



ANNUAL DISCLOSURE

YEAR 2025

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) 2024/3172 of 29 November 2024 laying down implementing technical standards for the application of Regulation (EU) 575/2013 of the European Parliament and of the Council with regard to public disclosures by institutions of the information referred to in Part Eight, Titles II and III, of that Regulation, and repealing Commission Implementing Regulation (EU) 2021/637, applicable starting from 1 January 2025 (Pillar 3 Disclosure).

Regulation (EU) 2021/637 shall continue to apply until the new Fundamental Review of the Trading Book (FRTB) framework enters into force, with regard to article 15 and Annexes XXIX and XXX, pursuant to article 16 of Regulation (EU) 2024/3172, with reference to market risk disclosure. On 23 February 2025, the EBA published the final draft Implementing Technical Standards (ITS) on the Pillar 3 Data Hub (P3DH) for large and other institutions, which centralises prudential disclosures by institutions through a single electronic access point on the EBA website. This requirement is part of the Banking Package laid down in the Capital Requirements Regulation (CRR3) and Capital Requirements Directive (CRD VI). The first application reference date, for large and other institutions, is 30 June 2025.

The EBA ITS also provides a transitional period (for the reference dates of 30 June, 30 September and 31 December 2025) in which the institutions can proceed with the publication of the Pillar 3 disclosure on their website and, subsequently, meet the requirement to submit the information to EBA in the technical format requested by the ITS.

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. Since January 01st 2026 the functional and reporting currency of UniCredit Bulbank AD is EUR following the Euro adoption in Bulgaria.

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 CRR3

REGULATION (EU) 575/2013	ANNUAL DISCLOSURE	REG. (EU) 2024/3172
<i>Article & Content</i>	<i>Section in the document</i>	<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 INS1 EU INS2 EU OVC EU CMS1 EU CMS2 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 (CRR2)	Section 15	EU MR1
445a. CVA risk	Section 16	EU CVA2
446. Operational risk	Section 17	EU ORA EU OR1 EU OR2 EU OR3

447. Key metrics	Section 6	EU KM1
448. Exposures to interest rate risk on positions not held in the trading book	Section 18	EU IRRBBA EU IRRBB1
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
455. Use of Internal Market Risk Models (CRR2)	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. 2024/3172 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 a 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 license for performing commercial banking activities. It is domiciled in the Republic of Bulgaria, with registered address Sofia, 7 “Sveta Nedelya” sq.

In 2025 Fitch Ratings upgraded the Bank’s Long-Term Issuer Default Rating (IDR) from ‘BBB+’ to ‘A-’ with stable outlook.

As of October 1st, 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 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 corporate business, delivering a unique Western, Central and Eastern European network to our extensive franchise of 15 million clients.

UniCredit Bulbank is also in line with the ESG Strategy and targets of the UniCredit Group. The main goal is to integrate all ESG topics in the core business and processes, taking into account both the risks and the market opportunities and to provide transparency to all stakeholders.

UniCredit Group pursues a long-term strategy focused on sustainable growth, capital efficiency and digital leadership. UniCredit Bulbank is fully aligned with the Group's Multi Year Plan 2026–2028, which reinforces and accelerates three strategic pillars:

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



2.2 RISK APPETITE

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 2026 Risk Appetite of UniCredit Bulbank reflects our ambition and commitment along the following main dimensions:

Strategic mission - UniCredit's purpose is to Empower Communities to Progress. Within that we have the following strategic imperatives:

- As a Group, We focus on core geographies and strengthen our client franchise to deliver sustainable growth, offering best in class products and services through internal capabilities and selected partnerships
- We are evolving our business model to expand capital light activities business and deliver value added products and services, while improving cost efficiency to fund investment and enhance operating leverage
- As a Group, we will achieve economies of scale from our footprint, steering centrally where it creates value and empowering local entities within a clear risk framework
- We continue to transform our technology by leveraging digital and data, redesigning our operating model and introducing new ways of working, with a strong commitment to innovation and continuous improvement
- We embed sustainability in everything we do, leading by example and providing tools to help clients and communities navigate the transition
- As a Board, we prioritize principles and values over short-term targets, ensuring implementation is monitored and trade-offs are carefully managed

Capital

- We maintain Capital ratio thresholds that ensure adequate buffers over every regulatory requirement in order to have a solid capital position also at financial conglomerate level in an uncertain macro scenario, managing regulatory changes and minimizing 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 are targeting a sustainable RoTE and distribution to shareholders, ensuring a solid Group tangible equity
- 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

Horizontal Risks

- We proactively address geopolitical risks within our evolving framework, ensuring potential impacts (e.g. portfolios vulnerable to spill-over effects) are monitored, assessed and mitigated across risks pillars
- We strictly monitor Early Warning Indicators to early detect any sign of deterioration, with forward-looking approach, also looking at stressed scenarios
- Given that future risk scenarios can quickly change their nature (e.g. cyber risk turns into a rep. risk, turns into liquidity risk) we continuously strengthen our multidisciplinary approach across the teams to anticipate and manage interconnected risks
- We continuously improve our Data Quality Framework, ensuring high data quality standards in line with Risk Data Aggregation and Risk Reporting (RDARR) principles
- We continuously assess and ensure robustness and appropriateness of internal control system and the effective interaction between the three lines of defence
- We will manage within our framework risks related to new products / businesses (amongst which consolidated insurance entities) and to digital assets, recognizing their potential opportunities as well as associated risks, ensuring their adherence to Group risk management and Compliance standards and maintaining strong oversight to ensure a strong presidium over Financial and Non-Financial Risks and to preserve the Group's solid capital and liquidity position

Credit Risk

- We continue to be disciplined in risk management and credit underwriting to preserve the portfolio good quality and support sound business growth in a controlled risk environment, with specific attention on vulnerable sectors and exposures towards emerging and geopolitical risks. We stay alert to risks and vulnerabilities while pursuing opportunities, considering industry trends, return on allocated capital, and leveraging government support where relevant
- We protect the bank by limiting exposure to selected portfolios in those sectors / countries showing significant signals of weakness
- We confirm a prudent approach vs. leveraged transactions coherently with our corporate footprint, within defined limits and triggers and in line with current risk appetite and control framework
- We set an NPE strategy which focuses on value maximization through all available levers, leveraging on disposals only when value is maximized
- We carefully assess and limit concentration risk of all kind, including industry, bulk, and country
- We limit our exposure to shadow banking entities, through limits and triggers at Group and Legal Entity level
- We confirm current restrictive strategy on exposures towards the riskiest NBFi (Non-Banking Financial Institutions) counterparties, such as hedge funds and highly leveraged funds, in line with the defined Risk Strategy thresholds



- On counterparty credit risk, we confirm the commercial banking and client-related activities as core (e.g. restrictive strategy on unsecured bond lending and selective approach for long term reverse repo)

Liquidity and Interest Rate Risks

- We aim at preserving the strong liquidity position across Bank and its subsidiaries, by dynamically assessing in ILAAP the funding and liquidity needs through continuous monitoring of market trends
- We execute the funding plan consistently with MREL requirements and in order to ensure an adequate buffer on LCR and NSFR
- We aim to maintain a structural balance of liquidity also on local currency level
- We optimize intragroup exposures, taking into account self-sufficiency strategy, internal/local MREL provisions and Group liquidity position
- We closely monitor the liquidity position under stress both at Bank and sub-consolidated level and we keep the well-diversified customers' deposits base and closely monitor deposits stability
- We aim at limiting NII volatility due to interest rate movements in a multiyear horizon by hedging deposits and capital through replicating strategies also in coherence with the evolution of behavioral risk models, maintaining a prudential approach on replicating strategy, prioritizing rolling execution vs target via swaps, to minimize risks from interest rate volatility and changing client's behavior
- We keep fixed-rate exposure hedged as much as possible, ensuring Economic Value Exposure within the regulatory threshold in normal and stressed conditions, after considering model risk, availability of liquid derivative market, expected tightening of regulations, while preventing over-hedge risks

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 embrace a prudent approach in the evaluation of fair valued items subject to valuation uncertainty
- We keep the domestic sovereign exposures in line with the main peers

Non-Financial Risks

- We adopt robust ICT and Cybersecurity controls across our estate to enable a safe, secure and resilient bank, also considering the Digital Operational Resilience Strategy (DORS) and the growing reliance on Cloud. We have continuous horizon scanning to cope with external changes and threats and work towards a proportionate 'Zero-Trust' approach, while ensuring appropriate awareness, education and access for all employees, commercial



partners and customers. We have zero-tolerance toward the deployment or use of prohibited AI systems

- We devote utmost attention to prevent frauds, even more with the widespread adoption of Instant Payments, that may increase fraudulent behaviors
- We adopt a structured third-party risk framework, along the whole supply chain including sub-contractors, progressively strengthening controls and approaches, and requiring third parties to be in compliance with applicable laws or regulations and standards with special focus on lock-in risks, termination clauses and exit strategy and Digital Sovereignty
- We ensure proper evaluation and distribution of new products and new utilization of technology (e.g. AI, cloud), in the context where they could negatively affect client protection
- We maintain and continuously update a solid framework (principles, control mechanisms, monitoring and mitigation actions) on Reputational Risk considering also the evolution of the geopolitical context and the fast changing financial and ESG-related environment, paying particular attention on the involvement of the Group in ESG sensitive matters and carefully monitoring the perceived level of the Group's reputation by external stakeholder
- We maintain the group data protection framework aligned with new regulations, regulatory enforcement trends and advanced technology and innovation as they may trigger increased data protection risks
- We foster a strong client centric compliance culture, monitoring the evolution of the conduct risk stemming from internal product factories expansion and changes in the regulatory context (increasing compliance challenges, including conflict of interest management), with attention to evaluation and distribution of new proprietary products in a context that could potentially negatively affect the clients' protection, setting escalation paths for timely reporting and resolution
- 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. We ensure appropriate monitoring and actions to identify and mitigate the risks of transactions and parties that bring sanctions risk

ESG

▪ Climate & Environmental Risk

- We are totally committed to supporting our clients in a just and fair transition
- We have integrated Climate & Environmental risks assessment within Risk Management framework with an aim to assess the Climate and Environmental risk profile of the corporate clients and to identify relevant mitigating measures by differentiating the banking products and services offered to the counterparty through several concrete initiatives in line with ECB regulatory requirements and the defined Group Roadmap.



- We carefully manage our corporate credit exposures and Real Estate collateral portfolio to climate risk considering both Transition and Physical Risk, ensuring proper origination, risk identification, monitoring and management, aiming at progressively increasing loan portfolio covered by the framework developed (in particular for credit risk assessment) and consistently with our Net Zero commitments, always taking into consideration our principles and values.
- **Social Lending**
 - We ensure accessible, fair, and equitable financial offer to clients at risk of economic and social exclusion, having developed new social products, tailored to local needs
 - We support communities with social projects and donations, contributing to youth and financial education, and promoting volunteering initiatives
 - We ensure a robust risk framework through a comprehensive set of policies and principles to properly integrate and manage potential risks related to social factors regarding our portfolios
- **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
- **Governance**
 - We ensure a robust Risk and Compliance framework through a comprehensive set of policies and principles. We apply zero tolerance towards acts of bribery and corruption, prohibiting them in any form

“Tone from the Top” and Risk Culture

- 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”, also 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



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 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 shall be an independent permanent advisory body appointed and dismissed by the SB of the Bank. The RC shall advise the SB and the Management Board (MB) 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 RC has advisory functions only, and the SB and MB shall 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 of the Bank and the relevant resolutions of the Management Board and the Supervisory Board.

Transactional Committee - Credit Council Session

The Credit Council Session 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-offs;
- 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)

The Financial & Credit Risk Committee – ALCO Session (FCRC-ALCO) is a decisional committee in the area of the financial management that is directly accountable to the Management Board of



the Bank (MB). It is responsible for developing and employing the liquidity management system of the Bank. FCRC-ALCO shall periodically submit reports to the MB concerning its operational decisions, including also results of the periodic liquidity stress tests under institution-specific, market-wide and combined alternative scenarios. The MB shall review and assess periodically the effectiveness of FCRC-ALCO's decisions and adjust accordingly the strategies, internal rules and limits for liquidity risk in which appropriate measures for applying them in possible liquidity shortfalls are envisaged. FCRC-ALCO's activities are driven by the goal to achieve satisfactory return on equity on a solid, not excessively volatile basis, within professionally designed and reliable risk management system. Boundaries for all activities are set by regulators, legal system and rules prescribed by the shareholders.

FCRC-ALCO is responsible at local level for:

- approving strategies, policies and methodologies for market risk, defined benefit obligation, counterparty credit risk, liquidity risk, FX risk and banking book interest rate risk, fund transfer pricing, setting limits (where applicable) accordingly;
- approving the Financial Plan (incl. Funding Plan and Contingency Funding Plan);
- evaluating the impact of transactions significantly affecting the overall financial risk portfolio profile as well as monitoring financial risks.

Non-Financial Risk and Controls Committee

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 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; monitor that the risk culture of the bank is implemented consistently;
- 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, Risk Indicators; Digital Risk framework activities, Scenario Analysis, risk mitigation measures, capital at risk; OpRepRisk strategies, Oversight of the TP arrangements, ICT project risk assessments, Risk Control Self 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, points of attention and mitigants, as well as on current and expected impacts of regulations monitored;
- Compliance key highlights and detected Compliance issues, if any;
- Relevant risks/ criticalities highlighted by Internal Audit function, for specific cases and in relation to specific areas;



- Results from 1LC and 2LC;
- 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 of allocation of Provisions for Risk and Charges (according to IAS 37) for: (1) Legal cases on event basis, (2) Customer Experience and Complains (as a pool not on single event basis), (3) Card Operational Provisions (as a pool not on single event basis) and monitor their utilization.
- Approval of Group methodologies, operational limits and methodologies for the measurement, management and control for the different types of NFRs; NFR Priorities and Mitigation Strategies; Any proposal of relevant change in the transfer strategy through insurance; High and Medium-High residual risk assessments (ICT project risk assessments, Risk Control Self Assessments, TP arrangements);
- 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 and AML and Financial Sanctions;
- 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 - ICT, Security & Cyber Risk Session

The ICT, Security and Cyber Risk Session has the mission to steer the overall security management framework as well as actively participate in the Business Continuity, Pandemic, and Emergency & Crisis Management activities performed in the day-to-day activities and management of the legal entities in the country.

In terms of security management, the committee shall:

- support the Security structure of to achieve the UniCredit Group Bulgaria security objectives according to the business needs
- to regulate the organizational aspects of the security management processes and procedures, including the issuing, the managing of results of the local committee sessions and Digital Security Strategy, part of local Security Strategy
- to address the separation of potential conflicting duties, to guarantee an adequate level of accountability and control, and to reduce opportunities for unauthorized or unintentional modification or misuse of the Bank’s assets
- to manage the security related aspects to the main IT D&I initiatives
- to identify and if needed update additional security measures for each relevant IT D&I initiative prior its implementation, in order to manage and treat potential digital security risks



- perform monitoring of the implementation of corrective plans by process/ business owners
- support and manage the proposals from the Security function

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

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 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.

Non-Financial Risk and Controls Committee – Third Party Risk Session

"Exception (escalation) process" management in compliance with "Rules for Third Party Risk Management" for UCB (the Bank) and its Subsidiaries.

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.

Nomination Committee

The Nomination Committee major functions are:

- to carry out, also with the support and in coordination with Group and local competent structures, preliminary assessment and evaluation of the individual suitability of selected candidate/s to fill management bodies' vacancies, as well as the individual suitability of the candidate/s to be appointed to Key function holder positions as defined in the Credit



Institutions Act and in accordance with applicable Group/Internal rules, and, where deemed appropriate by the NomCo, of other senior management staff.

- to carry out periodically, and at least annually, a collective suitability assessment of the management body (MB/SB), in accordance with applicable Group/Internal rules, evaluating the balance considering the knowledge, skills, diversity and experience of the MB/SB members, assessing the structure, size, composition and performance of the MB/SB and making respective recommendations with regard to any changes. The assessment is reported to the respective body accordingly.
- to monitor on ongoing basis the reputation, honesty, integrity, knowledge, skills and experience of Management body members and Key function holders and to identify, in the light of any relevant new facts, situations where a re-assessment should be performed;
- to prepare, with the support of Bank's competent structures, description of the functions and requirements for the candidates for the respective positions and to determine the time commitment that the elected members are expected to devote to each role

The Committee's functions are in line with the provisions of the Credit Institutions Act and with the rights and obligations as per Ordinance №20/2019 of BNB.

Remuneration Committee

The Remuneration Committee has as its general task the following competencies and responsibilities:

- proposes to the respective competent body for approval the remuneration of the members of the Management Board and of the Key Function Holders of the Bank;
- proposes to the competent body the remunerations of other Group material risk takers as per local legal requirements and in alignment with UniCredit Group guidelines and practices.
- proposes to the Supervisory Board and General Meeting of the Shareholders for approval a higher maximum level of the ratio between fixed and variable remuneration;
- supports the Supervisory Board in overseeing the remuneration policies, practices and processes and their compliance with the Remuneration policy and the principles of transparency and corporate governance;
- oversees whether the existing Remuneration policy of the Bank is up to date and, if necessary, makes proposals for changes before the Supervisory Board
- assesses the mechanisms and systems adopted to ensure that the remuneration system properly takes into account all types of risks, liquidity and capital levels and that the overall Remuneration policy and the individual remunerations are consistent with and promote sound and effective risk management and are in line with: the business strategy, objectives, corporate culture and values; the long-term interest of the Bank.
- assesses the achievement of performance targets and the need for ex post risk adjustment, including the application of malus and clawback arrangements

The Committee's functions are in line with the provisions of the Credit Institutions Act and with the rights and obligations as per BNB Ordinance №4/2019 for the requirements of remunerations in banks.



2.4 INTERNAL AUDIT FUNCTION

Internal Audit is an independent function, performing third level controls. It is an integral part of the Internal Control System of the Bank, including the oversight of its Subsidiaries. The purpose of Internal Audit is to provide an independent, objective assurance and consultancy activities, including the monitoring of risks stemming from its Subsidiaries, aimed at adding value and improving the Bank's processes.

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. The next external quality assessment is planned in 2027.

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 four teams Units - General Compliance Unit, Anti Money Laundering and Financial Sanctions Unit, Control of the Investment Intermediary and Market Integrity Unit and Data Protection Team. 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 analyze 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 Financial Crime 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 Program 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;
- 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 with the regulatory requirements;
- Assurance of timely and accurate communication with the law enforcement 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 Ordinance No 38 of 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 as follows:
 - MiFID II/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 Regulation;
 - Central Depository;
 - Dodd Frank-Volcker rule (USA Law);
 - Group shareholdings;
 - PRIIP's - Packaged retail and insurance-based investment products;
 - Benchmark - contribution of indexes;
 - IDD (Insurance Distribution Directive) - investment element;
 - CVB - Covered bonds and Securitization;
 - GSFT - Securities financing transactions.
- In accordance with the requirements of Ordinance No 38 of 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 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 (STOR) 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 FSC for the activities of the bank as an Investment Intermediary and as Registration Agent.
- Checks the agreements for Registration Agent services of Ordinance No 38 of FSC for compliance with the requirements of the Rules of Central Depository AD and 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 with regard to the financial instruments and investment services pursuing the requirements of MiFID II;
- The CII&MI unit communicates with the local competent authorities – Financial Supervision Commission, Bulgarian National Bank, Central Depository AD, Bulgarian Stock Exchange – Sofia AD in accordance with the activity of the Bank as an investment intermediary and registration agent.

