

# Contraction Degroof Detercam

# 2018 Risk Report

**Pillar 3 disclosures** 



Bank Degroof Petercam S.A. Rue de l'Industrie 44 1040 Bruxelles TVA BE 0403 212 172 RPM Bruxelles FSMA 040460 A degroofpetercam.com



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# 1. Introduction

#### PRESENTATION

Degroof Petercam is a leading independent financial institution serving individuals, institutional investors and organizations based on a rich history that dates back to 1871.

The Bank has set out a comprehensive strategy to further build growth and profitability by leveraging our unique integrated model and highly skilled people to bring value to our clients through:

- Re-engineering private banking
- Further growing asset management
- Integrating and boosting investment banking
- Upgrading and developing asset services
- Redesigning our operating model
- Becoming a love brand

Further we wish to strengthen our international network with a focus on the Belgian Luxembourg and France markets, and supported by external acquisitions.

#### PURPOSE OF PILLAR 3 DISCLOSURES – BASEL FRAMEWORK

The implementation of Basel III in Europe applies since the 1st. January 2014. Basel III is a comprehensive set of reform measures in banking prudential regulation to strengthen the regulation, supervision and Risk Management of the banking sector. These measures aim to improve the banking sector's ability to absorb shocks arising from financial and economic stress, whatever the source, to improve Risk Management and governance and to strengthen bank's transparency and disclosures. The general framework defined by Basel III is developed around three pillars.

The purpose of Pillar 3 disclosures is to provide information on banking institutions' Risk Management practices and regulatory capital ratios. This document is designed to satisfy these requirements and should be read in conjunction with our most recent annual report.

The Pillar 3 disclosure requirements from the Basel framework have been implemented in the European Union law via part Eight of Regulation (EU) N° 575/2013 of 26 June 2013 (the CRR), Directive 2013/33/EU of 26 June 2013 (CRD IV) and Circular NBB\_2017-25 based on EBA orientation (EBA/GL2016/11).

#### **OVERVIEW KEY RATIOS 2018**

- Common equity tier-1 ratio (Basel III fully loaded based on Danish compromise) of 16.76% at yearend;
- Fully loaded Basel leverage ratio based on CRR of 6.18% at year-end;
- Strong liquidity position at year-end (NSFR at 178% and LCR at 256%).

All these key ratios are well above the minimum regulatory requirements.

#### **DISCLOSURE POLICY**

The disclosure policy of Degroof Petercam ensures that risk disclosures convey its comprehensive risk profile to market participants.

The Pillar 3 disclosures and the bank's regulatory capital ratio calculations are prepared at the highest consolidation level, i.e. the Degroof Petercam Group, in line with the CRR requirements.

Regulatory ratios with regard to Bank Degroof Petercam Luxembourg, Bank Degroof Petercam France and Bank Degroof Petercam Spain are provided in Appendix 2.

These disclosures documents are not required to be, and have not been, audited by our independent auditors. They are subject to review by Risk Management and Finance representatives of the Bank and to formal approval by the Executive Committee of Bank Degroof Petercam<sup>1</sup> and the Board of Directors.

Disclosure documents are available in English on the Degroof Petercam website and located at http://annualreport.degroofpetercam.com. They complete the annual report chapter dedicated to Risk Management. They are updated every year, subject to Degroof Petercam's assessment of the need for update of any relevant items more frequently than annually.

The Bank Degroof Petercam disclosure policy has been validated by the Board of Directors.

#### **CROSS-REFERENCES**

To avoid unnecessary duplication of certain information and in order to make risk disclosures as clear as possible, we refer to the 2018 annual report of Degroof Petercam, insofar possible.

Key risk-related elements, such as exposure charts, are duplicated between the Annual Report and this Risk report, in order to foster consistency and clarity of disclosures. Information that will not be duplicated include notably:

Topics	Reports
Information regarding governance arrangements	Corporate governance section of the annual report and Management Report Internet site: <u>www.degroofpetercam.be/</u> « About us / Governance section »
Remuneration policies	The full text on www.degroofpetercam.be/ « About us / Governance section »
IFRS9	Annual Report (7.20 and 5.5 used in this document)
Liquidity risk	Annual Report (Chapter 5.3)
Hedge accounting Methodology	Annual Report (Chapter 3.4 and 7.3)

<sup>&</sup>lt;sup>1</sup> Also named in this document Degroof Petercam or the Bank

# 2. Scope of application

Information disclosed in this Risk Report is dated December 31<sup>st</sup>, 2018 and expressed in thousands of euros (unless otherwise specified). The scope of consolidation for the purpose of these disclosures is the same as the consolidation scope of our financial statements as published in our annual report. Some figures in this report may not tally exactly due to rounding.

In-scope entities are listed below and the table provides information on the consolidation method applied for each entity within the accounting and the regulatory scopes of consolidation:

Anthod of constant	Meth	od of regulatory consoli	idation		f Description of the entity Credit institution Other financial institution Credit institution Credit institution Other financial institution
Method of accounting consolidation	Full consolidation	Proportional consolidation	Neither consolidated nor deducted	Deducted	Description of the entity
ull consolidation	Х				Credit institution
ull consolidation	Х				Other financial institution
ull consolidation	Х				Other financial institution
ull consolidation	Х				Credit institution
ull consolidation	Х				Credit institution
ull consolidation	Х				Other financial institution
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quity method			х		Other financial institution
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quity method			X		
quity method			X		
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quity method			X		Other financial institution
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The following table highlights the differences between the scope of accounting consolidation and the scope of regulatory consolidation that applies for the purpose of providing the information required in Part Eight of the CRR.

These scopes are strictly identical.

The table furthermore highlights a breakdown of how the amounts disclosed were allocated to the different risk frameworks laid out in part three of the CRR.

	а	b	с	d	е	f	g
				Car	rying values of ite	ems	
	Carrying values as reported in published financial statements	Carrying values under scope of regulatory consolidation	Subject to the credit risk framework	Subject to the CCR framework	Subject to the securitisation framework	Subject to the market risk framework	No subject to capital requirement or subject to deduction from capital
Assets							
Cash, balances with central banks and other demand deposits	2,792,984	2,792,984	2,792,984				
Financial assets at fair value through profit or							
loss	234,161	234,161	114,378	114,654		5,130	
Financial assets held for trading	119,783	119,783		114,654		5,130	
Others financial assets	114,378	114,378	114,378				
Financial instruments for hedge	1,691	1,691	1,691				
Financial assets at fair value through other							
comprehensive income	891,504	891,504	891,504				
Equity instruments	12,766	12,766	12,766				
Debt instruments	878,738	878,738	878,738				
Financial assets at amortised cost	3,687,615	3,687,615	3,582,082		105,533		
Loans and advances to credit institutions	247,758	247,758	247,758				
Loans and advances to customers	2,067,007	2,067,007	2,067,007				
Debt instruments	1,372,851	1,372,851	1,267,317		105,533		
Property and equipment	83,185	83,185	83,185				
Goodwill and other intangible assets	372,640	372,640					372,640
Investments in entities accounted for using the							
equity method	1,418	1,418	682				737
Current tax assets	4,493	4,493	4,493				
Deferred tax assets	5,944	5,944	4,618				1,326
Other assets	138,866	138,866	138,866				
Total assets	8,214,501	8,214,501	7,614,482	114,654	105,533	5,130	374,703
Liabilities							
Financial liabilities held for trading	136,437	136,437					136,437
Financial instruments for hedge accounting	15,530	15,530					15,530
Deposits from credit institutions	80,058	80,058					80,058
Deposits from customers	6,837,520	6,837,520					6,837,520
Provisions	64,399	64,399					64,399
Current tax liabilities	27,570	27,570					27,570
Deferred tax liabilities	9,072	9,072					9,072
Other liabilities	118,083	118,083					118,083
Capitaux propres							
Issued capital	34,212	34,212					34,212
Share premium	417,369	417,369					417,369
Reserves and retained earnings	478,678	478,678					478,678
Revaluation reserves	-17,216	-17,216					-17,216
Treasury shares (-)	-44,631	-44,631					-44,631
Net profit for the period	56,764	56,764					56,764
Minority interests	659	659					659
Total Liabilities and Equities	8,214,501	8,214,501	0	0	0	0	8,214,501

The following table provides information on the main sources of differences (other than those due to different scopes of consolidation, which are shown in the previous table) between the financial statements' carrying value amounts (subject to capital requirement) and the exposure amounts used for regulatory purposes.



	а	b	С	d	е
			Items subj	ects to	
	Total	Credit Risk Framework	CCR Framework	Securitisation Framework	Market Risk Framework
Assets carrying value amount under the scope of regulatory consolidation	7,839,799	7,614,482	114,654		5,130
Liabilities carrying value amount under the regulatory scope of consolidation	0	0	0	0	0
Total net amount under the regulatory scope of consolidation	7,839,799	7,614,482	114,654	105,533	5,130
Off-balance sheet amounts	398,960	398,960			
Securities financing transactions	146,412	146,412			
Differences in valuations	40,721		40,721		
Others differences	12,890	12,890			
Exposure amounts considered for regulatory purposes	8,438,781	8,172,743	155,375	105,533	5,130

### 3. Risk Management governance

#### **3.1 Governance - General principles**

The Board of Directors of Degroof Petercam includes the members of the Executive Committee and the non-executive directors.

The composition of the Board of Directors is compliant with the following rules:

- The composition of the board as a whole must enable it to function effectively, efficiently and in the best interests of the company;
- It shows a diversity and a complementarity of experience and expertise;
- No individual member nor group of directors are able to control the decision-making of the board;
- The majority of directors are non-executive;
- The board includes three independent directors among its members as of 31 December 2018.

In accordance with Article 17 of its Articles of Association and Article 24 of the Belgian banking law, the Board of Directors has set up an Executive Committee within its ranks.

The Executive Committee is responsible for managing the activities of the Bank within the framework of the general policy defined by the Board of Directors.

Accordingly, the Executive Committee is empowered by the Board of Directors to make decisions and represents the company in its dealings with personnel, clients, other credit institutions, the wider economic and social environment and public authorities. It will also make decisions in respect of the representation of the company within its subsidiaries and within those companies in which it holds equity investments.

The composition of the Executive Committee is determined on the basis of the following principles:

- The complementarity of expertise (in financial matters, Risk Management, operational know-how, etc.) required to ensure the implementation of the strategy as defined by the Board of Directors;
- Changing requirements;
- The consideration of the moral and ethical criteria applicable within the group.

The Board of Directors established **four** specialized committees to assist in its tasks: Audit committee, Risk committee, Nomination Committee and Remuneration committee, composed exclusively of **non-executive** directors. Conform the legal provisions, at least one member of each specialized committee is independent within the meaning of Article 526ter of the Company Code, except for the Audit committee which must be composed of a majority of independent members. Directors must be member of maximum three specialised committees.

The composition of the Board on December 31, 2018 and the actual knowledge, skills and expertise of the members are described below (the collective and individual knowledge of the specialised committees' members are described in the Management Report):

Board of Directors	Non executive directors	Management Committee	Independent directors	Audit Committee	Risk Committee	Remuneration Committee	Nomination Committee	End of mandate	Main Degree	Expertise
Ludwig Criel	x*		х	x		x*	x	2021	Degree in Applied Economics, and Degree in management (Vlerick)	Business Administration, Banking and Finance
Philippe Masset, CEO		x*						2020	Master in Law and Economics	General banking experience (wholesale banking, private banking and other activities) - long general management experience in Belgium and abroad.
Nathalie Basyn, CFO		x						2021	MBA Finance/International Business; Graduate School of Business, Chicago, IL.	Financial Management, Business Planning Capital Management, Banking.
								2024	Commercial engineer Master in Business administration;Master in Tax Science; Doctorate in Applied Economics and Certified tax-accountant (CFA-FRM)	Macro/microeconomics, accounting, tax & finance
Bruno Colmant		х						2021		ALM troosury
Gautier Bataille de Longprey		x						2022	Civil engineer, applied mathematics for the economy ; General Management Program (INSEAD)	ALM, treasury, Asset valuation, Asset management, Private Equity, Financial Products, Credit and Derivatives.
									Economics ; G.A.S. Europees	Risk control,
Gilles Firmin, CRO Pascal Nyckees, COO		x						2019** 2021	en international recht Master in Business Administration (Solvay); International executive program (INSEAD)	compliance, regulatory Operational and technology strategy, Digital Transformation, Project and Change Management, Business Development.
Benoit Daenen		x						2023	Commercial engineer	UCIT manager, internal risk manager advisor and investment banker advising the Belgian Public sector, Private banking, portfolio management.
François Wohrer								2024	Politic Sciences DEA in International economics; Msc. In Economics	Banking, M&A, Strategy, Monetary economics.
Véronique	x	x					x	2024	Candidate in economics	Associative and social
veronique	٨						~	2021		

Board of Directors	Non executive directors	Management Committee	Independent directors	Audit Committee	Risk Committee	Remuneration Committee	Nomination Committee	End of mandate	Main Degree	Expertise
Peterbroeck									State-certified stockbroker	sector, development cooperation and management of private foundation.
Alain Schockert	x					x		2022	Degree in applied economics.; Master in Business Administration	Investment banking.
Alain Philippson	х						x*	2019**	Commercial engineer	Financial and Banking, Audit, governance.
Jean-Baptiste									Graduate from ESC Group Business School (Rheims); European Business Administration (University of Middlesex); Post graduate	Asset Management, Financial Expertise, business administration , and risk-Audit management.
Douville de Franssu Miguel del Marmol	x			x	x			2021 2021	degree in actuarial science Degree in business engineering	Experience in international general management.
Jean-Marie Laurent									MBA from Solvay Business	Corporate strategy; Financial analyses (accounts, P&L, cash flow statement); Risk / return analyses of
Josi	x			х			x	2022	Degree in Economics	financial instruments Banking and Finance,
Christian Jacobs	x		x	x*	x	x		28.05.2019		Audit and Risk Management , Business administration
Frank van Bellingen	x			x	x*			2019**	Master's degree in economics; Master's degree in international relations; Certified accountant and tax expert until 2006	Business administration, Banking/Finance, Shipping, Real estate, accounting and Energy
	~			~	A				Admission examination for agricultural engineer	Private Equity, Finance Management & Marketing, Governance
Jacques-Martin Philippson	x				x		x	2022		& Management of family business
									Degree in applied economics Antwerp (Belgium); DESS in applied marketing Aix- Marseille (France); Master in Business Administration:majorFinance (USA)	Strategic & operational Business management expertise in international context Corporate finance, Governance structures for growing family businesses.
Guido Vanherpe	х		х	х	х		х	2024		

\* Président

\*\* Renewal of the mandate for 3 years by the General Shareholder's meeting held on 28.05.2019

#### RECRUITMENT POLICY & DIVERSITY POLICY WITHIN THE BOARD OF DIRECTORS

The Nomination Committee makes proposals for the composition of the Board of Directors and the Executive Committee, defines the profile of their members and takes part in the processes of selection of them. The Nomination Committee makes recommendations for the appointment and renewal of the directors and the members of the Executive Committee taking into account proposals done by the shareholders and by the Executive Committee. The Nomination Committee makes regularly, in particular for the renewals of mandates, recommendations to the Board of Directors related to the size, the structure and the composition of the Board of Directors.

The Board of Directors has drawn up, on the basis of a recommendation of the Nomination Committee, a diversity policy aiming to ensure diversity in terms of know-how, experience, language, nationality, age, geographical background, and in terms of gender. This diversity policy complements the recruitment policy.

The diversity policy must ensure to maintain an appropriate balance of competencies, experiences, and carrier path in order to formulate a constructive criticism of the propositions/decisions submitted to the Board and to be open to innovating and creative ideas.

Beside the necessary financial knowledge and competencies to understand the group's activities, the Nomination Committee, in charge of the recruitment of candidates, ensures to have a suitable diverse composition in the Board in order to have different points of view and to facilitate the expression of independent opinions, taking into account the group's dynamic and the shareholders' structure.

The objective established by the Board of Directors in terms of gender is to have at least 15% of women within the Board in 5 years (i.e. after the General Shareholder's meeting which will approve the 2023 annual accounts).

In the framework of the selection of a candidate, the Nomination Committee analyses the files in function of the experience, expertise, carrier path, and taking into account the diversity criteria supra. The Nomination Committee ensures, as far as possible, to identify potential candidates of both genders. If the quantitative objective is not yet reached, the Nomination Committee advises by preference female candidates. However, the Nomination Committee ensures to always recommend the best candidate for the mandate to the Board.

The Nomination Committee takes also into account the conclusions of the periodical assessment of the Board regarding its size, composition, individual and collective knowledge of its members when a vacancy arises or when a renewal must be decided.

The diversity policy and its results are reviewed regularly by the Nomination Appointments Committee following the annual assessment of collective knowledge and the update of succession plan, in order to be updated if needed.

As from December 31, 2018, the Board of Directors is composed by:

Board of Directors	Number of members	19			
	Number of Women	2			
	Number of Independent Directors	3			
Non-executive Directors	Number of members	11			
	Number of Women	1			
	Main degree qualifications	Business administration			
		Business international			
		Economics/Public Finance			
		Tax/Accounting			
		Law			
		Commercial engineer			
		Actuariat			
		Marketing			
	Ages	40-49:1			
		50-59 : 4			
		60-69 : 4			
		70+:2			
	Nationalities	Belgium (10) - French (1)			
Executive Directors	Number of members	8			
	Number of Women	1			
	Main degree qualifications	Economics			
		Business Administration/Business			
		international			
		Civil & Commercial engineer			
		Tax/Accounting			
		Law			
		Risk management in banking			
	Ages	40-50 : 1 50-60 : 7			

Following the appointment of Ms Kathleen Ramsey as new independent director by the General Shareholders meeting held on May 28, 2019, the Board of Directors is composed, as from May 29, 2019 by 15% of women.

#### 3.2 Risk Management - General principles

The Bank's Executive Committee has defined the group's Risk Management governance policy in accordance with the risk appetite statements defined in the Bank's Risk Appetite Framework, which both have been validated by the Risk Committee and the Board of Directors. The adequacy of the risk profile of the bank with the risk appetite defined by the board is validated at least annually.

Formal risk documentation ensures that appropriate and proportionate measures are taken to mitigate risks, so that it can be demonstrated to all stakeholders, including supervisors, that the Board is effectively managing its risks, in particular by demonstrating that a strong and proactive Risk Management culture is implemented and integrated throughout the Bank.

It allows risks to be identified, measured and evaluated in a consistent manner and allows the Board of Directors to take ownership of the risks and mitigation measures.

The risk universe lists the different categories, sub-categories and types of risks. It also provides a definition for each of them. Risks policies document how the Banks deals with each significant risk.

The detection of new risks or risks whose magnitude and impact are changing (i.e. emerging risks) is regularly monitored by the various risk teams during brainstorming sessions. The results of the analyses (e. g. on the "Brexit") are communicated to the relevant hierarchical levels. They feed into discussions to help define the most appropriate response, such as setting up a working group, creating a new stress-test, etc.

In its Risk Appetite Framework, the Bank defined its risk universe and identified the main risk categories impacting its activities. These categories are discussed further in this document (Chapter 5 and onwards).

