
	0.15 to <0.25	159	0	0.00%	0.00%	0.00%	0.00%



	0.25 to <0.50	315	0	0.00%	0.00%	0.00%	0.00%
	0.50 to <0.75	269	0	0.00%	0.01%	0.01%	0.00%
	0.75 to <2.50	918	0	0.00%	0.01%	0.01%	0.01%
	0.75 to <1.75	689	0	0.00%	0.01%	0.01%	0.00%
	1.75 to <2.5	229	0	0.00%	0.02%	0.02%	0.01%
	2.50 to <10.00	322	0	0.00%	0.04%	0.05%	0.03%
	2.5 to <5	206	0	0.00%	0.03%	0.04%	0.02%
	5 to <10	116	0	0.00%	0.07%	0.07%	0.05%
	10.00 to <100.00	134	0	0.00%	0.40%	0.22%	0.14%
	10 to <20	75	0	0.00%	0.16%	0.14%	0.09%
	20 to <30	22	0	0.00%	0.24%	0.24%	0.12%
	30.00 to <100.00	37	0	0.00%	0.53%	0.38%	0.20%
	100.00 (Default)	207	0	0.00%	1.00%	1.00%	0.00%

Exposure class Retail - Secured by real estate non-SME	PD range	Number of obligors at the end of previous year		Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
			Of which number of obligors which defaulted in the year				
a	b	c	d	e	f	g	h
	0.00 to <0.15	4 313	1	0.00%	0.00%	0.00%	0.00%
	0.00 to <0.10			0.00%	0.00%	0.00%	0.00%
	0.10 to <0.15	4 313	1	0.00%	0.00%	0.00%	0.00%
	0.15 to <0.25	3 789	2	0.00%	0.00%	0.00%	0.00%
	0.25 to <0.50	7 590	9	0.00%	0.00%	0.00%	0.00%
	0.50 to <0.75	3 966	2	0.00%	0.01%	0.01%	0.00%
	0.75 to <2.50	8 434	8	0.00%	0.01%	0.01%	0.00%
	0.75 to <1.75	6 690	7	0.00%	0.01%	0.01%	0.00%
	1.75 to <2.5	1 744	1	0.00%	0.02%	0.02%	0.00%
	2.50 to <10.00	3 898	19	0.00%	0.05%	0.05%	0.01%
	2.5 to <5	2 359	7	0.00%	0.04%	0.04%	0.01%
	5 to <10	1 539	12	0.01%	0.07%	0.07%	0.01%
	10.00 to <100.00	1 674	70	0.04%	0.21%	0.19%	0.07%



	10 to <20	1 097	27	0.02%	0.14%	0.14%	0.04%
	20 to <30	376	21	0.06%	0.24%	0.24%	0.10%
	30.00 to <100.00	201	22	0.11%	0.45%	0.35%	0.15%
	100.00 (Default)	1 034	0	0.00%	1.00%	1.00%	0.00%

Exposure class Retail - Qualifying revolving	PD range	Number of obligors at the end of previous year		Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
			Of which number of obligors which defaulted in the year				
a	b	c	d	e	f	g	h
	0.00 to <0.15	31 913	64	0.00%	0.00%	0.00%	0.00%
	0.00 to <0.10			0.00%	0.00%	0.00%	0.00%
	0.10 to <0.15	31 913	64	0.00%	0.00%	0.00%	0.00%
	0.15 to <0.25	12 079	51	0.00%	0.00%	0.00%	0.00%
	0.25 to <0.50	14 855	73	0.00%	0.00%	0.00%	0.00%
	0.50 to <0.75	9 200	34	0.00%	0.01%	0.01%	0.00%
	0.75 to <2.50	27 995	224	0.01%	0.01%	0.01%	0.01%
	0.75 to <1.75	19 740	141	0.01%	0.01%	0.01%	0.01%
	1.75 to <2.5	8 255	83	0.01%	0.02%	0.02%	0.01%
	2.50 to <10.00	23 718	491	0.02%	0.05%	0.05%	0.02%
	2.5 to <5	13 051	193	0.01%	0.04%	0.04%	0.02%
	5 to <10	10 667	298	0.03%	0.07%	0.07%	0.03%
	10.00 to <100.00	9 370	1 002	0.11%	0.18%	0.16%	0.11%
	10 to <20	7 485	526	0.07%	0.14%	0.14%	0.08%
	20 to <30	1 804	433	0.24%	0.24%	0.24%	0.21%
	30.00 to <100.00	81	43	0.53%	0.57%	0.31%	0.29%
	100.00 (Default)	11 684	0	0.00%	1.00%	1.00%	0.00%



