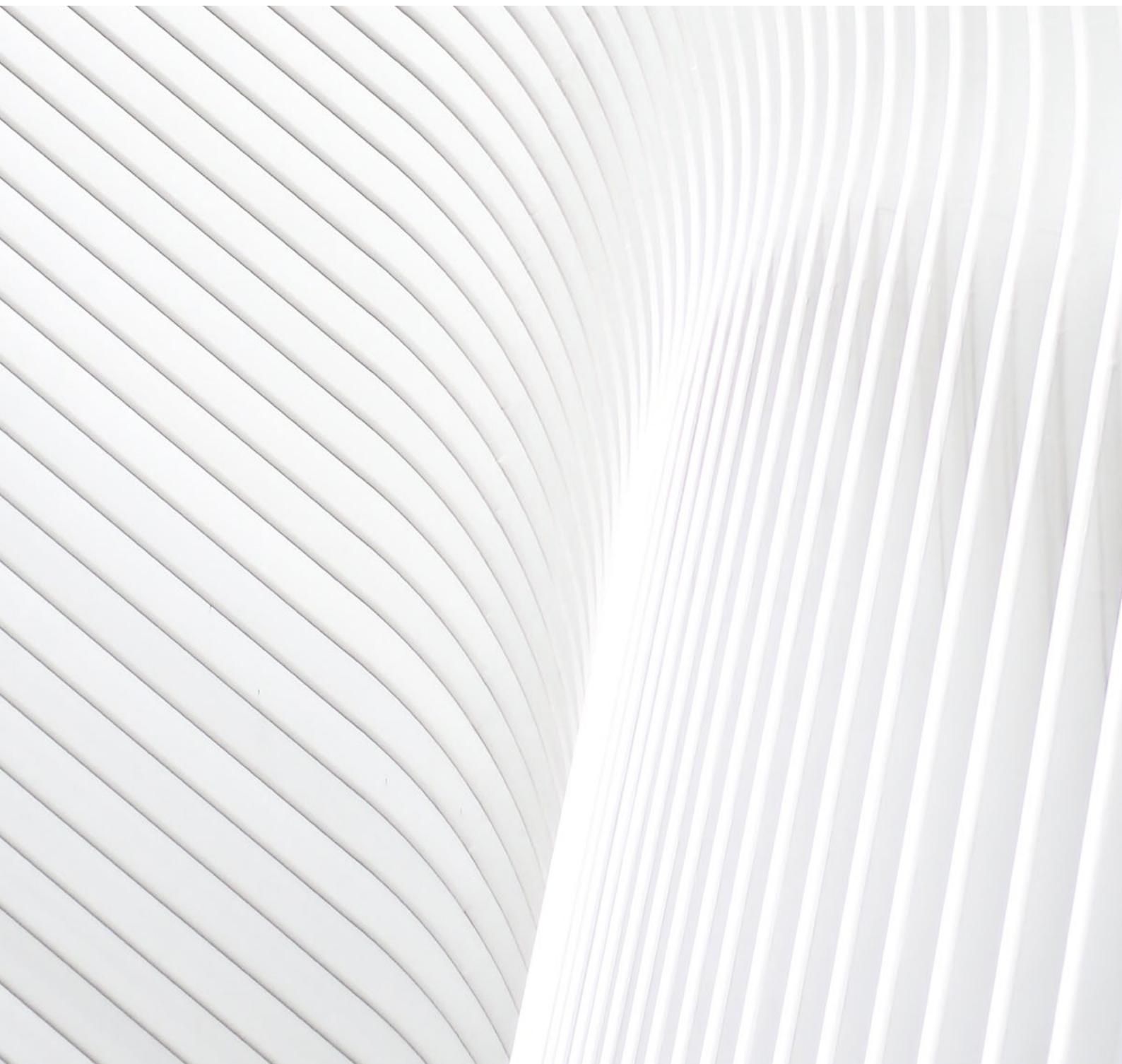


| **Make a Mark**  
| Risk Report 2019







# 2019 Risk Report

Updated Covid-19 special semi-annually disclosure (as of June 30, 2020)

## **Pillar 3 disclosures**

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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

## PURPOSE OF PILLAR 3 DISCLOSURES – BASEL FRAMEWORK

Basel III applies in Europe 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 in Belgium also via Circular NBB\_2017-25 based on EBA orientation (EBA/GL/2016/11) and Circular NBB\_2019-11 based on EBA orientation on NPE (EBA/GL/2018/10).

These requirements have been complemented by a guideline on reporting and disclosure of exposures subject to measures applied in response to the Covid-19 crisis on June 2020 (EBA/GL/2020/07).

## OVERVIEW KEY RATIOS 2019

- Common equity tier-1 ratio (Basel III fully loaded based on Danish compromise) of 19.48% at year-end;
- Fully loaded Basel leverage ratio – based on CRR – of 6.39% at year-end;
- Strong liquidity position at year-end (NSFR at 173% and LCR at 308%).

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

## HEALTH CRISIS COVID-19

In order to face the health crisis linked to Covid-19 that occurred in Belgium in March 2020, Bank Degroof Petercam has adapted its organization in order to protect the health of its staff, while safeguarding the assets of its clients and the operation of its activities.

As soon as the first containment measures were implemented, the group immediately activated its teleworking processes - already largely operational before the crisis - thus ensuring full operational and IT continuity.

During this period of containment, the group closely monitors on a daily basis the different risks to which it is exposed (Liquidity, Market, Asset Management, ...). The Executive Committee and the Board of Directors are regularly kept informed of any development.

In this exceptional context, the group demonstrated its low risk exposure, resulting in a resilient position both in terms solvency, with limited impacts on its equity ratios, as in terms of liquidity, with very stable liquidity ratios and positions.

Lending activity is not significantly impacted by the current crisis, given the very high level of collateral for Lombard loans, which account for the vast majority of customer loans.

Therefore, even if there might be a negative impact on the results for the year 2020, Degroof Petercam has sufficient consolidated own funds and liquidity to get through the crisis.

## SEMI ANNUALLY DISCLOSURE OF EXPOSURES SUBJECT TO MEASURE APPLIED IN RESPONSE TO THE COVID-19 CRISIS

On the date of 30 June 2020 :

- The bank does not hold on its balance sheet loans and advances that have been subject to legislative and/or non-legislative moratoria;
- The bank has not originated loans and advances under newly applicable public guarantee schemes introduced in response to the COVID-19 crisis.

## 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 Management Committee of Bank Degroof Petercam<sup>1</sup> and the Board of Directors.