The scope of the activity of the Data Protection Team 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 across 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 elements comprise the loss-warning level limit, which provides an early indication of any accumulation of position losses, domestic sovereign exposure limit, which constrains sovereign exposures within the banking book.

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 2025 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.

Climate and environmental risk within Market Risk framework

Climate Risk Scenarios in UniCredit Bulbank are designed for ICAAP purposes and take into consideration different hypothesis of transition risk:

- Delayed Transition: Governments do not ramp up efforts to limit global warming until 2030. Therefore, more stringent policy is required to achieve similar climate outcomes by 2050, resulting in greater economic impacts;
- No Further Action: Expanding fossil fuel demand and government failure to meet stated NDC commitments lead to higher emissions than in the baseline;
- Baseline: baseline aligns closely with the IEA’s Stated Policies Scenario. It reflects policy commitments that are backed up by measures;



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 standard approach for counterparty credit risk (SA-CCR) according to the capital requirement framework under Basel III was implemented in second quarter of 2021 and is now in use within UniCredit Bulbank (aligned with UniCredit Group). The SA-CCR 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.

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.



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 an annual 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.

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.

Structure and organization of the liquidity risk

The main relevant functions working on managing liquidity are Balance Sheet Management (BSM), Client Risk Management & Treasury (Treasury), and Liquidity Risk function within Financial risk and Modelling.

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 BSM and Treasury structures.



Measurement and reporting of liquidity risk

UniCredit Bulbank measures both short-term and structural liquidity.

The metrics included in 2025 RAF were:

- 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 measures the contingency risk;
- the Net Stable Funding Ratio (NSFR), that measures the structural liquidity risk in regulatory view;
- the Structural Liquidity Ratio (SLR), provides a counterbalance by the regulatory view, by taking into account the behavioral assumptions. SLR is calculated as the ratio between medium-long term liabilities and assets that maturing above one year and over 3 years;
- Loans to Deposits Ratio that measures the ratio between the loans to customers and deposits from customers. The L/D is a different concept for the funding gap (RAF metric till 2023 EoY) expressed as a ratio

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 behavioral modelling of non-maturing deposits (NMDs) has been introduced in Q2 2020 in compliance with the respective EBA Guidelines and recalibrated since then. The model estimates the liquidity and interest rate characteristics the customers follow and their real behavior, 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 NON-FINANCIAL RISKS

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 noncompliance with laws, rules, regulations, agreements, prescribed practices or ethical standards.

UniCredit Bulbank Management Board is responsible for operational risk oversight and for formal approval of the Operational Risk framework in terms of organizational set-up, strategies, rules and methodologies, 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 policy, Global Operational Regulations 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 bank regulation “Collection of information for the purpose of assessing the Operational risk in UniCredit Bulbank AD and the Bank’s subsidiaries ” and “Operational Risk Monitoring and Control Rulebook of 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 2025 were focused in managing the operational and reputational risks, as well as assessment and mitigation of risks in the bank processes and activities, participation in dedicated bank projects and initiatives.

The regular Operational Risk (OpRisk) tasks consist of: 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; Operational Risk Oversight and Second level controls on Third Party Risk; Risk and Controls Self-Assessment(RCSA) and Group Operations RCSA validation, Operational and Reputational Risk Strategies Definition and Monitoring; Operational Risk Oversight Model on UniCredit Bulbank Subsidiaries; Insurance Management – Insurance recoveries analysis and Annual evaluation on policies in place for renewals, Regular Second Level Control Monitoring on ICT and Digital Security Processes, Cyber Security Risk Assessment monitoring, etc.

ICT Risk is defined as risk of financial/market share losses and reputational damage resulting from the misuse of Information and Communication Technology, whereas Cyber Risk / ICT Security Risk as risk of loss due to breach of confidentiality, failure of integrity of systems and data, inappropriateness or unavailability of systems and data. This includes security risks resulting from inadequate or failed internal processes or external events including cyber-attacks. During 2025, the ICT and Cyber Risk Methodology Framework is enriched with the new regulatory requirements of the Digital Operational Resilience Act (DORA) and is enhanced with more detailed defined responsibilities for the First and Second Lines of Defense regarding Digital Risk.



Second level controls on ICT and Security processes were developed and regularly performed in 2025. This is a set of second level controls, aiming to strengthen the management of Digital risks. These controls cover some processes in the ICT and Security areas, like Change Management, ICT Incident Management, Vulnerability Management and Third Parties Management contracts.

On top of the regular annual operational risk activities, within 2025 several new initiatives and processes were implemented, as well as some existing ones were further enhanced and improved:

- The introduction of the New Standardized Approach according to the requirements of Basel IV and EBA RTS took place in 2025. The data on capital requirements for operational risks are calculated according to the Basel IV standardized approach.
- A change in the Operational Risk loss methodology related to the new Operational Events Taxonomy has been performed during the year and the new taxonomy has been implemented and is used in events, reports and other regular activities.
- Risk and Controls Self-Assessment (RCSA) activity cycle was further developed, the number of the mandatory key end-to-end (E2E) assessed processes has been enlarged - from 18 to 24; the scope of the assessed processes was increased too and in addition to business processes -1 digital process (IT solution) as well as 1 security process (Asset protection management) were also included; the number of validation checks performed by NFR was also increased.
- Participation of NFR in the annual group activity regarding the 2025 Group Operations RCSA. On a risk-based approach a sample of 5 payment processes was selected by the Holding for RCSA assessment, completed by Operations and validated by NFR. The scope of the processes was enlarged and in addition to the payment sub-processes, other Operations back and middle office procedures/sub-processes were included.
- One new Key Risk Indicator (KRI) was created related to Payments aiming to monitor monthly availability of the service SEPA Credit Transfer (Payment Acceptance service (BISERA7-EUR));
- Four new digital risk indicators were created and will be tracked through Second level control monitoring:
 - Obsolete infra software components (%)
 - Number of take the risks on vulnerabilities application plus infrastructure (for non UCS-served)
 - Number of Red-Wave vulnerabilities in take the risk (both Applications and Infrastructures) have a defined remediation plan
 - Overdue critical vulnerabilities on internet exposed applications/infrastructures
- Following the new Operational Risk methodology the Scenario Analysis process has been reviewed and changed. According to an ECB request to analyze the ESG risk, 3 Group storylines are mandatorily evaluated. According to the updated Operational Risk framework, the scenario model risk categories are replaced by 12 risk categories. The definitions of the new risk categories have been established in the new Operational Risk taxonomy and have been applied in the scenario analysis of 12 risk categories. It was necessary to present and provide one scenario for each proposed group storyline covering the 12 risk categories.
- The NFR activities regarding Digital Risk increased with new important process regarding Cyber Security Risk Assessment monitoring (Cyber SRA). The outcomes related to the overall ICT Asset Portfolio of the bank are analyzed, checked and challenged by NFR and the results are discussed with Digital Functions. NFR provides relevant reporting to Local NFR Committee for all Applications at risk (over tolerance level).



- Non-Financial Risk performed second level control checks on implementation of DORA regulatory requirements. In the scope were selection of 45 DORA requirements. Main Outcomes: All checked DORA requirements are fully covered. The NFR made a proposal for improvement regarding ICT Risk management methodology.

All activities regarding operational and reputational risk management included in the annual plan of activities, defined by the Group, were performed following the Group methodology and executed with no delay.

All key activities and results of the Operational Risk Identification (e.g. Internal losses, External data, Scenario analysis), the Assessment Measurement activities (e.g. KRI, RCSA, ICT Project Risk Assessment, Cyber SRA activity, etc.) and the Addressing – Mitigation activities (e.g. Operational Risk priorities and Strategies) were reported for information/approval to the Non-Financial Risk and Controls Committee – General Session (NFRC-GS). The Committee meetings are held quarterly and attended by the Bank's top management.

Operational Risk Permanent WorkGroup (PWG) meetings were held at least quarterly where process improvements and mitigation were discussed and monitored in a timely manner. All PWG meeting topics and outcomes were reported to the local NFRC committee - GS. Non-Financial Risk also participated and/or monitored in several key business, regulatory or digital transformation projects of the Bank.

Related to Euro Adoption Program, Non-Financial Risk actively participated in the monitoring of the project. Main project outcomes by the end of 2025 – January 2026. Currency transition completed successfully, no big issues or gaps. Post go-live phase is set to August 2026, when the remaining tasks will be completed, in accordance with the law requirements. For 2026 the Non-Financial Risk will focus and closely monitor the following risk drivers:

- Conduct and Fraud Risks – Follow-up on coverage extension of the Anti-Fraud system (SAS FM Tool); Monitoring of Safer Payments system enhancements; New Digital Onboarding solution
- ICT & ICT Security Risks - ATM obsolescence
- Conduct and Fraud Risks Transformation Related Risks – main focus on: Monitoring of the Euro Adoption project implementation phase outcomes and post go-live activities in 2026

Reputational risk. In 2025 Unicredit Bulbank started applying the new Group-wide methodology for calculating the Regulatory Capital (Pillar I) and Economic Capital (Pillar II) for Operational Risk across UniCredit Group. It applies to UniCredit S.p.A. and all Legal Entities within the Operational Risk Oversight perimeter, including both Extended and Simplified entities. The operational risk exposure amount is calculated by applying the Business Indicator Component (BIC) as provided by the CRR3 and the EBA/CP/2024/05. The operational risk capital requirement and the corresponding OpRisk RWA are quantified using the Business Indicator (BI) and the proper scaling factor. Therefore, as a first step, the Business Indicator is determined by relying on the Group's income sources as reported in Tagetik system. The calculations are performed in ARGO (operational event reporting system).

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 Operational Risk Permanent WorkGroup (PWG) and 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 outcome of the 2025 Annual Self-Assessment report concluded that the organization of Non-Financial Risk management in UniCredit Bulbank is well established. No deficiencies in any of the operational risk system components have been identified during the self-assessment process by the Non-Financial Risk function. The Group Internal Validation (GIV) function performed validation of the Operational Risk Management and Control (ORM) System in UCB and based on their analyses, the ORM system in UCB is assessed as “Adequate” (highest possible score). One Medium-Low recommendation was issued in the area of Scenario Analysis which is going to be closed during the regular activities performed within 2026. In addition, Local Internal Audit performed an inspection on the Operational risk management process. The aim of the audit was to review and assess the adequacy and effectiveness of internal controls in the processes of operational risk events identification, registration and reporting, and loss data collection, including data quality controls, controls over events classification and risk assessment, as well as completeness and timeliness of reporting. UCB Internal Audit confirmed “Adequate” overall evaluation as in previous years. No points of attention were highlighted, and no audit findings were issued in 2025.

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 Defense/Weapons, Nuclear energy, Coal sector, Water infrastructure/Large 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 on regular meetings.

Climate and Environmental (C&E) and social risk assessments are guided by dedicated risk sector policies as well as by the human rights commitment of UniCredit Group and, when applicable, by the Equator Principles (EP). With regards to policies fully linked to fossil fuel related activities, policies in place refer to artic and non- conventional Oil & Gas industry and Coal sector. Such policies also considered PACTA input results.

During 2025 the NFR structure 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 NFRC Committee);
- Rule the necessary escalation / decision-making processes (e.g. material events escalation process).

During the year main changes within reputational risk policies were:

- Regarding the Defence sensitive sector policy:
 - Munition stores (retail sellers) are not subject to the Reputational Risk Annual Clearance, without prejudice to the usual assessments of the business (e.g. bad news, legal proceedings, etc.).
 - The regulation does not cover investment products which are regulated by the Product Guidelines.
- Regarding Reputational Risk Quantification Model:
 - Inclusion of Customers' claims within the model inputs;
 - Change in the way the climate scenarios' drivers are transformed into shocks.

In 2025 the NFR continued organizing dedicated trainings aiming to improve the expertise of the branch managers and supervisors of the retail network of the bank regarding operational risks in their daily activities. In 2025 online trainings were conducted covering the specifics of the ICT Project Risk Assessment performed by the project leaders and in the Operational Risk module of the Retail Branch Academy training. The NFR conducts regular Operational Risk Introductory training for all new employees and employees who change their position.

The operational and reputational risk culture has been constantly spread out by the Non-Financial Risk throughout the organization, via training activities, combined with methodological guidance and support to the other structures ensure the outstanding risk awareness at Bank level. In the end of 2025, a new RepRisk tool was presented. Additional trainings were conducted for Business structures and specialist functions, which are involved in the overall reputational risk assessment process.

3.3 CREDIT RISK

Credit risk is defined as potential losses arising from unfulfillment 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 (only veto right in the Transactional committee)
- The Head of Underwriting



- The Heads of Corporate Credit Underwriting and Retail Credit Underwriting (responsible for Micro Business and Individuals Credit Underwriting) within the Underwriting function
- Leads/ 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 transactions, 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 transactions, 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 limits of the individual bodies (the non-collective ones) are personally delegated (ad personam) and approved by the Management Board. The authorities under credit transactions are exercised at full differentiation between the underwriting and commercial functions and independently of the approved structural unit budget (except Business individual authorities explicitly approved by the Management Board).

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

Credit risk monitoring and management are also focused fulfilling statutory lending limits set in Credit Institutions Law. Exposures to one client or group of related clients exceeding 10% of the capital base are treated as “Large exposures” and have to be approved by the Management Board. The maximum amount of exposure to one client or group of related clients must not exceed 25% of the capital base of the Bank.

In 2025 the Bank continued to perform its credit activities in compliance with the governing rules and internal policies. Despite the economic challenges associated with the uncertain international environment, including Russian/Ukrainian conflict and the tightening of monetary conditions in Europe and Bulgaria, the Bank’s portfolio remained resilient amidst these adversities. In 2025 credit activity is increasing, both for companies and for households.

Continuous improvements in underwriting systems and processes remain a key priority resulting in further enhancements in the underwriting framework aimed at simplifying processes:

- implementation of initiatives focused on improving the underwriting credit process, automating verifications, and integrating additional automatic data from internal and external sources
- Initial steps are taken toward the introduction of an automated approval process for the Private individuals and Micro segments
- A transactional score for Micro business customers is introduced enabling assessment of the credit risk based on clients; transactional’ behavior
- Emphasis is placed on further enhancements to the standard corporate underwriting credit process including simplification of credit workflows in the corporate underwriting system and enhancements of global infrastructure and tools for Climate and Environmental Risk factor assessment



The Bank continues to ensure strict adherence to the credit risk framework regulating lending activities in Retail and Corporate segments:

- Focus remains on expanding the scope credit-specific metrics/ thresholds when performing creditworthiness assessment
- Continued enhancements to credit monitoring process, including strengthening of the Unlikely-to-Pay (UTP) process
- Amendments in Credit decision-making framework in respect of appropriate authorization levels and limits aligned with the approved credit risk appetite
- Addressing the EBA and ECB priorities, the Bank has already embedded the elements of C&E risks into internal regulatory framework, Risk appetite framework, and Credit Risk Policy, internal rules and procedures for corporate clients.
- Second Level Control Framework: UCB has set up a robust internal control framework, as an element of the overall governance system, aimed at ensuring a correct and prudent assessment and management of credit risks. The control taxonomy includes first level of controls intended to ensure a correct execution of the credit process and Second Level Controls (2LC) aimed at monitoring adherence of the credit process to external regulatory requirements, internal rules, strategies and limits on a risk-based approach. 2LC cover all the steps of the credit life-cycle (Underwriting, Monitoring, Forbearance, Restructuring, Disposal) and the RWA and LLP calculation processes. The Bank applies a sound Risk Assessment methodology which relies on the combination of both quantitative and qualitative elements, in order to ensure that the assessment performed is supported by a relatively high degree of objectivity; As at 2025 YE, all second level controls assessed as applicable for UniCredit Bulbank, have been fully implemented. No structural issues in the credit sub-processes are detected.

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 in line with Group Credit Risk Strategies by Risk Management of UniCredit Group in close cooperation and alignment with local risk management functions and the business side. Credit Risk 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 business segmentation criteria (clients with turnover equal and higher than 1 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 Group Credit Risk Strategies process by the local Economic Research, Risk and Business functions and are subject to approval by relevant Holding functions. The basis for the local Steering Signals is classification of industries according to the Sector Outlook in combination with Climate Steering signals.

The Climate Steering signals are in compliance with the Group's Credit Risk Framework and -the Group methodology defined.

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

- Rejection criteria
- Scoring/rating
- Overruling



- Loan application and Loan contract requirements
- Maximum age of the applicant
- FX lending -
- Collateral requirements
- Income confirmation
- Debt ratio calculation
- 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. No changes in methodology for 2025 for Cost of living based on poverty line in the country as well as no changes in the local regulator Bulgarian National Bank's minimum requirements for mortgage lending, including LTV, tenor and DSTI (without cost of living) < 50%. DSTI is considered to provide a solid buffer to accommodate negative fluctuations in borrower's income. The CAP on exceptions from the abovementioned requirements which is 5% of total new production for a quarter are still in force. Extraordinary risk and prohibited transactions are also defined.

Monthly monitoring process is established on local level for Industry Limits. Industry perimeter EAD and EL% developments are analyzed monthly to ensure timely identification of potential Trigger/Limit breaches. If the aggregated Targets and/or Triggers level of a Limit (or relevant Sub-limit) are reached, a specific surveillance process shall be activated. In case of a breach of a Limit, an escalation procedure involving Management Board shall be immediately initiated including an appropriate de-risking plan for timely mitigation of the Limit breach. The required actions depend on materiality of breaches and classification of industries in accordance with their significance in the local and the aggregated CEE portfolio. Monthly monitoring is presented to the Financial and Credit Risk Committee – Credit Risk Session. On group level, Industry Limits are monitored on a quarterly basis, and a report with QvsQ development is prepared. Local input consists of detailed information regarding major deviations, reasoning, and potential actions if breach is registered. Quarterly monitoring is presented to the Risk Committee. In all cases breaches are justified, and the approval of new loans in the industries observed the rules set in the Corporate Credit Risk Policy with regard to financing principles (PD cut offs) and EL steering in line with the approved Risk Appetite.

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 of Borica AD, directorship position as member of the Management board of Association of Banks in Bulgaria, directorship position as member of the Management Board of Council of women in business in Bulgaria;
- The Deputy CEO – position removed with changes in the Statute of UCB dated 13.11.2025;



- Executive director and Head of People and Culture was holder of one directorship position as member of the Management Board of UniCredit Bulbank AD, which was terminated as of 28.05.2025 and the position is no longer part of the Management Board;
- Head of Legal was holder of one directorship position as member of the Management Board of UniCredit Bulbank AD, which was terminated as of 28.05.2025 and the position is no longer part of the Management Board;
- Director of Retail Division (Executive Director from 02.12.2025) 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;
- Director of Corporates Division (Executive Director from 02.12.2025) 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 and one directorship position as a Manager of Consortium “Fund for green and smart development”;
- 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 and as a member of the Supervisory Board of UniCredit Bank Serbia JSC and a member of the Supervisory Board of UniCredit Bank Czech Republic and Slovakia, A.S;
- CRO* was holder of one directorship position as member of the Management Board of UniCredit Bulbank AD (released as of 25.07.2025), as a member of the Supervisory Boards of its wholly owned subsidiaries UniCredit Consumer Financing EAD (released as of 14.11.2025) and UniCredit Leasing EAD (released as of 14.11.2025) and as a member of the Supervisory Board of UniCredit Banka Slovenija D.D.;
- The Chief Operative Officer is holder of one directorship position as member of the Management Board of UniCredit Bulbank AD, one directorship position as a member of the BoD of Cash Services Company AD and one directorship position as a member of the Management Board of Atanas Burov Foundation.