#### **RISK APPETITE FRAMEWORK**

With regard to risk appetite, it should be mentioned the Bank Degroof Petercam is a private bank whose shares are not listed on the stock exchange. The Bank does not use the market for its financing and is therefore not subject to an external rating.

The Bank's Board of Directors recognizes that risk is inherent in all products, activities, processes and systems, and therefore considers Risk Management to be a fundamental element in the Bank's management.

The Risk Appetite Framework is the set of tools, policies and rules used to identify, manage, mitigate and monitor all risks, and to communicate risks in an organized manner to the appropriate governance body.

The Bank's strategy is defined by the Board of Directors which determines the service offering and the clientele it serves, balancing expected performance with the risks involved.

Each business segment identifies the inherent risks and designs appropriate responses to them, in proportion to the size and nature of the inherent risks in the various business segments and the Bank's appetite for these risks.

The risk appetite statements are defined in order to ensure the long-term sustainability of shareholders' equity and to avoid excessive volatility in annual results, while allowing the Bank to grow.

These objectives are reflected in the Bank's risk strategy as follows:

- Limitation of market risks;
- Prudent strategic management;
- Long-term asset management;
- Limitation of credit risk.

The Board of Directors sets the limits that govern the Bank's activities and the associated risk-taking.

In order to ensure integration with the Bank's strategy, risk appetite must be integrated into all strategic planning and financial forecasting activities.

The Executive Committee ensures that the strategic objectives assigned to the various business sectors also correspond to the defined risk appetite statements, which are then translated into a selection of relevant key risk indicators. These are then used to monitor the actual exposure of the activity in relation to the appetite for the risk in question, allowing to detect and report any vulnerability, weakness or potential threat that could affect Bank's financial sustainability. Any violation of the thresholds triggers an internal escalation process. All statements and indicators are evaluated at least once a year.

The Bank's risk profile will contain residual risks (i.e. after mitigation of previously identified inherent risks) and will be addressed either through capital or possibly through any other form of loss absorption mechanism, such as an external insurance policy, the acceptance of a specific risk or the cessation of activities. The level of capital and the required liquidity reserves shall be calculated on the basis of an assessment of residual risks using appropriate and proportional techniques, including, when appropriated, stress tests. The bank implements an internal process for assessing the adequacy of capital and liquidity, and monitors it through a set of key risk indicators and ratios (such as CET1, CRR Leverage ratio, NSFR and LCR) whether at consolidated level, at the parent company level or at the level of subsidiaries.

In order to ensure the risk appetite framework is correctly implemented, other key Risk Management processes are in place such as:

- Product approval process: ensures new approved products, services or changes are consistent with the relevant risk strategy, risk appetite and corresponding limits or that necessary revisions are made;
- ICAAP: ensures the adequacy of capital in relation to the identified material risks;
- ILAAP: ensures the adequacy of liquidity in relation to the identified material risks;
- Stress-testing: ensures that the results of stress-testing exercises (internal and external) are used as
  input to better understand Bank's risk profile and its ability to withstand extraordinary effects
  resulting from internal or external difficulties while remaining within the limits of the approved risk
  appetite. They also serve as the basis for an early warning system to detect any deterioration or
  warning signals in commercial and operational activities. They can help to improve capital and
  liquidity management processes and understand the sensitivities surrounding the basic
  assumptions of strategic, capital and liquidity plans;
- Recovery plan: details "near-default" scenarios in order to identify a list of indicators and recovery actions to restore financial strength and viability when the bank comes under such severe stress.

#### 3.3 Risk and Compliance organization

The Risk Management function is an independent control department, reporting directly to the Chief Risk Officer. The separation of tasks and functions is essential to avoid any conflict of interest with commercial and operational activities.

From an organisational point of view, in order to guarantee the independence of the function and conform to the Banking Law, the Chief Risk Officer is a member of the Executive Committee and the Board of Directors and is invited to the Risk Committee.

The main tasks of Group Risk Management are to:

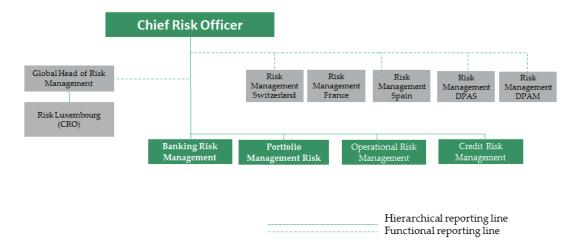
- Provide independent and relevant information, analysis and expertise on risk exposures;
- Provide advice on risk proposals and decisions made by the various business lines;
- Independently value the products held by the Bank or its clients;

- Define and modify control policies and procedures as part of Risk Management and corrective measures to address violations of risk policies, procedures and limits;
- Verify and inform the Board of Directors of the adequacy of the products and positions taken by the Group with the Bank's risk appetite.

Group Risk Management is made up of four teams that cover all Bank's business lines:

- "Banking Risk Management" covers all risks relating to activities carried out on behalf of the Bank (such as IRRBB, liquidity risk, market risk and counterparty risk);
- "Operational Risk Management" is responsible for identifying the various operational risks facing the Bank and ensuring that these risks are properly managed;
- "Portfolio Management Risk" is responsible for monitoring the legal, contractual and internal constraints governing the Bank's operational activities, mainly in Private Banking, Fund Management and Private Equity;
- "Credit Risk Management" is mainly responsible for monitoring the risk profile of credit exposures (e.g. mainly Lombard loans) granted by the Bank to High Net Worth Individuals and professionals.

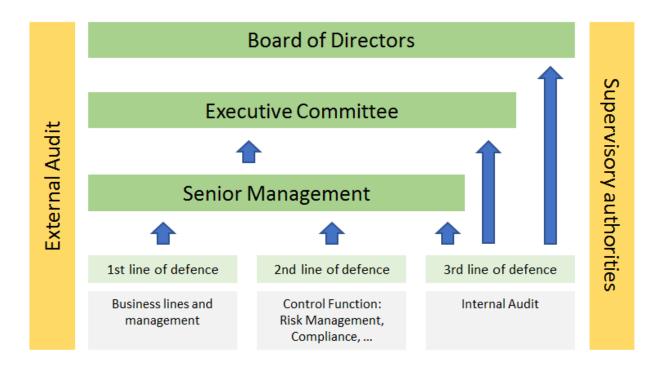
The Chief Risk Officer is responsible for the proper management of the subsidiaries' risks. To this end, it relies on the managers in charge of Risk Management at the subsidiaries.



The Compliance function, also reporting directly to the Chief Risk Officer, identifies the standards applicable to the activities developed by the Bank, whether they are enacted in the form of laws, regulations or circulars. The Compliance function also ensures that, in terms of integrity, the rules, guidelines, procedures and codes of ethics exist and are made known to everyone, are in line with the objectives pursued in terms of the integrity of the Bank's activities, and adequately take into account new laws and regulations. The Compliance function is further developed in chapter 9.

#### **3.4 Three lines of Defense Model**

Bank Degroof Petercam has set-up a risk culture that raises the awareness of its employees in the scope of a responsible execution of their tasks and a continuous awareness of potential risks. Therefore each employee is in charge of understanding their roles and carrying them out correctly. Bank Degroof Petercam applies the three lines of defense approach:



The Bank's business lines (private banking, asset management, financial markets, lending department, etc) act as **the first line of defense**. They are primarily responsible, under the supervision of the management bodies, for identifying and managing their risks. They are responsible for the day-to-day management of risks in accordance with the Bank's policies, procedures and controls and taking into account risk appetite and risk-taking capacity for the business line in question.

**The second line** comprises the Risk and Compliance functions. The Risk Management function ensures compliance with the overall Risk Management policy ("Risk Appetite Framework") and therefore that the risks generated by the Bank's various business lines are adequately identified, measured, mitigated, monitored and reported.

The Compliance function ensures compliance with the laws, regulations, rules of conduct and integrity that apply to institutions.

The internal audit department is **the third line of defense**. The internal audit function independently ensures that the first two lines of defense comply with procedures and provides independent assurance to the management bodies that Risk Management and Control procedures are defined and effective.

#### 3.5 Risk Governance structure

A strong and consistent risk culture is a key element of the Bank's effective Risk Management and should enable it to make sound and informed decisions in its long-term interests.

The Bank develops an integrated and comprehensive risk culture, based on a holistic view of the risks to which it is exposed and how they are managed, taking into account their risk appetite.

This risk culture is developed through policies, communication and staff training on activities, strategy and risk profile. It promotes an environment of open communication and effective challenge in which decision-making processes encourage a broad exchange of views, test current practices, foster a constructive and critical attitude among staff and promote a climate of open and constructive participation throughout the Bank.

The Board of Directors sets the tone at the top on how management, staff and suppliers balance risks, shareholder interests and business objectives. The Board of Directors is responsible for defining and

communicating the Bank's key values and expectations. The behavior of its members reflects its values. It continuously promotes, monitors and evaluates the risk culture.

Hence the Board of Directors shall amongst other:

- Approve the Risk Appetite Framework (RAF), developed in collaboration with the CEO, CRO and CFO, and ensure that it remains consistent with the Bank's short and long-term strategy, capital and liquidity plans, risk capacity and remuneration policies;
- Ensure that the CEO and other senior managers are responsible for the proper implementation of the RAF, including the timely identification, management and escalation of breaches in risk limit and of material risk exposures;
- Ensure that annual budgets are in line with risk appetite and that incentives and/or disincentives are included in compensation policies to facilitate adherence with this appetite;
- Include an assessment of risk appetite in their strategic discussions, including decisions regarding business line or product growth;
- Review and regularly monitor the actual risk profile and risk limits against agreed levels (e. g. by business sector, entity, product, risk category), including qualitative measures of compliance and reputation risk;
- Ensure that appropriate measures are taken with respect to violations of risk limits;
- Question the Executive Committee about activities that go beyond the risk appetite approved by the Board of Directors, if this happens;
- Obtain an independent assessment (through internal and/or external audits) of the design and effectiveness of the RAF and its alignment with the expectations of the supervisory authorities;
- Ensure that mechanisms are in place to ensure that the Executive Committee can act in a timely manner to effectively manage and, if necessary, mitigate material risks, particularly those that are close to or exceed the approved risk statement or limits;
- Discuss with the supervisory authorities' decisions regarding the Bank and the ongoing monitoring
  of risk appetite as well as significant changes in current levels of risk appetite or regulatory
  expectations regarding risk appetite;
- Ensure that adequate resources and expertise are dedicated to Risk Management and internal audit to provide independent assurance to the Board of Directors and the Executive Committee that they are operating within the framework of the RAF, including the use of third parties to support existing resources, where applicable;
- Ensure that Risk Management is supported by adequate and robust information systems and tools to enable the timely and accurate identification, measurement, assessment and communication of risks.

**The Audit Committee** assists the Board of Directors with regard to many different tasks including the monitoring of the effectiveness of the Bank's internal control systems and its internal audit function for all financial reporting, without compromising its independence;

The Audit Committee also receives the minutes of the Audit and Risk Committees of the subsidiaries. It also serves as the main interface between the Board of Directors, the internal auditor and the statutory auditor.

The Risk Committee deals with the Group's main risk strategies. It receives specific outcomes from the relevant managers, and examines control processes on specific risks such as market, credit and liquidity risks.

The Risk Committee assists and reports the Board of Directors mainly with regard to:

- The monitoring of the overall risk strategy and risk appetite, both current and future, taking into account all types of risks, to ensure that they are consistent with the Bank's economic strategy, objectives, culture and values;
- The implementation of the risk strategy and the corresponding limits set by the Executive Committee;

- The implementation of capital and liquidity management strategies and other relevant risks, such as market risk, credit risk, operational risk and reputational risk, to assess their adequacy in relation to the risk appetite and risk strategy that have been approved;
- The necessary adjustments to the risk strategy resulting from, among others, changes in the Bank's model, market developments or recommendations made by the Risk Management function;
- The recruitment of external consultants to whom the Board of Directors may decide to engage for advice or support;
- The review of various possible scenarios, including stress scenarios, to assess how the Bank's risk profile would respond to external and internal events;
- The alignment of all significant financial products and services offered to clients with the Bank's business model and risk strategy;
- The evaluation of the recommendations of internal or external auditors and monitoring the appropriate implementation of the measures adopted;
- The definition of the nature, volume, form and frequency of information concerning the risks to be transmitted to it;
- The review at least once a year of the procedures for monitoring compliance with laws, regulations and compliance principles to ensure that the main risks are properly identified, managed and brought to its attention;
- The review of the comments on internal control and Risk Management included in the annual report;
- The review of ICAAP, ILAAP Compliance Officer and Operational Risk activity reports;
- The assurance of effective follow-up of Risk Management defaults;
- The reception of regular reporting and communication from the CRO and other relevant functions regarding the risk tolerance defined by the Bank, the current state of the Bank's risk culture, limits, exceeding limits, risk mitigation plans;
- The review of risk policies at least annually and monitoring of the implementation of processes by the management to promote the Bank's compliance with approved risk policies.

The Risk Committee cooperates with other committees whose activities may have an impact on risk strategy (e.g. the Audit Committee and the Remuneration Committee) and communicates regularly, in particular with the Risk Management function. To this end, it has direct access to the CRO for instance. The Risk Committee shall, without prejudice to the tasks of the Remuneration Committee, consider

whether the incentives set out in the remuneration policies and practices take into account risk, capital and liquidity as well as the probability and timing of profits.

The Remuneration Committee assists the Board of Directors in order to:

- Define and allocate the overall amount of the group's variable compensation;
- Make proposals to the Board of Directors on the remuneration policy for non-executive directors, identified staff and independent control functions and submit the proposals to the general meeting of shareholders;
- Verify that the remuneration policy does not lead to additional risk taking within the bank and/or conflicts of interest within the group.

The Board of Directors has set up an **Executive Committee** (GEC), which meets weekly. Ad hoc meetings may be convened at the request of a member.

The GEC is vested by the Board of Directors with decision-making powers and powers of representation of the company in its relations with employees, customers, other credit institutions, the economic and social environment and the authorities, as well as with decision-making powers with regard to the representation of the company with its subsidiaries and with the companies in whose capital it has an interest.

More precisely, the Executive Committee is, among other things, in charge of:

- The preparation of proposals to be submitted for approval to the Board of Directors regarding the Group's strategy and the implementation of this strategy; This responsibility covers in particular

strategic planning, the organisation of the Group's activities in line with the strategy adopted by the Board of Directors, the formulation of recommendations including policies related to Risk Management;

- The implementation of a control system relating to the reliability of internal reporting, financial reporting and compliance of annual accounts with accounting regulations;
- The management of the Bank and in particular the preparation of financial statements, the monitoring of the Bank's results in relation to strategic objectives, plans and budgets, the management and organisation of support functions, risk monitoring, financial reporting, internal and external communication;
- Compliance with the legal and regulatory framework governing the Bank's activities;
- Verification of the correct implementation of the remuneration policy;
- The implementation of adequate communication to the Board of Directors in order to enable it to properly exercise its responsibilities and to receive all appropriate information.

In order to implement Risk Management reflecting the Group's appetite, the Executive Committee has delegated some of its responsibilities to the following committees:

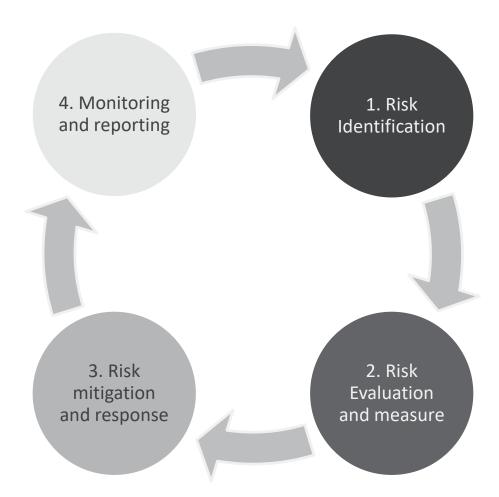
- **ALMAC**: The ALMAC Committee manages the ALM, market and liquidity risks of the various banking entities. It meets on a monthly basis;
- Credit Committee: The Credit Committee grants agreements for new credit lines (or renewals). It meets on a weekly basis;
- **Group Credit Committee**: The Group Credit Committee approves decisions to grant credit lines (or renewals) of more than €10,000,000 to the Group's banking entities. It meets on an ad-hoc basis;
- *Limits Committee*: The Limits Committee manages the Group's counterparty risks, particularly with regard to banking, institutional and custodian counterparties. It meets on a monthly basis;
- **Intake Committee**: The Intake Committee manages the risks associated with private equity structures. It meets on a monthly basis;
- *Impairment Committee*: The Impairment Committee manages decisions relating to individual and collective provisions at Group level. It meets on a quarterly basis;
- **Engagement approval Committee and Underwriting approval committee**: The committees evaluate, approve and monitor commitments in capital market transactions. It meets on an ad-hoc basis;
- **Group Risk Coordination Committee**: It is responsible for coordinating control functions within subsidiaries. It meets on a quarterly basis;
- Litigation Committee: The committee ensures compliance with the application of provisioning procedures related to disputes & complaints on the basis of proposals from the legal department. It meets on a monthly basis;
- **Data Management Committee**: The committee defines and executes the Group's Data strategy, monitors the Roadmap and the related Governance. It meets on a monthly basis;
- **Group Due Diligence Committee**: in line with the new onboarding policy, the committee reviews the anti-money laundering files submitted by the Local Diligence Committee and decides whether to accept the file. It meets on an ad-hoc basis;
- **Operational Risk Committee**: This committee monitors the adequacy of the effective operational risk taken by the organisation and ensures that appropriate measures are undertaken to operate according to the operational risk appetite defined. It meets on quarterly basis;

#### 3.6 Risk Measurement Methodology

The risk assessment process consists of four main steps. Risks must be detected before they can be analyzed, assessed, measured, mitigated and communicated.

This process is reviewed at least annually or on an ad hoc basis (when significant changes are made to the governance, organization or structure of the risk framework). The objective is to assess whether it remains appropriate and sufficient. The results are translated into recommendations, if necessary.

The Bank has a procedure for breaches of limits, including an escalation process. In addition, day-to-day management and monitoring of limits are carried out by Risk Management. This ensures that, among others, market, liquidity, credit/counterparty, wealth management and operational risks are thoroughly followed up.



When a new risk is identified, its relative importance must first be assessed or measured by the teams in charge of the activity in which the risk is identified. It is then assessed or measured by the Risk Management department, using appropriate methodologies, including both prospective and retrospective tools.

Risk assessment methods shall be based on both quantitative models and qualitative expert assessments (critical judgments and analyses) in order to take appropriately into account the relevant trends and data from the macroeconomic context identifying their potential impacts on exposures and portfolios.

Models can be related to estimates of the probability or the severity of events and the combined effect of probability and impact as a function of risk criteria. The objective is to aggregate risk exposures across all

business sectors, help identify risk concentration, assess the actual risk profile in relation to the approved risk appetite and detect and assess of potential risks arising.

When new risks are assessed as material, the Risk Management department must submit its analysis to a relevant committee to ensure that an internal project is put in place to maintain the newly identified risk at the desired appetite level.

Risk Management has a right of initiative in Risk Management, and may bring to the attention of the Executive Committee any element and opinion considered as significant in these matters. This right of initiative applies in particular to new financial products.