Disclosure documents are available in English/French/Dutch on the Degroof Petercam website and located at <https://annualreport.degroofpetercam.com/2019/en> “Reports/Full Annual Report or Financial Statements”. 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 2019 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 ( IV Management Report – 12 Governance) Internet site: <a href="http://www.degroofpetercam.com/">www.degroofpetercam.com/</a> « About us / Governance section »
Remuneration policies	The full text on <a href="http://www.degroofpetercam.com/">www.degroofpetercam.com/</a> « About us / Governance section »
IFRS9 (ECL)	Financial Statements (VI Consolidated financial statements 3.3 and 5.5 used in this document)
IFRS16 and IFRS5	Financial Statements (VI Consolidated financial statements 7.20 et 7.21 used in this document)
Liquidity risk	Financial Statements ( VI Consolidated financial statements Chapter 5.3)
Hedge accounting Methodology	Financial Statements ( VI Consolidated financial statements Chapter 3.4 and 7.3)

## 2. Scope of application

Information disclosed in this Risk Report is dated December 31<sup>st</sup>, 2019 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:

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

Name of the entity	a Method of accounting consolidation	c Method of regulatory consolidation			e Deducted	f Description of the entity
		Method of regulatory consolidation				
		b Full consolidation	Proportional consolidation	d Neither consolidated nor deducted		
Banque Degroof Petercam SA	Full consolidation	X				Credit Institution
Degroof Petercam Finance SA	Full consolidation	X				Other Financial Institution
Degroof Petercam Asset Management France SA	Full consolidation	X				Other Financial Institution
Banque Degroof Petercam Luxembourg SA	Full consolidation	X				Credit Institution
Banque Degroof Petercam France SA	Full consolidation	X				Credit Institution
Cobimmo SA	Full consolidation	X				Other company
Degroof Petercam Corporate Finance SA	Full consolidation	X				Other Financial Institution
Degroof Petercam Corporate Finance Spain	Full consolidation	X				Other Financial Institution
Degroof Petercam Asset Management SA	Full consolidation	X				Other Financial Institution
Degroof Petercam Asset Services SA	Full consolidation	X				Other Financial Institution
Degroof Petercam Insurance Broker SA	Full consolidation	X				Other Financial Institution
Guimard Investissements SA	Full consolidation	X				Other Financial Institution
Imofig SA	Full consolidation	X				Other company
Industrie Invest SA	Full consolidation	X				Other Financial Institution
Immobilière Cristal Luxembourg SA	Full consolidation	X				Other Financial Institution
Messine Holding SA	Full consolidation	X				Other Financial Institution
Banque Degroof Petercam (Suisse) SA	Full consolidation	X				Credit Institution
Orban Finance SA	Full consolidation	X				Other Financial Institution
Petercam Services SA	Full consolidation	X				Other Financial Institution
3P (L) SARL	Full consolidation	X				Other Financial Institution
Bank Degroof Petercam Spain, S.A.U.	Full consolidation	X				Credit Institution
Degroof Petercam, S.G.I.I.C	Full consolidation	X				Other Financial Institution
Promotion Partners SA	Full consolidation	X				Other Financial Institution
Amindis SA	Equity Method			X		Other company
Arvestar Asset Management SA	Equity Method			X		Other Financial Institution
BDG & Associés	Equity Method			X		Other Financial Institution
Le Cloître SA	Equity Method			X		Other company
Stairway to Heaven SA	Equity Method			X		Other Financial Institution

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.

	a	b	c	d	e	f	g
	Carrying values as reported in published financial statements	Carrying values under scope of regulatory consolidation	Carrying values of items				
Subject to the credit risk framework			Subject to the CCR framework	Subject to the securitisation framework	Subject to the market risk framework		
<b>Assets</b>							
Cash, balances with central banks and other demand deposits	2,186,892	2,186,892	2,186,892				
Financial assets at fair value through profit or loss	163,451	163,451	44,889	101,795		16,767	
<i>Financial assets held for trading</i>	118,562	118,562		101,795		16,767	
<i>Others financial assets</i>	44,889	44,889	44,889				
Financial instruments for hedge	2,523	2,523	2,523				
Financial assets at fair value through other comprehensive income	825,348	825,348	825,348				
<i>Equity instruments</i>	8,804	8,804	8,804				
<i>Debt instruments</i>	816,544	816,544	816,544				
Financial assets at amortised cost	4,539,247	4,539,247	4,436,310		102,936		
<i>Loans and advances to credit institutions</i>	104,399	104,399	104,399				
<i>Loans and advances to customers</i>	2,186,490	2,186,490	2,186,490				
<i>Debt instruments</i>	2,248,357	2,248,357	2,145,421		102,936		
Property and equipment	124,156	124,156	124,156				
Goodwill and other intangible assets	348,671	348,671					348,671
Investments in entities accounted for using the equity method	3,615	3,615	3,615				0
Current tax assets	7,475	7,475	7,475				
Deferred tax assets	7,214	7,214	1,464				5,750
Other assets	154,538	154,538	154,538				
Non-current assets and disposal groups classified as held for sale	115,056	115,056	115,056				
<b>Total assets</b>	<b>8,478,184</b>	<b>8,478,184</b>	<b>7,902,265</b>	<b>101,795</b>	<b>102,936</b>	<b>16,767</b>	<b>354,421</b>
<b>Liabilities</b>							
Financial liabilities held for trading	144,459	144,459					144,459
Financial instruments for hedge accounting	48,405	48,405					48,405
Deposits from credit institutions	93,743	93,743					93,743
Deposits from customers	6,840,426	6,840,426					6,840,426
Other financial liabilities	137,237	137,237					137,237
Provisions	46,182	46,182					46,182
Current tax liabilities	24,351	24,351					24,351
Deferred tax liabilities	5,152	5,152					5,152
Other liabilities	155,730	155,730					155,730
Liabilities included in disposal groups classified as held for sale	84,804	84,804					84,804
<b>Capitaux propres</b>							
Issued capital	34,212	34,212					34,212
Share premium	417,366	417,366					417,366
Reserves and retained earnings	426,101	426,101					426,101
Revaluation reserves	49,454	49,454					49,454
Treasury shares (-)	-49,627	-49,627					-49,627
Net profit for the period	20,188	20,188					20,188
Minority interests	0	0					0
<b>Total Liabilities and Equities</b>	<b>8,478,184</b>	<b>8,478,184</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>8,478,184</b>

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.

	a	b	c	d	e
	Total	Items subjects to			
		Credit Risk Framework	CCR Framework	Securitisation Framework	Market Risk Framework
Assets carrying value amount under the scope of regulatory consolidation (as per template EU LI1)	8,123,763	7,902,265	101,795	102,936	16,767
Liabilities carrying value amount under the regulatory scope of consolidation (as per template EU LI1)	0	0	0	0	0
<b>Total net amount under the regulatory scope of consolidation</b>	<b>8,123,763</b>	<b>7,902,265</b>	<b>101,795</b>	<b>102,936</b>	<b>16,767</b>
Off-balance sheet amounts	450,158	450,158			
Securities financing transactions	3,637	3,637			
Differences in valuations	28,789		28,789		
Others differences	-67,530	-67,530			
<b>Exposure amounts considered for regulatory purposes</b>	<b>8,538,818</b>	<b>8,288,531</b>	<b>130,584</b>	<b>102,936</b>	<b>16,767</b>

## 3. Risk Management governance

### 3.1 Governance - General principles

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The Board of Directors of Degroof Petercam includes the members of the Management 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 interest 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 four independent directors among its members as of 31 December 2019.

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 a Management Committee within its ranks.

The Management Committee shall work within the framework of the general policy defined by the Board of Directors, overseeing the effective management of the company and the group. It shall exercise all powers granted to it by law.

Accordingly, the Management 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 Management 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 **five** specialized committees to assist it in its tasks: Audit committee, Risk committee, Nomination Committee and Remuneration committee, composed exclusively of **non-executive** directors and the new IT Committee. Conform the legal provisions, at least one member of each specialized committee is independent within the meaning of article 7 :87 of the Company code and associations 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 legal specialized committees. The Board of Directors has also set up an IT Committee, composed of at least three non-executive directors of which one must be independent.