* After received regulatory approval, current CRO Stefan Stoyanov Ivanov is a member of the Management Board as of 12.03.2026.

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

In compliance with BNB/ECB requirements and the updated Ordinance No 20* of the BNB of 24 April 2019 on the Requirements to the Members of the Management and Control Bodies of a Credit Institution and on the Assessment of the Suitability of Their Members and the Key Function Holders, 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 policy Suitability assessment of the Corporate officers and Key function holders, 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 positions. The candidates for SB members must meet the requirements under Article 11, paragraph 1, items 3–8 and candidates for MB members must meet all requirements of abovementioned Article 11.

The bank has set up 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 requirements and responsibilities related to appointment of candidates as Management and the Supervisory Board members and Key function holders, as well as a separate internal Procedure for Suitability assessment of Corporate Officers and Key Function Holders, which outlines in detail the steps, roles, and necessary documentation in the process of conducting suitability assessments within UniCredit Bulbank AD, and the necessary actions regarding the formal procedure before the regulatory authorities.

3.4.3 Diversity policy, including the policy on gender diversity

As of the end of 2025, gender diversity across the organization remains strong and well balanced at managerial levels. At bank level, the overall gender distribution is **76% women and 24% men**. The ratio at managerial positions is **59% women / 41% men**, while at top managerial levels (CEO level and one level below) it stands at 62% women / 38% men, reflecting our sustained efforts toward balanced representation in leadership roles.

Diversity, equity, and inclusion (DE&I) at the workplace remained part of the P&C priorities and the managerial agenda across all functions. The different DE&I aspects are implicated in various internal requirements and procedures throughout all stages of the employee lifecycle, e.g., attraction and recruitment, compensation and benefits, learning and development, succession planning, etc.

In 2023 our continuous efforts for achieving gender equity and inclusion through the years have been recognized also externally. After a rigorous certification process UniCredit Bulbank has been awarded with EDGE Assess Certification. EDGE is the leading global assessment and business certification for gender equity. The certification marks not only the Bank significant progress in gender equity and inclusion, but it is also a testimony of our commitment for further improvement.



Being consistent in supporting this priority, we were recertified in the end of 2025 for another two years.

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, 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 Stages, 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, BPO1 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, Additional valuation adjustments, daily reconciliation between managerial PnL and market risk metrics (VaR and hypothetical PnL). Quarterly monitoring process covers the checks for trading intent for all portfolios in Trading book, 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), digital and TPM risk indicators, scenarios, KRIs, risk mitigation measures, capital at risk, RAF metrics, 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.

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 IV regulatory framework.

In 2014, Directive 2013/36/EU requirements 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 IV 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.

Detailed information regarding consolidated Own Funds of UniCredit Bulbank AD is disclosed in the following tables:

- ***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 2025 results, UniCredit Bulbank is classified as Large 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

Following a regulatory approval received in Q1 2025 the Bank reverted to Standardised Approach for calculation of the regulatory capital requirements for credit risk for the portfolio rated under local rating models. The Standardised Approach is used for all exposure classes except for exposures to Financial Institutions and Large Corporates rated under Group-wide rating models as well as Other non-credit obligation assets. For these three exposure types Foundation Internal



Rating Based Approach (F-IRB) is used. The bank continues to use the developed advanced risk models for Pillar 2 capital requirements and IFRS 9, as well as for decision making purposes.

Regulatory capital requirements for market risk are calculated under the Simplified Standardised Approach. For operational risk capital requirements are quantified under the new Standardised Approach after the abolishment of the Advanced Measurement Approach with Basel IV.

Economic Capital

Under Pillar 2 the quantitative assessment of the risk profile is based on individual measurement of credit, market, IRRBB + CSRBB, 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, related to the part of portfolio accounted as Trading Fair Value through Profit or Loss
	Position Risk in the BB (FVTPL)	Risk of loss on financial instruments from changes in market risk factors that are relevant for Banking positions, related to the part of portfolio accounted as Trading Fair Value through Profit or Loss
	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
	Participation risk (liquid positions)	Risk of loss on listed participations and funds in the Banking Book
IRRBB + CSRBB	Interest rate risk on Banking Book positions covering Credit spread and Interest Rate risks 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:

- ICAAP - Pillar 1 reconciliation document: a description of the models used for risk quantification under the ICAAP and compares their results as of December 2025 to the capital requirements under regulatory/Pillar 1 perspective.
- Reader's Manual: a document that contains references to a number of internal rules within the Bank's ICAAP framework, supporting documents and reports.
- 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.

Methodological changes

Unicredit Bulbank received regulatory approval to revert to STD approach for the portfolios rated under local rating models starting from Q1 2025. The estimated increase of RWA amounted to EUR 657 mn. The entry into force of Basel IV, at the same time, resulted in smaller effect in the Credit risk RWA - EUR 23 mn increase.

After the revert to STD approach only two rating models remained in the IRB scope – Institutions and Large multinational corporates. As a result, 91% of the Credit risk RWAs on sub-consolidated level are calculated under STD approach. Consequently, the new Basel IV concept of the output floor does not trigger any additional capital charges for Unicredit Bulbank.

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.**



- ***Template EU CMS1 - Comparison of modelled and standardised risk weighted exposure amount at risk level***
- ***Template EU CMS2 - Comparison of modelled and standardised risk weighted exposure amount for credit risk at asset class level***

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 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

During 2025 the level of the countercyclical capital buffer set by BNB remained at 2%.

As of 31.12.2025 the Institution-specific countercyclical capital buffer for UniCredit Bulbank is calculated at 1.98%.

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, loan commitments, issued guarantees and letter of credits and held to maturity debt securities – 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 recognized whenever the carrying amount of an asset or its cash-generating unit exceeds its recoverable amount. Impairment losses are recognized 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 internal evaluation process, the Bank is distinguishing between following types of customers' credit portfolio: performing loans, which are divided in transactions with or without Significant increase in credit risk (SICR) - 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) 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 according to CRR requirements 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 individually significant exposures.

Following the Regulation (EU) 2015/1278, UniCredit Bulbank applies definitions described below 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 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 forborne 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**



11 USE OF THE STANDARDISED APPROACH FOR CREDIT RISK

In accordance with the requirements of Article 113 of Regulation (EU) No 575/2013, and subject to availability, UniCredit Bulbank applies credit ratings issued by Fitch and Standard & Poor's for the purpose of calculating risk weights for its assets 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.

Exposure classes where ECAI ratings are used are as follows:

- exposures to central governments or central banks;
- exposures to regional governments or local authorities;
- exposures to public sector entities;
- exposures to multilateral development banks;
- exposures to institutions;
- exposures to corporates;
- exposures to institutions and corporates with a short-term credit assessment

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

Starting from 2025, UniCredit Bulbank AD has been authorised to revert to the Standardised Approach (Permanent Partial Use) for all former local IRB portfolios. In this context and in accordance with CRR3 provisions, the bank continues to use internal PD estimations, which are applied only to the Banks & Financial Institutions and Multinational Corporate portfolios under Foundation-IRB approach.

These portfolios are assessed using Group Wide models, defined as “unique models” that are applied consistently across all legal entities of the Group. As the risk profile of counterparties and exposures is considered independent of geographical location, this approach ensures maximum standardisation in both methodological framework and client risk assessment for Group Wide segments. Given that these models are developed and validated at Group level, reference is made to the UniCredit Group’s qualitative disclosure requirements related to the IRB approach for further details.

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)**

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. The bank applies the financial collateral comprehensive method for calculation of capital requirements for credit risk. Under STD approach the financial collaterals are used as EAD-reducing, while under IRB approach, they are treated as LGD-reducing collaterals;
- Guarantees that meet the requirements of Chapter Four *Credit Risk Mitigation* of the Regulation (EU) 575/2013. In case the guaranteed exposure is treated under Standardised approach, the risk weight substitution is used. For exposures treated under F-IRB and the guarantee provider also being under F-IRB, the PD substitution is used;



- Real Estate Properties that meet the requirements of Article 124 and Chapter Four *Credit Risk Mitigation* of the Regulation (EU) 575/2013. For calculation of capital requirements for credit risk under STD approach, exposures secured by real estate are calculated according to Articles 125 and 126. Under F-IRB approach real estate collaterals are treated like LGD-reducing.

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***

The following information is not relevant to UniCredit Bulbank:

- ***Template EU CR7 – IRB approach – Effect on the RWEAs of credit derivatives used as CRM techniques***



14 ENCUMBERED AND UNENCUMBERED ASSETS

As of 31.12.2025 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.
- Government bonds are pledged for corporate guarantee.

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 Encumbered 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 CVA RISK

UniCredit Bulbank calculates the own funds requirement for Credit Valuation Adjustment (CVA) risk, applying the Basic Approach (BA CVA) to CVA relevant exposures not covered by the Standardised CVA Approach. The BA CVA capital requirement is determined using prescribed regulatory parameters, without the use of internal CVA models, and reflects eligible exposures to OTC derivatives and securities financing transactions, after applying CRR defined exemptions and the recognition of eligible CVA hedges where applicable. The resulting CVA own funds requirement is included in the institution's total risk exposure amount.

Quantitative information related to CVA risk is disclosed as follows:

- ***Template EU CVA2 - Credit valuation adjustment risk under the Full Basic Approach (F-BA)***

The following information is not relevant to UniCredit Bulbank:

- ***Template EU CVA1 - Credit valuation adjustment risk under the Reduced Basic Approach (R-BA)***
- ***Template EU CVA3 - Credit valuation adjustment risk under the Standardised Approach (SA)***
- ***Template EU CVA4 - RWEA flow statements of credit valuation adjustment risk under the Standardised Approach (SA)***



17 OPERATIONAL RISK

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 the new calculations of Operational Risk RWA under Basel 4 and EBA RTS requirements since March 2025.

Operational risk is classified into the following Risk categories (RC) according to the *Operational Risk Taxonomy* applied by UniCredit Group:

- *Internal fraud*: fraud attempted or perpetrated against the organization by an internal party (i.e. an employee or affiliate of the organization, including instances where an employee is acting in collusion without external parties).
- *External fraud*: fraud attempted or perpetrated against the organization by an external party (i.e. a party without a direct relationship to the financial institution).
- *Employment practices and workplace safety*: risk of breaching employment legislation, mismanaging employee relations, and failing to ensure a safe work environment.
- *Conduct (Customer conduct & Market Integrity)*: failure to act in accordance with customers' best interests, fair market practices, and codes of conduct, including risk of non-compliance with regulatory requirements in regard to Market integrity, fairness, transparency and market abuse prevention.
- *Natural Disasters & Public Safety*: the risk of damage to the organization's physical assets, client assets, or public assets for which the organization is liable, and (criminal) injury to the organization's employees or affiliates.
- *ICT Risk*: risk of financial/market share losses and reputational damage resulting from the misuse of Information and Communication Technology.
- *Execution, delivery and process management*: the risk of information security incidents, including the loss, theft or misuse of data/information; this covers all types of data, e.g. client data, employee data, and the organization's proprietary data, and can include the failure to comply to rules concerning information security.
- *ICT Security Risk*: failure to process, manage and execute transactions and/or other processes (such as change program) correctly and/or appropriately.
- *Financial Crime*: the risk of money laundering, sanctions violations, bribery and corruption, and KYC failure.
- *Data protection*: risk of sanctions and reputational damage arising from personal data violations (data breaches) and non-compliance with Data Protection Regulation (in particular Regulation no. 679/2016 UE GDPR).
- *Tax Risk*: the risk of failing to meet tax payments/filing requirements.
- *Third-Party Risk*: the risk of failing to manage third party relationships and risks appropriately (including third party risk digital related), for example, not taking reasonable steps to identify and mitigate additional operational risks resulting from the outsourcing of services or functions.

Since some OpRisk categories typically have a few loss events, the following aggregations have been considered:

- "Financial Crime" is aggregated to "Conduct"
- "Data protection" is aggregated to "ICT Security Risk"
- "Tax Risk" and "Third Party Risk" are aggregated to "Execution, delivery and process management"



In 2025 UniCredit Bulbank started applying the new Group-wide methodology for calculating the Regulatory Capital (Pillar I) and Economic Capital (Pillar II) for Operational Risk across UniCredit Group. It applies to UniCredit S.p.A. and all Legal Entities within the Operational Risk Oversight perimeter, including both Extended and Simplified entities. The operational risk exposure amount is calculated by applying the Business Indicator Component (BIC) as provided by the CRR3 and the EBA/CP/2024/05. The operational risk capital requirement and the corresponding OpRisk RWA are quantified using the Business Indicator (BI) and the proper scaling factor. Therefore, as a first step, the Business Indicator is determined by relying on the Group's income sources as reported in Tagetik system. The calculations are performed in ARGO (operational event reporting system).

Pillar I: Regulatory Capital for Operational Risk.

1. Business Indicator (BI) Approach. The capital requirement is derived from the Business Indicator (BI), composed of:

ILDC – Interest, Lease & Dividend Component, SC – Service Component (Other operating income/expenses, fees & commissions) and FC – Financial Component (Trading & Banking Book results).

Certain items are explicitly excluded (e.g., insurance activity income, administrative expenses, depreciation, provisions unless OpRisk-related, tax items).

2. Business Indicator Component (BIC) and Capital Formula

Capital = BIC, calculated using regulatory scaling factors: (BI ≤ €1bn → 0.12 × BI; €1–30bn → 0.12 + 0.15 × (BI–1);

BI > €30bn → 4.47 + 0.18 × (BI–30)). Resulting OpRisk RWA = 12.5 × BIC.

Pillar II: Economic Capital – iMOR – Internal Model for Operational Risk.

Under the standard Accounting Approach (AA), some instruments (e.g., structured notes) generate profit/loss entries in different accounting lines than their hedging derivatives.

- The structured notes are booked in the banking book (BC).
- The hedging transactions are booked in the trading book (TC).

Because BI takes absolute values of TC and BC, these opposite direction impacts cannot be netted. The Prudential Boundary Approach (PBA) is an alternative method allowed under the regulatory framework to ensure that the Financial Component (FC) of the Business Indicator (BI) is calculated in a way that reflects true economic risk, rather than distortions caused by accounting rules. PBA is applicable for UC SpA, UCB GmbH and UCBA AG.

Calculation for Group, Subgroups, and Legal Entities. The allocated operational Capital at Risk for all the Legal Entities is sent to the Holding Company “Financial & Regulatory Disclosure” Function for upload into Tagetik Financial according to the “Detail Process Narrative of: Operational Risk - Capital Requirement Calculation”. The data is then visible in Tagetik to the Legal Entities in the “Group-view” format, while for individual and sub-consolidated requirements in local currency, the Legal Entities must refer to Aramis. The allocated capital is also communicated via email to the Legal Entities, including explanations about significant changes compared to the previous period.

Quantitative information related to CVA risk is disclosed as follows:

- **Template EU OR2 - Business Indicator, components and subcomponents**
- **Template EU OR3 - Operational risk own funds requirements and risk exposure amounts**

The following information is not relevant to UniCredit Bulbank:

Template EU OR1 - Operational risk losses



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 include daily basis point value sensitivity, weekly stress tests and monthly reporting of regulatory required variation in economic value of equity (instantaneous Supervisory Outlier Test interest rate shock as percentage of equity), variation in net interest income given the hypothesis of constant balance sheet under instantaneous Supervisory Outlier Test interest rate shock as percentage of equity and variation in earnings. Executive summary is reported in each monthly FCRC – ALCO session.

The Bank defines IRRBB as the current or prospective risk to both the earnings and the economic value of an institution arising from adverse movements in interest rates that affect interest rate sensitive instruments. IRRBB is managed by assigning limit and trigger thresholds for specific risk indicators, regular monitoring and escalation procedure for breaches. Daily calculation of BP01 total and by buckets, monthly calculation of EVE sensitivity, NII sensitivity and Earnings sensitivity are performed.

Quantitative information with regards to interest rate risk on positions not held in the trading book is disclosed in ***Template EU IRRBB1 - Interest rate risks of non-trading book activities.***



19 EXPOSURE TO SECURITISATION POSITIONS

Synthetic Securitization

UniCredit Bulbank (the “Bank” or the “Originator”) implemented a synthetic securitisation program to improve its capital optimization strategy and benefit in terms of new lending capabilities by structuring a synthetic securitisation (“A.R.T.S. Silver-2” or the “transaction”) to achieve significant risk transfer with respect to a portfolio of SME and corporate exposures originated by the Bank in its usual course of business.

The risk transfer under the synthetic securitisation was achieved using a credit risk mitigation instrument; the securitised exposures remained exposures of the Originator.

On June 27th, 2025, the “Financial Guarantee” between the Bank and an institutional investor (“Protection Seller”) was signed whereas the Effective Date was June 30th, 2025.

The structure of the transaction contains a Senior, Mezzanine and Junior tranches, with the Junior Tranche (First Loss Tranche) and the Senior Tranche retained by the Originator and the Mezzanine Tranche (Protected Tranche) being covered via a funded credit protection, in the form of a collateralized financial guarantee, with the collateral held with a high-rated custodian.

The transaction is designed to achieve a Significant Risk Transfer (SRT) as per the Securitisation Regulation in force.

The transaction achieved designation as a Simple, Transparent, and Standardised securitisation within the meaning of article 18 of Regulation (EU) 2402/2017.

The assets pooled in the securitisation exclusively consist of performing secured and unsecured loans originated by, owned by and carried as an asset of the Bank, being all such loans denominated in EUR or BGN and granted to SME and Corporate customers located in Bulgaria.

For the purposes of the regulatory requirements, the Bank is the Originator of the Reference Portfolio. As such, the Bank will retain, on an unhedged and unguaranteed basis, an exposure to each loan in the Reference Portfolio which will always be at least 5% of the notional amount of the initial portfolio and which will not benefit from any of 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 2025 are the following:

- Outstanding securitized amount (Reference Portfolio Notional Amount) BGN 3 923 869 544;
- RWA without securitization: BGN 2 066 230 565 (52.66% of the securitized portfolio);
- RWA after application of securitization framework: BGN 419 742 963 (10.70% of the securitized portfolio);

Transaction structure

The Financial guarantee has following structure as of 31.12.2025

Tranche	BGN Nominal Amount	Thickness	Attach	Detach	Guaranteed	Retained %	Amortization Typology
Senior	3 609 004 929	91.976%	8.024%	100%	0%	100%	Pro-Rata
Mezzanine	294 212 358	7.498%	0.526%	8.024%	100%	0%	Pro-Rata
Junior (Commitment)	20 652 257	0.526%	0%	0.526%	0%	100%	Sequential



The Scheduled Termination Date will be 30 June 2037 (considering the maturity date of the longest securitised loan/guarantee of the selected preliminary portfolio plus a 1-year workout period).

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

- Failure to Pay \geq 90 days past due;
- Bankruptcy in respect of any relevant Reference Entity;
- Restructuring.

At the time the Financial Guarantee was executed, the Bulgarian lev was legally fixed at an exchange rate of 1.95583 per euro under the Law on the Bulgarian National Bank. As of 1 January 2026, Bulgaria adopted the euro, and all BGN-denominated Reference Obligations were automatically converted to EUR at the same fixed rate, resulting in the entire Reference Portfolio becoming EUR-denominated.

The transaction achieved Significant Risk Transfer starting from 30 June 2025 Supervisory Reporting Date – confirmed by the ECB – by complying with Article 245(2)(a) of Regulation (EU) 575/2013 (since the transaction is structured to transfer the Protected Tranche to third parties) and complying with risk retention requirements set forth in Article 6 of Regulation (EU) 2017/2402 and Art. 6 and 11 of the Delegated Regulation 2023/2175 through the retention of not less than 5% of the amount of each securitised loan and guarantee.