All material risks identified in the context of a specific activity require an appropriate response aligned with the Bank's risk appetite. There are 4 different ways to mitigate an inherent risk into a residual risk that remains within the Bank's approved risk appetite statements: transfer risk, avoid risk, mitigate risk or accept risk. Mitigation techniques and limits must be identified and documented in the appropriate Risk Management policy. All material risks are monitored. Appropriate escalation procedures are also put in place when a limit is breached.

Risk Management reports directly to the GEC any serious or persistent breach of the Bank's risk appetite, procedures or policies.

The final step in the Risk Management process is risk monitoring and reporting, both internally (i.e. to management) and externally (i.e. to supervisory authorities).

Monitoring involves communicating the processes and findings throughout the organization. It includes regular and periodic reporting and risk monitoring by the various levels of committees to ensure that all relevant departments receive accurate, concise and understandable reports in a timely manner and can share relevant information on risk identification, measurement or evaluation, monitoring and management. Effective risk reporting requires proper internal assessment and communication of risk strategy, risk appetite and relevant risk data.

In order to cover all the risks linked to the Bank's activities, apart from the regulatory reporting (Corep, Finrep), all liquidity (LCR and NSFR reporting), ALM (Banking book), Interest Rate Risk Banking book, Trading / Fair Value (both for IFRS reporting (CVA / DVA, fair value derivatives and fair value hierarchy) and regulatory reporting (CVA, AVA, trading book reporting)) related data are under the supervision of the Risk department.

Risk reporting includes, among others, the comparison of all material risk exposures against the defined limits. The monitoring and reporting processes for each material risk are defined in their specific policies. Moreover, escalation processes are in place in order to quickly inform the CRO and, eventually, the GEC of any material breach of the risk appetite limits.

Risk Management reports to the GEC and the Risk Committee via a monthly risk dashboard. The risk dashboard includes the monitoring of the main risks and limits.

The method for calculating regulatory capital adequacy requirements in accordance with European regulations concerning prudential requirements applicable to credit institutions (Basel III) has been used since 31 March 2014. The Bank has chosen the following methodologies:

- The standard approach based on external ratings for credit risk in accordance with CRR, Part Three,
   Title II except chapter 3 and other paragraphs related to the internal models approach;
- The standard approach for market risk in accordance with CRR, Part Three, Title IV except chapter
   5 and other paragraphs related to the internal models approach;
- The basic indicator approach for operational risk in accordance with CRR, Part Three, Title III, chapter 1 and 2.

# 4. Own Fund and Capital Adequacy

#### 4.1 Own funds according to the CRD

Shareholders' funds used for the purpose of Basel III regulatory calculations amounted to EUR 509,7 mln; they comfortably exceeded the minimum levels (8% without buffers) required under prudential standards with the CET1 ratio (phased-in) reaching 16,76 % as of 31/12/2018.

The movements in regulatory capital ratios compared to the previous financial period are characterized by the following:

- The risk-weighted exposure of the Bank is stable, explained by the growth in the activity of granting credits to clients and the limited increase in operational risk have been off-set by a reduction in market risk;
- Tier 1 regulatory capital has declined slightly which is mainly justified by an increase in the accounting value of intangible assets that need to be deducted.

The implementation of IFRS 9 as of 1 January 2018 (date of first time application), had an insignificant impact on CET1 capital. The impacts were recognized in retained earnings and on reevaluation reserves for a net amount of EUR 2,1 mln. The explanations of these impacts are included in note 7.20 "Impacts of the first application IFRS " of our consolidated annual report.

This low impact is fully included in the prudential own funds.

Except for the regulatory adjustments listed in the table below, no other restrictions have been applied.

Common Equity Tier 1 capital : instruments and reserves	
Capital instruments and the related share premium accounts	406,949
of which 10.842.209 ordinary shares	34,212
of which share premium	417,369
of which direct holdings of ordinary shares	-44,631
Retained earnings	62,542
Accumulated other comprehensive income and others reserves	398,920
Common Equity Tier 1 (CET1) capital before regulatory adjustments	868,411
Common Equity Tier 1 (CET1) : regulatory adjustments	
Additional value adjustments	-1,281
Intangible assets (net of related tax liability)	-356,130
Deferred tax assets that rely on future profitability excluding those arising from temporary differences	-1,326
Common Equity Tiers 1 (CET1) regulatory adjustments	-358,737
Common Equity Tier 1 (CET1) capital	509,674
Additional Tier 1 (AT1) capital	0
Additional Tier 2 (AT2) capital	0
Total Capital	509,674
Total Risk Weighted assets	3,040,429

Capital ratios and buffers	
Common Equity Tier 1	16.76%
Tier 1	16.76%
Total Capital	16.76%
Institution specific buffer requirement	1.94%
of which capital conservation buffer requirement	1.88%
of which countercyclical buffer requirement	0.06%
Common Equity Tier 1 available to meet buffers	6.82%

Amounts below the thresholds for deduction (before risk weighting)	
Direct and indirect holdings of the capital of financial sector entities where the institution does not have a significant investment in those entities	15,100
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	1,731
Deferred tax assets arising from temporary differences	16,676

#### 4.2 Countercyclical Capital Buffers

The countercyclical buffer requirement (CCB) represents 0,06% of the risk weighted assets. The following table shows the breakdown of credit exposures relevant for the calculation of the CCB by country.

	Country	Country	Country	Country	Country	Country	TOTAL
	CZ	GB	НК	NO	SE	Other	
Countercyclical capital buffer							
rate set by the Designated	4.0000/	4.0000/	4.0750/	2.0000/	2.0000/	0.000%	
Authority *	1.000%	1.000%	1.875%	2.000%	2.000%	0.000%	
Relevant credit exposures - Credit Risk							
Exposure value under the Standardised Approach	502	76,458	10	48,387	28,080	3,757,747	3,911,184
Exposure value under the IRB Approach							
Relevant credit exposures – Market risk							
Sum of long and short positions of trading book exposures for standardised approaches		1				2,622	2,623
Value of trading book exposures for internal models							
Relevant credit exposures – Securitisation							
Exposure value of securitisation positions in the banking book under the Standardised Approach		5,687				97,168	102,855
Exposure value of securitisation positions in the banking book under the IRB Approach							- /
Total standardised approach	502	82,146	10	48,387	28,080	3,857,537	4,016,662

\* Countercyclical capital buffer rate set for the country in question by the Designated Authority of that country in accordance with Article 136, 137, 138 and 139 CRD

#### 4.3 Capital requirements by type of risk

The below table shows an overview of the components of the denominator of the risk-based capital requirements calculated in accordance with the Basel III/CRD framework at year-end 2018. More details on each of the material components can be found in the remainder of this document.

	RM	Minimum capital requirements (8%)	
	2018	2017	2018
Credit risk (excluding CCR)	1,953,127	1,860,473	156,250
Of which the standardised approach	1,953,127	1,860,473	
Of which the foundation IRB approach	0	0	
Of wich the advanced IRB approach	0	0	
Of which the foundation IRB approach	0	0	
Of wich equity IRB under the simple risk-weighted approach			
or the IMA	0	0	
CCR	80,481	107,309	6,439
Of which mark to market	55,694	71,326	
Of which original exposure	0	0	
Of which the standardised approach	0	0	
Of which internal model method	0	0	
Of which risk exposure amount for contributions to the default funf of a CCP	0	0	
Of which CVA	24 707	25.002	
Of which CVA	24,787	35,983	
Settlement risk	0	3	0
Securitisation exposures in the banking book (after the cap)	28,880	42,984	2,310
Of which IRB approach	0	0	
Of which IRB supervisory formula approach (SFA)	0	0	
Of which internal assessment approach (IAA)	0	0	
Of which the standardised approach	28,880	42,984	
Market Risk	84,064	122,500	6,725
Of which the standardised approach	84,064	122,500	
Of which IMA	0	0	
Large exposures	0	0	0
On another and Rich	047.640	044 750	67.042
Operationnal Risk	847,648	841,758	
Of which basic indicator approach	847,648	841,758	
Amounts below the thresholds for deduction (subject to			
250% risk weight)	46,228	57,607	3,698
Floor adjustment	0	0	0
TOTAL	3,040,429	3,032,635	243,234



#### 4.4 Leverage Ratio

CRR/CRD IV requires credit institutions to calculate, report and monitor their leverage ratio. This ratio is calculated as a percentage of Tier-1 capital relative to the total on and off-balance sheet exposure (not risk-weighted).

The leverage ratio is calculated based on Article 429 of CRR. Although the CRR/CRD IV currently does not prescribe a mandatory minimum leverage to be compliant with, a legislative proposal published on November 2016 by the European Commission suggest an introduction of a minimum leverage of 3%.

The ratio is monitored on an ongoing basis, reported on a quarterly basis in the Risk Management report and provided to the Board of Directors.

The leverage ratio of the Bank is structurally stable. In comparison, as at 31/12/2017, it amounted to 6.33%. The transition to 6.18% does not demonstrate any major changes in its composition but reflects an improvement of the own funds of the Bank.

As at 31/12/2018, the leverage ratio consisted of the following components:

Total derivati	ives			155,375	1
Total SFT exp	oosures			152,823	2
Total other as	ssets			8,108,095	3
Otl	her assets belonging to the trading book		5,130		
Otl	her non-trading book exposures (a+b+c+d+e+f+g+h+i+g+k)		8,102,966		
а	Covered bonds	597,580			
b	Central governments and central banks	2,926,973			
с	Regional governments and local authorities	283,585			
d	MDBs and International organisations	81,583			
e	PSEs	166,402			
f	Institutions	486,551			
g	Secured by mortgages of immovable properti	97,720			
h	Retail exposures	374,957			
i	Corporate	1,495,688			
g	Exposures in default	13,326			
k	Other exposures; of which:	1,578,600			
	Securitisation exposures	102,855			
Total off-bala	ances			200,594	4
(-) Asset amo	ount deducted - Tier 1 - fully phased-in definition			-372,640	5
(-) Asset amo	ount deducted - Tier 1 - transitional definition			-372,640	6
Total Leverag	ge ratio exposure (transitional definition)			8,244,248	7 = (1+2+3+4+5)
	ge ratio exposure (fully phased-in definition)			8,244,248	8 = (1+2+3+4+6)
Tier 1 capital	- fully phased-in definition			<u>509,674</u>	9
Leverage Rat	io - using a fully phased-in definition of Tier 1 capital			6.18%	(9/7)
Tier 1 capital	- transitional definition			509,674	10
	io - using a transitional definition of Tier 1 capital			6.18%	(10/8)



# 5. Credit risk

#### 5.1. Credit Risk Management and Governance

Credit risk, or default risk, is the risk that a financial loss is incurred if a borrower or counterparty fails to fulfill its financial obligations in a timely manner.

Lending activity is mostly granted to the Group's client base, based upon a thorough, individual credit risk assessment of each borrower and subject to obtaining satisfactory mitigants with regards to identified risks.

Given the core business of the Bank, lending activity is mostly conducted by pledging assets by the borrower, which aims at materially mitigating the credit risk exposure.

Degroof Petercam has established sound policies and procedures in order to define and monitor its credit risk exposure including the quality of the pledged assets, in accordance with the Risk Appetite Framework and the limit framework.

A very important role is assigned to the risk control function. All credit exposure within the Group is subject to an established credit risk approval process, including the implication of a senior committee level for large exposure.

Moreover, credit exposures are monitored on an ongoing basis, with each credit file being reviewed at least once a year. Forborne and non-performing exposures are reviewed at least every quarter by the Impairment Committee.

Concentration risk exposures are also monitored on an ongoing basis with the implementation of relevant risk mitigants, when considered necessary.

The following table shows a detail of minimum capital requirements for credit risk by exposure class\*

	Net value of exp	osures at the end of the period				
	On balance sheet exposures	Off balance sheet exposures	Total	Exposure Value	RWA	Capital requirements
	subject to credit risk	subject to credit risk				
Central governments or central banks	2,926,973		2,926,973	2,926,973	35	3
Regional governments or local authorities	283,585		283,585	283,585	0	0
Public sector entities	166,402		166,402	166,402	0	0
Multilateral Development Banks	81,583		81,583	81,583	0	0
International Organisations			0	0	0	0
Institutions	486,551	4,584	491,135	398,135	94,529	7,562
Corporates	1,495,688	241,797	1,737,485	1,088,883	1,008,597	80,688
Retail	374,957	54,994	429,951	95,887	71,915	5,753
Secured by mortgages on immovable property	97,720	1,936	99,656	81,093	31,587	2,527
Exposures in default	13,326		13,326	6,690	7,323	586
Items associated with particular high risk	21,799		21,799	21,799	32,699	2,616
Covered bonds	597,580		597,580	597,580	64,714	5,177
Claims on institutions and corporates with a short-term credit			0	0	0	0
Collective investments undertakings (CIU)	74,401	4,670	79,070	79,070	81,597	6,528
Equity exposures	27,021		27,021	27,021	27,021	2,162
Other exposures*	979,885	90,879	1,070,765	612,598	533,111	42,649
Total standardised approach	7,627,471	398,860	8,026,332	6,467,299	1,953,127	156,250

\*excluding amount subject to 250% risk weight



#### 5.2. Credit Risk Exposure Overview

This chapter presents the credit risk exposures of the Bank including several breakdowns:

- by exposure class
- by country (residence of the counterparty)
- by industry
- by residual maturity
- by credit quality step

Therefore, these breakdowns illustrate the concentration of the exposures. The Bank applies a conservative approach regarding its concentration risk through diversification.

As previously stated, Bank Degroof Petercam's risk appetite remains conservative. This translates into reinvestment of client's deposit and Bank's capital mainly in liquid and high quality assets.

#### CREDIT RISK EXPOSURE BY EXPOSURE CLASS

The following table provides the total (as of 31/12/2018) and the average amount of net asset exposures (over 2018) by exposure class:

	а	b
	Net value of exposures	Average net exposures
	at the end of the period	over the period
Central governments or central banks	2,926,973	3,075,628
Regional governments or local authorities	283,585	281,011
Public sector entities	166,402	92,858
Multilateral Development Banks	81,583	78,802
International Organisations	0	0
Institutions	491,135	684,704
Corporates	1,737,485	1,869,385
Retail	429,951	498,612
Secured by mortgages on immovable property	99,656	84,379
Exposures in default	13,326	31,975
Items associated with particular high risk	21,799	20,494
Covered bonds	597,580	543,039
Claims on institutions and corporates with a short-term credit	0	10,583
Collective investments undertakings (CIU)	79,070	84,121
Equity exposures	27,021	22,031
Other exposures	1,070,765	967,423
Total standardised approach	8,026,332	8,345,043

#### CREDIT RISK EXPOSURE BY COUNTRY

		Country	Country	Country	Country	Rest UEM	<b>Rest of the World</b>
	Total	BE	FR	LU	ES		
				Net value			
Central governments or central banks	2,926,973	1,510,551	45,284	1,104,420	73,754	173,181	19,782
Regional governments or local authorities	283,585	233,233	0	0	0	0	50,352
Public sector entities	166,402	65,545	7,858	1,388	0	90,818	794
Multilateral Development Banks	81,583	0	0	81,583	0	0	0
International Organisations	0	0	0	0	0	0	0
Institutions	491,135	229,832	88,619	42,616	20,910	74,796	34,362
Corporates	1,737,485	778,859	248,784	319,776	63,297	235,880	90,888
Retail	429,951	367,941	18,453	27,693	455	9,033	6,377
Secured by mortgages on immovable property	99,656	14,839	27,704	51,630	0	0	5,483
Exposures in default	13,326	641	1,204	11,433	1	0	47
Items associated with particular high risk	21,799	14,823	0	4,427	0	0	2,549
Covered bonds	597,580	269,628	156,499	0	0	72,094	99,359
Claims on institutions and corporates with a short-term credit assessment	0	0	0	0	0	0	0
Collective investments undertakings (CIU)	79,070	22,938	6,250	47,220	0	0	2,662
Equity exposures	27,021	2,345	173	0	0	24,503	0
Other exposures	1,070,765	668,141	77,675	125,908	37,194	29,505	132,342
Total standardised approach	8,026,332	4,179,316	678,503	1,818,093	195,612	709,811	444,997

#### CREDIT RISK EXPOSURE BY INDUSTRY

This table below provides a breakdown of exposures by industry (Nace code) and exposure classes.

		А	В	с	D	E	F
	<u>Total</u>	Agriculture, forestry	Mining and	Manufacturing	Electricity, gas, steam	Water supply	Construction
		and fishing	quarrying		and conditioning supply		
Central governments or central banks	2,926,973						
Regional governments or local authorities	283,585						
Public sector entities	166,402						
Multilateral Development Banks	81,583						
International Organisations	0						
Institutions	491,135						
Corporates	1,737,485	1,439	5,860	25,507	36,581		19,880
Retail	429,951			256	289		1,088
Secured by mortgages on immovable property	99,656						26,165
Exposures in default	13,326						
Items associated with particular high risk	21,799						
Covered bonds	597,580						
Claims on institutions and corporates with a short-term credit assessment	0						
Collective investments undertakings (CIU)	79,070						
Equity exposures	27,021	0	0	0	0		C
Other exposures	1,070,765						
Total standardised approach	8,026,332	1,439	5,860	25,763	36,871	0	47,133

		G	н	l I	К	J	L	М
	<u>Total</u>	Wholesale and	Transport and	Accomodation and food	Financial and	Information and	Real estate	Professional, scientific
		retail trade	storage	service activities	insurance activities	communication	activities	and technical activities
Central governments or central banks	2,926,973							
Regional governments or local authorities	283,585							
Public sector entities	166,402							
Multilateral Development Banks	81,583				81,583			
International Organisations	0							
Institutions	491,135				491,135			
Corporates	1,737,485	8,267	9,087	24,775	940,405	38,141	298,180	168,783
Retail	429,951	1,731	2	905	27,266	502	15,752	7,055
Secured by mortgages on immovable property	99,656				11,256		39,592	730
Exposures in default	13,326				10,793		1,942	1
Items associated with particular high risk	21,799			13,004	8,218		62	
Covered bonds	597,580				597,580			
Claims on institutions and corporates with a short-term credit assessment	0							
Collective investments undertakings (CIU)	79,070				79,070			
Equity exposures	27,021		0	3	26,796	19	203	1
Other exposures	1,070,765				50,196			
Total standardised approach	8,026,332	9,999	9,089	38,688	2,324,298	38,661	355,731	176,568

		N	0	Р	Q	ХХ	R	S
	<u>Total</u>	Administrative and support	Public administration	Education	Humane health services	Activities of	Arts, entertainment	Other services
		service activities	and defence, compulsory		and social work	households	and recreation	
			social security		activities			
Central governments or central banks	2,926,973		2,926,973					
Regional governments or local authorities	283,585		283,585					
Public sector entities	166,402		166,402					
Multilateral Development Banks	81,583							
International Organisations	0							
Institutions	491,135							
Corporates	1,737,485	13,632	5,078				12,262	129,608
Retail	429,951	1,709		2	8	367,990	265	5,133
Secured by mortgages on immovable property	99,656	498				15,849		5,566
Exposures in default	13,326					564		27
Items associated with particular high risk	21,799							516
Covered bonds	597,580							
Claims on institutions and corporates with a short-term credit assessment	0							
Collective investments undertakings (CIU)	79,070							
Equity exposures	27,021						0	
Other exposures	1,070,765		4,638			772,959		242,972
Total standardised approach	8,026,332	15,839	3,386,675	2	8	1,157,362	12,527	383,821

#### CREDIT RISK EXPOSURE BY RESIDUAL MATURITY

	а	b	С	d	е	(a+b+c+d+e)				
	Net value									
	On demand	<= 1 year	> 1 year <= 5 years	> 5 years	No stated	Total				
					maturity					
Central governments or central banks	0	2,573,271	210,123	139,769	3,809	2,926,973				
Regional governments or local authorities	0	47,014	149,286	87,285	0	283,585				
Public sector entities	0	80,038	82,835	0	3,529	166,402				
Multilateral Development Banks	0	0	78,969	2,614	0	81,583				
International Organisations	0	0	0	0	0	0				
Institutions	0	365,848	24,670	100,617	0	491,135				
Corporates	0	593,778	837,450	306,257	0	1,737,485				
Retail	0	97,108	247,513	85,331	0	429,951				
Secured by mortgages on immovable property	0	35,015	39,067	25,574	0	99,656				
Exposures in default	0	6,517	0	6,809	0	13,326				
Items associated with particular high risk	0	0	0	21,283	516	21,799				
Covered bonds	0	139,718	191,767	266,095	0	597,580				
Claims on institutions and corporates with a short-term										
credit assessment	0	0	0	0	0	0				
Collective investments undertakings (CIU)	0	0	0	0	79,070	79,070				
Equity exposures	0	0	96	26,699	226	27,021				
Other exposures	0	285,099	413,082	136,450	236,134	1,070,765				
Total standardised approach	0	4,223,408	2,274,858	1,204,783	323,284	8,026,332				

The Bank's exposure is for nearly 53% of the portfolio with a residual maturity less than one year term. This minimizes the Bank's risk exposure (risk of a rise in interest rates).