The composition of the Board on December 31, 2019 and the actual knowledge, skills and expertise of its members are described below (the collective and individual knowledge of the specialized 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	IT Committee	End of mandate	Main Degree	Expertise
Ludwig Criel	x*		x	x		x*	x		2021	Degree in Applied Economics, and Degree in management (Vlerick)	Business Administration, Banking and Finance
Bruno Colmant, CEO		x*							2021	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
Nathalie Basyn, CFO		x							2021	MBA Finance/International Business; Graduate School of Business, Chicago, IL.	Financial Management, Business Planning Capital Management, Banking.
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.
Gilles Firmin, CRO		x							2022	Economics ; G.A.S. Europees en international recht	Risk control, compliance, regulatory
Benoit Daenen <sup>2</sup>		x							2023	Commercial engineer	UCIT manager, internal risk manager advisor and investment banker advising the Belgian Public sector, Private banking, portfolio management.
François Wohrer		x							2024	Politic Sciences DEA in International economics; Msc. In Economics	Banking, M&A, Strategy, Monetary economics.
Véronique Peterbroeck	x						x		2021	Candidate in economics State-certified	Associative and social sector, development

<sup>2</sup> His mandate as member of the Management Committee terminated on 16th March 2020 and his mandate as Board member terminated on 26th May 2020.

Board of Directors	Non executive directors	Management Committee	Independent directors	Audit Committee	Risk Committee	Remuneration Committee	Nomination Committee	IT Committee	End of mandate	Main Degree	Expertise
										stockbroker	cooperation and management of private foundation.
Alain Schockert <sup>3</sup>	x					x			2022	Degree in applied economics.; Master in Business Administration	Investment banking.
Alain Philippson <sup>4</sup>	x						x*		2022	Commercial engineer	Financial and Banking, Audit, governance.
Jean-Baptiste Douville de Franssu	x				x			x	2021	Graduate from ESC Group Business School (Rheims); European Business Administration (University of Middlesex); Post graduate degree in actuarial science	Asset Management, Financial Expertise, business administration , and risk-Audit management.
Miguel del Marmol	x			x					2021	Degree in business engineering	Experience in international general management.
Jean-Marie Laurent Josi	x			x			x	x	2022	MBA from Solvay Business	Corporate strategy; Financial analyses (accounts, P&L, cash flow statement); Risk / return analyses of financial instruments
Frank van Bellingen	x			x	x*				2022	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
Jacques-Martin Philippson	x				x		x		2022	Admission examination for agricultural engineer	Private Equity, Finance Management & Marketing, Governance & Management of family business
Guido Vanherpe <sup>5</sup>	x		x	x	x		x*		2024	Degree in applied economics Antwerp (Belgium); DESS in applied marketing Aix-Marseille	Strategic & operational Business management expertise in

<sup>3</sup> His mandate terminated on 26th May 2020.

<sup>4</sup> His mandate terminated on 31st December 2019.

<sup>5</sup> He took the chairmanship of the Nomination Committee following the resignation of Alain Philippson.

Board of Directors	Non executive directors	Management Committee	Independent directors	Audit Committee	Risk Committee	Remuneration Committee	Nomination Committee	IT Committee	End of mandate	Main Degree	Expertise
										(France); Master in Business Administration: major Finance (USA)	international context Corporate finance, Governance structures for growing family businesses.
Kathleen Ramsey <sup>6</sup>	x		x	x	x		x	x*	2022	Bachelor of Arts (University of Tulsa); MBA Multinational (ESADE)	Technology and Operations, Risk Management, Art
Yvan De Cock	x		x	x*	x	x			2022	Master's degree in Law and Finance Management	Banking, audit, accounting and management

\* President

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

The Nomination Committee makes proposals for the composition of the Board of Directors and the Management 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 Management Committee, taking into account proposals done by the shareholders and by the Management 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.

<sup>6</sup> Member of the Risk Committee in replacement of Guido Vanherpe since 2020.



The objective established by the Board of Directors in terms of gender is to have at least 15% of women within the Board in 4 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 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, 2019, the Board of Directors is composed by:

<b>Board of Directors</b>	Number of members	18
	Number of Women	3
	Number of Independent Directors	4
<b>Non-executive Directors</b>	Number of members	12
	Number of Women	2
	Main degree qualifications	Business administration Business international Economics/Public Finance Tax/Accounting Law Commercial engineer Actuariat Marketing
	Ages	40-49 : 1 50-59 : 5 60-69 : 5 70+ : 1
	Nationalities	Belgium (10) - French (1) – American (1)
<b>Executive Directors</b>	Number of members	6
	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 : 5
	Nationalities	Belgium (5) - French (1)

Following the appointment of Ms Kathleen Ramsey as new independent director by the General Shareholders meeting held on May 28, 2019, the gender objective in the composition of the Board of Directors has been reached.

### 3.2 Risk Management - General principles

The Bank's Management 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 of Directors 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, the risk appetite must be integrated into all strategic planning and financial forecasting activities.

The Management 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;
- New Initiative risk approval process : assess the criticality of any new change initiative in order to guarantee that these initiatives are executed and delivered with an oversight proportionate to their assessed impact on the operational risk profile of the bank;
- 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.
- Internal Control Framework : recurrent independent controls on business activities or processes

### 3.3 Risk and Compliance organization

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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 organizational 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 Management Committee and the Board of Directors and is invited to the Risk Committee.

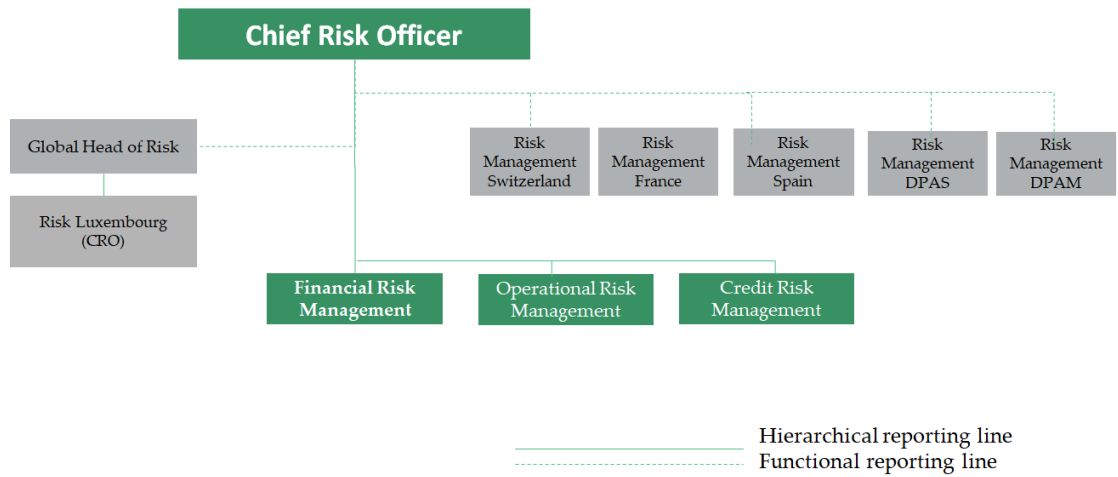
The main tasks of the Group Risk Management are to:

- 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.

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

- “Financial 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) and monitor the legal, contractual and internal constraints governing the Bank's operational activities, mainly in Private Banking, Fund Management and Private Equity;
- “Operational Risk Management” is responsible for identifying the various operational risks facing the Bank and ensuring that these risks are properly managed;
- “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.