Exposure class Retail - Other SME	PD range	Number of obligors at the end of previous year		Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
			Of which number of obligors which defaulted in the year				
a	b	c	d	e	f	g	h
	0.00 to <0.15	3 919	13	0.00%	0.00%	0.00%	0.00%
	0.00 to <0.10			0.00%	0.00%	0.00%	0.00%
	0.10 to <0.15	3 919	13	0.00%	0.00%	0.00%	0.00%
	0.15 to <0.25	1 466	4	0.00%	0.00%	0.00%	0.00%
	0.25 to <0.50	2 783	5	0.00%	0.00%	0.00%	0.00%
	0.50 to <0.75	2 397	4	0.00%	0.01%	0.01%	0.00%
	0.75 to <2.50	10 026	50	0.00%	0.01%	0.01%	0.01%
	0.75 to <1.75	7 700	34	0.00%	0.01%	0.01%	0.01%
	1.75 to <2.5	2 326	16	0.01%	0.02%	0.02%	0.01%
	2.50 to <10.00	4 342	80	0.02%	0.05%	0.05%	0.03%
	2.5 to <5	2 749	34	0.01%	0.04%	0.04%	0.02%
	5 to <10	1 593	46	0.03%	0.07%	0.07%	0.05%
	10.00 to <100.00	1 470	133	0.09%	0.44%	0.23%	0.15%
	10 to <20	770	48	0.06%	0.14%	0.14%	0.10%
	20 to <30	290	27	0.09%	0.25%	0.25%	0.14%
	30.00 to <100.00	410	58	0.14%	0.55%	0.38%	0.24%
	100.00 (Default)	3 987	0	0.00%	1.00%	1.00%	0.00%

Exposure class Retail - Other non-SME	PD range	Number of obligors at the end of previous year		Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
			Of which number of obligors which defaulted in the year				
a	b	c	d	e	f	g	h
	0.00 to <0.15	1 500	4	0.00%	0.00%	0.00%	0.00%
	0.00 to <0.10			0.00%	0.00%	0.00%	0.00%
	0.10 to <0.15	1 500	4	0.00%	0.00%	0.00%	0.00%
	0.15 to <0.25	690	1	0.00%	0.00%	0.00%	0.00%



	0.25 to <0.50	934	1	0.00%	0.00%	0.00%	0.00%
	0.50 to <0.75	720	1	0.00%	0.01%	0.01%	0.00%
	0.75 to <2.50	3 092	30	0.01%	0.01%	0.02%	0.01%
	0.75 to <1.75	1 805	17	0.01%	0.01%	0.01%	0.01%
	1.75 to <2.5	1 287	13	0.01%	0.02%	0.02%	0.01%
	2.50 to <10.00	7 101	55	0.01%	0.05%	0.06%	0.02%
	2.5 to <5	2 723	13	0.00%	0.04%	0.04%	0.01%
	5 to <10	4 378	42	0.01%	0.07%	0.08%	0.02%
	10.00 to <100.00	5 105	506	0.10%	0.21%	0.19%	0.11%
	10 to <20	3 163	109	0.03%	0.14%	0.14%	0.07%
	20 to <30	1 598	220	0.14%	0.25%	0.26%	0.16%
	30.00 to <100.00	344	177	0.51%	0.40%	0.36%	0.24%
	100.00 (Default)	7 564	0	0.00%	1.00%	1.00%	0.00%

F-IRB

Exposure class Institutions	PD range	Number of obligors in the end of previous year		Observed average default rate (%)	Exposure weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
			Of which number of obligors which defaulted in the year				
a	b	c	d	e	f	g	h
	0.00 to <0.15	50	0	0.00%	0.00%	0.00%	0.00%
	0.00 to <0.10	28	0	0.00%	0.00%	0.00%	0.00%
	0.10 to <0.15	22	0	0.00%	0.00%	0.00%	0.00%
	0.15 to <0.25	9	0	0.00%	0.00%	0.00%	0.00%
	0.25 to <0.50	5	0	0.00%	0.00%	0.00%	0.00%
	0.50 to <0.75	1	0	0.00%	0.01%	0.01%	0.00%
	0.75 to <2.50	8	0	0.00%	0.02%	0.02%	0.00%
	0.75 to <1.75	3	0	0.00%	0.01%	0.01%	0.00%
	1.75 to <2.5	5	0	0.00%	0.02%	0.02%	0.00%
	2.50 to <10.00	4	0	0.00%	0.05%	0.04%	0.00%
	2.5 to <5	3	0	0.00%	0.03%	0.04%	0.00%
	5 to <10	1	0	0.00%	0.08%	0.06%	0.00%



	10.00 to <100.00			0.00%	0.22%	0.00%	0.00%
	10 to <20			0.00%	0.14%	0.00%	0.00%
	20 to <30			0.00%	0.26%	0.00%	0.00%
	30.00 to <100.00			0.00%	0.44%	0.00%	0.00%
	100.00 (Default)			0.00%	1.00%	0.00%	0.00%