Other securitization deals

Since 2022, UniCredit Bulbank has had an active synthetic securitisation program to improve its capital optimization strategy and benefit in terms of new lending capabilities.

In May 2025, based on an economic analysis of future expected costs and benefits of the Silver transaction (originated in 2022) and complying with all regulatory requirements, the Bank exercised its Early Termination option. Following the termination – although an additional 1-year period is running for workout purposes – the financial guarantee is no longer valid for new credit events and for regulatory purposes the transaction is no longer included in the securitisation framework.

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 IV 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 IV 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.

Maturity mismatches and asset encumbrance are managed indirectly but systematically in managing leverage risk through funding and liquidity planning, ensuring that asset growth is supported by stable funding and that leverage management, liquidity risk management and funding strategy are fully aligned.

The leverage ratio increased slightly year-on-year, despite a material rise in leverage exposure, reflecting stronger Tier 1 capital generation. The change in the leverage ratio was driven by a positive contribution from Tier 1 capital. Tier 1 capital increased between 2024 and 2025, mainly as a result of retained earnings. The total leverage exposure increase is mainly reflected by loan portfolio growth and higher volumes of securities financing transactions. The increase in leverage exposure reflects business-driven balance-sheet growth, consistent with commercial and funding strategy of the bank to support lending activity, maintain liquidity, and ensure optimal asset allocation.

UniCredit maintained a stable and robust leverage ratio over the period. As a result, UniCredit Bulbank remained comfortably above regulatory leverage requirements, confirming that leverage risk was appropriately managed.

Detailed information is disclosed in

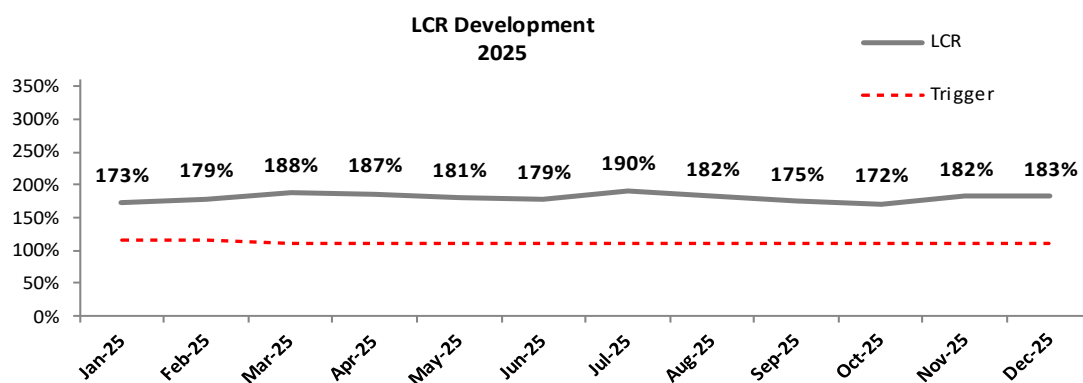
- **Template EU LR1 - LRSum: Summary reconciliation of accounting assets and leverage ratio exposures**
- **Template EU LR2 - LRCom: Leverage ratio common disclosure**
- **Template EU LR3 - LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)**



21 LIQUIDITY REQUIREMENTS

During 2025, UniCredit Bulbank's Liquidity Coverage Ratio (LCR) was always well above the Risk Appetite Framework trigger of 112% confirming the adequacy of the liquidity buffer from a regulatory perspective.

Liquidity Coverage Ratio in 2025



In 2025 the banking system in Bulgaria continued to be highly liquid. Against the backdrop of abundant local liquidity, interest rates on average customer deposits increased marginally. As the pricing of the BGN-denominated loans of local banks is linked to the cost of customer deposits, interest rates on BGN-denominated loans proved very resilient to the changes in the monetary conditions, despite the still high interest rates in the other European economies. Against this favorable environment for the prices of BGN denominated loans and still elevated inflation, demand for new loans remained very strong.

For UniCredit Bulbank, the LCR was at high levels, consistently with internal targets. The Bank is well situated for organic growth and adequately prepared to face liquidity challenges, as a result of world political instability and climate changes.

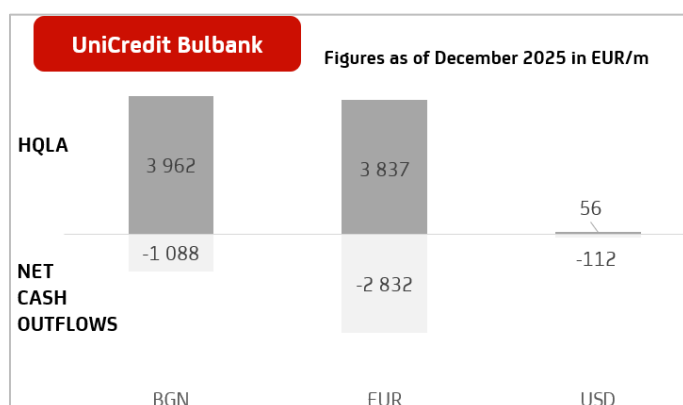
The monthly trend in the LCR is defined primarily by the main pillars of the liquidity strategy applied by the bank, namely targeting optimal risk-return profile of the investments in the view of generating added value, acting on both revenues and capital absorption layers thus generating sustainable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

- Reallocation of funds from placements in Central Bank (Bulgarian National Bank) to placements (incl. in the form of reverse repo deals) in other commercial banks
- In 2025 banking book liquidity was extremely strong, with deposits growth overpassing lending growth supporting high LCR levels throughout the year.
- In 2025 UniCredit Bulbank continue to fund its lending growth primarily through customer deposits. The growth in customer deposits reached record level of BGN 31.1 bln., +18% y/y. Respectively the Net/Loan Deposits Ratio still remained below 100%: at 77.5% (consolidated perimeter) positioning the bank well for utilizing further growth opportunities.
- Overall, UniCredit Bulbank displays a balanced funding structure, with deposits from customers representing 86% of the external liabilities (non-equity financing) by the end of 2025. The growth was mainly driven by the stable component of the Retail segment (+ 10.4% y/y). This further improved the liquidity profile of the customer deposits in terms of stability and diversification. The customer deposits are diversified in terms of clients (63% retail and 34% corporate) and currencies.



- In 2025, in terms of core Funding with the Group UniCredit Bulbank remained net lender (to the Group). The only funding from the Group relates to the iMREL issuance, following the "Single Point of Entry" resolution strategy. As of the end of 2025, the total amount of iMREL instruments reached EUR 1.255bn and contributing to the stability of the structural liquidity in the banks' balance sheet.
- As reported to Bulgarian National Bank, UniCredit Bulbank has about EUR 6.70bn of unencumbered aggregate liquidity resources as of December 31st, 2025, registering an insignificant increase compared to EUR 5.75bn in 2024.
- A portion of the bank's liquidity resources (26% of total HQLA / 2024 47%) is still held at the CB account.
- In addition, the Bank holds a portfolio of highly liquid sovereign bonds (91% from the bond portfolio) issued by the governments of Bulgaria, Italy, Poland, Spain, Hungary, Romania and by the European Union. The Level 1 HQLA has the following structure by currency: 69.5% of the bond portfolio is denominated in EUR, 28.8% of liquid assets are denominated in BGN and 1.7% 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

The collaterals calls have immaterial impact on Bulbank'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 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 within the UniCredit Group and roughly include dedicated meetings usually in February/March for reviewing the bank's performance and the individual proposals for remuneration of the Material risk takers, 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 targeting certain deadlines, even through per-rollam approvals. In year 2025 the RemCo had 5 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 with 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 2025 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 applies for the Material Risk Takers (identified staff) category the principles of deferred variable compensation payout in cash and equity. Material Risk Takers (Identified staff) are divided into two groups. Group Material Risk Takers - responsible for the daily management of the bank –board members, executive directors 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 year 2025 this group includes the members of the Supervisory Board of the Bank, the Chief Executive Officer 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 and 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 1638 TEUR and the total amount of the fixed remuneration is 5691 TEUR, thus summing up to a total remuneration of 7329 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
		31.12.2025	30.06.2025	31.12.2024
Available own funds (amounts)				
1	Common Equity Tier 1 (CET1) capital	4 004 190	4 349 982	3 481 118
2	Tier 1 capital	4 004 190	4 349 982	3 481 118
3	Total capital	4 548 844	4 894 699	3 840 052
Risk-weighted exposure amounts				
4	Total risk exposure amount	17 698 929	16 290 726	15 928 051
4a	Total risk exposure pre-floor	17 698 929	16 290 726	
Capital ratios (as a percentage of risk-weighted exposure amount)				
5	Common Equity Tier 1 ratio (%)	22.62%	26.70%	21.86%
5b	Common Equity Tier 1 ratio considering unfloored TREA (%)	22.62%	26.70%	
6	Tier 1 ratio (%)	22.62%	26.70%	21.86%
6b	Tier 1 ratio considering unfloored TREA (%)	22.62%	26.70%	
7	Total capital ratio (%)	25.70%	30.05%	24.11%
7b	Total capital ratio considering unfloored TREA (%)	25.70%	30.05%	
Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)				
EU 7d	Additional own funds requirements to address risks other than the risk of excessive leverage (%)	1.65%	1.65%	1.65%
EU 7e	of which: to be made up of CET1 capital (percentage points)	0.93%	0.93%	0.93%
EU 7f	of which: to be made up of Tier 1 capital (percentage points)	1.24%	1.24%	1.24%
EU 7g	Total SREP own funds requirements (%)	9.65%	9.65%	9.65%
Combined buffer and overall capital requirement (as a percentage of risk-weighted exposure amount)				
8	Capital conservation buffer (%)	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%
9	Institution specific countercyclical capital buffer (%)	1.98%	1.97%	1.99%
EU 9a	Systemic risk buffer (%)	2.82%	2.79%	2.86%
10	Global Systemically Important Institution buffer (%)	0.00%	0.00%	0.00%
EU 10a	Other Systemically Important Institution buffer (%)	1.00%	1.00%	1.00%
11	Combined buffer requirement (%)	8.30%	8.26%	8.35%
EU 11a	Overall capital requirements (%)	17.95%	17.91%	18.00%
12	CET1 available after meeting the total SREP own funds requirements (%)	15.38%	19.46%	14.46%
Leverage ratio				
13	Total exposure measure	43 854 896	40 083 187	38 676 382
14	Leverage ratio (%)	9.13%	10.85%	9.00%
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%
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%
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%
EU 14e	Overall leverage ratio requirement (%)	3.00%	3.00%	3.00%
Liquidity Coverage Ratio				
15	Total high-quality liquid assets (HQLA) (Weighted value -average)	13 105 683	11 514 181	11 250 120
EU 16a	Cash outflows - Total weighted value	11 243 075	15 486 013	15 623 802
EU 16b	Cash inflows - Total weighted value	4 089 360	9 043 305	9 380 487
16	Total net cash outflows (adjusted value)	7 153 715	6 442 708	6 243 315
17	Liquidity coverage ratio (%)	183.20%	178.72%	180.19%
Net Stable Funding Ratio				
18	Total available stable funding	31 736 858	28 862 579	26 786 624
19	Total required stable funding	18 924 184	17 452 534	16 117 925
20	NSFR ratio (%)	167.71%	165.38%	166.19%



EU OV1 - OVERVIEW OF RWAs

In thousands of BGN

		Total risk exposure amounts (TREA)		Total own funds requirements
		a	b	c
		31.12.2025	31.12.2024	31.12.2025
1	Credit risk (excluding CCR)	14 779 595	14 348 277	1 182 368
2	Of which the standardised approach	13 567 027	4 194 481	1 085 362
3	Of which the Foundation IRB (F-IRB) approach	666 018	745 788	53 281
4	Of which slotting approach	0	2 082 145	0
EU 4a	Of which equities under the simple riskweighted approach	0	21 476	0
5	Of which the Advanced IRB (A-IRB) approach	0	7 254 874	0
6	Counterparty credit risk - CCR	393 484	193 963	31 479
7	Of which the standardised approach	383 968	181 981	30 717
8	Of which internal model method (IMM)	0	0	0
EU 8a	Of which exposures to a CCP	0	0	0
9	Of which other CCR	9 516	11 982	761
10	Credit valuation adjustments risk - CVA risk	1 312	7 188	105
EU 10a	Of which the standardised approach (SA)	0	0	0
EU 10b	Of which the basic approach (F-BA and R-BA)	1 312	0	105
EU 10c	Of which the simplified approach	0	0	0
11	Not applicable			
12	Not applicable			
13	Not applicable			
14	Not applicable			
15	Settlement risk	0	0	0
16	Securitisation exposures in the non-trading book (after the cap)	360 900	18 360	28 872
17	Of which SEC-IRBA approach	0	18 360	0
18	Of which SEC-ERBA (including IAA)	0	0	0
19	Of which SEC-SA approach	360 900	0	0
EU 19a	Of which 1250% / deduction	0	0	0
20	Position, foreign exchange and commodities risks (Market risk)	85 113	169 625	6 809
21	Of which the Alternative standardised approach (A-SA)		86 750	0
EU 21a	Of which the Simplified standardised approach (S-SA)	85 113	169 625	6 809
22	Of which Alternative Internal Model Approach (A-IMA)	0	0	0
EU 22a	Large exposures	0	0	0
23	Reclassifications between the trading and non-trading books	0	0	0
24	Operational risk	2 078 525	1 190 638	166 282
EU 24a	Exposures to crypto-assets	0	0	0
25	Amounts below the thresholds for deduction (subject to 250% risk weight)	61 480	0	4 918
26	Output floor applied (%)	50%	0	
27	Floor adjustment (before application of transitional cap)	0	0	
28	Floor adjustment (after application of transitional cap)	0	0	
29	Total	17 698 929	15 928 051	1 415 914



Template EU CMS1 – Comparison of modelled and standardised risk weighted exposure amounts at risk level

		a	b	c	d	EU d
		RWEAs for modelled approaches that banks have supervisory approval to use	RWEAs for portfolios where standardised approaches are used	Total actual RWEAs (a + b)	RWEAs calculated using full standardised approach	RWEAs that is the base of the output floor
1	Credit risk (excluding counterparty credit risk)	1 212 568	13 567 027	14 779 595	15 180 679	15 038 351
2	Counterparty credit risk	155 984	237 500	393 484	428 224	428 224
3	Credit valuation adjustment		1 312	1 312	1 312	1 312
4	Securitisation exposures in the banking book	0	360 900	360 900	360 900	360 900
5	Market risk	0	85 113	85 113	85 113	1 257 900
6	Operational risk		2 078 525	2 078 525	2 078 525	2 078 525
7	Other risk weighted exposure amounts		4 815 629	4 815 629	4 815 629	2 078 525
8	Total	1 368 552	19 067 481	22 514 558	22 950 382	19 165 212



Template EU CMS2 – Comparison of modelled and standardised risk weighted exposure amounts for credit risk at asset class level

		a	b	c	d	EU d
		Risk weighted exposure amounts (RWEAs)				
		RWEAs for modelled approaches that institutions have supervisory approval to use	RWEAs for column (a) if re-computed using the standardised approach	Total actual RWEAs	RWEAs calculated using full standardised approach	RWEAs that is the base of the output floor
1	Central governments and central banks		0	406 824	406 824	406 824
EU 1a	Regional governments or local authorities		0	20 125	20 125	20 125
EU 1b	Public sector entities		0	395	395	395
EU 1c	Categorised as Multilateral Development Banks in SA		0	0	0	0
EU 1d	Categorised as International organisations in SA		0	0	0	0
2	Institutions	114 410	148 132	144 387	157 022	157 022
3	Equity		0	71 041	71 041	71 041
4	Not applicable					
5	Corporates	254 550	483 871	4 724 988	4 455 468	4 342 599
5.1	Of which: F-IRB is applied	254 550	689 457	530 521	831 171	689 457
5.2	Of which: A-IRB is applied		0		0	0
EU 5a	Of which: Corporates - General	254 550	483 871	3 281 874	596 740	483 871
EU 5b	Of which: Corporates - Specialised lending		0	903 749	903 749	903 749
EU 5c	Of which: Corporates - Purchased receivables		0	0	0	0
6	Retail	14	48	3 645 032	3 645 080	3 645 080
6.1	Of which: Retail - Qualifying revolving		0	0	0	0
EU 6.1a	Of which: Retail - Purchased receivables		0	0	0	0
EU 6.1b	Of which: Retail - Other	14	48	0	48	48
6.2	Of which: Retail - Secured by residential real estate		0	0	0	0
7	Not applicable					
EU 7a	Categorised as secured by immovable properties and ADC exposures in SA	275 666	214 772	4 952 294	214 772	214 772
EU 7b	Collective investment undertakings (CIU)		0		0	0
EU 7c	Categorised as exposures in default in SA	0	0	267 959	267 959	267 959
EU 7d	Categorised as subordinated debt exposures in SA		0	0	116 145	116 145
EU 7e	Categorised as covered bonds in SA	16 903	62 295	0	62 295	62 295
EU 7f	Categorised as claims on institutions and corporates with a short-term credit assessment in SA	4 475	15 656	0	15 656	15 656
8	Other non-credit obligation assets	546 550	546 550	546 550	546 550	546 550
9	Total	1 212 568	1 471 324	14 779 595	9 979 332	9 866 463



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	3 827 942	3 827 942	3 827 942		0	0	0
2	Non-derivative financial assets held for trading	200	200		200	0	200	0
3	Derivatives held for trading	131 427	131 427		131 427	0	131 427	0
4	Derivatives held for hedging	33 860	33 860		33 860	0	0	0
5	Loans and advances to banks and debt securities at amortised cost	5 712 950	5 712 950	713 694	4 999 256	0	0	0
6	Loans and advances to customers and debt securities at amortised cost	25 022 785	25 022 781	21 098 911	0	3 923 870	0	0
7	Pledged debt securities at amortised cost	1 458 719	1 458 719	1 458 719	0	0	0	0
8	Finance leases	1 397 302	1 397 302	1 397 302	0	0	0	0
9	Investment securities	2 194 837	2 194 837	2 194 837	0	0	0	0
10	Pledged investment securities	779 393	779 393	779 393	0	0	0	0
11	Investments in associates	5 839	5 844	5 844	0	0	0	0
12	Property, plant, equipment, right of use assets and investment properties	356 740	353 082	353 082	0	0	0	0
13	Intangible assets	83 572	83 572	30 543	0	0	0	53 029
14	Current tax assets	53 821	53 821	53 821	0	0	0	0
15	Deferred tax assets	6 159	6 134	6 257	0	0	0	0
16	Non-current assets and disposal groups classified as held for sale	16 280	16 280	16 280	0	0	0	0
17	Other assets	145 512	146 645	146 645	0	0	0	0
	Total assets	41 227 338	41 224 789	32 083 270	5 164 743	3 923 870	131 627	53 029



Breakdown by liability classes according to the balance sheet in the published financial statements								
1	Financial liabilities held for trading	109 244	109 244	0	109 244	0	109 244	0
2	Derivatives used for hedging	89 802	89 802	0	89 802	0	0	0
3	Deposits from banks	2 215 278	2 215 278	0	1 276 021	0	0	939 257
5	Deposits from customers and other financial liabilities at amortized cost	31 114 666	31 125 270	0	11 735	0	0	31 113 535
6	Debt securities issued	2 464 527	2 464 527	0	0	0	0	2 464 527
7	Fair value changes of the hedged items in portfolio hedge of interest rate risk	-13 759	-13 759	0	0	0	0	-13 759
8	Provisions	95 216	95 216	0	0	0	0	95 216
9	Current tax liabilities	14 092	12 793	0	0	0	0	12 793
10	Deferred tax liabilities	9 383	9 383	0	0	0	0	9 506
11	Other liabilities	185 635	184 737	0	0	0	0	184 737
	Total liabilities	36 284 084	36 292 491	0	1 486 802	0	109 244	34 805 812

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)

(***) The amount of Total Assets disclosed under the column g) includes for intangible assets the deduction of software, which is represented gross of deferred tax liabilities

The amount of Total liabilities disclosed under the column g) includes the liabilities which are not included in the regulatory framework for RWA and deferred tax liabilities (4 609 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)	41 224 789	32 083 270	3 923 870	5 164 743	131 627
2	Liabilities carrying value amount under the scope of prudential consolidation (as per template LI1)	36 292 491	0	0	1 486 802	109 244
3	Total net amount under the scope of prudential consolidation	41 224 789	32 083 270	3 923 870	5 164 743	131 627
4	Off-balance-sheet amounts	10 562 332	10 562 332			
5	<i>Differences in valuations</i>	-21 067	-20 577		-490	
6	<i>Differences due to different netting rules, other than those already included in row 2</i>	433 143	433 143			
7	<i>Differences due to consideration of provisions</i>	5 930	5 930			
8	<i>Differences due to the use of credit risk mitigation techniques (CRMs)</i>	-379 771	-379 771			
9	<i>Differences due to credit conversion factors</i>	-7 890 019	-7 890 019			
10	<i>Differences due to Securitisation with risk transfer</i>	-294 212		-294 212		
11	<i>Other differences</i>	123	123	-18 516		
12	Exposure amounts considered for regulatory purposes	43 641 248	34 794 431	3 611 142	5 164 253	131 627

Notes:

This template provides the reconciliation between (i) the carrying value amount under the scope of regulatory consolidation (as reported in template EU LI1), and (ii) the exposure amount considered for regulatory purposes (i.e. EAD) for the exposures subject to credit risk, securitisation framework, CCR and market risk.