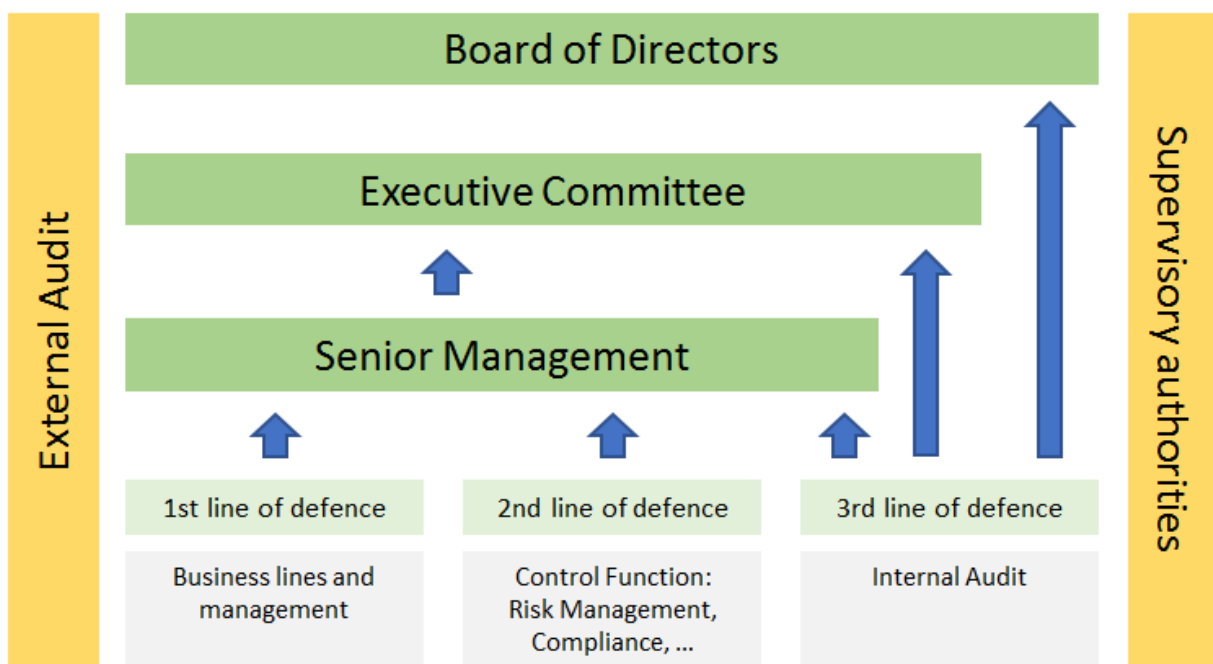


The Compliance function, also reporting directly to the Chief Risk Officer, identifies the standards applicable to the activities developed by the Bank, whether they are enacted in the form of laws, regulations or circulars. The Compliance function also ensures that, in terms of integrity, the rules, 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 his role and carrying it 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

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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 Management 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 Management 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 Management 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 Management 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 Risk Committee met seventeen times during the year. It systematically reported to the Board of Directors on its activities.

**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 a **Management Committee**, which meets weekly. Ad hoc meetings may be convened at the request of a member.

The Management Committee 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 Management 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 organization 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 organization 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.

The Board of Directors has also set up an **IT Committee**, the main role and mission of the committee are:

- Assisting the Board of Directors in promoting the IT vision within the Bank and its evolution and supervising the execution and implementation of the approved IT strategy by the executive committee taking into account the material IT risks with a view to ensure a balance between



regulatory impact, operational efficiency and commercial activity in a context of much needed IT and operational transformation;

- Supporting the Board of Directors in the IT area in order to facilitate the development, implementation, monitoring and periodical assessment of the Bank's internal governance framework from an IT perspective;
- Assisting the Risk Committee in the field of IT in ensuring the identification, monitoring and assessment of the operational IT risks inherent in all material products, activities, processes and systems to ensure that the inherent IT risks and incentives are well understood and managed; all relevant extracts of the reports, minutes and conclusions of the IT Board Committee relating to IT risks are communicated to the Risk Committee;
- Ensuring that the IT strategy is aligned with the business objectives as defined by the Board of Directors and taking into account the Bank's vision for innovation in the field of IT;
- Ensuring that the IT systems plan is meeting the requirements of the end users which will have been aligned with business priorities;
- Overseeing the overall budget, deliverables and resources in the field of IT.

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

- **ALMAC:** The ALMAC Committee manages the ALM 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;
- **Credit Monitoring Committee:** The Credit Monitoring Committee reviews the existing credits files. ;
- **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;
- **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:** Those committees evaluate, approve and monitor commitments in capital market transactions. It meets on an ad-hoc basis;
- **Control Function Coordination Committee:** The Coordination Committee is responsible for coordinating control functions within subsidiaries. It meets on a quarterly basis;
- **Litigation Committee:** The Litigation 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:** This committee defines and executes the Group's Data strategy, monitors the Roadmap and the related Governance. It meets on a monthly basis;
- **Local Diligence Committee:** In line with the onboarding policy, this committee ensures the revision Of high risk anti-money laundering files and decides to accept the file or eventually to forward it to the Group Due Diligence Committee
- **Group Due Diligence Committee:** in line with the new onboarding policy, the committee reviews the very high anti-money laundering files as well as the 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 organization and ensures that appropriate measures are undertaken to operate according to the operational risk appetite defined. It meets on quarterly basis;
- **Control Unit Committee:** This committee ensures that the identification and the assessment of risks in the Estate Planning Business, including International Patrimonial Services, at Belgian, French and Luxembourgish level;
- **Responsible Investment Advisory Group Committee:** This committee takes care of the development of the Group's commitment to responsible investment;
- **Group Asset Allocation Committee:** The committee defines of the asset management strategy;
- **Group Digital Committee:** This committee takes care of the development of digitalization within the Group;
- **Regulatory Project Steering Committee:** This committee aims at ensuring a correct implementation of the news laws, directives, circulars and regulations and to respond to requests from regulators;
- **Internal Risk Committee:** This committee monitors market risk, risk dashboard, RWA and equity, large exposures and validates investments in support portfolios.

### 3.6 Risk Measurement Methodology

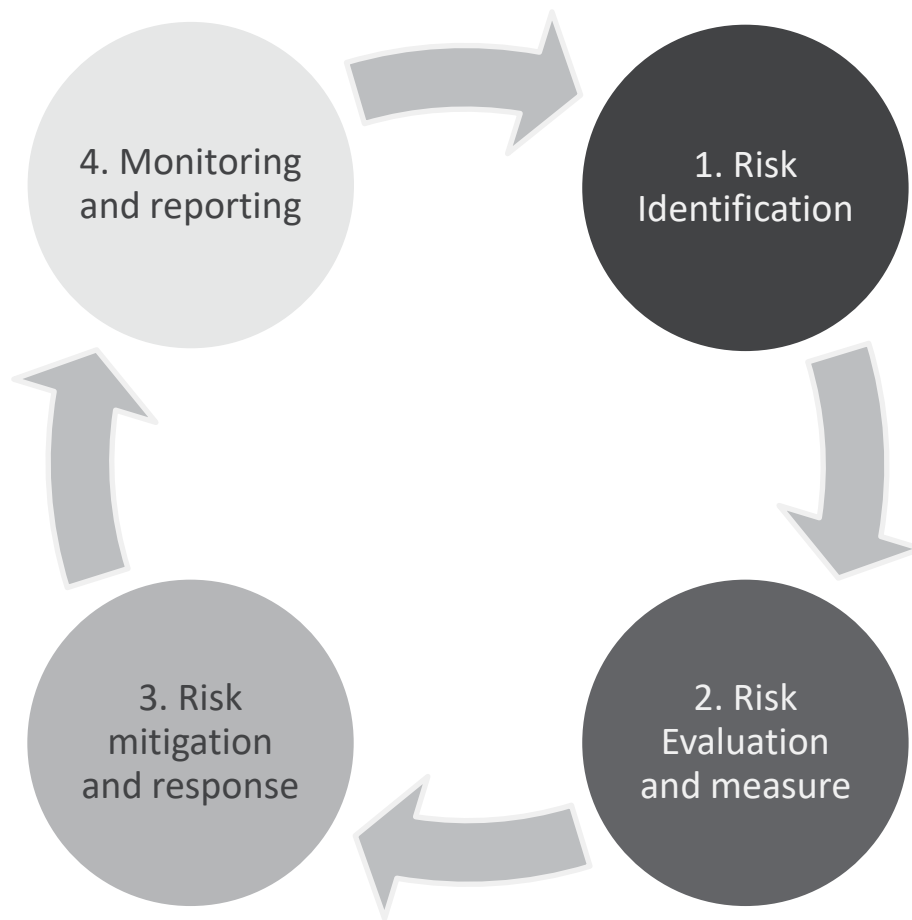
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The risk assessment process consists of four main steps. Risks must be detected before they can be analyzed, assessed, measured, mitigated and communicated.