Exposure class Corporates - Other	PD range	Number of obligors in the end of previous year		Observed average default rate (%)	Exposure weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
			Of which number of obligors which defaulted in the year				
a	b	c	d	e	f	g	h
	0.00 to <0.15	3	0	0.00%	0.00%	0.00%	0.00%
	0.00 to <0.10	3	0	0.00%	0.00%	0.00%	0.00%
	0.10 to <0.15			0.00%	0.00%	0.00%	0.00%
	0.15 to <0.25	2	0	0.00%	0.00%	0.00%	0.00%
	0.25 to <0.50	3	0	0.00%	0.00%	0.00%	0.00%
	0.50 to <0.75			0.00%	0.01%	0.00%	0.00%
	0.75 to <2.50	3	0	0.00%	0.00%	0.01%	0.00%
	0.75 to <1.75	2	0	0.00%	0.00%	0.01%	0.00%
	1.75 to <2.5	1	0	0.00%	0.00%	0.02%	0.00%
	2.50 to <10.00	2	0	0.00%	0.03%	0.05%	0.00%
	2.5 to <5	1	0	0.00%	0.03%	0.04%	0.00%
	5 to <10	1	0	0.00%	0.08%	0.06%	0.00%
	10.00 to <100.00			0.00%	0.18%	0.00%	0.00%
	10 to <20			0.00%	0.18%	0.00%	0.00%
	20 to <30			0.00%	0.00%	0.00%	0.00%
	30.00 to <100.00			0.00%	0.00%	0.00%	0.00%
	100.00 (Default)			0.00%	0.00%	0.00%	0.00%


Template EU CR3 – CRM techniques overview: Disclosure of the use of credit risk mitigation techniques
In thousands of BGN

		Unsecured carrying amount	Secured carrying amount			
				Of which secured by collateral	Of which secured by financial guarantees	
						Of which secured by credit derivatives
a	b	c	d	e		
1	Loans and advances	10 765 976	12 512 342	11 331 608	1 180 734	
2	Debt securities	4 745 261	0	0	0	
3	Total	15 511 237	12 512 342	11 331 608	1 180 734	
4	Of which non-performing exposures	26 913	104 207	97 073	7 134	
EU-5	Of which defaulted					

Template EU MR1 - Market risk under the standardised approach
In thousands of BGN

		a
		RWEAs
	Outright products	
1	Interest rate risk (general and specific)	2 688
2	Equity risk (general and specific)	5 650
3	Foreign exchange risk	0
4	Commodity risk	38
	Options	
5	Simplified approach	0
6	Delta-plus approach	0
7	Scenario approach	0
8	Securitisation (specific risk)	0
9	Total	8 376



Template EU OR1 - Operational risk own funds requirements and risk-weighted exposure amounts

In thousands of BGN

Banking activities		a	b	c	d	e
		Relevant indicator			Own funds requirements	Risk exposure amount
		Year-3	Year-2	Last year		
1	Banking activities subject to basic indicator approach (BIA)					
2	Banking activities subject to standardised (TSA) / alternative standardised (ASA) approaches					
3	<u>Subject to TSA:</u>					
4	<u>Subject to ASA:</u>					
5	Banking activities subject to advanced measurement approaches AMA	993 924	934 885	965 251	89 293	1 116 163

Template EU-SEC1 - Securitisation exposures in the non-trading book

In thousands of BGN

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
		Institution acts as originator							Institution acts as sponsor				Institution acts as investor			
		Traditional				Synthetic		Sub-total	Traditional		Synthetic	Sub-total	Traditional		Synthetic	Sub-total
		STS		Non-STS			of which SRT		STS	Non-STS			STS	Non-STS		
		of which SRT	of which SRT													
1	Total exposures	0	0	0	0	1 698 800	1 698 800	1 698 800	0	0	0	0	0	0	0	0
2	Retail (total)															
3	residential mortgage															
4	credit card															
5	other retail exposures															
6	re-securitisation															
7	Wholesale (total)	0	0	0	0	1 698 800	1 698 800	1 698 800	0	0	0	0	0	0	0	0
8	loans to corporates	0	0	0	0	1 698 800	1 698 800	1 698 800	0	0	0	0	0	0	0	0
9	commercial mortgage															
10	lease and receivables															
11	other wholesale															
12	re-securitisation															



Template EU-SEC3 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as originator or as sponsor

In thousands of BGN

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	EU-p	EU-q
		Exposure values (by RW bands/deductions)					Exposure values (by regulatory approach)				RWEA (by regulatory approach)				Capital charge after cap			
		≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW/deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/deductions
1	Total exposures	1 698 800	0	0	0	0	1 698 800	0	0	0	169 880	0	0	0	13 590	0	0	0
2	Traditional transactions	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3	Securitisation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4	Retail	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5	Of which STS	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6	Wholesale	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7	Of which STS	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8	Re-securitisation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9	Synthetic transactions	1 698 800	0	0	0	0	1 698 800	0	0	0	169 880	0	0	0	13 590	0	0	0
10	Securitisation	1 698 800	0	0	0	0	1 698 800	0	0	0	169 880	0	0	0	13 590	0	0	0
11	Retail underlying	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12	Wholesale	1 698 800	0	0	0	0	1 698 800	0	0	0	169 880	0	0	0	13 590	0	0	0
13	Re-securitisation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0