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>	X					Leasing activities
<i>UniCredit Consumer Financing EAD</i>	<i>Full consolidation</i>	X					Consumer lending and other similar activities in line with the applicable law and regulations
<i>UniCredit Fleet Management EOOD</i>	<i>Full consolidation</i>	X					Transport services
Cash Service Company AD	<i>Equity method</i>			X			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>				X		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		
	Category level AVA	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	21	175	21	0	35	3	128	104	24
2	Not applicable										
3	Close-out cost	0	149	140	503	0	195	26	506	171	335
4	Concentrated positions	0	0	0	20 164	0	0	0	20 164	0	20 164
5	Early termination	0	0	0	0	0	0	0	0	0	0
6	Model risk	0	0	0	1	0	25	18	22	20	2
7	Operational risk	0	8	16	39	0	0	0	63	27	36
8	Not applicable										
9	Not applicable										
10	Future administrative costs	0	2	176	6	0	0	0	184	168	16
11	Not applicable										
12	Total Additional Valuation Adjustments (AVAs)	-	-	-	-	-	-	-	21 067	490	20 577



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	Template EU CC2 - Share capital
	of which: Instrument type 1	285 777	
	of which: Instrument type 2		
	of which: Instrument type 3		
2	Retained earnings	3 701 467	Template EU CC2 - Retained earnings
3	Accumulated other comprehensive income (and other reserves)	64 667	Template EU CC2 - Revaluation and other reserves and Retained earnings
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	4 051 911	
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)	-48 420	Template EU CC2 -Intangible assets and Deferred tax liabilities
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	35 733	Template EU CC2 -Revaluation and other reserves
12	Negative amounts resulting from the calculation of expected loss amounts	-2 173	



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)	-2 136	
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	-30 725	
28	Total regulatory adjustments to Common Equity Tier 1 (CET1)	-47 721	
29	Common Equity Tier 1 (CET1) capital	4 004 190	
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)	4 004 190	
Tier 2 (T2) capital: instruments			
46	Capital instruments and the related share premium accounts	540 980	Template EU CC2 -Debt securities issued
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	3 674	
51	Tier 2 (T2) capital before regulatory adjustments	544 654	
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	544 654	
59	Total capital (TC = T1 + T2)	4 548 844	
60	Total Risk exposure amount	17 698 929	
Capital ratios and requirements including buffers			
61	Common Equity Tier 1 capital	22.62%	
62	Tier 1 capital	22.62%	
63	Total capital	25.70%	
64	Institution CET1 overall capital requirements	9.65%	
65	of which: capital conservation buffer requirement	2.50%	
66	of which: countercyclical capital buffer requirement	1.98%	
67	of which: systemic risk buffer requirement	2.82%	
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	18.12%	
68	Common Equity Tier 1 capital (as a percentage of risk exposure amount) available after meeting the minimum capital requirements	0.00%	
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)	24 592	
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)	3 674	
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach	8 211	
Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2014 and 1 Jan 2022)			
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	c
		Balance sheet as in published financial statements	Under regulatory scope of consolidation	Reference
		As at period end	As at period end	
Assets - Breakdown by asset classes according to the balance sheet in the published financial statements				
1	Cash and balances with Central Bank	3 827 942	3 827 942	
2	Non-derivative financial assets held for trading	200	200	
3	Derivatives held for trading	131 427	131 427	
4	Derivatives held for hedging	33 860	33 860	
5	Loans and advances to banks and debt securities at amortised cost	5 712 950	5 712 950	
6	Loans and advances to customers and debt securities	25 022 785	25 022 781	
7	Pledged debt securities at amortised cost	1 458 719	1 458 719	
8	Finance leases	1 397 302	1 397 302	
9	Investment securities	2 194 837	2 194 837	
10	Pledged investment securities	779 393	779 393	
11	Investments in associates	5 839	5 844	
12	Property, plant, equipment, right of use assets and investment properties	356 740	353 082	
13	Intangible assets	83 572	83 572	Template EU CC1 p.8
14	Current tax assets	53 821	53 821	
15	Deferred tax assets	6 159	6 134	
16	Non-current assets and disposal groups classified as held for sale	16 280	16 280	
17	Other assets	145 512	146 645	
18	Total assets	41 227 338	41 224 789	
Liabilities - Breakdown by liability class according to the balance sheet in the published financial statements				
1	Financial liabilities held for trading	109 244	109 244	
2	Derivatives held for hedging	89 802	89 802	
3	Deposits from banks	2 215 278	2 215 278	
4	Deposits from customers and other financial liabilities at amortized cost	31 114 666	31 125 270	
5	Debt securities issued	2 464 527	2 464 527	Template EU CC1 p.46
6	Fair value changes of the hedged items in portfolio hedge of interest rate risk	-13 759	-13 759	
7	Provisions	95 216	95 216	
8	Current tax liabilities	14 092	12 793	
9	Deferred tax liabilities	9 383	9 383	Template EU CC1 p.8
10	Other liabilities	185 635	184 737	
11	Total liabilities	36 284 084	36 292 491	
Shareholders' Equity				
1	Share capital	285 777	285 777.00	Template EU CC1 p.1
2	Revaluation and other reserves	62 765	62 765.00	Template EU CC1 p.3 and p.11
3	Retained earnings	3 712 674	3 703 369.00	Template EU CC1 p.2 and p.3
4	Profit for the year	882 038	880 387.00	
5	Total shareholders' equity	4 943 254	4 932 298	

		a	b	c	d	e	f	g	h
		Qualitative or quantitative information - Free format	Qualitative or quantitative information - Free format	Qualitative or quantitative information - Free format	Qualitative or quantitative information - Free format	Qualitative or quantitative information - Free format	Qualitative or quantitative information - Free format	Qualitative or quantitative information - Free format	Qualitative or quantitative information - Free format
1	Issuer	UniCredit Bulbank AD	UniCredit Bulbank AD	UniCredit Bulbank AD	UniCredit Bulbank AD	UniCredit Bulbank AD	UniCredit Bulbank AD	UniCredit Bulbank AD	UniCredit Bulbank AD
2	Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	ISIN BG1100001061	XS2417110132	XS2574372723	XS2647344287	XS2732160143	XS2703160346	XS2802116306	XS2949618016
2a	Public or private placement	private	Private	Private	Private	Private	Private	Private	Private
3	Governing law(s) of the instrument	Bulgarian	Italian Law	Italian Law	Italian Law	Italian Law	Italian Law	Italian Law	Italian Law
3a	Contractual recognition of write down and conversion powers of resolution authorities	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	<i>Regulatory treatment</i>								
4	Current treatment taking into account, where applicable, transitional CRR rules	Common Equity Tier 1	N/A	N/A	N/A	N/A	N/A	N/A	N/A
5	Post-transitional CRR rules	Common Equity Tier 1	eligible liabilities	eligible liabilities	eligible liabilities	eligible liabilities	Tier 2	Tier 2	eligible liabilities (T2 -after the approval from BNB)
6	Eligible at solo/(sub-)consolidated/ solo&(sub-)consolidated	solo&(sub-)consolidated	solo&(sub-)consolidated	solo&(sub-)consolidated	solo&(sub-)consolidated	solo&(sub-)consolidated	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	SNP	SNP	SNP	SNP	T2	T2	T2 (after the approval from BNB)
8	Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	285 777	313 mio BGN recognised in eligible liabilities	489 mio BGN recognised in eligible liabilities	196 mio BGN recognised in eligible liabilities	196 mio BGN recognised in eligible liabilities	196 mio BGN recognised in T2	98 mio BGN recognised in T2	125 mio BGN recognised in eligible liabilities
9	Nominal amount of instrument	285 777	312 933	488 958	195 583	195 583	195 583	97 792	
EU-9a	Issue price	100 per cent	100	100	100	100	100	100	100
EU-9b	Redemption price	100 per cent	100	100	100	100	100	100	100
10	Accounting classification	Shareholders' equity	Financial liabilities measured at amortised cost	Financial liabilities measured at amortised cost	Financial liabilities measured at amortised cost	Financial liabilities measured at amortised cost	Financial liabilities measured at amortised cost	Financial liabilities measured at amortised cost	Financial liabilities measured at amortised cost
11	Original date of issuance	30.05.2007	06/12/2021	27/01/2023	17/07/2023	18/12/2023	27/10/2023	17/04/2024	06/12/2024



12	Perpetual or dated	Perpetual	dated	dated	dated	dated	dated	dated	dated
13	Original maturity date	N/A	06/12/2027	27/01/2029	17/07/2029	18/12/2029	27/10/2033	17/04/2034	06/12/2034
14	Issuer call subject to prior supervisory approval	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
15	Optional call date, contingent call dates and redemption amount	N/A	07.12.2026 tax event	27.01.2028 tax event	17.07.2028 tax event	18.12.2029 tax event	27.10.2028 tax or regulatory call event	17.04.2029 tax or regulatory call event	06.12.2029 tax or regulatory call event
16	Subsequent call dates, if applicable	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	<i>Coupons / dividends</i>								
17	Fixed or floating dividend/coupon	N/A	floating	floating	floating	floating	floating	floating	floating
18	Coupon rate and any related index	N/A	3M EURIBOR + 1.62%	3M EURIBOR + 3.03%	3M EURIBOR + 2.09%	3M EURIBOR + 2.04%	3M EURIBOR + 4.51%	3M EURIBOR + 2.28%	3M EURIBOR + 2.14%
19	Existence of a dividend stopper	no	No	No	No	No	No	No	No
EU-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Fully discretionary	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory
EU-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Fully discretionary	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory
21	Existence of step up or other incentive to redeem	No	No	No	No	No	No	No	No
22	Noncumulative or cumulative	Noncumulative	Cumulative	Cumulative	Cumulative	Cumulative	Cumulative	Cumulative	Cumulative
23	Convertible or non-convertible	Nonconvertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible
24	If convertible, conversion trigger(s)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
25	If convertible, fully or partially	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
26	If convertible, conversion rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
27	If convertible, mandatory or optional conversion	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
28	If convertible, specify instrument type convertible into	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
29	If convertible, specify issuer of instrument it converts into	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
30	Write-down features	No	No	No	No	No	No	No	No
31	If write-down, write-down trigger(s)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
32	If write-down, full or partial	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
33	If write-down, permanent or temporary	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
34	If temporary write-down, description of write-up mechanism	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A



34a	Type of subordination (only for eligible liabilities)	N/A	Statutory	Statutory	Statutory	Statutory	Statutory	Statutory	Statutory
EU-34b	Ranking of the instrument in normal insolvency proceedings	17	Rank 05	Rank 05	Rank 05	Rank 05	Rank 03	Rank 03	Rank 05 (Rank 03 - after the approval from BNB)
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	Senior Obligations means any senior obligations of, or other indebtedness of the Issuer, which constitute direct, unconditional, unsubordinated and unsecured obligations of the Issuer	Senior Obligations means any senior obligations of, or other indebtedness of the Issuer, which constitute direct, unconditional, unsubordinated and unsecured obligations of the Issuer	Senior Obligations means any senior obligations of, or other indebtedness of the Issuer, which constitute direct, unconditional, unsubordinated and unsecured obligations of the Issuer	Senior Obligations means any senior obligations of, or other indebtedness of the Issuer, which constitute direct, unconditional, unsubordinated and unsecured obligations of the Issuer	Unsubordinated unsecured creditors (including depositors, holders of Senior Obligations and Non-Preferred Senior Obligations)	Unsubordinated unsecured creditors (including depositors, holders of Senior Obligations and Non-Preferred Senior Obligations)	Unsubordinated unsecured creditors (including depositors, holders of Senior Obligations and Non-Preferred Senior Obligations)
36	Non-compliant transitioned features	No	No	No	No	No	No	No	No
37	If yes, specify non-compliant features	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
37a	Link to the full term and conditions of the instrument (signposting)	N/A							



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			Total	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				
010	Breakdown by country:													
	Country: ARGENTINA	4	0	0	0	0	4	0	0	0	0	0	0.00%	0.00%
	Country: AUSTRIA	40 985	499	0	0	0	41 484	3 351	0	0	3 351	41 888	0.29%	0.00%
	Country: BELGIUM	1 022	0	0	0	0	1 022	15	0	0	15	188	0.00%	1.00%
	Country: BULGARIA	21 195 288	802 794	0	0	0	21 998 082	1 078 955	6 809	28 872	1 114 636	13 932 950	97.59%	2.00%
	Country: CANADA	1 470	11 421	0	0	0	12 891	209	0	0	209	2 613	0.02%	0.00%
	Country: SWITZERLAND	932	0	0	0	0	932	67	0	0	67	838	0.01%	0.00%
	Country: CYPRUS	1 086	0	6 043 528	0	3 903 218	9 947 832	73	0	0	73	913	0.01%	1.00%
	Country: CZECH REPUBLIC	2	0	0	0	0	2	0	0	0	0	0	0.00%	1.25%
	Country: GERMANY	9 237	0	0	0	0	9 237	698	0	0	698	8 725	0.06%	0.75%
	Country: DENMARK	157	0					6	0	0	6	75	0.00%	2.50%
	Country: ALGERIA	0	7 090	0	0	0	7 090	536	0	0	536	6 700	0.05%	0.00%
	Country: ESTONIA	61	0	0	0	0	61	1	0	0	1	13	0.00%	1.50%
	Country: SPAIN	5 580	0	0	0	0	5 580	445	0	0	445	5 563	0.04%	0.50%
	Country: FINLAND	118	0	0	0	0	118	9	0	0	9	113	0.00%	0.00%



Country: FRANCE	6 259	0	0	0	0	6 259	432	0	0	432	5 400	0.04%	1.00%
Country: United Kingdom excluding Guernsey, Jersey, Isle of Man	6 720	2 077	0	0	0	8 797	410	0	0	410	5 125	0.04%	2.00%
Country: GEORGIA	9	486	0	0	0	495	46	0	0	46	575	0.00%	1.00%
Country: GREECE	7 763	0	0	0	0	7 763	592	0	0	592	7 400	0.06%	0.25%
Country: CROATIA	0	50 399	0	0	0	50 399	728	0	0	728	9 100	0.06%	1.50%
Country: HUNGARY	953	11 724	0	0	0	12 677	76	0	0	76	950	0.01%	1.00%
Country: INDONESIA	4	0	0	0	0	4	0	0	0	0	0	0.00%	0.00%
Country: ISRAEL	384	1 353	0	0	0	1 737	89	0	0	89	1 113	0.01%	0.00%
Country: INDIA	4	0	0	0	0	4	0	0	0	0	0	0.00%	0.00%
Country: ITALY	16 442	799	0	0	0	17 241	1 315	0	0	1 315	16 438	0.12%	0.00%
Country: Kirgizstan	114	0	0	0	0	114	3	0	0	3	38	0.00%	0.00%
Country: KAZAKHSTAN	5	0	0	0	0	5	0	0	0	0	0	0.00%	0.00%
Country: MOROCCO	2	109	0	0	0	111	7	0	0	7	88	0.00%	0.00%
Country: MARSHALL ISLANDS	8 885	0	0	0	0	8 885	571	0	0	571	7 138	0.05%	0.00%
Country: NORTH MACEDONIA	0	0	0	0	0	0	0	0	0	0	0	0.00%	1.75%
Country: MALTA	4	0	0	0	0	4	0	0	0	0	0	0.00%	0.00%
Country: NETHERLANDS	114 743	53 466	0	0	0	168 209	12 074	0	0	12 074	150 925	1.06%	2.00%
Country: NORWAY	169	0	0	0	0	169	14	0	0	14	175	0.00%	2.50%
Country: POLAND	14 753	0	0	0	0	14 753	1 180	0	0	1 180	14 750	0.10%	1.00%
Country: Occupied Palestinian Territories	3	0	0	0	0	3	0	0	0	0	0	0.00%	0.00%



	Country: PORTUGAL	19	0	0	0	0	19	2	0	0	2	25	0.00%	0.00%
	Country: ROMANIA	1 479	0	0	0	0	1 479	118	0	0	118	1 475	0.01%	1.00%
	Country: SERBIA	2 140	0	0	0	0	2 140	168	0	0	168	2 100	0.01%	0.00%
	Country: RUSSIAN FEDERATION	350	2	0	0	0	352	12	0	0	12	150	0.00%	0.50%
	Country: SWEDEN	17 303	0	0	0	0	17 303	691	0	0	691	8 638	0.06%	2.00%
	Country: SLOVENIA	0	0	0	0	0	0	0	0	0	0	0	0.00%	1.00%
	Country: SLOVAKIA	35	0	0	0	0	35	3	0	0	3	38	0.00%	1.50%
	Country: SIERRA LEONE	0	0	0	0	0	0	0	0	0	0	0	0.00%	0.00%
	Country: Syria, Arab Republic of	560	0	0	0	0	560	17	0	0	17	213	0.00%	0.00%
	Country: Tunisia	0	412	0	0	0	412	50	0	0	50	625	0.00%	0.00%
	Country: TURKEY	38 975	0	0	0	0	38 975	3 106	0	0	3 106	38 825	0.27%	0.00%
	Country: TAIWAN, PROVINCE OF CHINA	2	0	0	0	0	2	0	0	0	0	0	0.00%	0.00%
	Country: UKRAINE	64	0	0	0	0	64	2	0	0	2	25	0.00%	0.00%
	Country: UNITED STATES	5 052	0	0	0	0	5 052	378	0	0	378	4 725	0.03%	0.00%
020	Total	21 499 137	942 631	6 043 528	0	3 903 218	32 388 357	1 106 449	6 809	28 872	1 142 130	14 276 633	100.00%	-