### CREDIT RISK EXPOSURE BY CREDIT QUALITY STEP

As mentioned earlier, for the credit assessment of exposures and the corresponding RWA's calculation, the Bank uses the CRR Standardised Approach (as described in the CRR Articles 120 to 134) which includes regulatory mapping between external ratings and Credit Quality Step (CQS). In this process, ratings from internationally recognized rating agencies (ECAIS - Standard & Poors, Fitch, Moody's) are used (second best rating approach). This approach is the same for each exposure class subject to the use of ratings. In priority, the rating of the issuer is considered. If it is not available, the rating of the final guarantor is used instead.

If no rating is available, the risk-weight provided by the Standardised Approach is used.

The following tables show the credit risk exposures before and after risk mitigation (cfr 5.6 describing the mitigation technique) class split by credit quality step (where CQS1 is the best rating and CQS4, the worst).

	Net value of exposures	CQS1	CQS2	CQS3	CQS4	ALL OTHER CQS	UNRATED
	at the end of the period						
Central governments or central banks	2,926,973	2,925,035	1,938	0	0	0	0
Regional governments or local authorities	283,585	283,585	0	0	0	0	0
Public sector entities	166,402	166,402	0	0	0	0	0
Multilateral Development Banks	81,583	73,155	0	0	0	0	8,428
International Organisations	0	0	0	0	0	0	0
Institutions	491,135	238,103	205,054	47,924	0	0	54
Corporates	1,737,485	38,102	99,609	255,205	33,476	0	1,311,094
Retail	429,951	0	0	0	0	0	429,951
Secured by mortgages on immovable property	99,656	0	0	0	0	0	99,656
Exposures in default	13,326	0	0	0	0	0	13,326
Items associated with particular high risk	21,799	0	0	0	0	0	21,799
Covered bonds	597,580	548,021	49,559	0	0	0	0
Claims on institutions and corporates with a short-term credit	0	0	0	0	0	0	0
Collective investments undertakings (CIU)	79,070	0	0	0	0	0	79,070
Equity exposures	27,021	0	0	0	0	0	27,021
Other exposures	1,070,765	46,101	0	0	0	0	1,024,664
Total standardised approach	8,026,332	4,318,502	356,160	303,129	33,476	0	3,015,064

	Exposure value after	CQS1	CQS2	CQS3	CQS4	ALL OTHER CQS	UNRATED
	credit risk mitigation						
Central governments or central banks	2,926,973	2,925,035	1,938	0	0	0	0
Regional governments or local authorities	283,585	283,585	0	0	0	0	0
Public sector entities	166,402	166,402	0	0	0	0	0
Multilateral Development Banks	81,583	73,155	0	0	0	0	8,428
International Organisations	0	0	0	0	0	0	0
Institutions	398,135	238,103	112,054	47,924	0	0	54
Corporates	1,088,883	38,102	99,609	255,205	33,476	0	662,492
Retail	95,887	0	0	0	0	0	95,887
Secured by mortgages on immovable property	81,093	0	0	0	0	0	81,093
Exposures in default	6,690	0	0	0	0	0	6,690
Items associated with particular high risk	21,799	0	0	0	0	0	21,799
Covered bonds	597,580	548,021	49,559	0	0	0	0
Claims on institutions and corporates with a short-term credit assessment	0	0	0	0	0	0	0
Collective investments undertakings (CIU)	79,070	0	0	0	0	0	79,070
Equity exposures	27,021	0	0	0	0	0	27,021
Other exposures	631,089	46,101	0	0	0	0	584,989
Total standardised approach	6,485,790	4,318,502	263,160	303,129	33,476	0	1,567,523



#### **5.3. DEFAULTED – NON-DEFAULTED EXPOSURES**

Under specific conditions, a credit exposure is considered "in default". In that case, the Bank may record a **specific** provision called "impairment". The Bank records also a **general** provision reflecting the potential future default of its exposure (Expected Credit Loss "ECL").

These aspects are developed in this chapter.

In line with the CRR, we consider a client/facility "in default" if one or more of the following conditions are fulfilled:

- The client/facility is 'unlikely to pay';
- The client/facility is 'more than 90 days past due'.

Note that an exposure is considered "past-due" if it incurs a delay of payment (interest or principal). This is consistent with the definition used for internal credit Risk Management purposes for the relevant financial instrument.

The Impairment Committee is responsible for deciding on these write-offs on a file-by-file basis taking into account various factors:

- Whether the collateral is recoverable within a normal timeframe;
- The probability of recovering the cash flows and estimating the timeframe for such a recovery;
- The number of days since the most recent cash receipt;
- The status of the file and/or the debtor;
- The period since the last impairment of the related receivable (in general, approximately five years).

Since the 1<sup>st</sup> January 2018, impairment losses have been recorded according to IFRS 9 requirements, i.e. based upon the expected credit loss methodology. This new accounting norm replaces the IAS 39 norm.

In this context, Bank Degroof Petercam classifies each financial asset (that falls within the scope of IFRS 9) by reference to the extent of the increase in credit risk ('Significant Increase in Credit Risk' or 'SICR') as from the date of initial recognition and, based on this classification, for each financial asset calculates impairments on the basis of an expected credit loss model over the full life of the asset concerned ("Expected Credit Loss" or 'ECL'). When the expected recoveries are less than the Bank's exposure, the ECL is accounted for.

Credit risk is composed of three levels, according to IFRS 9, as defined in the table below:

Stage	Trigger	ECL = impairment
Stage 1 = « performing »	Initial recognition	12 months expected credit loss (= 12 months ECL)
Stage 2 = « under-performing »	Significant credit risk increase (without recognized loss) since initial recognition	Lifetime expected credit loss (= LEL)
Stage 3 = « non-performing »	Loss event	

More details on this methodology are given in the Annual Report (title 5.5 Credit Risk).

All these above information are presented in the following tables by:

- class
- industry
- country (residence of the counterparty)

## BY EXPOSURE CLASS

	G	ross carrying values of						
	Defaulted	exposures	Non-defaulted	Specific credit risk	General credit	Accumulated	Credit risk adjustments	Net values
	Impaired	Past due>90 days	exposures	adjustment	risk adjustment	write-offs	charges of the period	
	а	b	с	d	е	f	g	(a+b+c-d-e)
Central governments or central banks	0	0	2,926,995	0	23	0	23	2,926,973
Regional governments or local authorities	0	0	283,605	0	19	0	19	283,585
Public sector entities	0	0	166,413	0	11	0	11	166,402
Multilateral Development Banks	0	0	81,593	0	10	0	10	81,583
International Organisations	0	0	0	0	0	0	0	C
Institutions	0	0	491,140	0	5	0	5	491,135
Corporates	0	0	1,739,131	0	1,646	0	0	1,737,485
Retail	923	0	429,668	550	89	0	0	429,951
Secured by mortgages on immovable property	0	0	99,745	0	89	0	0	99,656
Exposures in default	13,948	10,341	0	10,963	0	15,021	-1,359	13,326
Items associated with particular high risk	0	0	21,799	0	0	0	0	21,799
Covered bonds	0	0	597,600	0	19	0	0	597,580
Claims on institutions and corporates with a short-term credit assessment	0	0	0	0	0	0	0	c
Collective investments undertakings (CIU)	0	0	79,070	0	0	0	0	79,070
Equity exposures	0	0	27,021	0	0	0	0	27,021
Other exposures	4,503	105	1,071,000	4,420	357	0		1,070,831
Total standardised approach	19,374	10,446	8,014,780	15,934	2,268	15,021	-1,291	8,026,398
Of which: Loans	19,374	10,446	5,090,275	15,934	1,695	15,021	-1,863	5,102,466
Of which: Debt securities			2,252,921	0	572	0	572	2,252,349
Of which: Off-balance-sheet exposures	0		398,929	0	0	0	0	398,929

The Bank exposure in default primary incurred within the loan portfolio and remains pretty limited, reflecting the overall good credit quality of the Bank loan portfolio and tight underwriting standards of its lending activity.

## **BY INDUSTRY**

	(	Gross carrying values of						
	Defaulted	exposures	Non-defaulted	Specific credit risk	General credit	Accumulated	Credit risk adjustments	Net values
	Impaired	Past due>90 days	exposures	adjustment	risk adjustment	write-offs	charges of the period	
	а	b	С	d	е	f	g	(a+b+c-d-e)
Agriculture, forestry and fishing	0	0	1,440	0	1	0	0	1,439
Mining and quarrying	0	0	5,868	0	8	0	0	5,860
Manufacturing	0	0	25,776	0	13	0	0	25,763
Electricity, gas, steam and conditioning supply	0	0	36,878	0	7	0	0	36,871
Water supply	0	0	0	0	0	0	0	0
Construction	0	0	47,193	0	60	0	0	47,133
Wholesale and retail trade	0	0	10,004	0	5	0	0	9,999
Transport and storage	0	0	9,097	0	8	0	0	9,089
Accomodaion and food service activities	0	0	38,758	0	71	0	0	38,688
Financial and insurance activities	8,751	405	2,324,150	7,507	798	8,202	530	2,324,298
Information and communication	0	0	38,794	0	133	0	0	38,661
Real estate activities	3,447	0	354,087	1,564	239	0	-14	355,731
Professional, scientific and technical activities	767	0	176,686	767	118	4,707	172	176,568
Administrative and support service activities	0	0	15,850	0	11	0	0	15,839
Public administration and defence, compulsory social security	0	0	3,386,741	0	66	0	53	3,386,675
Education	0	0	2	0	0	0	0	2
Humane health services and social work activities	0	0	8	0	0	0	0	8
Activities of households	5,489	2,807	1,154,596	4,970	493	2,019	179	1,157,362
Arts, entertainment and recreation	0	0	12,543	0	16	0	0	12,527
Other services	920	7,234	376,714	1,125	220	-93	-2,212	383,821
Total standardised approach	19,374	10,446	8,015,185	15,934	2,268	14,835	-1,291	8,026,332

## **BY COUNTRY**

	G	ross carrying values of						
	Defaulted	Defaulted exposures		Specific credit risk	General credit Accumulated		Credit risk adjustments	Net values
	Impaired	Impaired Past due>90 days		adjustment	risk adjustment write-offs		charges of the period	
	а	b	С	d	е	f	g	(a+b+c-d-e)
Country BE	2,470	684	4,178,982	1,927	826	12,909	-1,571	4,179,383
Country FR	4,476	80	677,988	3,395	646	1,193	374	678,503
Country LU	5,069	9,682	1,807,065	3,337	386	733	-257	1,818,093
Country ES	166	0	195,643	165	32	0	16	195,612
Rest UEM	2,807	0	710,045	2,732	309	0	67	709,811
Rest of the World	4,385	0	445,058	4,378	68	0	79	444,997
Total standardised approach	19,374	10,446	8,014,780	15,934	2,268	14,835	-1,291	8,026,398

The Group's main defaulted exposures stem from Belgium and Luxembourg, which are the two core countries of activity for the Group.

## AGEING OF PAST-DUE EXPOSURES

		а	b	С	d	е	f	
				Gross carry	ing values			
		<= 30 days	> 30 days <= 90 days	> 90 days <= 180 days	> 180 days <= 1 year	> 1 year <= 5 years	> 5 years	Total
1	Loans	22,481	4,413	405	0	20,331	5,759	53,389
	Central banks							0
	General governments							0
	Credit institutions							0
	Other financial corporations	11,416	0	405	0	<i>7,9</i> 85	1,321	21,126
	Non-financial corporations	2,941	2,918	0	0	7,416	4,392	17,667
	Households	8,124	1,495	0	0	4,930	47	14,596
2	Debt securities	0	0	0	0	0	2,620	2,620
3	Total exposures	22,481	4,413	405	0	20,331	8,379	56,009



## **EVOLUTION OF PROVISIONS DURING 2018**

The table below identifies the changes in the Bank's stock of general and specific credit risk adjustments held against loans and debt securities (including securitisation exposures) that are defaulted or impaired (between 01/01/2018 opening balance and 31/12/2018 closing balance).

		а	b
		Accumulated specific	Accumulated general credit
		credit risk adjustment	risk adjustment
1	Opening balance	-34,815	-4,011
2	Increases due to amounts set aside for estimated loan	1 202	1.049
	losses during the period Decreases due to amounts reversed for estimated	-1,392	-1,048
3	credit risk adjustments	2,755	1,167
	Decreases due to amounts taken against accumulated		
4	credit risk adiustments	0	1,504
5	Transfers between credit risk adjustments	0	0
6	impact of exchange rate differences	0	0
	Business combinations, including acquisitions and		
7	disposals of subsidiaries	0	0
8	Other adjustments	14,899	120
9	Closing balance	-18,554	-2,268
	Recoveries on credit risk adjustments recorded directly		
10	to the statement of profit or loss	0	0
	Specific credit risk adjustments directly recorded to the		
11	statement of profit or loss	0	0

### THE EVOLUTION OF THE DEFAULT

The table below identifies the changes in the Bank's stock of defaulted loans and debt securities (between 01/01/2018 opening balance and 31/12/2018 closing balance).

	Gross carrying value defaulted exposures
1 Opening balance	41,401
2 Loans and debt securities that have defaulted or	
impaired since the last reporting period	616
3 Returned to non-defaulted status	0
4 Amounts written off	-15,318
5 Other changes*	-4,705
6 Closing balance	19,374

\* This line includes partial repayments of loans and debt securities

#### 5.4. Forbearance

Forbearance measures consist of concessions towards a borrower facing or about to face financial difficulties, as a result of which this latter is granted concessions by the bank, i.e. a review of the terms and conditions of its outstanding credit facilities to enable the repayment of its debt.

In order to maximise the possibility of recovering amounts due if the counterparty encounters financial difficulties, Bank Degroof Petercam may, in certain specific cases and under certain conditions, accept a restructuring of the financial instrument which will generally take the form of an extension of the residual life of the loan/bond, or a postponement or rescheduling of certain contractual due dates, without the Bank is incurring a loss.

#### The following table presents the non-performing and forborne exposures (as of 31/12/2018)

		a	b	C	d	e	f	g	h	i	j	k	I.	m
			Gr	oss carrying values	of performing a	nd non-performing ex	posures		Accumulated im adjustments due	pairment and provision to credit risk	ons and negative fa	ir value	Collaterals a guarantees	
		p p	If which erforming but ast due > 30 ays and <= 90 ays	Of which performing forbone	Of which non-performing On performing exposure		ning exposure	On non-perfor	ming exposures	On non- perfomring exposures	Of which forbone exposures			
		Gross carrying amount	ays			Of which defaulted	Of which impaired	Of which forbone		Of which forbone		Of which forbone		
010	Debt securities	2,358,358	0	0	2,620		0 0		-572	0		0	0	0
	Central banks	10,142			. 0				-1		0			
	General governments	736,855			0				-65		0			
	Credit institutions	778,308			0				-45		0			
	Other financial corporations	470,717			2,620				-268		-2,620			
	Non-financial corporations	362,336			0				-194		0			
020	Loans and advances	5,120,277	4,413	16,102	29,820	19,374	1 19,374	16,770	-1,695	-76	-15,933	-2,966	8,735	8,362
	Central banks	2,547,222												
	General governments													
	Credit institutions	489,682							-7	-49				
	Other financial corporations	350,494	0	1,100	9,711	9,306	9,306	6,650	-479		-6,411	-2,938	3,713	3,713
	Non-financial corporations	707,304	2,918	14,978	12,061	4,827	4,827	7,262	-716	-26	-4,663	-28	1,792	1,792
	Households	1,025,575	1,495	24	8,048	5,241	5,241	216	-493		-4,860		3,230	2,857
030	Off-balance-sheet exposures	455,651	0	47	298	(	0 0	0	0	0	0	0	0	0
	Loan commitments given	322,817	0	47	298	(	) 0	0						
	Central banks													
	General governments													
	Credit institutions													
	Other financial corporations	129,577												
	Non-financial corporations	60,038			45									
	Households	133,202		47	252									
	Financial guarantees given Central banks	101,963												
	General governments													
	Credit institutions													
	Other financial corporations	7,756												
	Non-financial corporations	69,333												
	Households	24,874												
	Other Commitments given	30,871												
	Central banks	256												
	General governments													
	Credit institutions	9,197												
	Other financial corporations	4,684												
	Non-financial corporations	11,907												
	Households	4,828												



## 5.5. Counterparty Credit Risk

As support of its core business, the Bank offers to its customers some financial markets services such as OTC derivative transactions or Repo/Reverse Repo transactions. A counterparty credit risk results from those transactions. Limited trading activity is also conducted with non-banking counterparties, including mainly regulated European investments funds but also insurance companies, corporate entities and a few high net worth individuals.

Such activity is primarily conducted with selected banking counterparties in developed countries benefiting from solid external risk ratings assigned by internationally recognized rating agencies (ECAIS).

Credit limits are defined and established by the Limits Committee.

Each counterparty is assigned its own internal limits, which are defined based upon an individual risk assessment of their latest financials.

Risk Management monitors the usage against these limits on a daily basis and any breach is immediately escalated to senior business and Risk Management.

The counterparty credit risk is calculated according to the method "Mark-to-Market" defined in Article 274 of the CRR.