Template EU-SEC5 - Exposures securitised by the institution - Exposures in default and specific credit risk adjustments

In thousands of BGN

		a	b	c
		Exposures securitised by the institution - Institution acts as originator or as sponsor		
		Total outstanding nominal amount		Total amount of specific credit risk adjustments made during the period
			Of which exposures in default	
1	Total exposures	1 867 348	0	0
2	Retail (total)	538	0	0
3	residential mortgage	0	0	0
4	credit card	0	0	0
5	other retail exposures	538	0	0
6	re-securitisation	0	0	0
7	Wholesale (total)	1 866 810	0	0
8	loans to corporates	1 866 810	0	0
9	commercial mortgage	0	0	0
10	lease and receivables	0	0	0
11	other wholesale	0	0	0
12	re-securitisation	0	0	0



Template EU LR1 - LRSum: Summary reconciliation of accounting assets and leverage ratio exposures

In thousands of BGN

		a
		Applicable amount
1	Total assets as per published financial statements	29 302 000
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation	-1 495
3	(Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference)	0
4	(Adjustment for temporary exemption of exposures to central banks (if applicable))	0
5	(Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting framework but excluded from the total exposure measure in accordance with point (i) of Article 429a(1) CRR)	0
6	Adjustment for regular-way purchases and sales of financial assets subject to trade date accounting	0
7	Adjustment for eligible cash pooling transactions	0
8	Adjustment for derivative financial instruments	120 156
9	Adjustment for securities financing transactions (SFTs)	2 329
10	Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	2 442 708
11	(Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital)	0
EU-11a	(Adjustment for exposures excluded from the total exposure measure in accordance with point (c) of Article 429a(1) CRR)	0
EU-11b	(Adjustment for exposures excluded from the total exposure measure in accordance with point (j) of Article 429a(1) CRR)	0
12	Other adjustments	532 740
13	Total exposure measure	32 398 438



Template EU LR2 - LRCom: Leverage ratio common disclosure

In thousands of BGN

		CRR leverage ratio exposures	
		a	b
		31.12.2022	31.12.2021
On-balance sheet exposures (excluding derivatives and SFTs)			
1	On-balance sheet items (excluding derivatives, SFTs, but including collateral)	28 731 846	25 176 261
2	Gross-up for derivatives collateral provided, where deducted from the balance sheet assets pursuant to the applicable accounting framework	0	0
3	(Deductions of receivables assets for cash variation margin provided in derivatives transactions)	-11 714	-20 253
4	(Adjustment for securities received under securities financing transactions that are recognised as an asset)	0	0
5	(General credit risk adjustments to on-balance sheet items)	0	0
6	(Asset amounts deducted in determining Tier 1 capital)	-49 453	-50 212
7	Total on-balance sheet exposures (excluding derivatives and SFTs)	28 670 679	25 105 796
Derivative exposures			
8	Replacement cost associated with SA-CCR derivatives transactions (ie net of eligible cash variation margin)	99 056	82 839
EU-8a	Derogation for derivatives: replacement costs contribution under the simplified standardised approach	0	0
9	Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions	268 666	173 149
EU-9a	Derogation for derivatives: Potential future exposure contribution under the simplified standardised approach	0	0
EU-9b	Exposure determined under Original Exposure Method	0	0
10	(Exempted CCP leg of client-cleared trade exposures) (SA-CCR)	0	0
EU-10a	(Exempted CCP leg of client-cleared trade exposures) (simplified standardised approach)	0	0
EU-10b	(Exempted CCP leg of client-cleared trade exposures) (Original Exposure Method)	0	0
11	Adjusted effective notional amount of written credit derivatives	0	0
12	(Adjusted effective notional offsets and add-on deductions for written credit derivatives)	0	0
13	Total derivatives exposures	367 722	255 988



Securities financing transaction (SFT) exposures			
14	Gross SFT assets (with no recognition of netting), after adjustment for sales accounting transactions	915 000	179 571
15	(Netted amounts of cash payables and cash receivables of gross SFT assets)	0	0
16	Counterparty credit risk exposure for SFT assets	2 329	768
EU-16a	Derogation for SFTs: Counterparty credit risk exposure in accordance with Articles 429e(5) and 222 CRR	0	0
17	Agent transaction exposures	0	0
EU-17a	(Exempted CCP leg of client-cleared SFT exposure)	0	0
18	Total securities financing transaction exposures	917 329	180 339
Other off-balance sheet exposures			
19	Off-balance sheet exposures at gross notional amount	7 441 053	6 917 409
20	(Adjustments for conversion to credit equivalent amounts)	-4 998 345	-4 591 342
21	(General provisions deducted in determining Tier 1 capital and specific provisions associated associated with off-balance sheet exposures)		
22	Off-balance sheet exposures	2 442 708	2 442 708
Excluded exposures			
EU-22a	(Exposures excluded from the total exposure measure in accordance with point (c) of Article 429a(1) CRR)	0	0
EU-22b	(Exposures exempted in accordance with point (j) of Article 429a(1) CRR (on and off balance sheet))	0	0
EU-22c	(Excluded exposures of public development banks (or units) - Public sector investments)	0	0
EU-22d	(Excluded exposures of public development banks (or units) - Promotional loans)	0	0
EU-22e	(Excluded passing-through promotional loan exposures by non-public development banks (or units))	0	0
EU-22f	(Excluded guaranteed parts of exposures arising from export credits)	0	0
EU-22g	(Excluded excess collateral deposited at triparty agents)	0	0
EU-22h	(Excluded CSD related services of CSD/institutions in accordance with point (o) of Article 429a(1) CRR)	0	0
EU-22i	(Excluded CSD related services of designated institutions in accordance with point (p) of Article 429a(1) CRR)	0	0
EU-22j	(Reduction of the exposure value of pre-financing or intermediate loans)	0	0
EU-22k	(Total exempted exposures)	0	0
Capital and total exposure measure			
23	Tier 1 capital	3 111 187	3 301 187
24	Total exposure measure	32 398 438	27 984 831