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

In thousands of BGN

		a
1	Total risk exposure amount	17 698 929
2	Institution specific countercyclical capital buffer rate	1.98%
3	Institution specific countercyclical capital buffer requirement	350 439

TEMPLATE EU CR10 – SPECIALISED LENDING AND EQUITY EXPOSURES

In thousands of BGN

Template EU CR10.5

Equity exposures under Articles 133 (3) to (6) and 495a(3) CRR						
	On-balance sheet exposure	Off-balance sheet exposure	Risk weight	Exposure value	Risk weighted exposure amount	Expected loss amount
Categories	a	b	c	d	e	f
	5		100%	5	5	
	19 800		250%	19 800	49 500	
	9 985		other	9 985	21 536	
Total	29 790			29 790	71 041	



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)	171 936	314 151		1.4	680 523	662 287	662 287	383 968
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)					6 311 549	820 781	820 781	9 516
5	VaR for SFTs					0	0	0	0
6	Total					6 992 072	1 483 068	1 483 068	393 484



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									214 333				214 333
8	Retail													0
9	Institutions and corporates with a short-term credit assessment													0
10	Other items										20 155			20 155
11	Total exposure value	0	0	0	0	0	0	0	0	214 333	20 155	0		234 488



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 Corporate (F-IRB)							
1	0.00 to <0.15	11 421	0.00%	1.00	0%	1.00	1 138.77	0.10
2	0.15 to <0.25	0	0.00%	0.00	0%	0.00	0.00	0.00
3	0.25 to <0.50	0	0.00%	0.00	0%	0.00	0.00	0.00
4	0.50 to <0.75	11 724	0.01%	1.00	0%	0.01	0.00	0.00
5	0.75 to <2.50	1 664	0.02%	3.00	0%	1.00	1 281.68	0.77
6	2.50 to <10.00	369	0.04%	2.00	0%	1.84	417.40	1.13
7	10.00 to <100.00	0	0.00%	0.00	0%	0.00	0.00	0.00
8	100.00 (Default)	0	0.00%	0.00	0%	0.00	0.00	0.00
x	Sub-total (Exposure class X)	25 177	0.01%	7.00	0%	0.55	2 837.85	0.11

		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	1 222 626	0.00%	11.00	0.18%	1.36	152 651.28	0.12
2	0.15 to <0.25	0	0.00%	0.00	0.00%	0.00	0.00	0.00



3		0.25 to <0.50	0	0.00%	0.00	0.00%	0.00	0.00	0.00
4		0.50 to <0.75	777	0.01%	1.00	0.45%	1.00	494.89	0.64
5		0.75 to <2.50	0	0.00%	0.00	0.00%	0.00	0.00	0.00
6		2.50 to <10.00	0	0.00%	0.00	0.00%	0.00	0.00	0.00
7		10.00 to <100.00	0	0.00%	0.00	0.00%	0.00	0.00	0.00
8		100.00 (Default)	0	0.00%	0.00	0.00%	0.00	0.00	0.00
x		Sub-total (Exposure class X)	1 223 402	0.00%	12.00	0.18%	1.36	153 146.18	0.13

		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	Total F-IRB							
1	0.00 to <0.15	1 234 047	0.00%	12	0.19%	1.36	153 790	0.12
2	0.15 to <0.25	0	0.00%	0	0.00%	0.00	0	0.00
3	0.25 to <0.50	0	0.00%	0	0.00%	0.00	0	0.00
4	0.50 to <0.75	12 501	0.01%	2	0.03%	0.08	495	0.04
5	0.75 to <2.50	1 664	0.02%	3	0.40%	1.00	1 282	0.77
6	2.50 to <10.00	369	0.04%	2	0.40%	1.84	417	1.13
7	10.00 to <100.00	0	0.00%	0	0.00%	0.00	0	0.00
8	100.00 (Default)	0	0.00%	0	0.00%	0.00	0	0.00
y	Total (all CCR relevant exposure classes)	1 248 579	0	19	0	1.35	155 984	0



Template EU CCR5 – Composition of collateral for CCR exposures

In thousands of BGN

		a	b	c	d	e	f	g	h
		Collateral used in derivative transactions				Collateral used in SFTs			
Collateral type		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		328		4 763				
3	Domestic sovereign debt								1 267 971
4	Other sovereign debt								
5	Government agency debt								
6	Corporate bonds								
7	Equity securities								
8	Other collateral								
9	Total	0	328	0	4 763	0	0	0	1 267 971



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						Accumulated 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
	Of which stage 1	Of which stage 2		Of which stage 2	Of which stage 3		Of which stage 1	Of which stage 2		Of which stage 2	Of which stage 3					
005	Cash balances at central banks and other demand deposits	3 238 541	3 238 541	0	0	0	0	-24	-24	0	0	0	0	0	0	0
010	Loans and advances	29 312 839	26 547 051	2 765 788	772 312	0	772 312	-331 933	-93 264	-238 669	-489 595	0	-489 595	6 723	24 333 296	229 595
020	Central banks	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
030	General governments	373 438	373 438	0	0	0	0	-58	-58	0	0	0	0	0	275 201	0
040	Credit institutions	5 074 058	5 074 058	0	0	0	0	-482	-482	0	0	0	0	0	4 990 523	0
050	Other financial corporations	307 226	293 396	13 830	1	0	1	-1 813	-828	-985	-1	0	-1	0	295 979	0
060	Non-financial corporations	12 636 260	10 849 446	1 786 814	580 684	0	580 684	-213 449	-61 708	-151 741	-381 374	0	-381 374	5 911	11 674 585	196 628
070	Of which SMEs	7 659 889	6 633 743	1 026 146	438 683	0	438 683	-151 870	-42 433	-109 437	-257 495	0	-257 495	2 323	7 287 106	178 702
080	Households	10 921 857	9 956 713	965 144	191 627	0	191 627	-116 131	-30 188	-85 943	-108 220	0	-108 220	812	7 097 008	32 967
090	Debt securities	7 055 485	7 055 485	0	0	0	0	-1 145	-1 145	0	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	6 614 719	6 614 719	0	0	0	0	-921	-921	0	0	0	0	0	0	0
120	Credit institutions	415 406	415 406	0	0	0	0	-107	-107	0	0	0	0	0	0	0
130	Other financial corporations	5 047	5 047	0	0	0	0	-17	-17	0	0	0	0	0	0	0
140	Non-financial corporations	20 313	20 313	0	0	0	0	-100	-100	0	0	0	0	0	0	0
150	Off-balance-sheet exposures	10 536 712	9 875 142	661 570	25 620	0	25 620	-33 103	-17 307	-15 796	-22 197	0	-22 197	0	6 906 620	2 424
160	Central banks	0	0	0	0	0	0	0	0	0	0	0	0		0	0
170	General governments	89 998	89 998	0	0	0	0	-12	-12	0	0	0	0		86 153	0
180	Credit institutions	1 207 937	1 207 937	0	0	0	0	-254	-254	0	0	0	0		0	0
190	Other financial corporations	134 186	133 211	975	0	0	0	-282	-275	-7	0	0	0		131 955	0
200	Non-financial corporations	8 385 108	7 804 141	580 967	24 477	0	24 477	-29 275	-15 254	-14 021	-21 608	0	-21 608		6 441 595	2 368
210	Households	719 483	639 855	79 628	1 143	0	1 143	-3 280	-1 512	-1 768	-589	0	-589		246 917	56
220	Total	50 143 577	46 716 219	3 427 358	797 932	0	797 932	-366 205	-111 740	-254 465	-511 792	0	-511 792	6 723	31 239 916	232 019



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	88 623	9 009 001	7 506 850	12 659 149	0	29 263 623
2	Debt securities	0	903 577	2 907 860	3 242 903	0	7 054 340
3	Total	88 623	9 912 578	10 414 710	15 902 052	0	36 317 963

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	693 708
020	Inflows to non-performing portfolios	344 659
030	Outflows from non-performing portfolios	-266 055
040	Outflows due to write-offs	-22 968
050	Outflow due to other situations	-243 087
060	Final stock of non-performing loans and advances	772 312



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	693 708	
020	Inflows to non-performing portfolios	344 659	
030	Outflows from non-performing portfolios	-266 055	
040	Outflow to performing portfolio	-32 028	
050	Outflow due to loan repayment, partial or total	-103 510	
060	Outflow due to collateral liquidations	-9 030	9 030
070	Outflow due to taking possession of collateral	0	0
080	Outflow due to sale of instruments	-82 653	18 524
090	Outflow due to risk transfers	0	0
100	Outflows due to write-offs	-22 968	
110	Outflow due to other situations	-15 866	
120	Outflow due to reclassification as held for sale	0	
130	Final stock of non-performing loans and advances	772 312	

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 collateral and financial guarantees received on non-performing exposures with forbearance measures
			Of which defaulted	Of which impaired					
005	Cash balances at central banks and other demand deposits	0	0	0	0	0	0	0	0
010	Loans and advances	368 367	362 380	362 380	362 380	-40 412	-245 240	440 540	112 063
020	Central banks	0	0	0	0	0	0	0	0
030	General governments	0	0	0	0	0	0	0	0
040	Credit institutions	0	0	0	0	0	0	0	0
050	Other financial corporations	0	0	0	0	0	0	0	0
060	Non-financial corporations	360 416	326 560	326 560	326 560	-39 980	-217 464	430 071	109 064
070	Households	7 951	35 820	35 820	35 820	-432	-27 776	10 469	2 999
080	Debt Securities	0	0	0	0	0	0	0	0
090	Loan commitments given	33 068	260	260	260	-1 181	-145	32 000	115
100	Total	401 435	362 640	362 640	362 640	-41 593	-245 385	472 540	112 178

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	117 405
020	Non-performing forborne loans and advances that failed to meet the non-performing exit criteria	10 750



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	3 238 541	3 238 541	0	0	0	0	0	0	0	0	0	
010	Loans and advances	29 312 839	29 259 169	53 670	772 312	505 764	57 186	50 382	38 081	91 226	12 727	16 946	772 312
020	Central banks	0	0	0	0	0	0	0	0	0	0	0	0
030	General governments	373 438	373 438	0	0	0	0	0	0	0	0	0	0
040	Credit institutions	5 074 058	5 074 058	0	0	0	0	0	0	0	0	0	0
050	Other financial corporations	307 226	307 224	2	1	1	0	0	0	0	0	0	1
060	Non-financial corporations	12 636 260	12 622 844	13 416	580 684	381 167	17 221	38 105	33 242	85 987	11 037	13 925	580 684
070	Of which SMEs	7 659 889	7 648 510	11 379	438 683	328 011	17 218	10 596	24 450	34 416	11 037	12 955	438 683
080	Households	10 921 857	10 881 605	40 252	191 627	124 596	39 965	12 277	4 839	5 239	1 690	3 021	191 627
090	Debt securities	7 055 485	7 055 485	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	6 614 719	6 614 719	0	0	0	0	0	0	0	0	0	0
120	Credit institutions	415 406	415 406	0	0	0	0	0	0	0	0	0	0
130	Other financial corporations	5 047	5 047	0	0	0	0	0	0	0	0	0	0
140	Non-financial corporations	20 313	20 313	0	0	0	0	0	0	0	0	0	0
150	Off-balance-sheet exposures	10 536 712			25 620								25 620
160	Central banks	0			0								0
170	General governments	89 998			0								0
180	Credit institutions	1 207 937			0								0
190	Other financial corporations	134 186			0								0
200	Non-financial corporations	8 385 108			24 477								24 477
210	Households	719 483			1 143								1 143
220	Total	50 143 577	39 553 195	53 670	797 932	505 764	57 186	50 382	38 081	91 226	12 727	16 946	797 932

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			Of which subject to impairment	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 non-performing						
		Of which defaulted						
010	On-balance-sheet exposures	30 085 151	772 312	772 312	30 084 559	820 957		571
020	BULGARIA	24 712 981	769 565	769 565	24 712 389	812 980		571
030	ITALY	3 603 929	4	4	3 603 929	2 602		0
070	Other countries	1 768 241	2 743	2 743	1 768 241	5 375		0
080	Off-balance-sheet exposures	10 562 332	25 620	25 620			55 300	
090	BULGARIA	9 118 731	21 621	21 621			51 004	
140	Other countries	1 443 601	3 999	3 999			4 296	
150	Total	40 647 483	797 932	797 932	30 084 559	820 957	55 300	571



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			Of which loans and advances subject to impairment	Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures	
	Of which non-performing						
		Of which defaulted					
010	Agriculture, forestry and fishing	669 600	14 056	14 056	669 600	-14 199	0
020	Mining and quarrying	7 290	439	439	7 290	-547	0
030	Manufacturing	2 939 846	125 718	125 718	2 939 254	-108 828	-571
040	Electricity, gas, steam and air conditioning supply	1 353 336	226	226	1 353 336	-35 196	0
050	Water supply	33 715	3 136	3 136	33 715	-1 435	0
060	Construction	912 642	16 886	16 886	912 642	-29 700	0
070	Wholesale and retail trade	3 520 414	152 154	152 154	3 520 414	-139 207	0
080	Transport and storage	753 195	38 002	38 002	753 195	-50 718	0
090	Accommodation and food service activities	455 828	55 501	55 501	455 828	-54 693	0
100	Information and communication	135 496	13 330	13 330	135 496	-9 845	0
110	Financial and insurance activities	12 223	48	48	12 223	-75	0
120	Real estate activities	1 626 486	53 075	53 075	1 626 486	-52 586	0
130	Professional, scientific and technical activities	428 440	99 814	99 814	428 440	-87 770	0
140	Administrative and support service activities	263 355	5 628	5 628	263 355	-6 144	0
150	Public administration and defense, compulsory social security	256	0	0	256	-3	0
160	Education	5 204	0	0	5 204	-68	0
170	Human health services and social work activities	53 600	981	981	53 600	-612	0
180	Arts, entertainment and recreation	17 412	486	486	17 412	-1 182	0
190	Other services	28 606	1 204	1 204	28 606	-1 444	0
200	Total	13 216 944	580 684	580 684	13 216 352	-594 252	-571

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			Past due > 90 days											
					Unlikely to pay that are not past due or are 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	30 085 151	29 312 839	53 670	772 312	505 764	266 548	57 186	50 382	38 081	91 226	12 727	16 946						
020	<i>Of which secured</i>	21 103 013	20 525 119	20 125	577 894	390 648	187 248	20 021	39 772	32 855	84 433	7 725	2 442						
030	<i>Of which secured with immovable property</i>	14 345 771	13 967 274	13 617	378 497	306 380	72 117	9 050	5 077	16 363	36 464	4 518	645						
040	<i>Of which instruments with LTV higher than 60% and lower or equal to 80%</i>	4 157 031	4 092 802		64 229	52 895	11 334												
050	<i>Of which instruments with LTV higher than 80% and lower or equal to 100%</i>	2 561 298	2 510 356		50 942	41 264	9 678												
060	<i>Of which instruments with LTV higher than 100%</i>	2 934 422	2 812 976		121 446	83 134	38 312												
070	Accumulated impairment for secured assets	-579 232	-208 154	-2 408	-371 078	-223 851	-147 227	-6 659	-34 567	-25 542	-70 294	-7 722	-2 443						
080	Collateral																		
090	<i>Of which value capped at the value of exposure</i>	23 858 256	23 644 783	22 109	213 473	170 053	43 420	13 570	6 097	7 600	13 905	2	2 246						
100	<i>Of which immovable property</i>	12 450 299	12 298 421	11 364	151 878	130 042	21 836	6 271	2 780	3 147	9 638	0	0						
110	<i>Of which value above the cap</i>	32 009 515	30 929 254	8 324	1 080 261	919 477	203 926	12 879	109 406	97 355	-13 901	433	-2 246						
120	<i>Of which immovable property</i>	22 357 443	21 417 392	9 087	940 051	836 146	173 196	19 824	112 716	49 940	-9 638	354	0						
130	Financial guarantees received	704 635	688 513	2 328	16 122	12 200	3 922	2 875	401	555	91	0	0						
140	Accumulated partial write-off	-6 723	0	0	-6 723	-516	-6 207	-200	-949	-916	-3 652	-312	-178						



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	25 084	-14 814
030	Residential immovable property	2 074	-1
040	Commercial Immovable property	23 008	-14 813
050	Movable property (auto, shipping, etc.)	2	0
060	Equity and debt instruments	0	0
070	Other collateral	0	0
080	Total	25 084	-14814

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	3 618	-1 864	1 754	-186								
020	Collateral obtained by taking possession other than that classified as PP&E	71 846	-54 928	25 084	-14 814	0	0	2 626	0	22 458	-14 814		
030	Residential immovable property	3 693	-2 077	2 074	-1	0	0	2 072	0	2	-1		
040	Commercial immovable property	68 141	-52 840	23 008	-14 813	0	0	554	0	22 454	-14 813		
050	Movable property (auto, shipping, etc.)	12	-11	2	0	0	0	0	0	2	0		
060	Equity and debt instruments												
070	Other collateral												
080	Total	75 464	-56 792	26 838	-15 000	0	0	2 626	0	22 458	-14 814		



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	1 711 305	1 597 085			36 327 548	9 850 063		
030	Equity instruments	0	0	0	0	25 268	0	25 268	0
040	Debt securities	1 597 085	1 597 085	1 288 656	1 288 656	4 891 998	4 451 803	5 126 655	4 686 966
050	of which: covered bonds	0	0	0	0	414 548	0	414 461	0
060	of which: securitisations	0	0	0	0	0	0	0	0
070	of which: issued by general governments	1 597 085	1 597 085	1 288 656	1 288 656	4 451 903	4 451 803	4 686 966	4 686 966
080	of which: issued by financial corporations	0	0	0	0	419 721	0	419 463	0
090	of which: issued by non-financial corporations	0	0	0	0	20 447	0	20 447	0
120	Other assets	114 220	0			31 410 283	5 398 260		



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	of which notionally eligible EHQLA and HQLA	Unencumbered	
			Fair value of collateral received or own debt securities issued available for encumbrance	
				of which EHQLA and HQLA
	010	030	040	060
130 Collateral received by the disclosing institution			2 304 825	2 304 825
140 Loans on demand			0	0
150 Equity instruments			0	0
160 Debt securities			2 304 825	2 304 825
170 of which: covered bonds			0	0
180 of which: securitisations			0	0
190 of which: issued by general governments			2 304 825	2 304 825
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	1 700 262	1 707 643