The following table provides a comprehensive view of the methodology used to calculate CCR regulatory requirements:

	а	b	С	d	е	f	g
	Notional	Replacement	Potential	EEPE	Multiplier	EAD	RWAs
		cost/current	future credit			post CRM	
		market value	exposure				
Mark to market		218,661	83,126			149,422	55,694
Original exposure	9,555,866						
Standardised approach		301,787			0	149,422	55,694
IMM (for derivatives and SFTs)				0	0	0	0
Of which securities financing transactions				0	0	6,412	1,282
Of which derivatives and long settlement transactions				0	0	143,010	54,412
Of which contractual cross-product netting				0	0	0	0
Financial collateral comprehensive method (for SFTs)						0	0
Var for SFTs						0	0
Total						149,422	55,694



# CREDIT VALUATION ADJUSTMENT

CVA (Credit Valuation Adjustment) is a regulatory capital charge to cover the volatility of expected losses due to counterparty credit risk exposure related to derivatives (over-the-counter).

The CVA capital charge is calculated according to the regulatory Standardised formula.

Credit valuation adjustment capital charge 31/12/2018 (in millions of Eur)	Exposure value	RWA'S
All portfolios subject to the Standardised method	76.5	24.8
Total subject to the CVA capital charge	76.5	24.8

## 5.6. Use of credit risk mitigation techniques

In accordance with its Risk Appetite Framework, the Bank has established policies in order to mitigate its credit risks and uses several credit risk mitigation techniques:

- Netting legal agreements (close-out agreements);
- Collateral;
- Clearing;
- Guarantees.

The Bank does not make any use of Credit Derivative instruments as a risk mitigation technique.

With regards to the use of ECAIs ("OEEC") as a risk mitigation technique, the Bank has retained the credit risk Standard Approach, which is based upon external ratings from EBA-recognized rating agencies, in the methodology for calculating regulatory capital adequacy. External ratings are also used in order to select, manage and monitor the group's investment portfolio invested in fixed income securities.

The Bank has no recourse to any Export Credit Agency.

#### NETTING LEGAL AGREEMENTS

With regards to its OTC derivative, repo /reverse repo and securities lending activities, the Bank's policy is to enter into internationally recognized master netting agreements (typically ISDA and Global Master Repurchase / Securities Lending Agreement) with counterparties that permit to offset receivables and payables with these latter and therefore materially reduce the credit risk exposure. Netting rules are based upon recognized legal opinions.

#### COLLATERAL

The Bank also endeavors to sign collateral agreements with all its counterparties, which enable to receive and post cash and/or securities collateral with respect to its derivative positions, subject to the terms of the related credit support or similar legal arrangements (typically ISDA & CSA). Retained credit terms included in the ISDA/CSA must be in line with the internal collateral management policy. Eligibility of collateral included in CSA agreements must meet general standard market practices and be of high quality in terms of issuers, external ratings and liquidity.

As for its lending activity, the Bank uses different forms of collateral to offset its risk exposure, in the form of pledge on financial assets (which must be satisfactory diversified, of strong quality and liquidity), on real estates (residential mortgages, mortgage mandates and commercial mortgages), on commercial assets (e.g. on corporate shares). These assets are recorded at market value and reassessed on a regular basis.

All pledged assets must meet terms defined in the Bank's collateral policy, including in terms of valuation frequency and concentration.

Financial collateral received is subject to regular monitoring, which includes valuation and calculation of coverage ratios between loan and collateral keeping in mind the concentration aspect.



In addition Risk Management is performing liquidity test onto such pledged assets on a regular basis in order to assess the eligibility of these assets as receivable collateral in regards with the CRR regulation.

#### CLEARING

The Group is also making use to clearinghouses in order to reduce its counterparties' exposure. The following table shows the Group's exposure towards Qualified and Non-Qualified Central Counterparty Clearinghouse. In particular, the template includes all types of exposures and related capital requirements.

	а	b
	EAD post CRM	RWAs
Exposures to QCCPs (total)		2,852
Exposures for trade at QCCPs (excluding initial margin		
and default fund contributions); of which	71,311	2,852
(i) OTC derivatives	9,936	397
(ii) Exchange-traded derivatives	61,375	2,455
(iii) SFTs	0	0
(iv) Netting sets where cross-product netting has been		
approved	61,375	2,455
Segregated initial margin	0	
Non-Segregated initial margin	0	0
Perfunded default fund contributions	0	0
Alternative calculation of own funds requirements for		
exposures		0
Exposures to non-QCCPs (total)		52,842
Exposures for trade at non-QCCPs (excluding initial		
margin and default fund contributions); of which	78,111	52,842
(i) OTC derivatives	71,626	51,485
(ii) Exchange-traded derivatives	74	74
(iii) SFTs	6,412	1,282
(iv) Netting sets where cross-product netting has been		
approved	49,187	29,359
Segregated initial margin	0	
Non-Segregated initial margin	0	0
Perfunded default fund contributions	0	0
Unfunded default fund contributions	0	0



#### **GUARANTEES**

In exceptional circumstances, the Bank may invest in bonds guaranteed by a third party, usually a government.

In this case, the credit worthiness of the third party is assessed based on external ratings. These positions are monitored by the ALMAC in accordance with ALM and IFRS9 policies.

# CREDIT RISK EXPOSURE AND CRM EFFECTS (AS OF 31/12/2018)

The following table shows the effects of the credit conversion factor (CCF), the credit risk mitigation (CRM) and the risk-weighted assets by exposure class. RWA density provides a synthetic metric on the riskiness of each portfolio.

	а	b	С	d	е	f
	Exposures befo	re CCF and CRM	Exposures pos	t CCF and CRM	RWA's and R	WA density
Evenosuro elessos	On balance sheet	Off balance sheet	On balance sheet	Off balance sheet		
Exposure classes	amounts	amounts	amounts	amounts	RWA's	RWA density
Central governments or central banks	2,926,973	0	2,926,973	0	35	0.00%
Regional governments or local authorities	283,585	0	283,585	0	0	0.00%
Public sector entities	166,402	0	166,402	0	0	0.00%
Multilateral Development Banks	81,583	0	81,583	0	0	0.00%
International Organisations	0	0	0	0	0	0.00%
Institutions	486,551	4,584	393,551	4,584	94,529	4.73%
Corporates	1,495,688	241,797	1,052,922	35,961	1,008,597	50.45%
Retail	374,957	54,994	87,660	8,227	71,915	3.60%
Secured by mortgages on immovable property	97,720	1,936	81,027	66	31,587	1.58%
Exposures in default	13,326	0	6,690	0	7,323	0.37%
Items associated with particular high risk	21,799	0	21,799	0	32,699	1.64%
Covered bonds	597,580	0	597,580	0	64,714	3.24%
Claims on institutions and corporates with a short-term						
credit assessment	0	0	0	0	0	0.00%
Collective investments undertakings (CIU)	74,401	4,670	74,401	4,670	81,597	4.08%
Equity exposures	27,021	0	27,021	0	27,021	1.35%
Other exposures	979,885	90,879	604,766	26,323	579,338	28.98%
Total	7,627,471	398,860	6,405,960	79,830	1,999,355	
		8,026,332				



# EXPOSURE BREAKDOWN POST CCF AND CRM (AS OF 31/12/2018)

The following table provides the post "Credit conversion factor" and "Credit risk mitigation" exposure by risk-weight of risk-weighted asset (corresponding to the riskiness attributed to the exposure according to the Standardised Approach).

Exposure classes								Risk W	eight								Total	Of which
	0%	2%	4%	10%	20%	35%	50%	70%	75%	100%	150%	250%	370%	1250%	Other	Deducted		unrated
Central governments or central banks	2,926,798	0	0	0	175	0	0	0	0	0	0	0	0	0	0	0	2,926,973	0
Regional governments or local authorities	283,585	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	283,585	0
Public sector entities	166,402	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	166,402	0
Multilateral Development Banks	81,583	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	81,583	0
International Organisations	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Institutions	0	0	0	0	348,462	0	49,673	0	0	0	0	0	0	0	0	0	398,135	0
Corporates	0	0	0	0	38,102	0	99,609	0	0	951,172	0	0	0	0	0	0	1,088,883	686,825
Retail	0	0	0	0	0	0	0	0	95,887	0	0	0	0	0	0	0	95,887	95,887
Secured by mortgages on immovable property	0	0	0	0	0	59,730	21,362	0	0	0	0	0	0	0	0	0	81,093	81,093
Exposures in default	0	0	0	0	0	0	0	0	0	5,423	1,266	0	0	0	0	0	6,690	6,690
Items associated with particular high risk	0	0	0	0	0	0	0	0	0	0	21,799	0	0	0	0	0	21,799	21,799
Covered bonds	0	0	0	548,021	49,559	0	0	0	0	0	0	0	0	0	0	0	597,580	0
Claims on institutions and corporates with a short-term credit assess	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Collective investments undertakings (CIU)	0	0	0	0	0	0	0	0	0	74,016	5,055	0	0	0	0	0	79,070	79,070
Equity exposures	0	0	0	0	0	0	0	0	0	27,021	0	0	0	0	0	0	27,021	27,021
Other exposures	79,488	0	0	0	0	0	0	0	0	533,111	0	18,491	0	0	0	0	631,089	593,612
Total standardised approach	3,537,856	0	0	548,021	436,298	59,730	170,645	0	95,887	1,590,743	28,120	18,491	0	0	0	0	6,485,790	1,591,997

The abscise represents the risk-weight assigned to each credit quality as stated in Article 113 to Article 114 in Part Three, Title 2, Chapter 2 of the CRR.

# DERIVATIVES TRANSACTIONS AND SECURITIES TRANSACTIONS POST CCF AND CRM (AS OF 31/12/2018)

The following table provides a breakdown of CCR exposures calculated in accordance with Part Three, Title II, Chapter 6 of the CRR and risk-weighted according to Chapter 3 of the same title, by portfolio (type of counterparties) and by risk weight (riskiness attributed according to the standardised approach).

									Risk	Weight								
	0%	2%	4%	10%	20%	35%	50%	70%	75%	100%	150%	250%	370%	1250%	Other	Deducted	Total	Of which
																		unrated
Central governments or central banks	(	) (	0 0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Regional governments or local authorities	(	) (	0 0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Public sector entities	(	) (	0 0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Multilateral Development Banks	(	) (	0 0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
International Organisations	(	) (	0 0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Institutions	(	) (	71,311	0	16,106	0	20,490	0	0	0	0	0	0	0	0	0	107,906	0
Corporates	(	) (	0 0	0	0	0	0	0	0	24,333	0	0	0	0	0	0	24,333	24,333
Retail	(	) (	0 0	0	0	0	0	0	8,559	0	0	0	0	0	0	0	8,559	8,559
Secured by mortgages on immovable property	(	) (	0 0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Exposures in default	(	) (	0 0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Items associated with particular high risk	(	) (	0 0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Covered bonds	(	) (	0 0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Claims on institutions and corporates with a short-term credit assess	(	) (	0 0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Collective investments undertakings (CIU)	(	) (	0 0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Equity exposures	(	) (	0 0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Other exposures	(	) (	0 0	0	0	0	0	0	0	8,623	0	0	0	0	0	0	8,623	0
Total	(	) (	71,311	0	16,106	0	20,490	0	8,559	32,956	0	0	0	0	0	0	149,422	32,892



## **EXPOSURE THROUGH DERIVATIVES & STRUCTURED FINANCE TRANSACTIONS**

The following table provides an overview of the impact of netting and collateral held on exposures for which the exposure is measured as counterparty credit risk (CCR).

	а	b	с	d	е
	Gross positive fair				
	value or net	Netting	Netted current		Net credit
	carrying amount	benefits	credit exposure	Collateral held	exposure
Derivatives	116,345	44,096	72,249	12,365	59,884
SFTs	146,412	0	146,412	140,000	6,412
Cross-product netting	0	0	0	0	0
Total	262,756	0	218,661	152,365	66,296

The table below provides a breakdown of all types of collateral (cash, sovereign debt, corporate bonds, etc.) posted or received to support or reduce CCR exposures related to derivative transactions or to SFTs, including transactions cleared through a CCP (Central Counterparty Clearinghouse).

	а	b	С	d	е	f
	(	Collateral used in de	Collateral used in SFTs			
	Fair value of collateral received         Fair value of posted collateral		Fair value of	Fair value of		
	Segregated	Unsegregated	Segregated	Unsegregated	collateral received	posted collateral
DEBT SECURITIES	51,196	0	C	0	0	0
EQUITIES	32,696	0	C	0	0	0
FUNDS	11,736	0	C	0	0	0
CASH	61,097	0	C	0	140,000	0
Total	156,724	0	C	0	140,000	0

## UNSECURED VS. SECURED EXPOSURE

The following table shows the exposures in the form of loans and debt securities, depending on whether or not they are secured. This table includes our deposits to Central banks (50% of the loans exposures) that cannot be secured.

	а	b	С	d	е
	Exposures unsecured -	Exposures secured -	Exposures secured by	Exposures secured by	Exposures secured by
	Carrying amount	Carrying amount	<u>collateral</u>	financial guarantees	<u>credit derivatives</u>
Total loans	3,539,298	1,563,350	1,555,978	7,372	0
Central banks	2,547,222	0	0	0	0
General governments	0	0	0	0	0
Credit institutions	489,675	0	0	0	0
Other financial corporations	132,606	212,336	209, 738	2,598	0
Non-financial corporations	194,179	506,638	502,480	4,158	0
Households	175,616	844,377	843,760	616	0
Total debt securities	2,290,991	64,175	0	64,175	0
Central banks	10,141	0	0	0	0
General governments	736,790	0	0	0	0
Credit institutions	714,089	64,175	0	64,175	0
Other financial corporations	467,829	0	0	0	0
Non-financial corporations	362,142	0	0	0	0
Total exposures	5,830,289	1,627,525	1,555,978	71,547	0
Of which defaulted	0	22,440	8,518	0	0
Loans and advances	0	22,440	8,518	0	0
Central banks	0	0	0	0	0
General governments	0	0	0	0	0
Credit institutions	0	0	0	0	0
Other financial corporations	0	4,157	3,713	0	0
Non-financial corporations	0	11,085	1,792	0	0
Households	0	7,199	3,014	0	0
Debt securities	0	0	0	0	0
Central banks	0	0	0	0	0
General governments	0	0	0	0	0
Credit institutions	0	0	0	0	0
Other financial corporations	0	0	0	0	0
Non-financial corporations	0	0	0	0	0
Households	0	0	0	0	0



#### BREAKDOWN OF COLLATERAL AND GUARANTEES BY TYPE

		Maximum amount of the collateral or guarantee that can be considered								
		Loans collateralized by immovable property	lential/commercia							
	Guarantees and collateral	Residential/commercia			Financial guarantees received					
			issued]	-	P					
		010	030	040	050					
010	Loans and advances	138,598	140,890	1,204,823	7,372					
020	of which: Other financial corporations	20,736	20,915	171,083	2,598					
030	of which: Non-financial corporations	100,066	41,203	342,230	4,158					
040	of which: Households	17,796	78,772	691,510	616					
	Eligible collateral percentage	71%	100%	82%	100%					

## 5.7. Equity Exposures in the Banking Book

The Bank has currently no intention to take exposures on equities in the Banking book. The Banking book objectives include limited equity investments in the context of the commercial activities of the Bank. The holding period of the portfolio is long-term.

#### 5.8. Securitisation Exposures in the Banking Book

The Bank owns a portfolio of floating-rate European securitisations.

The current exposures can be described as follows:

					Senior	Mezzanine	Provisions	RWA
Securitisation	Investor	Residential mortgages	ES	01/1900	4,737			947
Securitisation	Investor	Residential mortgages	ES	01/1900	1,681			1,681
Re-securitisation	Investor	Other assets	KY	01/1900		2,620	-2,620	0
Securitisation	Investor	Residential mortgages	GR	01/1900	1,892			6,622
Securitisation	Investor	Residential mortgages	ES	01/1900	539			270
Securitisation	Investor	Residential mortgages	PT	01/1900	1,864			932
Securitisation	Investor	Residential mortgages	GB	01/1900	5,687			1,137
Securitisation	Investor	Consumer loans	GR	01/1900	19,859			3,972
Securitisation	Investor	Consumer loans	DE	01/1900	35,831			7,166
Securitisation	Investor	Consumer loans	LU	01/1900	17,347			3,469
Securitisation	Investor	Consumer loans	NL	01/1900	7,761			1,552
Securitisation	Investor	Consumer loans	ES	01/1900	5,512			1,102
Securitisation	Investor	Residential mortgages	PT	01/1900	145			29
					102,855	2,620	-2,620	28,880

#### 5.9. Settlement

Settlement risk is the risk that the Bank delivers sold asset or cash to a counterparty, but this latter fails to deliver the expected cash or purchased asset due to solvency issues.



To mitigate this risk, the Bank endeavors to settle its financial securities transactions on a Delivery Versus Payment basis ("DVP") and its FX transactions through the Continuous Linked Settlement system ("CLS").

This risk is extremely low.

The corresponding Risk Weight Asset for the settlement risk is zero at end December 2018 (no pending transaction) (see Title 4.3 above).

# 6. ALM & Market risk

# 6.1. Policy

ALM management is a complementary activity to the Bank's Core Business (Private Banking). ALM investment strategies are cautious. They concern bonds of very high quality that can be mobilised quickly if necessary and for which the interest rate risk is hedged through Interest Rate Swaps. There is no desire to find funding sources dedicated to ALM management. Investments are always made in relation to the Bank's financing level (customer deposits).

The Bank does not have trading activity. However, some of the Bank's activities generate market risks. These are intermediation, brokerage, market-making and customer services in derivatives products. The Bank also has an equity portfolio. This portfolio is qualified as an investment portfolio (legacy and accompanying) but it is important to note that this portfolio is intended to support customer service. Market risks are therefore a consequence of the services the Bank offers to its clients. In this sense, the Bank wishes to minimize this type of risk.

ALM & Market risk are the risks of unfavorable trends in market factors (interest rates, equity prices, exchange rates, credit spread, inflation, commodity prices, etc.) having an impact on the positions that the Bank takes for its own account.

Treasury, foreign exchange, providing liquidity for securities, and OTC option brokerage activities are monitored on a daily basis using indicators such as Value-at-Risk (VAR), interest rate sensitivity, scenario analyses, option sensitivity (delta, gamma, vega, etc.) and, more simply, nominal volumes.

These risks are covered by the ALM and Market Risk policies in accordance with the Bank's Risk Appetite Framework while these activities are constrained by a strong set of limits.

The exposures are daily monitored by Risk Management and reported to appropriate committees (mainly the ALMAC).

Open positions are characteristically low compared to our own funds as presented in the following table which displays the components of own funds requirements under the Standardised Approach for market risk.

	а	b
	RWAs	Capital requirements
Outright products		
Interrest rate risk (general and specific)	27,268	2,181
Equity risk (general and specific)	56,796	4,544
Foreign exchange risk	0	0
Commodity risk	0	0
Options		
Simplified approach	0	0
Delta-plus method	0	0
Scenario approach	0	0
Securisation (specifi risk)	0	0
Total	84,064	6,725

#### 6.2 Interest Rate Risk

The interest rate risk results from differences between the maturities and the revaluation dates of assets and liabilities on the balance sheet and off balance sheet. This is the financial risk caused by the impact of a change in interest rates on the interest margin and on the fair values of interest rate instruments. This risk is managed on a daily basis using the Value-Basis-Point indicator ('VBP') which only takes into account elements that are sensitive to interest rates, all maturities combined.