Leverage ratio			
25	Leverage ratio (%)	9.60%	11.85%
EU-25	Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%)	9.60%	11.85%
25a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) (%)	9.60%	11.85%
26	Regulatory minimum leverage ratio requirement (%)	3.00%	3.00%
EU-26a	Additional own funds requirements to address the risk of excessive leverage (%)	0.00%	0.00%
EU-26b	of which: to be made up of CET1 capital	0.00%	0.00%
27	Leverage ratio buffer requirement (%)	0.00%	0.00%
EU-27a	Overall leverage ratio requirement (%)	3.00%	3.00%
Choice on transitional arrangements and relevant exposures			
EU-27b	Choice on transitional arrangements for the definition of the capital measure	NA	NA
Disclosure of mean values			
28	Mean of daily values of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivable	915 000	179 571
29	Quarter-end value of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables	915 000	179 571
30	Total exposure measure (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	32 398 438	27 868 190
30a	Total exposure measure (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	32 398 438	27 868 190
31	Leverage ratio (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	9.60%	11.85%
31a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	9.60%	11.85%



Template EU LR3 - LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)

In thousands of BGN

		a
		CRR leverage ratio exposures
EU-1	Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:	28 731 846
EU-2	Trading book exposures	2 828
EU-3	Banking book exposures, of which:	28 729 018
EU-4	Covered bonds	97 817
EU-5	Exposures treated as sovereigns	11 453 946
EU-6	Exposures to regional governments, MDB, international organisations and PSE, not treated as sovereigns	61 203
EU-7	Institutions	271 445
EU-8	Secured by mortgages of immovable properties	3 834 876
EU-9	Retail exposures	3 748 782
EU-10	Corporates	6 194 061
EU-11	Exposures in default	131 318
EU-12	Other exposures (eg equity, securitisations, and other non-credit obligation assets)	2 935 570



Template EU LIQ1 - Quantitative information of LCR

In thousands of BGN

		a	b	c	d	e	f	g	h
		Total unweighted value (average)				Total weighted value (average)			
EU 1a	Quarter ending on (DD Month YYYY)	31.12.2022	30.09.2022	30.06.2022	31.03.2022	31.12.2022	30.09.2022	30.06.2022	31.03.2022
EU 1b	Number of data points used in the calculation of averages								
HIGH-QUALITY LIQUID ASSETS									
1	Total high-quality liquid assets (HQLA)					10 511 366	9 876 632	9 330 994	10 535 755
CASH - OUTFLOWS									
2	Retail deposits and deposits from small business customers, of which:	14 626 229	14 018 775	13 547 261	13 431 599	1 187 677	1 140 963	1 101 504	1 102 211
3	Stable deposits	7 092 954	6 706 111	6 442 575	6 250 651	354 648	335 306	322 129	312 533
4	Less stable deposits	7 533 275	7 312 664	7 104 686	7 180 948	833 029	805 657	779 375	789 678
5	Unsecured wholesale funding	8 266 100	8 188 288	7 279 339	7 419 623	3 658 908	3 716 657	3 251 469	3 513 777
6	Operational deposits (all counterparties) and deposits in networks of cooperative banks	556 224	509 560	417 600	373 944	119 624	109 756	88 793	79 287
7	Non-operational deposits (all counterparties)	7 709 876	7 678 728	6 861 739	7 045 679	3 539 284	3 606 901	3 162 676	3 434 490
8	Unsecured debt								
9	Secured wholesale funding								
10	Additional requirements	9 260 047	8 379 196	8 538 421	7 493 147	4 650 981	3 868 699	4 326 719	3 543 884
11	Outflows related to derivative exposures and other collateral requirements	4 131 487	3 358 164	3 890 645	3 136 129	4 131 487	3 358 164	3 890 645	3 136 129
12	Outflows related to loss of funding on debt products								
13	Credit and liquidity facilities	5 128 560	5 021 032	4 647 776	4 357 018	519 494	510 535	436 074	407 755