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.

To ensure the completeness of the identification of critical risks, in addition to the risk assessment, multiple sources are taken into account such as RCSA, analyze of incidents, internal and external audit and systemic risk. Risk Management has a right of initiative in managing risks, and may bring to the attention of the Management 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.

The limits are established by a top-down approach and are divided into levels from Key Risk Indicators to most specifics and granular exposures by country, sector, type of investment, issuers, counterparties and underlying assets.

This limit hierarchy ensures that Key Risk indicators are respected and that the Bank's management is in line with the Board of Directors' risk appetite statements.

All material risks are monitored. Appropriate escalation procedures are also put in place when a limit or indicator is breached.

Risk Management reports directly to the Management Committee 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.

The Internal Control Framework evaluates the set of controls in place to mitigate risks throughout the Bank, allowing the risk profile to remain within the risk appetite and compliance standards defined by the Board of Directors.

The RCSA is a control exercise which assesses the organization 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.

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 Management Committee of any material breach of the risk appetite limits.

Risk Management reports to the Management Committee 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

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Shareholders' funds used for the purpose of Basel III regulatory calculations amounted to EUR 535 mln; they comfortably exceeded the minimum levels (8% without buffers) required under prudential standards with the CET1 ratio (phased-in) reaching 19,48 % as of 31/12/2019.

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

- The Bank's risk-weighted volume decreased significantly following a disinvestment in securities issued by companies to invest in covered bonds and securities issued by the public sector with a zero or very low weighting, offset by a slight increase in operational and market risk.
- The increase in Tier 1 capital is mainly justified by the decrease in the book value of intangible assets to be deducted and to the result for the financial year 2018 which has not been distributed.

The implementation of IFRS 16 as of 1 January 2019 (date of first time application), had an impact of -30 bps (0.3%) on CET1 capital. The explanations of these impacts are included in note 7.20 "Impacts of the first application IFRS 16" of our consolidated annual report.

The application of IFRS 5 for the Spanish subsidiaries does not have an impact on the treatment in the Credit risk calculation. The explanation of these impacts is included in note 7.21 of our consolidated annual report.

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

<b>Common Equity Tier 1 capital : instruments and reserves</b>	
Capital instruments and the related share premium accounts	401,951
of which 10.842.209 ordinary shares	34,212
of which share premium	417,366
of which direct holdings of ordinary shares	-49,627
Retained earnings	219,274
Accumulated other comprehensive income and others reserves	256,281
Common Equity Tier 1 (CET1) capital before regulatory adjustments	877,506
<b>Common Equity Tier 1 (CET1) : regulatory adjustments</b>	
Additional value adjustments	-1,188
Intangible assets (net of related tax liability)	-335,519
Deferred tax assets that rely on future profitability excluding those arising from temporary differences	-5,750
Common Equity Tiers 1 (CET1) regulatory adjustments	-342,457
<b>Common Equity Tier 1 (CET1) capital</b>	<b>535,049</b>
<b>Additional Tier 1 (AT1) capital</b>	<b>0</b>
<b>Additional Tier 2 (AT2) capital</b>	<b>0</b>
<b>Total Capital</b>	<b>535,049</b>
<b>Total Risk Weighted assets</b>	<b>2,746,062</b>

<b>Capital ratios and buffers</b>	
Common Equity Tier 1	19.48%
Tier 1	19.48%
Total Capital	19.48%
Institution specific buffer requirement	2.60%
of which capital conservation buffer requirement	2.50%
of which countercyclical buffer requirement	0.10%
Common Equity Tier 1 available to meet buffers	8.89%

<b>Amounts below the thresholds for deduction (before risk weighting)</b>	
Direct and indirect holdings of the capital of financial sector entities where the institution does not have a significant investment in those entities	12,302
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	2,168
Deferred tax assets arising from temporary differences	12,712

As a result of its supervisory review and evaluation process (SREP), the competent supervisory authority (ECB) can require that higher minimum ratios be maintained (= pillar 2 requirements).

Following the SREP for 2019, the pillar 2 requirement (P2R) for Bank Degroof Petercam amounts to 3.00 % CET1.

The pillar 2 Capital Guidance (P2G) amounts for Bank Degroof Petercam to 1%.

The Common Equity Tier 1 available of 8.89% comfortably exceeded the P2R et P2G buffers.

## 4.2 Countercyclical Capital Buffers

The countercyclical buffer requirement (CCB) represents 0,10% of the risk weighted assets.

The following table shows the breakdown of credit exposures relevant for the calculation of the CCB by country.

	Country DK	Country FR	Country GB	Country HK	Country IE	Country NO	Country SE	Country Other	TOTAL
Countercyclical capital buffer rate set by the Designated Authority *	1.000%	0.250%	1.000%	2.000%	1.000%	2.500%	2.500%	0.000%	
<b>Relevant credit exposures - Credit Risk</b>	<b>16,269</b>	<b>748,369</b>	<b>41,788</b>	<b>57</b>	<b>4,096</b>	<b>71,176</b>	<b>61,167</b>	<b>2,062,114</b>	<b>3,005,036</b>
Exposure value under the Standardised Approach	16,269	748,369	41,788	57	4,096	71,176	61,167	2,062,114	3,005,036
Exposure value under the IRB Approach	0	0	0	0	0	0	0	0	0
<b>Relevant credit exposures – Market risk</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1,819</b>	<b>1,821</b>
Sum of long and short positions of trading book exposures for standardised approaches	0	0	1	0	0	0	0	1,819	1,821
Value of trading book exposures for internal models	0	0	0	0	0	0	0	0	0
<b>Relevant credit exposures – Securitisation</b>	<b>0</b>	<b>22,051</b>	<b>1,684</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>79,202</b>	<b>102,936</b>
Exposure value of securitisation positions in the banking book under the Standardised Approach	0	22,051	1,684	0	0	0	0	79,202	102,936
Exposure value of securitisation positions in the banking book under the IRB Approach	0	0	0	0	0	0	0	0	0
<b>Total standardised approach</b>	<b>16,269</b>	<b>770,420</b>	<b>43,474</b>	<b>57</b>	<b>4,096</b>	<b>71,176</b>	<b>61,167</b>	<b>2,143,135</b>	<b>3,109,793</b>

\* 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 (other country where no buffer required).