This risk is managed on a monthly basis by the ALMAC using a standard defined in terms of duration gap. This standard was developed based on the maximum loss that is deemed to be acceptable in the event that interest rates rise by 1%, as allocated by the Executive Committee to the group's transformation activity. This includes all balance sheet items and, accordingly, also the treasury positions.

Furthermore, in accordance with Basel III, a stress test compares the loss which would be recorded if there was a parallel increase in interest rates of 2%, to the Bank's shareholders' equity. This results to 3% of Bank's regulatory own funds at 31 December 2018.

This ratio decreased strongly compared to 2016 (when it amounted to 9%). This is due to multiple factors:

- The inclusion of the Bank's engagements towards its Pension Funds;
- The increase of own funds;
- The decrease of the Bank's exposure to interest rate risk.

The loss in case of an increase in interest rates of 1% amounted to:

	2017	2018
On 31/12	2,454	7,117
Average for the period	12,393	9,896
Maximum for the period	17,810	12,283
Minimum for the period	2,454	7,117

The following table sets out the evolution of the sensitivity of the interest rate risk of the Bank (VBP indicator):

	2017	2018
on 31/12	-139	-199
Average for the period	-148	-216
Maximum dfor the period	-205	-255
Minimum forthe period	-118	-199

on 31/12	2017	2018
Increase of the interest rates with 100 basis points		
Increase (decrease) in net interest income over the next 12 months	30,289	35,277
Increase (decrease) in the present value of equity	-2,454	-7,117
Decrease of the interest rates with 100 basis points		
Increase (decrease) in net interest income over the next 12 months	-35,254	-42,459
Increase (decrease) in the present value of equity	1,843	6,399

Since 1 January 2018, the Bank has decided to apply hedge accounting in accordance with the methodology described in the hedging policies and summarised in the Annual Report in points 3.4 and 7.3. The items covered are bonds and loans. Hedging instruments are Interest Rate Swaps (IRS).

At initial recognition, the Bank documents all hedging relationships. The hedging documentation includes the identification of the bond or the loan, the nature of the risk being hedged, the hedging instrument and the method used to assess the effectiveness of the hedge. The Bank also assesses on an ongoing basis whether the hedging instruments effectively compensate for the movements in the fair value of the hedged elements.

The values below show the impact on the economic value of the bank of a 1-basis-point parallel upward shift of swap curves by currencies. In summary, more than 90% of the sensitivity is coming from the EUR currency.

	Globa		EU	R	US	D	CHF		Other
Sensitivity	-	199	-	181	-	16	-	3	1

#### 6.3 Foreign exchange risk

This mainly involves hedging the foreign exchange risk generated by all departments of the Bank and brokerage for institutional investors, principally collective investment funds.

The indicators used to monitor the daily foreign exchange risk are:

- Limits set in terms of nominal amounts;
- Historical VAR.

	20	17	2018		
	Nominal	VAR 99%	Nominal	VAR 99%	
on 31 december	3,006	8	2,212	9	
Average for the period	1,571	17	2,124	20	
Maximum for the period	844	4	1,443	7	
Minimum for the period	3,311	68	3,774	90	

It should be noted that the market RWA for foreign exchange risk is now less than 2% of Bank's own funds, which makes it possible to apply a zero RWA to this type of risk. This is in line with the Bank's policy of not taking foreign exchange risk on the balance sheet.

## 6.4 Equity and option risk

#### SHORT TERM RISK EXPOSURE

The Equity risk results from the liquidity provider service on Belgian shares that the Bank offers to its clients.

The indicators used to monitor the daily equity risk are:

- Limits set in terms of nominal amounts;
- Historical VAR.

The risks attached to options are monitored using various indicators, mainly involving sensitivity to movements of the main underlying factors (mainly delta and rho, but also gamma and vega) and the Value-at-Risk.

		31/12/2018	Average	Minimum	Maximum
Equity Risk	Nominal	600	1,398	600	2,400
	VAR 99%	33	62	33	104
Option Risk	Delta equivalent	0	0	0	0
	VAR 99%	0	0	0	0

## LONG TERM RISK EXPOSURE

Long-term equity risk is the risk that the value of the Bank's own funds declines as a result of a fall in the price of the shares included in the Bank's proprietary share portfolio.

This risk has declined significantly during the past three financial periods as a consequence of the sale of the majority of the share's portfolio.

Market value of the Bank's proprietary share portfolio is as follow:

	Legacy Portfolio	Accompanying Portfolio
31.12.2018	24,504	13,818
31.12.2017	43,984	

The impact on the Bank's own funds of a movement in the price of equities held by the Bank is as follows (all other factors being equal):

	Movement	Impact on own funds	
Relevant markets or indices[2]		31.12.2017	31.12.2018
Bel 20	10%	0	0
Other Belgian securities	10%	426	426
Other European securities	10%	0	0
The rest of th world	10%	3,972	3,406

#### **6.5 Commodities Risk**

The Bank is not exposed to this type of risk.

# 7. Liquidity risk

Liquidity risk is the risk of the Bank being unable to meet its financial commitments at their due dates at a reasonable cost.

In accordance with the Risk Appetite Framework of the Bank, and as described in the liquidity risk policy, the main objective of liquidity management is to ensure that the group has access to sufficient funding, even during very unfavorable conditions. The liquidity strategy is managed at a consolidated level by the ALMAC on a monthly basis, with day-to-day management being delegated to the treasury departments of the Brussels and Luxembourg dealing rooms, under the supervision of Risk Management.

Risk Management ensures that the Bank is able to hold sufficient liquidity in all crisis scenarios (i.e. systemic and idiosyncratic), whether it is a general liquidity crisis on the market or a liquidity crisis specific to the Bank. The assumptions underlying these scenarios are reviewed regularly. Treasury flows must remain positive under each of the scenarios, which are monitored on a daily basis. The internal stress test scenarios are supplemented by the regulatory stress tests.

The liquidity strategy of Bank Degroof Petercam can be summarized as follows:

- A large base of customer deposits, sourced from several group entities. In this respect, the merger
  of Bank Degroof and Petercam has reinforced the already significant stable deposit base of Bank
  Degroof through the addition of Petercam's client deposits;
- A complete independence from interbank funding: the Bank does not need to have recourse to inter-bank funding to finance itself;
- A low 'loan-to-deposit ratio', which indicates that the volume of credits granted is substantially lower than the total of customers' deposits;
- Portfolios which are liquid and which, for the most part, can rapidly be mobilized through repo operations with the European Central Bank.

In consequence, at the end of 2018, the Bank liquidity ratio stood for the LCR at 256% (liquidity buffer at Eur 4.1 mld and net outflows at EUR 1.6 mld) and for NSFR at 178%.

The table setting out the maturities of our assets and liabilities is available in our 2018 Annual Report ("5.3 Liquidity risk" section). The liquidity gap is based on contractual maturities. The calculation of the corrected liquidity gap takes into account the capacity to mobilize the bonds portfolio.

#### ENCUMBERED ASSETS

The encumbered assets of the Bank amounted to EUR 311 mln at end 2018 and represented 3.80% of the total assets.

The encumbered assets of the Bank Degroof Petercam relate to cash and securities provided as collateral exchanged in order to hedge credit risk exposures under the securities lending, repo and derivative transactions, and also to cash deposits towards central banks in compliance with mandatory reserving requirements.

For the breakdown of encumbered vs. unencumbered asset and more details around encumbered assets of the group, we refer to our Annual Report.

Lastly, it should be noted that the Bank has no covered bond program.

# 8. Asset management risk

Asset management risk is the financial risk deriving from a possible lack of consistency or excessive risktaking in the asset management strategies pursued by the group as a whole. This risk thus includes the risk of legal actions by clients for which the legal mandates were not respected, the commercial risk of the loss of clients whose portfolios have under-performed as a result of inadequate management, and the reputational risk resulting from such events, but also from the elements imposed by regulations (MIFID, etc.).

In view of the importance of the asset management activities, this risk is specifically monitored within each entity by the respective control departments, and also at a consolidated level using aggregated data.

For the Private Banking activity, the checks (in particular with regard to diversification, equity ratio, products authorised for management (including the use of derivatives) and MIFID scoring) performed focus on compliance with management constraints set by the clients ,the Executive Committee and regulations, as well as on performance monitoring.

At the level of the collective asset management activity within the Bank, the checks focus on compliance with legal requirements, prospectuses and investment processes.

Risk Management ensures that the checks and the management principles for Private Banking are consistent from one subsidiary to another.

# 9. Compliance risk

## 9.1 Definition

Compliance risk is the threat posed to the Bank's financial, organisational, or reputational standing resulting from violations of laws, regulations, codes of conduct, circulars, or organisational standards of practice (see section 9.4 for more details).

The compliance risk is handled by the Compliance function.

#### 9.2. Governance

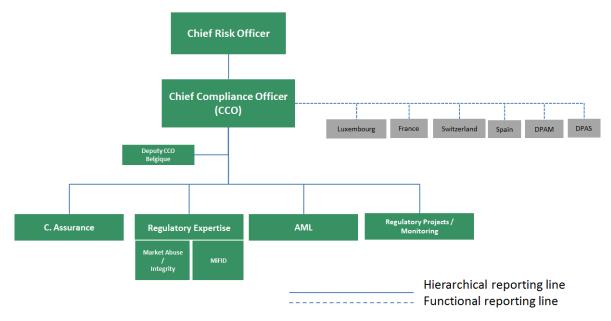
The Compliance function is an independent function that composes, with the Risk Management, the second line of defense.

In accordance with Circular NBB\_2012\_14 / FSMA\_2012\_21, the Compliance monitors the Compliance risk and identifies the standards applicable to the activities developed by the Bank, whether they are enacted in the form of laws, regulations or circulars.

The Compliance function also ensures that, in terms of integrity, the rules, guidelines, procedures and codes of ethics:

- Exist and are made known to all;
- Are in line with the objectives pursued in terms of the integrity of the Bank's activities;
- Adequately take into account new laws and regulations.

The Chief Compliance Officer (CCO) reports directly to the CRO and functionally supervises the Compliance Officers of the Bank's subsidiaries. This functional supervision takes precedence over the local reporting relationship of these Compliance Officers. When necessary, the Compliance Officer has direct access to the Board of Directors.



#### 9.3. Organization

At the parent company level, the Compliance department is organized into teams based on the major areas that fall within the scope of Compliance:

#### COMBATING MONEY LAUNDERING AND TERRORIST FINANCING (AML/CTF)

The "AML" team is responsible for the prevention of money laundering and terrorist financing, the prevention in tax matters and the prevention of reputation risk. Money laundering Risk Management includes, in particular, the following:

- Answer the first line for any request to identify or accept clients with an increased level of risk for all departments of the Bank and for certain subsidiaries;
- Screening operations and clients against embargo and sanction lists;
  - Carry out 2nd line controls to detect operations likely to be linked to money laundering or terrorist financing;
- Declare to CFI the operations related to money laundering or terrorist financing;
- Draft Policies and Procedures in accordance with the requirements of the AML regulations, embargo regulations;
- Train the Bank's staff on AML/CTF matters;
- Conduct a periodic review of all the Bank's clients;
- Score the Bank's clients for AML Risk;
- Report to Management the above-mentioned significant risks, actual or potential;
- Respond to the various requests of regulators, judicial authorities and CFI.

#### **MIFID**

The "MiFID II" Directive, transposed by the law of 21 November 2017 and the Royal Decree of 19 December 2017, as well as Regulation 600.2014 and the delegated regulations, constitutes the regulatory basis to which the MiFID team refers in order to ensure that the Bank complies with all its obligations. The main topics covered by this team include the following:

- Classification of clients;
- Clients profiling;
- Suitability / appropriateness test;
- Information to clients;
- Reporting to clients;
- Reporting to the authorities;
- Inducements.

#### MARKET ABUSE

The "Market Abuse" team ensures compliance with the provisions of the European Market Abuse Regulation (MAR).

The main topics are:

• Prevention of improper use and dissemination of inside information;

- Prevention of market manipulation;
- Cartography and compliance supervision of the safe harbors and legitimate behaviors such as market soundings, share buyback or liquidity provision.

#### **INTEGRITY**

Various topics related to integrity:

- Conflict of interests cartography and management;
- Gift policy monitoring;
- Personal account dealing;
- Whistleblowing;
- Respect of the code of conduct.

It must also be noted that a separated team covers the projects carried out by Compliance or represents Compliance in various other projects.

#### 9.4. Compliance Risks

The main risks the Compliance department is dealing with are the following:

#### AML/FCT RISKS

- The risk of being in relation with persons listed on sanctions/embargos lists or with people who would damage the reputation of the Bank;
- The risk of accepting funds linked to tax fraud or whose origin is unacceptable;
- The risk of executing transactions which would be part of a fraud scheme.

#### **MIFID RISKS**

- The risk of mis-selling, i.e. selling to a client a product which is not suitable or appropriate or a product for which the client does not belong to the target market of the product;
- The risk of not providing the client with the information he deserves in the context of its relationship with the Bank.

#### MARKET ABUSE RISKS

- The risk of manipulating markets or not detecting a manipulation attempt;
- The risk of dissemination or use of inside information.

In order to monitor those risks, the Compliance department carries out a number of controls based for some of them on the results of the first line of defense controls.

# 10. **Operational risk**

#### **10.1 Definition**

The Basel Committee defines operational risk as the risk of loss occurring from inadequate or failed internal processes, people and systems, or from external events. Operational risks encompass the broadest range of risks, arising from internal sources such as operational processes, information systems and organisation, as well as from external sources such as legal requirements or natural disasters.

Beyond risks arising from the core back-office operations, operational risks encompass among others information risk (related to information systems as well as to communication), legal risk (i.e. the risk of legal suit arising from potential failure to comply with regulatory or contractual commitments) and compliance risk (i.e. the risk of regulatory sanctions for failing to comply with the law).

#### **10.2. Governance**

The Operational Risk Management (ORM) function belongs to the 2nd line of defense within the organisation and ensures operational risks taken by the organisation are appropriately managed and do not exceed the risk appetite defined by the Board of Directors.

Its main tasks can be described as follows:

- Ensure the development and implementation of the operational Risk Management framework and related policies ;
- Independently analyze the operational risk of the Group ;
- Advise top management on remediation plans where required;
- Participate in the change management process.

An ORM framework has been defined and approved by the Board of Directors. In this context, the Executive Committee appoints the Operational Risk Committee as the official body to monitor the adequacy of the effective operational risk taken by the organisation and to ensure that appropriate measures are undertaken to operate according to the operational risk appetite defined.

The Operational Risk Committees are composed of the following permanent members: the CRO (as president), the head of Operational Risk Management, the head of Compliance, the head of Portfolio Management Risk (when applicable), the CISO and the Data Privacy Officer. Business representatives are requested to alternatively participate to this committee to discuss their respective risks they are in charge of.

The Operational Risk Committee gathers at least on a quarterly basis. Group/Mother Company 2<sup>nd</sup> line representatives mentioned above are invited to participate to the Operational Committees of the subsidiaries.

The Operational Risk Management department also liaises with other control functions of the organisation (compliance, data privacy office, portfolio management risk, etc.) in order to capture operational risk from those specific areas. Specific responsibilities of these departments are described in their own policies and/or frameworks.

#### 10.3. Operational risk measurement

The ORM function applies several techniques to capture operational risks faced by the organisation and accomplish its tasks.

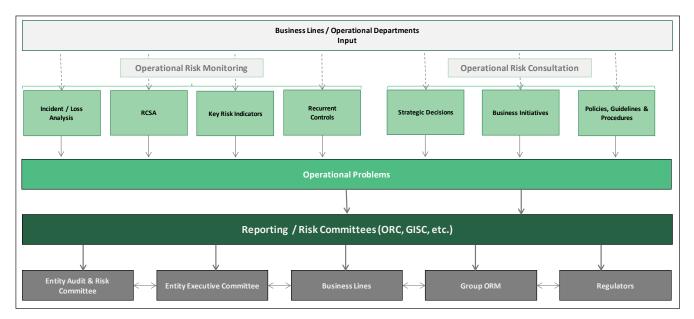
#### **OPERATIONAL RISK MONITORING**

#### (a) Incident/Loss Analysis

Operational incidents (generating losses or not) due to systems failures, human errors, etc. are recorded within an Operational Risk Database and monitored by Risk Management in order to identify potential issues within the organisation or arising from external factors.

#### (b) <u>Risk & Control (Self-)Assessment</u> ( RC(S)A)

The RC(S)A is a control exercise which assesses the organisation and the processes underlying the activities against the potential threats and vulnerabilities and considers their potential impact. The exercise also intends to assess the efficiency of the controls to manage the identified inherent risks and also aims at measuring the residual risk.



The RCSA objectives may be summarised as follows:

- Identify problems faced through the activities conducted by Bank Degroof Petercam that can lead to risks;
- Assess the risks of these problems (from a quantitative as well as from a qualitative perspective) and the effectiveness of the controls in place;
- Determine the causes of the risks/problems;
- Determine remediation plans.
- (c) Key Risk Indicators

The Operational Risk Management department also ensures the development of Key Risk Indicators to ensure the monitoring of its operational risk on a continuous basis.

#### (d) <u>Recurrent Controls</u>

The Operational Risk Management department conducts recurrent 2nd line controls on activities or processes. The scope of these controls is determined on the basis of the overall operational risk assessment conducted by the department, on the level of risk associated with the activities /processes, as well as on the adequacy of the controls in place in the 1st line.

#### OPERATIONAL RISK MANAGEMENT CONSULTATION

Bank Degroof Petercam promotes the development of a strong risk culture throughout the Company and ensures looks for Risk Management advice on all its strategic and business initiatives. More particularly in the context of operational risk:

- Direct participation onto the Executive Committee: the Chief Risk Officer is a permanent member of the Executive Committees and actively reacts to all initiatives informed of all strategic and business initiatives discussed at Senior Management level. The department is informed of all discussions held at business line initiatives and participates if need be to business line Executive Committees. Local representatives of each entity are also kept informed of all strategic and operational thoughts in due time;
- Active participation in organisational and operational reviews: the department is also consulted in the design and review of all organisational aspects of the company. With this respect, the Operational Risk Management reviews all policies and procedures elaborated within Bank Degroof Petercam and provides comments and suggestions ways to improve processes and to avoid, mitigate, eliminate and control risks. The department also conserves a right of initiative in all domains to suggest projects or operational and organisational reviews;
- Active participation in the change management process: the department is also a permanent member of the change management committee put in place by each entity. The department will also be invited in steering committees to monitor the progress of critical projects.

#### ESCALATION AND REPORTING

The ORM framework describes the escalation process enabling any incident/risk to be reported quickly and efficiently from the Business Unit/Subsidiaries to the Executive Committee in order to ensure an appropriate implication of the management.

The ORM function ensures the reporting of these incidents/risks through monthly and quarterly reporting including:

- Statistics on incidents reported over last quarter (analysis by process, error types, etc.) + analysis of incidents on a rolling one year-period;
- A description of major incidents reported over last quarter;
- A review of "claims";
- A review of the problems/risks status;
- A status on 2nd line recurrent control performed by the ORM Local Team.

It serves as a basis of discussion for the "Operational Risk Committee".