14	Other contractual funding obligations	14 177	16 391		18 185	14 177	16 391		18 185
15	Other contingent funding obligations	2 068 987	2 413 422	2 844 486	1 730 621	137 668	169 033	208 854	101 900
16	TOTAL CASH OUTFLOWS					9 649 411	8 911 743	8 888 546	8 279 957
CASH - INFLOWS									
17	Secured lending (e.g. reverse repos)	915 017	532 043	469 219	1 118 620		41 104	39 034	0
18	Inflows from fully performing exposures	209 874	134 654	85 892	78 529	135 565	75 321	52 197	48 048
19	Other cash inflows	4 122 165	3 375 985	3 905 159	3 143 940	4 122 165	3 375 985	3 905 159	3 143 940
EU-19a	(Difference between total weighted inflows and total weighted outflows arising from transactions in third countries where there are transfer restrictions or which are denominated in non-convertible currencies)								
EU-19b	(Excess inflows from a related specialised credit institution)								
20	TOTAL CASH INFLOWS	5 410 043	4 399 083	4 767 542	4 564 183	4 420 717	3 848 811	4 303 662	3 415 082
EU-20a	<i>Fully exempt inflows</i>	0	0	0	0	0	0	0	0
EU-20b	<i>Inflows subject to 90% cap</i>	0	0	0	0	0	0	0	0
EU-20c	<i>Inflows subject to 75% cap</i>	5 410 043	4 399 083	4 767 542	5 410 043	4 420 717	3 848 811	4 303 662	3 415 082
TOTAL ADJUSTED VALUE									
EU-21	LIQUIDITY BUFFER					10 511 366	9 876 632	9 330 994	10 535 755
22	TOTAL NET CASH OUTFLOWS					5 228 694	5 062 932	4 584 884	4 864 875
23	LIQUIDITY COVERAGE RATIO					201.03%	195.08%	203.52%	216.57%



Template EU LIQ2: Net Stable Funding Ratio

31.12.2022

		a	b	c	d	e
(in currency amount)		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
Available stable funding (ASF) Items						
1	Capital items and instruments	2 780 251	0	0	519 834	3 300 085
2	Own funds	2 780 251	0	0	48 091	2 828 342
3	Other capital instruments		0	0	471 743	471 743
4	Retail deposits		14 786 645	0	0	13 665 008
5	Stable deposits		7 140 541	0	0	6 783 514
6	Less stable deposits		7 646 104	0	0	-6 881 494
7	Wholesale funding:		10 022 150	0	313 665	4 284 427
8	Operational deposits		558 488	0	0	10 512
9	Other wholesale funding		9 463 662	0	313 665	4 294 939
10	Interdependent liabilities		0	0	0	0
11	Other liabilities:	273 282	0	0	239 330	239 330
12	NSFR derivative liabilities	273 282				
13	All other liabilities and capital instruments not included in the above categories		0	0	239 330	239 330
14	Total available stable funding (ASF)					21 488 850
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					2 807 003
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool		0	0	0	0
16	Deposits held at other financial institutions for operational purposes		0	0	0	0
17	Performing loans and securities:		6 185 034	1 281 936	8 988 659	10 403 814
18	Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		915 017	0	0	0
19	Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		633 542	425 988	2 120 362	2 396 710
20	Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		4 018 035	761 332	3 611 878	7 829 301

In thousands of BGN

30.09.2022

		a	b	c	d	e
(in currency amount)		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
Available stable funding (ASF) Items						
1	Capital items and instruments	2 744 638	0	0	425 734	3 170 372
2	Own funds	2 744 638	0	0	57 086	2 801 724
3	Other capital instruments		0	0	368 648	368 648
4	Retail deposits		14 159 766	0	0	13 081 322
5	Stable deposits		6 750 648	0	0	6 413 116
6	Less stable deposits		7 409 118	0	0	-6 668 206
7	Wholesale funding:		9 252 333	0	313 374	4 016 302
8	Operational deposits		511 070	0	0	16 655
9	Other wholesale funding		8 741 263	0	313 374	4 032 957
10	Interdependent liabilities		0	0	0	0
11	Other liabilities:	241 157	6 701	0	273 151	273 151
12	NSFR derivative liabilities	241 157				
13	All other liabilities and capital instruments not included in the above categories		6 701	0	273 151	273 151
14	Total available stable funding (ASF)					20 557 802
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					2 764 124
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool		0	2	2	1
16	Deposits held at other financial institutions for operational purposes		0	1	1	0
17	Performing loans and securities:		5 821 551	-2	-2	0
18	Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		449 835	0	0	0
19	Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		824 828	0	1	0
20	Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		3 976 821	0	0	0