## 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 2019. More details on each of the material components can be found in the remainder of this document.

	RWAs		Minimum capital requirements (8%)
	2019	2018	2019
<b>Credit risk (excluding CCR)</b>	<b>1,622,587</b>	<b>1,953,127</b>	<b>129,807</b>
Of which the standardised approach	1,622,587	1,953,127	
Of which the foundation IRB approach	0	0	
Of which the advanced IRB approach	0	0	
Of which the foundation IRB approach	0	0	
Of which equity IRB under the simple risk-weighted approach or the IMA	0	0	
<b>CCR</b>	<b>96,591</b>	<b>80,481</b>	<b>7,727</b>
Of which mark to market	71,145	55,694	
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 fund of a CCP	0	0	
Of which CVA	25,446	24,787	
<b>Settlement risk</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Securitisation exposures in the banking book (after the cap)</b>	<b>21,676</b>	<b>28,880</b>	<b>1,734</b>
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	21,676	28,880	
<b>Market Risk</b>	<b>88,278</b>	<b>84,064</b>	<b>7,062</b>
Of which the standardised approach	88,278	84,064	
Of which IMA	0	0	
<b>Large exposures</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Operational Risk</b>	<b>879,257</b>	<b>847,648</b>	<b>70,341</b>
Of which basic indicator approach	879,257	847,648	
<b>Amounts below the thresholds for deduction (subject to 250% risk weight)</b>	<b>37,674</b>	<b>46,228</b>	<b>3,014</b>
<b>Floor adjustment</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>TOTAL</b>	<b>2,746,062</b>	<b>3,040,429</b>	<b>219,685</b>

The risk weighted exposure of the Bank has decreased over the year 2019, primarily as a result of the shift of investments in corporate bonds towards investments in covered bonds and sovereign bonds with a low or no RWA impact, combined with a higher loan collateralization level.

The increase in Operational Risk for 2019 is based on an average increase in gross income for the last 3 years (2017 to 2019).





## 5. Credit risk

### 5.1. Credit Risk Management and Governance

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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 exposures at the end of the period			Exposure Value	RWA	Capital requirements
	On balance sheet exposures	Off balance sheet exposures	Total			
	subject to credit risk	subject to credit risk				
Central governments or central banks	2,455,397		2,455,397	2,455,397	0	0
Regional governments or local authorities	437,628		437,628	437,628	0	0
Public sector entities	337,926		337,926	337,926	0	0
Multilateral Development Banks	134,070		134,070	134,070	0	0
International Organisations	17,479		17,479	17,479	0	0
Institutions	304,727	3,941	308,668	294,067	49,530	3,962
Corporates	1,894,759	402,970	2,297,729	995,334	989,105	79,128
Retail	458,338	42,769	501,106	110,132	82,599	6,608
Secured by mortgages on immovable property	108,793	455	109,248	98,920	36,133	2,891
Exposures in default	19,299		19,299	15,299	18,553	1,484
Items associated with particular high risk	20,382		20,382	20,382	30,572	2,446
Covered bonds	1,128,718		1,128,718	1,128,718	112,872	9,030
Claims on institutions and corporates with a short-term credit	86,566		86,566	86,565	17,511	1,401
Collective investments undertakings (CIU)	31,807		31,807	31,807	31,807	2,545
Equity exposures*	2,763		2,763	2,763	2,763	221
Other exposures*	381,040		381,040	381,040	251,142	20,091
<b>Total standardised approach</b>	<b>7,819,691</b>	<b>450,135</b>	<b>8,269,825</b>	<b>6,547,526</b>	<b>1,622,587</b>	<b>129,807</b>

\*excluding amount subject to 250% risk weight

## 5.2. Credit Risk Exposure Overview

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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 31/12/2019) and the average amount of net asset exposures (over 2019) by exposure class:

	a	b
	Net value of exposures	Average net exposures
	at the end of the period	over the period
Central governments or central banks	2,455,397	2,716,978
Regional governments or local authorities	437,628	436,250
Public sector entities	337,926	293,698
Multilateral Development Banks	134,070	106,821
International Organisations	17,479	4,370
Institutions	308,668	415,374
Corporates	2,297,729	2,261,165
Retail	501,106	502,535
Secured by mortgages on immovable property	109,248	102,964
Exposures in default	19,299	31,960
Items associated with particular high risk	20,382	22,158
Covered bonds	1,128,718	1,008,426
Claims on institutions and corporates with a short-term credit assessment	86,565	157,456
Collective investments undertakings (CIU)	31,807	39,162
Equity exposures	3,733	22,632
Other exposures	395,138	418,535
<b>Total standardised approach</b>	<b>8,284,894</b>	<b>8,540,485</b>

## CREDIT RISK EXPOSURE BY COUNTRY

	Total	Country BE	Country FR	Country LU	Country ES	Rest EMU	Rest of the World
	Net value						
Central governments or central banks	2,455,397	1,451,080	81,658	489,663	137,275	283,278	12,443
Regional governments or local authorities	437,628	332,309	0	0	0	0	105,319
Public sector entities	337,926	189,653	33,927	0	0	37,901	76,444
Multilateral Development Banks	134,070	0	0	0	0	134,070	0
International Organisations	17,479	0	0	0	0	17,479	0
Institutions	308,668	4,306	69,075	28,243	18,991	120,450	67,603
Corporates	2,297,729	1,296,443	277,104	374,901	61,361	74,586	213,334
Retail	501,106	385,801	38,975	21,926	29,510	4,923	19,972
Secured by mortgages on immovable property	109,248	15,675	36,004	53,166	0	0	4,403
Exposures in default	19,299	4,817	9,669	4,569	172	72	0
Items associated with particular high risk	20,382	6,561	300	9,746	0	677	3,098
Covered bonds	1,128,718	251,743	471,746	0	0	167,689	237,540
Claims on institutions and corporates with a short-term credit assessment	86,565	42,999	10,506	8,013	2,644	2,969	19,433
Collective investments undertakings (CIU)	31,807	410	5,720	25,677	0	0	0
Equity exposures	3,733	2,592	193	0	0	102	845
Other exposures	395,138	35,158	13,459	113,069	0	151,203	82,250
<b>Total standardised approach</b>	<b>8,284,894</b>	<b>4,019,546</b>	<b>1,048,339</b>	<b>1,128,972</b>	<b>249,954</b>	<b>995,398</b>	<b>842,684</b>

## CREDIT RISK EXPOSURE BY INDUSTRY

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

		A	B	C	D	E	F
	<u>Total</u>	Agriculture, forestry and fishing	Mining and quarrying	Manufacturing	Electricity, gas, steam and conditioning supply	Water supply	Construction
Central governments or central banks	2,455,397					0	
Regional governments or local authorities	437,628						
Public sector entities	337,926						
Multilateral Development Banks	134,070						
International Organisations	17,479						
Institutions	308,668						
Corporates	2,297,729		0	3,027	0		26,386
Retail	501,106	171			255		1,503
Secured by mortgages on immovable property	109,248						26
Exposures in default	19,299						
Items associated with particular high risk	20,382						
Covered bonds	1,128,718						
Claims on institutions and corporates with a short-term credit assessment	86,565						
Collective investments undertakings (CIU)	31,807						
Equity exposures	3,733						
Other exposures	395,138						
<b>Total standardised approach</b>	<b>8,284,894</b>	<b>171</b>	<b>0</b>	<b>3,027</b>	<b>256</b>	<b>0</b>	<b>27,914</b>