#### INFORMATION SECURITY GOVERNANCE

The Executive Committee is responsible for ensuring that the Group manages its risks related to information security in an appropriate manner, according to the risk appetite of the Bank and in compliance with applicable laws and regulations.

In this context, the Group Information Security Committee (GISC) is the body within the Group to:

- Identify and quantify the information security risks faced by the Group;
- Follow that adequate responses are provided to those risks faced ;
- Coordinate all aspects of information security within the Group and to continuously improve the Information Security Management System (ISMS) of the Bank.

The GISC assumes with this respect the following responsibilities:

- The monitoring of the information security threats and vulnerabilities (risk assessment), as well as the monitoring of the new "best practices" in terms of Information Security;
- The definition of the Information Security Strategy based on the risk assessment mentioned here above ;
- The definition of the policies & guidelines adopted by the Group, i.e. the set-up of information security related policies and guidelines at Group level (+ the control/approval of specific policies and guidelines in the different entities when required);
- The control of the respect of information security principles adopted by the Group.

The GISC gathers at least on a quarterly basis (or more if needed), and reports on a quarterly basis to the Executive Committee through the Operational Risk Committee.

In order to ensure appropriate follow-up and reporting on all Information Security aspects throughout all entities, the Group CISO organises regular follow-up meetings with major 1<sup>st</sup> line stakeholders of Information Security domains.

These meetings enable to monitor the progress of the various ongoing projects and potential information security events encountered on a day-to-day basis. They also enable decisions within the context of existing policies and guidelines agreed.

### 11. Remuneration

#### **11.1. Decision making process of the remuneration policy**

The following bodies and functions are involved in terms of determination of the remuneration policy within Bank Degroof Petercam:

- Board of Directors ;
- Remuneration Committee;
- Executive Committee;
- Control Functions;
- External consultants.

#### **Board of Directors**

The Board of Directors has the central role in determining any remuneration policy within Bank Degroof Petercam. It is the ultimate organ of decision and supervision in this matter.

The Board of Directors makes the individual decisions regarding the remuneration of the members of the Identified Staff. Similarly, it can only agree to derogations from the remuneration policy.

It delegates the preparation of the decisions to the Remuneration Committee and their implementation to the Executive Committee.

#### **Remuneration Committee**

The Remuneration Committee is composed of non-executive members of the Board of Directors.

The Remuneration Committee provides opinions and proposals for decisions to the Board of Directors relating to:

- The Remuneration Policy within Bank Degroof Petercam and any amendments thereto ;
- The global Variable Remuneration package of Bank Degroof Petercam;
- The allocation of the envelope between the entities of Bank Degroof Petercam and the share of the envelope reserved for Identified Staff;
- Remuneration of Identified Staff and Control Functions ;
- Remuneration of the non-executive members of the Board of Directors ;
- The possible implementation of stock option plans or capital increases reserved for Employees.

The Remuneration Committee directly supervises the Remuneration of the heads of the Control Functions. In its opinions and decision-making, the Remuneration Committee takes into account the long-term interests of shareholders, investors and other stakeholders of Bank Degroof Petercam as well as the public interest.

Mr Ludwig Criel (president) and Christian Jacobs are members of the Remuneration Committee in their capacity as independent directors. The Chief Executive Officer and the Group Chief HR Officer are invited to the remuneration committee meetings. The remuneration committee met 7 times in 2018.

#### **Executive Committee**

The implementation of the remuneration policy is executed by the Executive Committee.

The remuneration policy is an integral part of the governance memorandum prepared under the responsibility of the Executive Committee and approved by the Board of Directors.



#### **Control Functions**

The Control Functions, and more specifically Internal Audit, Risk and Compliance, cooperate closely with the Board of Directors, the Executive Committee and the Remuneration Committee in the establishment, the monitoring of the application and the evaluation of the Remuneration Policy and the Remuneration Policy for Identified Staff.

As part of this cooperation, the Control Functions may at any time, on their own initiative or at the request of the bodies concerned, formulate opinions.

The Control Functions also cooperate in determining the overall remuneration strategy of Bank Degroof Petercam, taking into account the promotion of effective Risk Management.

#### **External Consultants**

Bank Degroof Petercam works with an external law firm (Claeys & Engels) to get legal advice on our remuneration policies and framework, ensuring we comply with all relevant guidelines.

#### 11.2. Information on link between pay and performance

The following performance monitoring principles apply to all Employees:

- At the beginning of the performance period, the Employee and one of his line managers agree on a set of performance objectives in line with Bank Degroof Petercam's strategy;
- In line with Bank Degroof Petercam's internal policies for the prevention and management of conflicts of interest, the performance objectives avoid creating conflicts of interest, in particular through incentives that may encourage Employees to promote their own interests or the interests of Bank Degroof Petercam at the potential expense of clients. To this end, all performance objectives will include an appreciable share of qualitative criteria and will not establish a direct link between the sale (of categories) of specific financial instruments and the variable remuneration;
- A performance evaluation is performed at the end of the performance period by one of the line managers. It is carried out on the basis of financial and non-financial criteria, individual or collective;
- All performance goals and performance evaluations are properly documented.

## **11.3.** Most important design characteristics of the Banks' remuneration policy

The setting of remuneration takes into account market practice, competitiveness, risks , the long-term objectives of the company and its stakeholders and the continuously changing regulations.

**Fixed remuneration** is mainly determined on the basis of the function of the employee, reflecting professional experience, responsibility and job complexity.

#### Variable remuneration

The level of variable remuneration can depend on several factors, such as the Group overall performance, the performance of the staff member's business division or entity and the staff member's individual performance.

The total volume of variable remuneration granted does not limit the capacity of Bank Degroof Petercam to

strengthen its own funds. To this end, variable remuneration is only granted if there is sufficient margin to generate a variable remuneration envelope. This envelope is set by the Board of Directors on the proposal of the Remuneration Committee.

Guaranteed variable remuneration is not compatible with sound Risk Management or the principle of earnings-based and performance-based compensation and is not part of future-oriented compensation plans. As a result, a guaranteed variable remuneration will be granted only exceptionally, and only to newly recruited Employees and for their first year of employment, provided that Bank Degroof Petercam has a sound and solid financial base.

A number of **non-cash benefits** are granted to all staff (like cellular phone, hospitalization insurance) or are dependent upon the level of the role within the organization (like company car).

#### Sign on bonuses

For specific recruitment needs, bonuses paid in cash charged to the bonus pool for the fiscal year can be granted to new hires. These bonuses must include a claw-back clause in case the new hire leaves the Group the first year following the hire date.

#### Severance payment in lieu of notice

#### For self-employed

For self-employed managers, the severance entitlement will in principle not exceed 12, respectively 18 months subject to the motivated recommendation of the Remuneration Committee, and are defined in the management agreement.

#### For employees

In case of the early termination of an employment contract, any amount paid in the transactional context (beyond the existing legal minimums and collective agreements) should reflect the actual past performance of the employee and cannot reward a failure. The evaluation of this performance must be documented.

If under Belgian legislation additional legal requirements and procedures should be respected to exceed severance packages of 12, respectively 18 months, the required approval procedure will be fully respected.

#### **Buyout awards**

Buyout awards to newly hired experienced executives will be paid according to a schedule and under conditions as equivalent as possible to the initial vesting dates and conditions of the repurchased instruments and in accordance with the payment and behavioral conditions stipulated in the framework of the Bank's deferred remuneration plan in effect at the time of the buy-out awards to these employees, including deferral, retention, pay out in instruments and claw-back arrangements.

Buyout awards are – for the avoidance of doubt - however not considered as variable remuneration in the sense of CRD IV since they do not reward a professional activity performed for Bank Degroof Petercam.

#### Remuneration of the non-executive Board members

The remuneration of the non-executive members of the Board of Directors, of the Nomination and Remuneration Committees and of other committees is solely composed of a fixed remuneration that is established based on the market references.

Those members do not receive any form of variable remuneration.

#### 11.4. Identified Staff

Bank Degroof Petercam applies specific rules for Identified Staff. The performance-based remuneration of Identified Staff is awarded in a manner which promotes sound Risk Management and does not induce excessive risk-taking. This is ensured by specific rules, which are applicable to the variable remuneration of Identified Staff

For employees belonging to the Identified Staff, the Remuneration Policy provides for an appropriate balance between the fixed and variable components of the total remuneration.

The fixed remuneration represents a sufficiently large portion of the total remuneration to guarantee the exercise of a fully flexible variable remuneration policy, and in particular the possibility of not paying any variable remuneration. Variable remuneration is, in any case, limited to the higher of the following two amounts:

- 50% of the Fixed Remuneration ;
- EUR 50,000, without this amount exceeding the amount of the Fixed Remuneration.

#### DEFERRAL

The policy of deferral of variable remuneration applies to Identified Staff (IS) and implies that the acquisition and payment of 40% of said remuneration is postponed during a period of at least three years, for the part in cash as well as for the part that is granted in a conditional cash instrument.

It the total variable remuneration is less than EUR 75,000 gross for the Belgian employees or any other amount provided in the applicable national legislations, in accordance with the application of the principle of proportionality and for administrative reasons, the deferred portion of the bonus is paid on the date of granting. As such, Identified Staff who are allocated a variable remuneration of less than 75,000 EUR are not subject to deferral and payment in a conditional cash instrument.

In accordance with the applicable legislation, when the amount of the variable remuneration is particularly high, i.e. above EUR 200,000, the acquisition and payment of 60% of the latter is deferred for a minimum period of five years, both for the cash part as for the part granted in a conditional cash instrument. The acquisition and payment of 60% of variable remuneration granted to the Chief Executive Officer (CEO) of Bank Degroof Petercam is deferred for a minimum period of 5 years, both for the cash part as for the part granted in a conditional cash part as for the part granted in a conditional cash part as for the part granted in a conditional cash part as for the part granted in a conditional cash instrument.

The acquisition and the payment of the deferred part of the variable remuneration are only realized providing that, at the anticipated moment of the deferred payment, the relevant Identified Staff has not previously been lawfully dismissed for misconduct. In the latter hypotheses, the Identified Staff loses its rights relating to the deferred part of the Variable Remuneration.

In applying the deferral regimes of the granting of a part of the variable remuneration and of the use of a conditional cash instrument for the granting of part of the variable remuneration, the Board of Directors shall be able to exempt the Identified Staff that complies with the criteria established by the National Bank of Belgium in this matter, from the application of those systems for any given performance year.

#### STRUCTURE FOR 2018 VARIABLE REMUNERATION

#### Deferral Mechanism for IS having variable remuneration > 75 k€ et < 200-k€

60% payable immediately and 40 % to defer over three years

Variable	Year Y	Y+1	Y+2	Y+3	Y+4	Total
Deferral of variable in %	60%	13.33%	13.33%	13.33%		100%
Type of pay-out :						
Cash in %	50%	50%	50%	50%		
Conditional Cash Instrument en % (retention of 1 year)	50%	50%	50%	50%		
Example of variable of 100 k€						
Deferral	60	13,33	13,33	13,34		100
Cash in k€	30	6,67	6,67	6,66		50
Conditional Cash Instrument in k€		30	6,67	6,67	6,66	50

#### Deferral Mechanism for IS having variable remuneration > 200 k $\! \in \!$

40% payable immediately and 60% to defer over 5 years

Variable	Year Y	Y+1	Y+2	Y+3	Y+4	Y+5	Y+6	Total
Deferral of variable in %	40%	12%	12%	12%	12%	12%		100%
Type of pay-out:								
Cash in %	50%	50%	50%	50%	50%	50%		
Conditional Cash Instrument en % (retention of 1 year)	50%	50%	50%	50%	50%	50%		
Example of variable of 200 k€								
Deferral	80	24	24	24	24	24		200
Cash in k€	40	12	12	12	12	12		100
Conditional Cash Instrument in k€		40	12	12	12	12	12	100

#### CONDITIONAL CASH PLAN

Bank Degroof Petercam has implemented a "conditional Cash Plan" which intends to determine the terms and conditions regarding the allocation of variable remuneration in the form of "conditional cash". Bank Degroof Petercam hereby confirms that any grant subject to the terms and conditions established in the Plan shall be considered to be grants in accordance with article 6 of annex 2 of the Belgian Banking Act, article 94, 1 (I) of the CRD IV and the Commission Delegated Regulation (EU) No 527/2014 of March, 12th 2014, supplementing the European Parliament Directive (EU) No 2013/36/EU and the Council with regard to the regulatory technical standards for the determination of classes of instruments that appropriately reflect the credit quality of the going concern institution and which are intended to be used for variable remuneration purposes, as confirmed by the competent registration authority.

#### Scope

Provided that it is not neutralized, 50% of the non-deferred part and the deferred part of the variable remuneration will be paid to the Identified Staff according to the provisions of the Plan. This Plan does not affect in principle the evaluation and the allocation of variable remuneration that is based on the general provisions of malus and claw-back included in the remuneration policy. As of the date of the allocation to the date of the acquisition ("vesting"), the malus provisions can be applied.

#### Conditions governing the allocation of rights stipulated in the Plan

The acquisition of the variable remuneration is subject to the following conditions:

- A retention period of one (1) year in order to align the incentives with the long-term interest of Bank Degroof Petercam. This retention period commences as of:
  - a) the accrual of the right to the non-deferred part of the variable remuneration in cash ; or,
  - b) in the event of deferred remuneration over a period of 3-5 years, the date following the acquisition of every deferred part.

As from the date of acquisition ("vesting"), which is the beginning of the retention period, no general malus provision can be applied to the specific part.

• Meeting the below mentioned thresholds after the retention period for the relevant part of the variable remuneration

Threshold to be met	% of the amount
CET1 ratio, as specified by the SREP decision for the relevant period	60%
Liquidity ratio as defined by the SREP decision for the relevant period	30%
Leverage ratio as defined by the SREP decision for the relevant period	10%

During the retention period, the ratios will also be periodically evaluated and valued to ensure continued compliance with the thresholds as required and in accordance with the general legal requirements.

The consolidated CET1 ratio of Bank Degroof Petercam must be equal to or higher than the regulatory requirements, as determined by the SREP decision, including O-SII buffers . If this threshold is not met, Degroof Petercam Bank will not allocate any right according to this Plan for the year in question.

During the retention period, the ratios will also be periodically evaluated and valued to ensure continued compliance with the thresholds as required and in accordance with the general legal requirements.

The assessment whether or not this condition is met will be made by the Board of Directors during the first 3 months of the calendar year following the allocation or the acquisition. The Risk Committee and the Remuneration Committee will be involved in the decision process.

The effective allocation of the rights will be made at the latest on 31 May of the calendar year following the assessment by the Board of Directors ("the Settlement Date").

#### MALUS SYSTEM AND RECOVERY OF VARIABLE REMUNERATION

The performances of the Identified Staff are evaluated in a multiannual framework. This framework is thus much broader than solely the date on which the variable remuneration is granted.

For instance, it should be possible to modify the variable remuneration, even if it was already granted or paid, under the influence of reasons that were not known yet or expected at the moment of payment or acquisition of the variable remuneration, but that would have influenced the granting itself or the amount of the variable remuneration.

The variable remuneration, including the possibly deferred part, is therefore only paid or only acquired if the amount is acceptable vis-à-vis the financial situation of Bank Degroof Petercam and if it is justified based on the performances of Bank Degroof Petercam, of the business unit to which the Identified Staff belongs and of the Identified Staff him/herself.

All variable remunerations are reduced (malus) up to possibly 100% by the relevant unit of Bank Degroof Petercam or reclaimed according to the following provisions and conditions:

a. The relevant unit of Bank Degroof Petercam shall reduce the parts of the variable remuneration that are not yet paid or acquired of all (possibly former) Identified Staff (malus system) if Bank Degroof Petercam has a decreased or negative financial on investment or if one of the following circumstances is discovered :

- (i) The Identified Staff does not comply with the applicable standards of expertise and professional integrity;
- (ii) The Identified Staff is involved with practices that have led to considerable losses for Bank Degroof Petercam or is responsible for such practices;
- (iii) The Identified Staff is involved with a special mechanism that has as its purpose or effect the promotion of fiscal fraud by third parties;
- (iv) Any circumstance that implies that the payment of the variable remuneration constitutes an infringement to the sound Remuneration Policy of Bank Degroof Petercam or of the Risk Management strategy as provided by the above article 1.4 or to its low to medium risk profile.

b. The relevant unit of Bank Degroof Petercam shall reclaim the variable remuneration that is already paid or acquired of all (possibly former) Identified Staff if Bank Degroof Petercam has a decreased or negative financial return or if one of the following circumstances is discovered within three years following the payment or, when appropriate, the acquisition of the Variable Remuneration :

- (i) The Identified Staff does not comply with the applicable standards of expertise and professional integrity;
- (ii) The Identified Staff is involved with practices that have led to considerable losses for Bank Degroof Petercam or is responsible for such practices;



(iii) The Identified Staff is involved with a special mechanism that has as its purpose or effect the promotion of fiscal fraud by third parties.

#### **11.5.** Performance criteria and parameters for variable remuneration

#### SENIOR MANAGEMENT

For senior management Key Performance Indicators (KPI's) are set yearly at Group Level and validated by the Remuneration Committee and Board of Directors. 5 Categories of targets are agreed upon beforehand; Financials, Customer, People, Strategic Programs and Regulatory.

For variable remuneration of senior management at least 10% is based on the results of Bank Degroof Petercam Group.

The remaining variable component is realized through the achievement of business unit related objectives and individual related objectives, including quantitative and qualitative, financial and non-financial elements with a focus on preserving current value as well as creating future value and without incentivizing excessive risk or mis-selling of products.

For the members of the Executive Committee, for the year 2018, variable remuneration was 60% group related, 20% business unit related and 20% individual related<sup>2</sup>.

#### ALL STAFF

At the beginning of performance period, the Employee and his line management agree on a set of performance objectives in line with Bank Degroof Petercams's strategy. All performance goals and performance evaluations are properly documented.

For 2018 three types of objectives were defined;

- WHAT; linked to responsibilities and objectives of the role; impacts 60% of variable pay (if applicable)
- HOW; linked to competencies, expertise and professional rigor; impacts 35% of variable pay (if applicable)
- My HOW; linked to personal development; impacts 5% of variable pay (if applicable)

Pay-out of variable pay (if applicable) is based on individual performance score, group and business unit result.