21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		299 488	205 597	394 407	2 758 251
22	Performing residential mortgages, of which:		431 821	94 616	3 132 457	0
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		349 433	85 645	2 952 011	0
24	Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products		186 619	0	123 962	177 803
25	Interdependent assets		0	0	0	0
26	Other assets:		2 293 882	10 260	600 580	644 116
27	Physical traded commodities				0	0
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs				0	0
29	NSFR derivative assets				0	0
30	NSFR derivative liabilities before deduction of variation margin posted				273 282	13 664
31	All other assets not included in the above categories		2 020 600	10 260	600 580	630 452
32	Off-balance sheet items		3 305 968	520 610	3 389 068	505 565
33	Total RSF					11 825 832
34	Net Stable Funding Ratio (%)					181.71%

21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		268 661	0	0	0
22	Performing residential mortgages, of which:		367 297	0	0	0
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		297 585	0	0	0
24	Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products		202 770	0	1	0
25	Interdependent assets		0	0	0	0
26	Other assets:		2 246 135	2	2	727 444
27	Physical traded commodities				0	0
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs				0	0
29	NSFR derivative assets				82 065	82 065
30	NSFR derivative liabilities before deduction of variation margin posted				241 157	12 058
31	All other assets not included in the above categories		1 922 913	2	2	633 321
32	Off-balance sheet items		3 529 465	0	0	0
33	Total RSF					11 505 054
34	Net Stable Funding Ratio (%)					178.68%

30.06.2022

		a	b	c	d	e
(in currency amount)		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
Available stable funding (ASF) Items						
1	Capital items and instruments	2 819 832	0	0	321 932	3 141 764
2	Own funds	2 819 832	0	0	56 480	2 876 312
3	Other capital instruments		0	0	265 452	265 452
4	Retail deposits		13 604 948	0	0	12 567 914
5	Stable deposits		6 469 232	0	0	6 145 770
6	Less stable deposits		7 135 716	0	0	-6 422 144
7	Wholesale funding:		8 870 879	0	313 150	3 655 192
8	Operational deposits		418 627	0	0	14 594
9	Other wholesale funding		8 452 252	0	313 150	3 669 786

31.03.2022

		a	b	c	d	e
(in currency amount)		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
Available stable funding (ASF) Items						
1	Capital items and instruments	2 977 014	0	0	555 494	3 532 508
2	Own funds	2 977 014	0	0	53 195	3 030 209
3	Other capital instruments		0	0	502 299	502 299
4	Retail deposits		13 578 747	0	0	12 535 771
5	Stable deposits		6 297 972	0	0	5 983 073
6	Less stable deposits		7 280 775	0	0	-6 552 698
7	Wholesale funding:		8 822 785	0	313 103	3 567 132
8	Operational deposits		375 240	0	0	15 232
9	Other wholesale funding		8 447 545	0	313 103	3 582 364

10	Interdependent liabilities		0	0	0	0
11	Other liabilities:	160 075	5 449	0	301 993	301 993
12	<i>NSFR derivative liabilities</i>	160 075				
13	<i>All other liabilities and capital instruments not included in the above categories</i>		5 449	0	301 993	301 993
14	Total available stable funding (ASF)					19 666 863
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					2 753 493
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool		0	0	0	0
16	Deposits held at other financial institutions for operational purposes		0	0	0	0
17	Performing loans and securities:		5 328 450	0	0	0
18	<i>Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut</i>		391 151	0	0	0
19	<i>Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions</i>		798 644	0	0	0
20	<i>Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:</i>		3 630 610	0	0	0
21	<i>With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk</i>		403 710	0	0	0
22	<i>Performing residential mortgages, of which:</i>		480 237	0	0	0
23	<i>With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk</i>		290 501	0	0	0
24	<i>Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products</i>		27 808	0	0	0
25	Interdependent assets		0	0	0	0
26	Other assets:		2 002 450	0	0	666 143

10	Interdependent liabilities		0	0	0	0
11	Other liabilities:	110 121	11 464	2 806	271 523	272 926
12	<i>NSFR derivative liabilities</i>	110 121				
13	<i>All other liabilities and capital instruments not included in the above categories</i>		11 464	2 806	271 523	272 926
14	Total available stable funding (ASF)					19 908 337
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					2 631 689
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool		0	0	0	0
16	Deposits held at other financial institutions for operational purposes		0	0	0	0
17	Performing loans and securities:		5 838 036	0	0	0
18	<i>Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut</i>		1 118 620	0	0	0
19	<i>Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions</i>		644 618	0	0	0
20	<i>Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:</i>		3 477 184	0	0	0
21	<i>With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk</i>		370 860	0	0	0
22	<i>Performing residential mortgages, of which:</i>		572 962	0	0	0
23	<i>With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk</i>		325 996	0	0	0
24	<i>Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products</i>		24 652	0	0	0
25	Interdependent assets		0	0	0	0
26	Other assets:		1 962 609	0	0	615 093



27	Physical traded commodities				0	0
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs				0	0
29	NSFR derivative assets				16 501	16 501
30	NSFR derivative liabilities before deduction of variation margin posted				160 075	8 004
31	All other assets not included in the above categories		1 825 874	0	0	641 638
32	Off-balance sheet items		3 578 305	0	0	0
33	Total RSF					10 908 300
34	Net Stable Funding Ratio (%)					180.29%