		G	H	I	K	J	L	M
	Total	Wholesale and retail trade	Transport and storage	Accomodaion and food service activities	Financial and insurance activities	Information and communication	Real estate activities	Professional, scientific and technical activities
Central governments or central banks	2,455,397		0		2,176,015			
Regional governments or local authorities	437,628							
Public sector entities	337,926							
Multilateral Development Banks	134,070				134,070			
International Organisations	17,479				17,479			
Institutions	308,668				308,668			
Corporates	2,297,729	6,973	1,488		715,601	1,560	234,154	147,864
Retail	501,106	1,809	400		15,942	500	8,677	8,289
Secured by mortgages on immovable property	109,248		10		13,737		72,143	3,060
Exposures in default	19,299				5,937			
Items associated with particular high risk	20,382				20,382			
Covered bonds	1,128,718				1,128,718			
Claims on institutions and corporates with a short-term credit assessment	86,565				86,565			
Collective investments undertakings (CIU)	31,807				31,807			
Equity exposures	3,733	3			3,733			
Other exposures	395,138				248,618	5,838	104,652	
<b>Total standardised approach</b>	<b>8,284,894</b>	<b>8,785</b>	<b>1,898</b>		<b>4,907,272</b>	<b>7,898</b>	<b>419,625</b>	<b>159,213</b>

		N	O	P	Q	XX	R	S
	Total	Administrative and support service activities	Public administration and defence, compulsory social security	Education	Humane health services and social work activities	Activities of households	Arts, entertainment and recreation	Other services
Central governments or central banks	2,455,397		0	279,379	3			0
Regional governments or local authorities	437,628			437,628				0
Public sector entities	337,926			337,926				0
Multilateral Development Banks	134,070							0
International Organisations	17,479							0
Institutions	308,668							0
Corporates	2,297,729	10,813		2	3	0	832,234	1,002
Retail	501,106	1,037				5	433,623	263
Secured by mortgages on immovable property	109,248	500					19,772	
Exposures in default	19,299						13,358	
Items associated with particular high risk	20,382							
Covered bonds	1,128,718							
Claims on institutions and corporates with a short-term credit assessment	86,565							
Collective investments undertakings (CIU)	31,807							
Equity exposures	3,733							
Other exposures	395,138	13,667		14,074				8,287
<b>Total standardised approach</b>	<b>8,284,894</b>	<b>26,016</b>	<b>1,069,009</b>	<b>6</b>	<b>6</b>	<b>6</b>	<b>1,298,987</b>	<b>1,265</b>
								<b>353,546</b>



## CREDIT RISK EXPOSURE BY RESIDUAL MATURITY

	a	b	c	d	e	(a+b+c+d+e)
	Net value					
	On demand	<= 1 year	> 1 year <= 5 years	> 5 years	No stated maturity	Total
Central governments or central banks	1,333,572	597,325	357,375	155,277	11,849	2,455,397
Regional governments or local authorities	0	168,633	98,900	70,051	100,044	437,628
Public sector entities	0	71,056	144,041	7,749	115,080	337,926
Multilateral Development Banks	0	37,620	96,450	0	0	134,070
International Organisations	0	0	17,479	0	0	17,479
Institutions	78,421	179,034	12,072	39,141	0	308,668
Corporates	180,052	566,095	1,070,933	462,721	17,929	2,297,729
Retail	42,656	98,832	252,029	106,537	1,053	501,106
Secured by mortgages on immovable property	0	14,090	60,733	34,424	0	109,248
Exposures in default	0	9,744	864	0	8,691	19,299
Items associated with particular high risk	0	0	0	0	20,382	20,382
Covered bonds	0	0	395,590	733,128	0	1,128,718
Claims on institutions and corporates with a short-term credit assessment	61,076	25,489	0	0	0	86,565
Collective investments undertakings (CIU)	0	0	0	0	31,807	31,807
Equity exposures	0	0	102	2,448	1,183	3,733
Other exposures	75,095	30,490	0	0	289,553	395,138
<b>Total standardised approach</b>	<b>1,770,871</b>	<b>1,798,408</b>	<b>2,506,568</b>	<b>1,611,477</b>	<b>597,571</b>	<b>8,284,894</b>

The Bank's exposure is for nearly 43% 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).

The mapping between external ratings and Credit Quality Step (CQS) complies with the standard association published by EBA.

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 issue is considered. If it is not available, the rating of the issuer is used instead.

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

	EXPOSURE CLASSES for WHICH each ECAI or ECA is used	RWA OF WHICH: WITH A CREDIT ASSESSMENT BY A NOMINATED ECAI	RWA OF WHICH: WITH A CREDIT ASSESSMENT DERIVED FROM CENTRAL GOVERNMENT
Central governments or central banks	X	0	0
Regional governments or local authorities	X	0	0
Public sector entities	X	0	0
Multilateral Development Banks	X	0	0
International Organisations	X	0	0
Institutions	X	47,955	14,560
Corporates	X	122,349	0
Retail			
Secured by mortgages on immovable property			
Exposures in default			
Items associated with particular high risk			
Covered bonds	X	90,857	
Claims on institutions and corporates with a short-term credit assessment	X	17,511	
Collective investments undertakings (CIU)			
Equity exposures*	X	2,603	
Other exposures*			

The following tables show the credit risk exposures before and after risk mitigation (see 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 at the end of the period	CQS1	CQS2	CQS3	CQS4	ALL OTHER CQS	UNRATED
Central governments or central banks	1	2,455,397	2,252,589	77,440	125,369	0	0	0
Regional governments or local authorities	2	437,628	437,628	0	0	0	0	0
Public sector entities	3	337,926	337,926	0	0	0	0	0
Multilateral Development Banks	4	134,070	125,641	0	0	0	0	8,428
International Organisations	5	17,479	17,479	0	0	0	0	0
Institutions	6	308,668	230,953	34,238	0	0	0	43,477
Corporates	7	2,297,729	2	18,012	109,241	11,091	0	2,159,385
Retail	8	501,106	0	0	0	0	0	501,106
Secured by mortgages on immovable property	9	109,248	0	0	0	0	0	109,248
Exposures in default	10	19,299	0	0	0	0	0	19,299
Items associated with particular high risk	11	20,382	0	0	0	0	0	20,382
Covered bonds	12	1,128,718	1,128,718	0	0	0	0	0
Claims on institutions and corporates with a short-term credit assessment	13	86,565	85,905	660	0	0	0	0
Collective investments undertakings (CIU)	14	31,807	0	0	0	0	0	31,807
Equity exposures	15	3,733	0	78	2,564	0	0	1,091
Other exposures	16	395,138	51,011	0	0	0	0	344,128
<b>Total standardised approach</b>		<b>8,284,894</b>	<b>4,667,852</b>	<b>130,428</b>	<b>237,173</b>	<b>11,091</b>	<b>0</b>	<b>3,238,351</b>