<sup>&</sup>lt;sup>2</sup> For 2019, the weight of regulatory objectives has been increased for members of the Executive Committee and Senior Management. Indeed, this amounts to more than 20% for the members of the Executive Committee and is included in the Group and Business Unit objectives/kpi's

## 11.6. Aggregated quantitative information

Table 01. Information on the remuneration of all staff		MB Supervisory Function	MB Management Function	Investment banking	Retail banking	Asset Management	Corporate Functions	Independent Control Functions	All other	Total
	Codes	[001]	[002]	[005]	[010]	[015]	[016]	[017]	[020]	[025]
Performance year for which the remuneration is awarded (Year N)	0050									2018
Number of members (Headcount)	0060	41.0	40.1							
Total number of staff in FTE	0100			120.1	356.1	196.4	599.5	74.3	-	
Total net profit (+) or loss (-) in year N (in EUR)	0200									
Total remuneration (in EUR)	0300	1,681,833	17,848,968	17,902,718	41,766,928	20,291,762	50,944,910	7,458,539	-	
Of which: Total variable remuneration (in EUR)	0310	241,250	4,477,731	4,906,879	7,302,183	3,598,855	5,489,845	971,967	-	

Table 02. Information on the remuneration of identified staff		MB Supervisory Function	MB Management Function	Investment banking	Retail banking	Asset Management	Corporate Functions	Independent Control Functions	All other	Total
	Codes	[001]	[002]	[005]	[010]	[015]	[016]	[017]	[020]	[025]
Performance year for which the remuneration is awarded (Year N)	0050									2018
Members (Headcount)	0060	21.0	35.0							
Number of identified staff in FTE	0100			9.0	6.0	-	6.0	9.6	-	
Number of identified staff in senior management positions	0200			7.0	6.0	1.0	6.0	1.6	-	
Total fixed remuneration (in EUR)	0400	1,504,729	11,515,285	1,783,635	1,438,417	176,959	1,127,274	1,080,785	-	
Of which: fixed in cash	0410	1,488,302	11,483,219	1,783,635	1,438,417	167,967	1,127,274	1,078,109	-	
Of which: fixed in shares and share-linked instruments	0420	-	-	-	-	-	-	-	-	
Of which: fixed in other types of instruments	0430	16,427	32,066	-	-	8,993	-	2,676	-	
Total variable remuneration (in EUR)	0500	15,000	4,028,380	534,412	352,433	18,500	431,652	282,627	-	
Of which: variable in cash	0510	15,000	2,628,047	415,975	288,426	18,500	316,503	240,744	-	
Of which: variable in shares and share-linked instruments	0520	-	-	-	-	-	-	-	-	
Of which: variable in other types of instruments	0530	-	1,400,333	118,438	64,008	-	115,149	41,883	-	
Total amount of variable remuneration awarded in Year N which has been deferred (in EUR) *	0600	-	1,731,925	119,439	51,206	-	92,119	33,506	-	
Of which: deferred variable in cash in Year N	0610	-	941,804	59,720	25,603	-	46,059	16,753	-	
Of which: deferred variable in shares and share-linked instruments in Year N	0620	-	-	-	-	-	-		-	
Of which: deferred variable in other types of instruments in Year N	0630	-	790,121	59,720	25,603	-	46,059	16,753	-	
Additional information regarding the amount of total variable remunerat	ion									
Article 450 h(iii) CRR: Total amount of outstanding deferred variable remuneration awarded in previous periods and not in year N (in Eur)	0680	-	3,130,836	205,884	66,295	-	66,066	-	-	
Total amount of explicit ex post performance adjustment applied in year N for previously awarded remuneration (in EUR)	0700	-	-	-	-	-	-		-	
Number of beneficiaries of guaranteed variable remuneration	0800	-	2	-		-	1	-	-	
Total amount of guaranteed variable remuneration (in EUR)	0900	-	1,030,399	-	-	-	23,500	-	-	
Number of beneficiaries of severance payments	1000	-	-	1	-	-	-	-	-	
Total amount of severance payments paid in year N (in EUR)	1100	-	-	488,363	-	-	-	-	-	
Article 450h(v): Highest severance payment to a single person in EUR	1150	-	-	488,363	-	-	-	-	-	
Number of beneficiaries of contributions to discretionary pension benefits in year N	1200	-	-	-	-	-	-	-	-	
Total amount of contributions to discretionary pension benefits (in EUR) in year N	1300	-	-	-	-	-	-	-	-	
Total amount of variable remuneration awarded for multi-year periods under programmes which are not revolved annually (in EUR)	1400	-		-	-		-		-	

\* all deferred variable is non-vested (given nature of conditional cash plan)

Table 02A. Information on identified staff remunerated EUR 1 million or         more per financial year		Number of Identified Staff (headcount)	Total
	Codes	[005]	[010]
Performance year for which the remuneration is awarded (Year N)	0050		2018
Total Remuneration; payment band (in EUR)			
1 000 000 to 1 500 000	0100	2	
1 500 000 to 2 000 000	0200		
2 000 000 to 2 500 000	0300		
2 500 000 to 3 000 000	0400		
3 000 000 to 3 500 000	0500		
3 500 000 to 4 000 000	0600		
4 000 000 to 4 500 000	0700		
4 500 000 to 5 000 000	0800		
5 000 000 to 6 000 000	0900		
6 000 000 to 7 000 000	1000		
7 000 000 to 8 000 000	1100		
8 000 000 to 9 000 000	1200		
9 000 000 to 10 000 000	1300		
more than 10 000 000	1400		

## 12. APPENDIX 1 – GLOSSARY

#### ALM (Asset and Liability Management)

The ongoing process of formulating, implementing, monitoring and revising strategies for both on-balancesheet and off-balance-sheet items, in order to achieve an organization's financial objectives, given the organization's risk tolerance and other constraints.

#### Asset Encumbrance

An asset shall be treated as encumbered if it has been pledged or if it is subject to any form of arrangement to secure, collateralize or credit enhance any transaction from which it cannot be freely withdrawn.

#### Asset quality review (AQR)

The asset quality review is part of the ECB's comprehensive assessment, an exercise to deliver greater transparency on bank's balance sheets, to prompt the repair of impaired balance sheets and to rebuild confidence in banks. It took place for the first time in 2014. The asset quality review was based on balance sheets at year-end 2013, the assessment covered credit and market, on- and off-balance-sheet, domestic and non-domestic exposures.

#### Basel III

Basel III is a global regulatory standard on bank capital adequacy, stress testing and market liquidity risk agreed upon by the members of the Basel Committee on Banking Supervision in 2010. Basel III was developed in response to the deficiencies in financial regulation revealed by the late-2000s financial crisis and then translated into CRR/CRD European Directive.

#### Credit impairment on financial assets

A financial asset or a group of financial assets is credit-impaired when one or more events that have a detrimental impact on the estimated future cash flows of that financial asset have occurred. If such evidence exists, the entity applies the appropriate impairment methodology to the financial asset concerned.

#### Credit risk

The potential for loss or negative deviation from the expected value due to the default or deterioration in credit quality of a counterparty (e.g., an OTC derivatives counterparty or a borrower) or an issuer of securities or other instruments we hold or due to events or measures taken by the political or monetary authority of a particular country.

#### Interest rate risk

The potential negative deviation from the expected value of a financial instrument or portfolio thereof due to changes in the level or in the volatility of interest rates.

#### LCR (Liquidity Coverage Ratio)

'Stock of high-quality liquid assets minus Total net cash outflows over the next 30 calendar day'. A result of 100% (or more) indicates that a bank is maintaining a sufficient stock of 'high-quality liquid assets' to cover net cash outflows for a 30-day period under a stress scenario. The parameters of the stress scenario are defined under Basel III.

#### Leverage Ratio

The Leverage Ratio is a new supplementary non-risk based measure to contain the build-up of leverage (i.e. a backstop as regards the degree to which a bank can leverage its capital base). It is calculated as a percentage of tier-1 capital relative to the total on and off balance sheet exposure (non-risk weighted).



#### Liquidity risk

Liquidity risk is the risk that an organization will be unable to meet its payment obligations as they come due because of the inability to liquidate assets or obtain adequate funding (liability liquidity risk) or the risk that it cannot easily unwind or offset specific exposures without significantly lowering market prices because of inadequate market depth or marked disruptions (asset liquidity risk).

#### Market risk

The potential negative deviation from the expected value of a financial instrument (or portfolio thereof) due to changes in the level or volatility of market prices.

#### Netting

An agreed offsetting of positions or obligations by trading partners or participants to an agreement. Netting reduces the number of individual positions or obligations subject to an agreement to a single obligation or position.

#### NSFR (Net Stable Funding Ratio)

'Available Stable Funding/Required Stable Funding', where available stable funding is derived from different components on the liabilities side of the balance sheet (required funding = assets side). Basel III defined weightings for determining stability are assigned to the different components (both assets and liabilities). An NSFR of 100% means that the funding situation is stable.

#### **Operational risk**

The risk of loss or potential deviation from the expected value of the organization resulting from inadequate or failed internal processes, people and systems or from external events.

#### RWA (Risk-Weighted Asset)

An exposure weighted according to the 'riskiness' of the asset concerned. 'Riskiness' depends on factors such as the probability of default by the obligor, the amount of collateral or guarantees and the maturity of the exposure.

#### Tier-1 ratio

[Tier-1 capital] / [total weighted risks]. The calculation of the core tier-1 ratio does not include hybrid instruments (but does include the core-capital securities sold to the Belgian and Flemish governments).

#### VaR (Value at Risk)

VaR represents an investor's maximum potential loss on the value of an asset or a portfolio of financial assets and liabilities, based on the investments timeframe and a confidence interval. This potential loss is calculated on the basis of historical data or deduced from normal statistical laws.

Abbreviations	Description
ALM	Asset Liability Management
ALMAC	Asset Liability Management Committee
AML	Anti Money Laundering
AT1	Additional Tier 1
AT1	Additional Tier 2
AVA	Additional Valuation Adjustment
BDPCH	Banque Degroof Petercam Swizterland
BDPF	Banque Degroof Petercam France
BDPL	Banque Degroof Petercam Luxembourg
BDPS	Banque Degroof Petercam Spain
ССВ	Countercyclical Capital Buffer
CCF	Credit Conversion Factor
ССО	Chief Compliance Officer
ССР	Central Counterparty
CCR	Counterparty Credit Risk
CEO	Chief Executive Officer
CET1	Core Equity Tier One
CRD	Capital Requirements Directive
CRM	Credit Risk Mitigation
CRO	Chief Risk Officer
CRR	Capital Requirements Regulation
CSA	Credit Support Annex
CTF	CounterTerrorist Financing
CTIF/CFI	The Belgian Financial Intelligence Processing Unit
CVA	Credit Valuation Adjustement
DPAM	Degroof Petercam Asset Management
DPAS	Degroof Petercam Asset Services
DVA	Debt Valuation Adjustement
EAD	Exposure at Default
EBA/ABE	European Banking Authority
ECB/BCE	European Central Bank
EEPE	Effective Expected Positive Exposure
EUR	euros
GEC	Group Executive Committee
ICAAP	Internal Capital Adequacy Assessment Process
IFRS9	International Financial Reporting Standards 9
ILAAP	Internal Liquidity Adequacy Assessment Process
ISDA	International Swaps and Derivatives Association
LCR	Liquidity Coverage Ratio
MAR	Market Abuse Reglementation
MiFID	Markets in Financial Instruments Directive
NBB/NBB	Banque Nationale de Belgique

NSFR	Net Stable Funding Ratio
ORM	Operational Risk Management
RAF	Risk Appetite Framework
RWA	Risk Weighted Assets
SFT	Securities Financing Transaction (repo/reverse repo / securities lending and borrowing)
SREP	Supervisory Review and Evaluation Process
VaR	Value at Risk
VBP	Value Basis Point

## 13. **APPENDIX 2 – Regulatory ratio**

Regulatory ratios with regard to Bank Degroof Petercam Luxembourg, Bank Degroof Petercam France and Bank Degroof Petercam Spain are provided in the following table.

Ratio on 31/12/2018	CET1	Leverage Ratio	LCR	NSFR
Banque Degroof Petercam (Groupe Conso)	16.76%	6.18%	256%	178%
Banque Degroof Petercam Luxembourg	27.07%	6.63%	188%	186%
Banque Degroof Petercam France	16.59%	11.79%	406%	163%
Bank Degroof Petercam Spain	15.53%	10.56%	223%	162%

# 14. APPENDIX 3 – Mapping with Pillar 3 requirements

The table below makes the links between the Bank's table of contents and the the part Eight of regulation (EU) No 575/2013 further defined in the EBA guidelines EBA/GL/2016/11

		Degroof Petercam Pillar 3 Rep	ort
	Section DP Pillar 3 report	Article EU Part Eight in the CRR	Table (for disclosure guidance) / Template (for disclosure formats)
1	Introduction		
2	Scope of application	Article 436 (a, b, d applicable)	Template 1: EU LI1 – Differences between accounting and regulatory scopes of consolidation and the mapping of financial statement categories with regulatory risk categories Template 2: EU LI2 – Main sources of differences between regulatory exposure amounts and carrying values in financial statements Template 3: EU LI3 – Outline of the differences in the scopes of consolidation (entity by entity) Table 5: EU LIA – Explanations of differences between accounting and regulatory exposure amounts
3	Risk management governance	Article 435	Table 1: EU OVA – Institution risk management approach
	3.1 Governance - General principles	Article 435(2) (a), Article 435(2)(b), Article 435(2)( c), Article 435(2)(d)	
	3.2 Risk Management - General principles	Article 435(1) (a), Article 435(1)( e) and Article 435(1)(f)	
	3.3 Risk and Compliance organization	Article 435(1)	
	3.4 Three lines of Defense Model	Article 435(1)	
	3.5 Risk Governance structure	Article 435(1)(b), Article 435(2)( e)	
	3.6 Risk Measurement Methodology	Article 435(1)( c), Article 438(a)	
4	Own Fund and Capital Adequacy	Article 437	
	4.1 Own funds according to the CRD	Article 437(a, b, c, d, e), Article 438(f)	
	4.2 Countercyclical Capital Buffers	Article 440 (b)	
	4.3 Capital requirements by type of risk	Article 438(c, e)	Template 4: EU OV1 – Overview of RWAs
	4.4 Leverage Ratio	Article 451(a, b, d, e)	
5	Credit Risk		

	Degroof Petercam Pillar 3 Report							
	Section DP Pillar 3 report	Article EU Part Eight in the CRR	Table (for disclosure guidance) / Template (for disclosure formats)					
	5.1. Credit Risk Management and Governance	Article 435(1)	Table 2: EU CRA – General qualitative information about credit risk					
	5.2. Credit Risk Exposure Overview	Article 440 (a), Article 442(c, d, e, f), Article 444, Article 453( e)	Table 8: EU CRD – Qualitative disclosure requirements on institutions' use of external credit ratings under the standardised approach for credit risk Template 7: EU CRB-B – Total and average net amount of exposures Template 8: EU CRB-C – Geographical breakdown of exposures Template 9: EU CRB-D – Concentration of exposures by industry or counterparty types Template 10: EU CRB-E – Maturity of exposures					
	5.3. DEFAULTED – NON-DEFAULTED EXPOSURES	Article 442(a, b, g, h, i)	Table 6: EU CRB-A – Additional disclosure related to the credit quality of assets Template 11: EU CR1-A – Credit quality of exposures by exposure class and instrument Template 12: EU CR1-B – Credit quality of exposures by industry or counterparty types Template 13: EU CR1-C – Credit quality of exposures by geography Template 14: EU CR1-D – Ageing of past-due exposures Template 16: EU CR2-A – Changes in the stock of general and specific credit risk adjustments Template 17: EU CR2-B – Changes in the stock of defaulted and impaired loans and debt securities					
	5.4. Forbearance		Template 15: EU CR1-E – Non-performing and forborne exposures					
	5.5. Counterparty Credit Risk	Article 439(a, b, f)	Table 3: EU CCRA – Qualitative disclosure requirements related to CCR Template 25: EU CCR1 – Analysis of CCR exposure by approach Template 26: EU CCR2 – CVA capital charge					
	5.6. Use of credit risk mitigation techniques	Article 435(1) (d), Article 439€, Article 442(b), Article 453(a, b, c, d, f, g)	Table 7: EU CRC – Qualitative disclosure requirements related to CRM techniquesTemplate 18: EU CR3 – CRM techniques – OverviewTemplate 19: EU CR4 – Standardised approach – Credit risk exposure and CRM effectsTemplate 20: EU CR5 – Standardised approachTemplate 27: EU CCR8 – Exposures to CCPsTemplate 28: EU CCR3 – Standardised approach – CCR exposures by regulatory portfolio and riskTemplate 31: EU CCR5-A – Impact of netting and collateral held on exposure valuesTemplate 32: EU CCR5-B – Composition of collateral for exposures to CCR					
	5.7. Equity Exposures in the Banking Book							
	5.8. Securitization Exposures in the Banking Book							
	5.9. Settlement							
6	ALM & Market risk							
	6.1. Policy	Article 435(1)	Table 4: EU MRA – Qualitative disclosure requirements related to market risk Template 34: EU MR1 – Market risk under the standardised approach					
	6.2 Interest Rate Risk	Article 435(1) (d), Article 448						
	6.3 Foreign exchange risk							

		Degroof Petercam Pillar 3 Re	port
	Section DP Pillar 3 report	Article EU Part Eight in the CRR	Table (for disclosure guidance) / Template (for disclosure formats)
	6.4 Equity and option risk		
	6.5 Commodities Risk		
7	Liquidity risk	Article 435(1)	
	Encumbered assets	Article 443	
8	Asset management risk		
9	Compliance Risk		
	9.1 Definition	Article 435(1)	
	9.2. Governance	Article 435(1)(b)	
	9.3. Organization		
	9.4. Compliance Risks	Article 435(1) (a)	
10	Operational risk		
	10.1 Definition	Article 435(1)	
	10.2. Governance	Article 435(1) (a)	
	10.3. Operational risk measurement	Article 435(1) (d)	
11	Rémunération	Article 450(1)	
	11.1. Decision making process of the remuneration policy	Article 450(1)(a)	
	11.2. Information on link between pay and performance	Article 450(1)(b)	
	11.3. Most important design characteristics of the Banks' remuneration policy	Article 450(1)(c, d, f)	
	11.4. Identified staff	Article 450(1)(c, d, f)	
	11.5. Performance criteria and parameters for variable remuneration	Article 450(1)( e, f)	
	11.6. Aggregated quantitative information	Article 450(1)(g, h, i)	

Degroof Petercam Pillar 3 Report		
Section DP Pillar 3 report	Article EU Part Eight in the CRR	Table (for disclosure guidance) / Template (for disclosure formats)
Not applicable	Article 436(c, e), Article 437(f), Article 438(b, d), Article 439(c, d, g, h, i), Article 441, Article 445, Article 446, Article 447, Article 449, Article 450(1)(j), Article 450(2), Article 451(c ), Article 452, Article 454, Article 455	Table 9: EU CRE – Qualitative disclosure requirements related to IRB models Table 10: EU MRB – Qualitative disclosure requirements for institutions using the IMA Template 5: EU CR10 – IRB (specialised lending and equities) Template 6: EU INS1 – Non-deducted participations in insurance undertakings Template 21: EU CR6 – IRB approach – Credit risk exposures by exposure class and PD range Template 22: EU CR7 – IRB approach – Effect on the RWAs of credit derivatives used as CRM techniques Template 23: EU CR7 – IRB approach – Effect on the RWAs of credit derivatives used as CRM techniques Template 23: EU CR9 – IRB approach – Backtesting of PD per exposure class Template 24: EU CR9 – IRB approach – Backtesting of PD per exposure class Template 29: EU CCR4 – IRB approach – CCR exposures by portfolio and PD scale Template 30: EU CCR7 – RWA flow statements of CCR exposures under the IMM Template 36: EU MR2-A – Market risk under the IMA Template 36: EU MR2-A – Market risk under the IMA Template 37: EU MR3 – IMA values for trading portfolios Template 37: EU MR3 – IMA values for trading portfolios Template 38: EU MR4 – Comparison of VaR estimates with gains/losses