27	Physical traded commodities				0	0
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs				0	0
29	NSFR derivative assets				0	0
30	NSFR derivative liabilities before deduction of variation margin posted				110 121	5 506
31	All other assets not included in the above categories		1 852 488	0	0	609 587
32	Off-balance sheet items		2 087 419	0	0	0
33	Total RSF					10 329 029
34	Net Stable Funding Ratio (%)					192.74%



Template EU REM1 - Remuneration awarded for the financial year

In thousands of BGN

		a	b	c	d
		MB Supervisory function	MB Management function	Other senior management	Other identified staff
1	Fixed remuneration	Number of identified staff	10	9	91
2		Total fixed remuneration	83	3 065	0
3		Of which: cash-based	162	5 994	0
4		(Not applicable in the EU)			
EU-4a		Of which: shares or equivalent ownership interests			
5		Of which: share-linked instruments or equivalent non-cash instruments			
EU-5x		Of which: other instruments			
6		(Not applicable in the EU)			
7		Of which: other forms			
8		(Not applicable in the EU)			
9	Variable remuneration	Number of identified staff	6	9	91
10		Total variable remuneration	0	2 645	0
11		Of which: cash-based	0	1 099	0
12		Of which: deferred	0	515	0
EU-13a		Of which: shares or equivalent ownership interests	0	1 546	0
EU-14a		Of which: deferred	0	1 546	0
EU-13b		Of which: share-linked instruments or equivalent non-cash instruments			
EU-14b		Of which: deferred			
EU-14x		Of which: other instruments			
EU-14y		Of which: deferred			
15		Of which: other forms			
16		Of which: deferred			
17	Total remuneration (2 + 10)				



Template EU REM3 - Deferred remuneration

In thousands of BGN

		a	b	c	d	e	f	EU - g	EU - h
	Deferred and retained remuneration	Total amount of deferred remuneration awarded for previous performance periods	Of which due to vest in the financial year	Of which vesting in subsequent financial years	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in the financial year	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in future performance years	Total amount of adjustment during the financial year due to ex post implicit adjustments (i.e. changes of value of deferred remuneration due to the changes of prices of instruments)	Total amount of deferred remuneration awarded before the financial year actually paid out in the financial year	Total of amount of deferred remuneration awarded for previous performance period that has vested but is subject to retention periods
1	MB Supervisory function	0	0	0	0	0	0	0	0
2	Cash-based						-		
3	Shares or equivalent ownership interests						-		
4	Share-linked instruments or equivalent non-cash instruments						-		
5	Other instruments						-		
6	Other forms						-		
7	MB Management function	2 370	747	1 623			-	747	640
8	Cash-based	882	107	775			-	107	
9	Shares or equivalent ownership interests	1 488	640	848			-	640	640
10	Share-linked instruments or equivalent non-cash instruments						-		
11	Other instruments						-		
12	Other forms						-		
13	Other senior management						-		
14	Cash-based						-		
15	Shares or equivalent ownership interests						-		
16	Share-linked instruments or equivalent non-cash instruments						-		
17	Other instruments						-		
18	Other forms						-		
19	Other identified staff	326	102	224			-	102	
20	Cash-based	167	31	136			-	31	
21	Shares or equivalent ownership interests	159	71	88			-	71	159
22	Share-linked instruments or equivalent non-cash instruments						-		
23	Other instruments						-		
24	Other forms						-		
25	Total amount	2 696	849	1 847				849	640



Template EU REM5 - Information on remuneration of staff whose professional activities have a material impact on institutions' risk profile (identified staff)

In thousands of BGN

		a	b	c	d	e	f	g	h	i	j
		Management body remuneration			Business areas						-
		MB Supervisory function	MB Management function	Total MB	Investment banking	Retail banking	Asset management	Corporate functions	Independent internal control functions	All other	Total
1	Total number of identified staff										
2	Of which: members of the MB	6	9	15							
3	Of which: other senior management										
4	Of which: other identified staff				6	55	0	10	20	0	
5	Total remuneration of identified staff	83	5 709	11 328	652	6 424	0	1 566	2 285		
6	Of which: variable remuneration	0	2 645	5 173	177	1 400	0	291	541		
7	Of which: fixed remuneration	83	3 065	6 156	475	5 024	0	1 275	1 744		



Declaration by the Manager charged with preparing the financial reports

The undersigned, Mrs. Sandra Vojnovic – Chief Financial Officer and Member of the Management Board of UniCredit Bulbank, in her capacity as the Manager charged with preparing the financial reports of UniCredit Bulbank AD

DECLARES

that, pursuant to article 154-bis, paragraph 2, of the “Consolidated Law on Financial Intermediation”, the information disclosed in this document corresponds to the accounting documents, books and records.

Sofia,

June 28, 2023

Mrs. Sandra Vojnovich

Chief Financial Officer
and Member of the Management Board
of UniCredit Bulbank

A handwritten signature in blue ink, appearing to read "Sandra Vojnovich", written over a dotted line.

/signature/