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		RWEAs and RWEAs density	
		On-balance-sheet exposures	Off-balance-sheet exposures	On-balance-sheet exposures	Off-balance-sheet exposures	RWEAs	RWEAs density (%)
		a	b	c	d	e	f
1	Central governments or central banks	9 776 453	3 157	9 908 472	674	406 824	4.11%
2	Non-central government public sector entities	95 597	31 774	95 596	4 258	20 520	20.55%
EU 2a	Regional governments or local authorities	95 417	30 947	95 417	4 042	20 125	20.23%
EU 2b	Public sector entities	180	827	179	216	395	100.00%
3	Multilateral development banks	0	1 271	162 891	343	0	0.00%
EU 3a	International organisations	9 896	0	9 896	0	0	0.00%
4	Institutions	63	38 328	20 879	5 224	8 890	34.06%
5	Covered bonds	0	0	0	0	0	0
6	Corporates	4 328 671	4 209 033	4 463 964	364 988	4 194 467	86.86%
6.1	Of which: Specialised Lending	1 016 024	434 953	1 012 374	25 394	903 749	87.09%
7	Subordinated debt exposures and equity	29 790	0	29 790	0	71 041	238.47%
EU 7a	Subordinated debt exposures						
EU 7b	Equity	29 790	0	29 790	0	71 041	238.47%
8	Retail	4 892 804	1 015 887	4 855 751	290 511	3 645 032	70.83%
9	Secured by mortgages on immovable property and ADC exposures	10 716 756	2 406 500	10 701 114	298 677	4 952 294	45.02%
9.1	Secured by mortgages on residential immovable property - non IPRE	6 862 772	299 876	6 851 817	86 015	2 015 029	29.04%
9.2	Secured by mortgages on residential immovable property - IPRE	4 036	0	4 036	0	1 800	44.60%
9.3	Secured by mortgages on commercial immovable property - non IPRE	2 380 359	1 456 114	2 376 399	182 597	1 719 815	67.21%
9.4	Secured by mortgages on commercial immovable property - IPRE	1 134 474	376 342	1 134 474	7 910	774 840	67.83%
9.5	Acquisition, Development and Construction (ADC)	335 115	274 168	334 388	22 155	440 810	123.63%
10	Exposures in default	282 298	3 411	259 188	666	267 959	103.12%
EU 10a	Claims on institutions and corporates with a short-term credit assessment	0	0	0	0	0	0
EU 10b	Collective investment undertakings (CIU)	0	0	0	0	0	0
EU 10c	Other items	0	0	0	0	0	0
11	not applicable						
12	TOTAL	30 132 328	7 709 361	30 507 541	965 342	13 567 027	43.11%



Template EU CR5 – standardised approach

In thousands of BGN

	Exposure classes	Risk weight																									Total	Of which unrated
		0%	2%	4%	10%	20%	30%	35%	40%	45%	50%	60%	70%	75%	80%	90%	100%	105%	110%	130%	150%	250%	370%	400%	1250%	Others		
		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y		
1	Central governments or central banks	5 987 069	0	176 107	3 714 299	0	0	0	0	0	25 414	0	0	0	0	0	0	0	0	0	0	6 257	0	0	0	0	9 909 146	0
2	Non-central government public sector entities	0	0	0	0	99 167	0	0	0	0	0	0	0	0	0	0	687	0	0	0	0	0	0	0	0	0	99 854	0
EU 2a	Regional governments or local authorities	0	0	0	0	99 167	0	0	0	0	0	0	0	0	0	292	0	0	0	0	0	0	0	0	0	0	99 459	0
EU 2b	Public sector entities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	395	0	0	0	0	0	0	0	0	0	0	395	0
3	Multilateral development banks	163 234	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	163 234	0
EU 3a	International organisations	9 896	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	9 896	0
4	Institutions	0	0	0	0	25	13 394	0	0	0	12 511	0	0	125	0	0	0	0	0	0	48	0	0	0	0	0	26 103	368
5	Covered bonds																										0	0
6	Corporates	0	0	0	0	313 137	0	0	0	0	24 983	0	0	0	244 872	0	4 101 282	0	0	144 678	0	0	0	0	0	0	4 828 952	4 438 684
6.1	Of which: Specialised Lending	0	0	0	0	0	0	0	0	0	0	0	0	244 872	0	648 218	0	0	144 678	0	0	0	0	0	0	0	1 037 768	1 037 768
7	Subordinated debt exposures and equity	0	0	0	0	0	0	0	0	0	0	0	0	0	0	5	0	0	0	0	19 800	0	0	0	9 985	29 790	29 790	
EU 7a	Subordinated debt exposures																										0	0
EU 7b	Equity	0	0	0	0	0	0	0	0	0	0	0	0	0	0	5	0	0	0	0	19 800	0	0	0	9 985	29 790	29 790	
8	Retail exposures	0	0	0	0	0	0	0	0	173 364	0	0	0	4 968 677	0	0	4 221	0	0	0	0	0	0	0	0	0	5 146 262	4 116 105
9	Secured by mortgages on immovable property and ADC exposures	0	0	0	0	5 783 453	3 153	0	0	580	0	1 501 075	0	1 193 161	10 854	105 547	1 178 052	0	43 573	17 663	255 307	0	0	0	907 373	10 999 791	10 994 748	
9.1	Secured by mortgages on residential immovable property - non IPRE	0	0	0	0	5 783 453	0	0	0	40	0	0	0	1 130 046	0	0	24 293	0	0	0	0	0	0	0	0	0	6 937 832	6 932 788
9.1.1	no loan splitting applied	0	0	0	0	0	0	0	0	0	0	0	0	14 474	0	0	12 429	0	0	0	0	0	0	0	0	0	26 903	21 858
9.1.2	loan splitting applied (secured)	0	0	0	0	5 783 453	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	5 783 453	5 783 453



9.1.3	loan splitting applied (unsecured)	0	0	0	0	0	0	0	0	40	0	0	0	1 115 572	0	0	11 864	0	0	0	0	0	0	0	0	0	1 127 476	1 127 476
9.2	Secured by mortgages on residential immovable property - IPRE	0	0	0	0	0	3 153	0	0	0	0	0	0	0	0	0	0	0	0	0	883	0	0	0	0	0	4 036	4 036
9.3	Secured by mortgages on commercial immovable property - non IPRE	0	0	0	0	0	0	0	0	540	0	1 501 075	0	63 115	10 854	0	965 749	0	0	17 663	0	0	0	0	0	0	2 558 996	2 558 996
9.3.1	no loan splitting applied	0	0	0	0	0	0	0	0	144	0	0	0	46 233	10 854	0	732 218	0	0	17 528	0	0	0	0	0	0	806 977	806 977
9.3.2	loan splitting applied (secured)	0	0	0	0	0	0	0	0	0	0	1 501 075	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1 501 075	1 501 075
9.3.3	loan splitting applied (unsecured)	0	0	0	0	0	0	0	0	396	0	0	0	16 882	0	0	233 531	0	0	135	0	0	0	0	0	0	250 944	250 944
9.4	Secured by mortgages on commercial immovable property - IPRE	0	0	0	0	0	0	0	0	0	0	0	0	0	0	105 547	0	0	43 573	0	85 891	0	0	0	0	907 373	1 142 384	1 142 384
9.5	Acquisition, Development and Construction (ADC)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	188 010	0	0	0	168 533	0	0	0	0	0	356 543	356 543
10	Exposures in default	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	243 644	0	0	0	16 210	0	0	0	0	0	259 854	259 854
EU 10a	Claims on institutions and corporates with a short-term credit assessment																											
EU 10b	Collective investment undertakings (CIU)																											
EU 10c	Other items																											
11	not applicable																											
EU 11c	TOTAL	6 160 200	0	176 107	3 714 300	6 195 782	16 547	0	0	173 944	62 908	1 501 075	0	6 161 963	255 726	105 547	5 527 890	0	43 573	162 341	271 565	26 057	0	0	0	917 358	31 472 883	19 839 549



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

In thousands of BGN

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
Exposure class Corporates-Other													
	0.00 to <0.15	359 807	447 525	0.10	402 622	0.10%	18	31.32%	4	123 074	0.31	125	-47
	0.00 to <0.10	1 868	421 202	0.10	43 330	0.08%	15	40.24%	3	10 779	0.25	13	-3
	0.10 to <0.15	357 939	26 323	0.05	359 292	0.10%	3	30.24%	5	112 296	0.31	112	-44
	0.15 to <0.25	178 303	360	0.00	46 284	0.19%	2	40.00%	1	11 942	0.26	35	-106
	0.25 to <0.50	103 697	57 729	0.31	121 680	0.41%	5	39.20%	2	55 686	0.46	195	-28
	0.50 to <0.75	47 111	15 733	0.12	49 045	0.66%	3	40.00%	2	30 079	0.61	130	-31
	0.75 to <2.50	210 550	80 570	0.12	220 162	1.44%	13	39.89%	2	198 339	0.90	1 268	-362
	0.75 to <1.75	204 184	65 539	0.10	210 790	1.42%	8	39.81%	2	187 113	0.89	1 191	-317
	1.75 to <2.5	6 365	15 031	0.20	9 372	1.98%	5	41.60%	2	11 226	1.20	77	-46
	2.50 to <10.00	21 176	56 294	0.34	40 130	3.53%	5	36.78%	3	48 370	1.21	520	-288
	2.5 to <5	21 176	55 507	0.34	39 972	3.53%	4	36.75%	3	48 138	1.20	516	-288
	5 to <10	0	787	0.20	157	5.17%	1	45.00%	0	231	1.47	4	0
	10.00 to <100.00	5 000	70 667	0.45	36 732	10.43%	5	36.89%	4	63 032	1.72	1 413	-379
	10 to <20	5 000	70 665	0.45	36 732	10.43%	4	36.89%	4	63 032	1.72	1 413	-379
	20 to <30	0	2	0.20	0	27.34%	1	0.00%	3	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	3 994	0.20	799	100.00%	1	0.00%	5	0	0.00	320	-3 994
	Subtotal (exposure class)	925 644	732 872	0.00	917 454	116.77%	52	264.07%	23	530 522	0.58	4 006	-5 235
	Total (all exposures classes)	1 633 335	1 706 160	1.85	1 810 427		121.00		20.79	666 018.00	0.37	4 269.00	-5 472.00



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
Exposure class institutions													
	0.00 to <0.15	687 384	960 001	0.19	866 574	0.06%	53	28.82%	1.54	115 024	0.13	146	-214
	0.00 to <0.10	686 263	949 144	0.19	862 415	0.06%	43	28.74%	1.54	113 697	0.13	144	-211
	0.10 to <0.15	1 121	10 857	0.28	4 159	0.12%	10	45.00%	1.99	1 327	0.32	2	-3
	0.15 to <0.25	0	0	0.00	0	0.00%	0	0.00%	0.00	0	0.00	0	0
	0.25 to <0.50	9 709	3 393	0.37	10 963	0.26%	8	45.00%	1.33	5 504	0.50	13	-2
	0.50 to <0.75	2 445	9 526	0.50	7 208	0.74%	2	45.00%	2.25	5 701	0.79	24	-12
	0.75 to <2.50	5 207	147	0.20	5 236	1.95%	4	45.00%	1.00	6 164	1.18	46	-6
	0.75 to <1.75	0	39	0.20	8	1.13%	1	45.00%	2.70	10	1.25	0	0
	1.75 to <2.5	5 207	107	0.20	5 229	1.95%	3	45.00%	1.00	6 154	1.18	46	-6
	2.50 to <10.00	2 947	120	0.20	2 971	2.59%	1	45.00%	0.99	3 105	1.05	35	-3
	2.5 to <5	2 947	120	0.20	2 971	2.59%	1	45.00%	0.99	3 105	1.05	35	-3
	5 to <10	0	0	0.00	0	0.00%	0	0.00%	0.00	0	0.00	0	0
	10.00 to <100.00	0	102	0.20	20	10.45%	1	0.00%	5.00	0	0.00	0	-1
	10 to <20	0	102	0.20	20	10.45%	1	0.00%	5.00	0	0.00	0	-1
	20 to <30	0	0	0.00	0	0.00%	0	0.00%	0.00	0	0.00	0	0
	30.00 to <100.00	0	0	0.00	0	0.00%	0	0.00%	0.00	0	0.00	0	0
	100.00 (Default)	0	0	0.00	0	0.00%	0	0.00%	0.00	0	0.00	0	0
Subtotal (exposure class)		707 692	973 289	2	892 972	16.05%	69	208.82%	12	135 498	0.15	264	-238
Total (all exposures classes)		1 633 335	1 706 160	1.85	1 810 427		121.00		20.79	666 018.00	0.37	4 269.00	-5 472.00



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

In thousands of BGN

		Total 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	9 781 334	100.00%	0.00%	0.00%
2	Regional governments and local authorities	0	101 543	100.00%	0.00%	0.00%
3	Public sector entities	0	10 949	100.00%	0.00%	0.00%
4	Institutions		920 731	0.00%	98.90%	1.10%
5	Corporates	1 049 472	9 059 906	4.35%	11.98%	83.67%
5.1	<i>Of which Corporates - General</i>	583	6 148 031	0.00%	11.98%	0.00%
5.2	<i>Of which Corporates - Specialised lending</i>		2 699 328	0.00%	0.00%	100.00%
5.2.1	<i>Of which Corporates - Specialised lending, excluding slotting approach</i>		67 344	0.21%	0.00%	99.79%
5.2.2	<i>Of which Corporates - Specialised lending under slotting approach</i>		2 631 984	-0.21%	0.00%	0.21%
5.3	<i>Of which Corporates - Purchased Receivables</i>	0	212 547	100.00%	0.00%	0.00%
6	Retail	0	8 260 217	0.18%	0.00%	99.82%
6.1	<i>of which Retail – Qualifying revolving</i>		133 088	0.00%	0.00%	100.00%
6.2	<i>of which Retail – Secured by residential immovable property</i>		6 872 478	0.00%	0.00%	200.00%
6.3	<i>Of which Retail - Purchased Receivables</i>		2 454	100.00%	0.00%	0.00%
6.4	<i>of which Retail - Other retail exposures</i>		1 252 197	1.08%	0.00%	198.92%
7	Equity	0	26 921	0.00%	0.00%	100.00%
EU 7a	Collective investment undertakings (CIU)	0	0	0.00%	0.00%	0.00%
8	Other non-credit obligation assets	1 185 411	1 297 903	8.67%	91.33%	0.00%
9	Total	3 127 856	29 347 013	35.11%	10.84%	54.05%

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

In thousands of BGN

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	0											0	0	
2	Regional governments and local authorities	0											0	0	
3	Public sector entities	0											0	0	
4	Institutions	892 973	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%				0.00%	0.00%	0	135 497
5	Corporates	917 454	0.12%	28.37%	28.37%	0.00%	0.00%	0.00%				14.39%	0.00%	0	530 521
5.1	Corporates – General	917 454	0.12%	28.37%	28.37%	0.00%	0.00%	0.00%				14.39%	0.00%	0	530 521
5.2	Corporates – Specialised lending	0												0	0
5.3	Corporates - Purchased Receivables	0												0	0
6	Total	1 810 427	0.07%	14.38%	14.38%	0.00%	0.00%	0.00%				7.29%	0.00%	0	666 018



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

In thousands of BGN

		Risk weighted exposure amount 31.12.2025
		a
1	Risk weighted exposure amount as at the end of the previous reporting period	10 153 796
2	Asset size (+/-)	-11 135
3	Asset quality (+/-)	53 711
4	Model updates (+/-)	45 838
5	Methodology and policy (+/-)	-9 029 642
6	Acquisitions and disposals (+/-)	0
7	Foreign exchange movements (+/-)	0
8	Other (+/-)	0
9	Risk weighted exposure amount as at the end of the reporting period	1 212 568



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

In thousands of BGN

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	55	0	0.00%	0.06%	0.00%	0.00%
	0.00 to <0.10	50	0	0.00%	0.06%	0.00%	0.00%
	0.10 to <0.15	5	0	0.00%	0.12%	0.00%	0.00%
	0.15 to <0.25	0	0	0.00%	0.00%	0.00%	0.00%
	0.25 to <0.50	4	0	0.00%	0.26%	0.00%	0.00%
	0.50 to <0.75	0	0	0.00%	0.74%	0.00%	0.00%
	0.75 to <2.50	2	0	0.00%	1.95%	2.00%	0.00%
	0.75 to <1.75	0	0	0.00%	1.13%	0.00%	0.00%
	1.75 to <2.5	2	0	0.00%	1.95%	2.00%	0.00%
	2.50 to <10.00	6	0	0.00%	2.59%	4.00%	0.00%
	2.5 to <5	6	0	0.00%	2.59%	4.00%	0.00%
	5 to <10	0	0	0.00%	0.00%	0.00%	0.00%
	10.00 to <100.00	2	0	0.00%	10.45%	14.00%	0.00%
	10 to <20	2	0	0.00%	10.45%	14.00%	0.00%
	20 to <30	0	0	0.00%	0.00%	0.00%	0.00%
	30.00 to <100.00	0	0	0.00%	0.00%	0.00%	0.00%
	100.00 (Default)	0	0	0.00%	0.00%	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	16	0	0.00%	31.32%	0.00%	0.00%
	0.00 to <0.10	14	0	0.00%	40.24%	0.00%	0.00%
	0.10 to <0.15	2	0	0.00%	30.24%	0.00%	0.00%
	0.15 to <0.25	3	0	0.00%	40.00%	0.00%	0.00%
	0.25 to <0.50	6	0	0.00%	39.20%	0.00%	0.00%
	0.50 to <0.75	1	0	0.00%	40.00%	1.00%	0.00%
	0.75 to <2.50	2	0	0.00%	39.89%	2.00%	0.00%
	0.75 to <1.75	0	0	0.00%	39.81%	0.00%	0.00%
	1.75 to <2.5	2	0	0.00%	41.60%	2.00%	0.00%
	2.50 to <10.00	5	0	0.00%	36.78%	6.00%	0.00%
	2.5 to <5	3	0	0.00%	36.75%	4.00%	0.00%
	5 to <10	2	0	0.00%	45.00%	8.00%	0.00%
	10.00 to <100.00	2	0	0.00%	36.89%	22.00%	0.00%
	10 to <20	1	0	0.00%	36.89%	14.00%	0.00%
	20 to <30	0	0	0.00%	0.00%	0.00%	0.00%
	30.00 to <100.00	1	0	0.00%	0.00%	30.00%	0.00%
	100.00 (Default)	1	0	0.00%	0.00%	100.00%	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		
				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	7 939 249	24 562 891	23 858 256	704 635	
2	Debt securities	7 054 340	0	0	0	
3	Total	14 993 589	24 562 891	23 858 256	704 635	
4	<i>Of which non-performing exposures</i>	53 122	229 595	213 473	16 122	
EU-5	<i>Of which defaulted</i>	0	0			



Template EU MR1 - Market risk under the standardised approach

In thousands of BGN

		a
		RWEAs
	Outright products	
1	Interest rate risk (general and specific)	85 113
2	Equity risk (general and specific)	0
3	Foreign exchange risk	0
4	Commodity risk	0
	Options	
5	Simplified approach	0
6	Delta-plus approach	0
7	Scenario approach	0
8	Securitisation (specific risk)	0
9	Total	85 113

Template EU CVA 2 – Credit valuation adjustment risk under the Full Basic Approach (F-BA)

In thousands of BGN

		a	EU b
		Own funds requirements	Notional of CVA hedges
1	BACVA ^(sr-unhedged)	162	
2	BACVA ^(sr-hedged)	162	
3	Total	105	
EU 4	Single-name CDS		0
EU 5	Index CDS		0
EU 6	Total		0



Template EU OR2 - Business Indicator, components and subcomponents

In thousands of BGN

		a	b	c	d
	BI and its subcomponents	31.12.2025	31.12.2024	31.12.2023	Average value
1	Interest, lease and dividend component (ILDC)				801 414
EU 1	ILDC related to the individual institution/consolidated Group (excluding entities considered by Article 314(3))				801 414
1a	Interest and lease income	1 186 858	1 179 533	1 011 211	1 125 867
1b	Interest and lease expense	220 035	202 278	136 503	186 272
1c	Total assets/Asset component	39 013 540	35 171 270	32 490 562	35 558 457
1d	Dividend income/ dividend component	14 038	9 554	8 068	10 553
2	Services component (SC)				433 495
2a	Fee and commission income	466 149	415 287	364 290	415 242
2b	Fee and commission expense	135 430	106 442	89 751	110 541
2c	Other operating income	13 710	20 702	20 346	18 253
2d	Other operating expense	6 683	-3 409	21 878	8 384
3	Financial component (FC)				150 773
3a	Net profit or loss applicable to trading book (TB)	129 329	150 520	138 605	139 485
3b	Net profit or loss applicable to banking book (BB)	2 088	-19 764	12 011	-1 888
EU 3c	Approach followed to determine the TB/BB boundary (PBA or accounting approach)				0
4	Business Indicator (BI)				1 385 682
5	Business indicator component (BIC)				166 282

Disclosure on the BI:

		a
6a	BI gross of excluded divested activities	1 385 682
6b	Reduction in BI due to excluded divested activities	0
EU 6c	Impact in BI of mergers/acquisitions	0



Template EU OR3 - Operational risk own funds requirements and risk exposure amounts

In thousands of BGN

		a
1	Business Indicator Component (BIC)	166 282
EU 1	Alternative Standardised Approach (ASA) Own Funds Requirements (OROF) under Article 314(4)	0
2	<i>Not applicable</i>	-
3	Minimum Required Operational Risk Own Funds Requirements (OROF)	166 282
4	Operational Risk Exposure Amounts (REA)	2 078 525

Template EU IRRBB1 - Interest rate risks of non-trading book activities

In thousands of BGN

Supervisory shock scenarios		a	b	c	d
		Changes of the economic value of equity		Changes of the net interest income	
		Current period	Last period	Current period	Last period
1	Parallel up	-0.0399	-0.0047	0.0123	0.0058
2	Parallel down	0.0001	-0.0298	-0.0331	-0.0214
3	Steepener	0.0194	0.0123		
4	Flattener	-0.0404	-0.0226		
5	Short rates up	-0.0450	-0.0217		
6	Short rates down	0.0129	0.0071		

Behavioral model implemented for Non-maturity deposits.
Average duration of 2.08Y and longest duration of 36Y.



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	3 611 141	3 611 141	3 611 141	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	3 611 141	3 611 141	3 611 141	0	0	0	0	0	0	0
8	loans to corporates	0	0	0	0	3 611 141	3 611 141	3 611 141	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	3 609 005	0	0	0	2 136	0	0	3 609 005	2 136	0	0	360 901	0	0	0	28 872	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	3 609 005	0	0	0	2 136	0	0	3 609 005	2 136	0	0	360 901	0	0	0	28 872	0
10	Securitisation	3 609 005	0	0	0	2 136	0	0	3 609 005	2 136	0	0	360 901	0	0	0	28 872	0
11	Retail underlying	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12	Wholesale	3 609 005	0	0	0	2 136	0	0	3 609 005	2 136	0	0	360 901	0	0	0	28 872	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	3 923 870	0	18 516
2	Retail (total)	0	0	0
3	residential mortgage	0	0	0
4	credit card	0	0	0
5	other retail exposures	0	0	0
6	re-securitisation	0	0	0
7	Wholesale (total)	3 923 870	0	18 516
8	loans to corporates	3 923 870	0	18 516
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	41 227 338
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation	-2 549
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	614 707
9	Adjustment for securities financing transactions (SFTs)	4 844 615
10	Adjustment for off-balance sheet items (i.e. conversion to credit equivalent amounts of off-balance sheet exposures)	2 033 898
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) and point (ca) 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	-4 863 113
13	Total exposure measure	43 854 896



Template EU LR2 - LRCom: Leverage ratio common disclosure

In thousands of BGN

		CRR leverage ratio exposures	
		a	b
		31.12.2025	31.12.2024
On-balance sheet exposures (excluding derivatives and SFTs)			
1	On-balance sheet items (excluding derivatives, SFTs, but including collateral)	36 093 268	33 128 217
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)	-4 721	-1 978
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)	-57 445	-53 136
7	Total on-balance sheet exposures (excluding derivatives and SFTs)	36 031 102	33 073 103
Derivative exposures			
8	Replacement cost associated with SA-CCR derivatives transactions (i.e. net of eligible cash variation margin)	240 711	174 315
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	539 283	315 991
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	779 994	490 306
Securities financing transaction (SFT) exposures			



14	Gross SFT assets (with no recognition of netting), after adjustment for sales accounting transactions	4 999 716	1 869 851
15	(Netted amounts of cash payables and cash receivables of gross SFT assets)	0	0
16	Counterparty credit risk exposure for SFT assets	10 186	406 770
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	5 009 902	2 276 621
Other off-balance sheet exposures			
19	Off-balance sheet exposures at gross notional amount	10 494 041	9 516 454
20	(Adjustments for conversion to credit equivalent amounts)	-8 460 143	-6 680 102
21	(General provisions deducted in determining Tier 1 capital and specific provisions associated with off-balance sheet exposures)		
22	Off-balance sheet exposures	2 033 898	2 836 352
Excluded exposures			
EU-22a	(Exposures excluded from the total exposure measure in accordance with point (c) and point (ca) 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	(Excluded exposures to shareholders according to Article 429a (1), point (da) CRR)	0	0
EU-22l	(Exposures deducted in accordance with point (q) of Article 429a(1) CRR)	0	0
EU-22m	(Total exempted exposures)	0	0
Capital and total exposure measure			
23	Tier 1 capital	4 004 190	3 481 118



24	Total exposure measure	43 854 896	38 676 382
Leverage ratio			
25	Leverage ratio (%)	9.13%	9.00%
EU-25	Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%)	9.13%	9.00%
25a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) (%)	9.13%	9.00%
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	2 533 097	1 155 970
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	4 999 716	1 869 851
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)	41 388 277	37 962 501
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)	41 388 277	37 962 501
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)	9.67%	9.17%
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)	9.67%	9.17%



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:	36 093 268
EU-2	Trading book exposures	200
EU-3	Banking book exposures, of which:	36 093 068
EU-4	Covered bonds	415 299
EU-5	Exposures treated as sovereigns	9 786 349
EU-6	Exposures to regional governments, MDB, international organisations and PSE, not treated as sovereigns	95 597
EU-7	Institutions	292 308
EU-8	Secured by mortgages of immovable properties	12 885 092
EU-9	Retail exposures	5 326 287
EU-10	Corporates	5 527 626
EU-11	Exposures in default	283 981
EU-12	Other exposures (e.g. equity, securitisations, and other non-credit obligation assets)	1 480 529



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 YYY)	31.12.2025	30.09.2025	30.06.2025	31.03.2025	31.12.2025	30.09.2025	30.06.2025	31.03.2025
EU 1b	Number of data points used in the calculation of averages								
HIGH-QUALITY LIQUID ASSETS									
1	Total high-quality liquid assets (HQLA)	X				12 051 661	12 039 026	11 870 050	11 381 356
CASH - OUTFLOWS									
2	Retail deposits and deposits from small business customers, of which:	20 216 735	18 980 203	18 175 692	17 944 689	1 533 230	1 437 884	1 374 453	1 368 238
3	<i>Stable deposits</i>	12 037 381	11 266 065	10 767 174	10 490 377	601 869	563 303	538 359	524 519
4	<i>Less stable deposits</i>	8 179 354	7 714 137	7 408 518	7 454 312	931 361	874 580	836 095	843 719
5	Unsecured wholesale funding	9 983 397	10 098 776	9 546 799	9 145 381	4 786 571	4 737 572	4 582 031	4 392 113
6	<i>Operational deposits (all counterparties) and deposits in networks of cooperative banks</i>	736 953	769 905	753 476	741 159	159 671	168 437	164 962	162 457
7	<i>Non-operational deposits (all counterparties)</i>	9 242 062	9 324 400	8 788 356	8 396 602	4 622 518	4 564 664	4 412 103	4 226 703
8	<i>Unsecured debt</i>	8 606	8 578	9 237	7 620	8 606	8 578	9 237	7 620
9	<i>Secured wholesale funding</i>	X				0	0	0	0
10	Additional requirements	13 242 083	14 805 567	15 291 309	14 025 126	7 509 348	9 205 708	9 948 115	9 026 500
11	<i>Outflows related to derivative exposures and other collateral requirements</i>	6 830 469	8 507 372	9 261 525	8 309 876	6 830 469	8 507 372	9 261 525	8 309 876
12	<i>Outflows related to loss of funding on debt products</i>	0	0	0	0	0	0	0	0
13	<i>Credit and liquidity facilities</i>	6 411 614	6 298 195	6 029 784	5 715 250	678 879	698 336	686 590	716 625



14	Other contractual funding obligations	59 684	11 347	154 537	52 842	59 684	11 347	151 478	52 842
15	Other contingent funding obligations	3 135 823	3 628 654	4 021 703	2 458 198	173 887	222 505	270 699	125 860
16	TOTAL CASH OUTFLOWS					14 066 945	15 619 122	16 334 105	14 970 220
CASH - INFLOWS									
17	Secured lending (e.g. reverse repos)	2 212 643	1 298 766	1 311 166	1 712 014	4 680	0	0	4 740
18	Inflows from fully performing exposures	574 084	575 361	612 375	395 508	494 650	503 046	544 729	333 492
19	Other cash inflows	6 835 837	8 506 553	9 269 180	8 310 911	6 835 837	8 506 553	9 269 180	8 310 174
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)					0	0	0	0
EU-19b	(Excess inflows from a related specialised credit institution)					0	0	0	0
20	TOTAL CASH INFLOWS	9 622 564	10 380 680	11 192 721	10 418 433	7 335 168	9 009 600	9 813 909	8 648 406
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>	9 622 564	10 380 680	11 192 721	10 418 433	7 335 168	9 009 600	9 813 909	8 648 406
TOTAL ADJUSTED VALUE									
EU-21	LIQUIDITY BUFFER					12 051 661	12 039 026	11 870 050	11 381 356
22	TOTAL NET CASH OUTFLOWS					6 731 777	6 609 522	6 520 196	6 321 814
23	LIQUIDITY COVERAGE RATIO					179.03%	182.15%	182.05%	180.03%



Template EU LIQ2: Net Stable Funding Ratio

31.12.2025

(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	3 859 205	0	0	1 452 184	5 311 389
2	Own funds	3 859 205	0	0	544 655	4 403 860
3	Other capital instruments		0	0	907 529	907 529
4	Retail deposits		21 427 089	0	0	19 919 917
5	Stable deposits		12 710 753	0	0	12 075 215
6	Less stable deposits		8 716 336	0	0	7 844 702
7	Wholesale funding:		11 929 746	313 688	1 609 822	6 262 492
8	Operational deposits		797 472	0	0	398 736
9	Other wholesale funding		11 132 274	313 688	1 609 822	5 863 756
10	Interdependent liabilities		0	0	0	0
11	Other liabilities:	173 349	68 291	0	243 060	243 060
12	NSFR derivative liabilities	173 349				
13	All other liabilities and capital instruments not included in the above categories		68 291	0	243 060	243 060
14	Total available stable funding (ASF)					31 736 858
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					487 128
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:		11 456 039	1 682 371	16 535 012	17 109 510
18	Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		4 237 380	0	0	0

In thousands of BGN

30.09.2025

(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	4 188 616	0	0	1 327 125	5 515 741
2	Own funds	4 188 616	0	0	544 516	4 733 132
3	Other capital instruments		0	0	782 609	782 609
4	Retail deposits		19 250 931	0	0	17 898 983
5	Stable deposits		11 462 913	0	0	10 889 767
6	Less stable deposits		7 788 018	0	0	7 009 216
7	Wholesale funding:		11 634 939	0	1 925 477	6 345 279
8	Operational deposits		772 365	0	0	386 183
9	Other wholesale funding		10 862 574	0	1 925 477	5 959 096
10	Interdependent liabilities		0	0	0	0
11	Other liabilities:	122 139	68 394	0	232 853	232 853
12	NSFR derivative liabilities	122 139				
13	All other liabilities and capital instruments not included in the above categories		68 394	0	232 853	232 853
14	Total available stable funding (ASF)					29 992 856
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					252 648
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:		8 644 703	1 878 819	15 239 074	16 058 014
18	Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		1 375 914	0	0	0



19	Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		1 363 480	729 926	4 467 328	4 944 511
20	Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		5 253 070	762 355	5 054 155	11 750 308
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		2 569 578	215 788	1 333 709	6 730 144
22	Performing residential mortgages, of which:		561 749	148 837	6 571 289	0
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		529 712	140 487	6 309 451	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		40 360	41 253	442 240	414 691
25	Interdependent assets		0	0	0	0
26	Other assets:		593 038	69 888	591 336	721 870
27	Physical traded commodities				0	0
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		0	0	0	0
29	NSFR derivative assets		0	0	0	0
30	NSFR derivative liabilities before deduction of variation margin posted		173 349	0	0	8 667
31	All other assets not included in the above categories		419 689	69 888	591 336	713 203
32	Off-balance sheet items		3 462 952	909 877	5 116 532	605 676
33	Total RSF					18 924 184
34	Net Stable Funding Ratio (%)					167.71%

19	Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		1 614 599	1 103 769	3 948 760	4 652 110
20	Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		5 211 389	639 980	4 764 629	11 010 285
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		2 287 560	191 968	1 310 575	6 221 134
22	Performing residential mortgages, of which:		407 842	133 942	6 081 417	0
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		395 394	130 392	5 894 022	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		34 959	1 128	444 268	395 619
25	Interdependent assets		0	0	0	0
26	Other assets:		3 608 904	83 193	702 430	843 884
27	Physical traded commodities				0	0
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		0	0	0	0
29	NSFR derivative assets		0	0	0	0
30	NSFR derivative liabilities before deduction of variation margin posted		122 139	0	0	6 107
31	All other assets not included in the above categories		3 486 765	83 193	702 430	837 777
32	Off-balance sheet items		3 296 809	1 119 951	5 506 925	653 173
33	Total RSF					17 807 719
34	Net Stable Funding Ratio (%)					168.43%

30.06.2025

		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	4 183 688	0	0	1 132 880	5 316 568
2	<i>Own funds</i>	4 183 688	0	0	544 718	4 728 406
3	<i>Other capital instruments</i>		0	0	588 162	588 162
4	Retail deposits		18 518 980	0	0	17 212 968
5	<i>Stable deposits</i>		10 917 706	0	0	10 371 821
6	<i>Less stable deposits</i>		7 601 274	0	0	6 841 147
7	Wholesale funding:		10 949 567	0	1 923 504	6 110 599
8	<i>Operational deposits</i>		764 136	0	0	37 178
9	<i>Other wholesale funding</i>		10 185 431	0	1 923 504	6 073 421
10	Interdependent liabilities		0	0	0	0
11	Other liabilities:	166 852	71 754	0	222 444	222 444
12	<i>NSFR derivative liabilities</i>	166 852				
13	<i>All other liabilities and capital instruments not included in the above categories</i>		71 754	0	222 444	222 444
14	Total available stable funding (ASF)					28 862 579
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					236 885
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:		8 550 422	1 827 131	14 528 135	15 650 509
18	<i>Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut</i>		1 176 047	0	0	0
19	<i>Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions</i>		1 858 759	1 099 501	3 819 856	4 545 540

31.03.2025

		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	4 163 576	0	0	730 290	4 893 866
2	<i>Own funds</i>	0	0	0	545 170	4 708 746
3	<i>Other capital instruments</i>		0	0	185 120	185 120
4	Retail deposits		18 126 481	0	0	16 843 434
5	<i>Stable deposits</i>		10 592 033	0	0	10 062 431
6	<i>Less stable deposits</i>		7 534 448	0	0	6 781 003
7	Wholesale funding:		10 723 308	0	1 924 443	5 929 383
8	<i>Operational deposits</i>		728 915	0	0	18 143
9	<i>Other wholesale funding</i>		9 994 393	0	1 924 443	5 911 240
10	Interdependent liabilities		0	0	0	0
11	Other liabilities:	165 442	171 267	0	260 945	260 945
12	<i>NSFR derivative liabilities</i>	165 442				
13	<i>All other liabilities and capital instruments not included in the above categories</i>		171 267	0	260 945	260 945
14	Total available stable funding (ASF)					27 927 628
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					216 168
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:		8 507 791	1 622 354	14 162 129	15 244 315
18	<i>Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut</i>		2 113 973	0	0	0
19	<i>Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions</i>		836 556	808 650	4 003 000	4 490 981



20	Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		5 034 995	573 834	4 610 857	10 708 858
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		451 983	48 812	319 742	4 248 663
22	Performing residential mortgages, of which:		459 791	127 048	5 654 197	0
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		333 367	122 088	5 427 093	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		20 830	26 748	443 225	396 111
25	Interdependent assets		0	0	0	0
26	Other assets:		3 619 143	14 066	768 187	877 625
27	Physical traded commodities				0	0
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		0	0	0	0
29	NSFR derivative assets		0	0	0	0
30	NSFR derivative liabilities before deduction of variation margin posted		166 852	0	0	8 343
31	All other assets not included in the above categories		3 452 291	14 066	768 187	869 282
32	Off-balance sheet items		3 251 994	796 942	5 936 610	687 515
33	Total RSF					17 452 534
34	Net Stable Funding Ratio (%)					165.38%

20	Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		4 996 332	670 239	4 528 014	10 335 960
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		607 136	95 336	487 411	4 175 845
22	Performing residential mortgages, of which:		495 755	118 588	5 188 279	0
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		328 013	114 513	5 002 815	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		65 175	24 877	442 836	417 374
25	Interdependent assets		0	0	0	0
26	Other assets:		3 488 608	13 711	638 592	707 364
27	Physical traded commodities				0	0
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		0	0	0	0
29	NSFR derivative assets		0	0	0	0
30	NSFR derivative liabilities before deduction of variation margin posted		165 442	0	0	8 272
31	All other assets not included in the above categories		3 323 166	13 711	638 592	699 092
32	Off-balance sheet items		3 400 680	683 195	4 005 515	503 365
33	Total RSF					16 671 212
34	Net Stable Funding Ratio (%)					167.52%



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	7	5	95
2		Total fixed remuneration	35	1 303	5 862
3		Of which: cash-based	35	1 149	5 599
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		154	263
8	(Not applicable in the EU)				
9	Variable remuneration	Number of identified staff		5	95
10		Total variable remuneration		1 240	1 792
11		Of which: cash-based		523	1 681
12		Of which: deferred		237	29
EU-13a		Of which: shares or equivalent ownership interests		717	111
EU-14a		Of which: deferred		476	51
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)	35	2 543	0	7 654

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								
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	7 842	2 007	5 835			3 738	1 749	1 742
8	Cash-based	931	265	666			0	265	0
9	Shares or equivalent ownership interests	6 772	1 643	5 129			3 706	1 367	1 643
10	Share-linked instruments or equivalent non-cash instruments	138	99	40			31	117	99
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	1 090	442	647			411	506	333
20	Cash-based	209	109	100			0	109	0
21	Shares or equivalent ownership interests	881	333	548			411	397	333
22	Share-linked instruments or equivalent non-cash instruments								
23	Other instruments								
24	Other forms								
25	Total amount	8 931	2 449	6 482	0	0	4 149	2 255	2 075



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									107
2	Of which: members of the MB	7	5	12						
3	Of which: other senior management									
4	Of which: other identified staff			6	42		13	34		
5	Total remuneration of identified staff	35	2 543	2 578	424	3 689	0	1 324	2 217	0
6	Of which: variable remuneration	0	1 240	1 240	128	841		324	499	
7	Of which: fixed remuneration	35	1 303	1 338	296	2 847		1 001	1 718	



Declaration by the Manager charged with preparing the financial reports

The undersigned, Ms. Nevena Nikse – 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 16, 2026

Ms. Nevena Nikse

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