		Exposure value after credit risk mitigation	CQS1	CQS2	CQS3	CQS4	ALL OTHER CQS	UNRATED
Central governments or central banks	1	2,455,397	2,252,589	77,440	125,369	0	0	0
Regional governments or local authorities	2	437,628	437,628	0	0	0	0	0
Public sector entities	3	337,926	337,926	0	0	0	0	0
Multilateral Development Banks	4	134,070	125,641	0	0	0	0	8,428
International Organisations	5	17,479	17,479	0	0	0	0	0
Institutions	6	294,067	261,610	32,458	0	0	0	0
Corporates	7	995,334	2	18,012	109,241	11,091	0	856,989
Retail	8	110,132	0	0	0	0	0	110,132
Secured by mortgages on immovable property	9	98,920	0	0	0	0	0	98,920
Exposures in default	10	15,299	0	0	0	0	0	15,299
Items associated with particular high risk	11	20,382	0	0	0	0	0	20,382
Covered bonds	12	1,128,718	1,128,718	0	0	0	0	0
Claims on institutions and corporates with a short-term credit assessment	13	86,565	85,905	660	0	0	0	0
Collective investments undertakings (CIU)	14	31,807	0	0	0	0	0	31,807
Equity exposures	15	3,733	0	78	2,564	0	0	1,091
Other exposures	16	395,138	51,011	0	0	0	0	344,128
<b>Total standardised approach</b>		<b>6,562,596</b>	<b>4,698,508</b>	<b>128,647</b>	<b>237,173</b>	<b>11,091</b>	<b>0</b>	<b>1,487,177</b>

## 5.3. DEFAULTED – NON-DEFAULTED EXPOSURES

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 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 these methodologies are given in the Annual Report (title 5.5 Credit Risk)

In the following templates, the Bank classified as a **specific** credit adjustment non performing exposures (stage 3) and as **general** credit adjustment, reflecting the potential future default of its exposure, for the other ECL.

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

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

In the context of the ECB's supervisory work on non-performing loans (NPL), specific guidance<sup>7</sup> to banks on non-performing loans was published including expectations with regard to NPL-related disclosures, additional to the information required under part eight of the CRR (article 431).

Due to a gross NPL ratio<sup>8</sup> of 0.83% on 31/12/2019 the Bank should only disclose the four templates applicable to all credit institutions.

These templates show the volumes and levels of NPLs, forbore and foreclosed assets in their balance sheets, with the aim of fostering transparency, providing meaningful information to market participants on the quality of credit institutions' assets and addressing any potential asymmetries of information.

The first one (Template NPE1) on the credit quality of forbore exposures is presented in chapter 5.4 Forbearance.

The other are presented in this chapter under the NPL disclosure sub titles:

- Template NPE3 : credit quality of performing and non-performing exposures by past due days;
- Template NPE4 : performing and non-performing exposures and related provision;
- Template NPE9 : collateral obtained by taking possession and execution processes.

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<sup>7</sup> EBA/GL/2018/10 and NBB circular BNB\_2019\_11

<sup>8</sup> NPL ratio is the ratio of the gross carrying amount of NPLs and advances to the total gross carrying amount of loans and advances subject to the NPE definition – as defined in template NPE3

## BY EXPOSURE CLASS

	Gross carrying values of							Net values (a+c-d-e)
	Defaulted exposures		Non-defaulted exposures c	Specific credit risk adjustment d	General credit risk adjustment e	Accumulated write-offs f	Credit risk adjustments charges of the period g	
	Impaired a	of which : Past due > 90 days b						
Central governments or central banks	0	0	2,455,473	0	77	0	0	2,455,397
Regional governments or local authorities	0	0	437,655	0	27	0	0	437,628
Public sector entities	0	0	337,955	0	29	0	0	337,926
Multilateral Development Banks	0	0	134,088	0	19	0	0	134,070
International Organisations	0	0	17,481	0	3	0	0	17,479
Institutions	0	0	308,675	0	7	0	0	308,668
Corporates	0	0	2,298,941	0	1,212	0	0	2,297,729
Retail	0	0	501,155	0	49	0	0	501,106
Secured by mortgages on immovable property	0	0	109,262	0	14	0	0	109,248
Exposures in default	37,313	24,956	0	18,014	0	2,681	-2,790	19,299
Items associated with particular high risk	0	0	20,382	0	0	0	0	20,382
Covered bonds	0	0	1,128,801	0	83	0	0	1,128,718
Claims on institutions and corporates with a short-term credit assessment	0	0	86,565	0	0	0	0	86,565
Collective investments undertakings (CIU)	0	0	31,807	0	0	0	0	31,807
Equity exposures	0	0	3,733	0	0	0	0	3,733
Other exposures	0	0	395,323	145	40	0	0	395,138
<b>Total standardised approach</b>	<b>37,313</b>	<b>24,956</b>	<b>8,267,298</b>	<b>18,159</b>	<b>1,558</b>	<b>2,681</b>	<b>-2,790</b>	<b>8,284,894</b>
Of which: Loans	37,313	24,956	4,455,519	18,159	1,078	11	-2,790	4,473,595
Of which: Debt securities			3,103,563	0	480	2,670	0	3,103,083
Of which: Off-balance-sheet exposures			450,158	0	0	0	0	450,158

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		Non-defaulted	Specific credit	General credit	Accumulated	Credit risk adjustments	Net values	
	Defaulted exposures								exposures
	Impaired	of which : Past due > 90 days	a	b	c	d	e	f	
Agriculture, forestry and fishing	0	0	171	0	0	0	0	0	171
Mining and quarrying	0	0	0	0	0	0	0	0	0
Manufacturing	0	0	3,027	0	0	0	0	0	3,027
Electricity, gas, steam and conditioning supply	0	0	256	0	0	0	0	0	256
Water supply	0	0	0	0	0	0	0	0	0
Construction	0	0	27,981	67	0	0	0	0	27,914
Wholesale and retail trade	303	303	8,782	300	0	0	0	0	8,785
Transport and storage	0	0	1,901	0	2	0	0	0	1,898
Accommodation and food service activities	0	0	0	0	0	0	0	0	0
Financial and insurance activities	11,524	1,499	4,900,600	3,588	1,264	2,670	-636	0	4,907,272
Information and communication	0	0	8,105	0	207	0	0	0	7,898
Real estate activities	662	0	421,180	2,217	0	0	0	0	419,625
Professional, scientific and technical activities	1,337	0	159,287	1,410	0	0	-988	0	159,213
Administrative and support service activities	0	0	26,750	733	0	0	0	0	26,016
Public administration and defence, compulsory social security	0	0	1,069,095	0	86	0	0	0	1,069,009
Education	0	0	6	0	0	0	0	0	6
Humane health services and social work activities	0	0	6	0	0	0	0	0	6
Activities of households	23,487	23,154	1,285,159	9,660	0	11	-1,167	0	1,298,987
Arts, entertainment and recreation	0	0	1,265	0	0	0	0	0	1,265
Other services	0	0	353,730	184	0	0	0	0	353,546
<b>Total standardised approach</b>	<b>37,313</b>	<b>24,956</b>	<b>8,267,298</b>	<b>18,159</b>	<b>1,558</b>	<b>2,681</b>	<b>-2,790</b>		<b>8,284,894</b>

## BY COUNTRY

	Gross carrying values of		Non-defaulted	Specific credit risk	General credit	Accumulated	Credit risk adjustments	Net values	
	Defaulted exposures								exposures
	Impaired	of which : Past due > 90 days	a	b	c	d	e	f	
Country BE	8,782	6,013	4,015,275	4,023	487	0	-2,096	0	4,019,546
Country FR	13,797	6,628	1,038,908	4,026	340	0	-631	0	1,048,339
Country LU	7,096	4,676	1,124,856	2,527	452	11	526	0	1,128,972
Country ES	0	0	249,974	0	20	0	-80	0	249,954
Rest EMU	2,830	2,830	995,448	2,776	104	0	-86	0	995,398
Rest of the World	4,810	4,810	842,838	4,808	155	2,670	-424	0	842,684
<b>Total standardised approach</b>	<b>37,313</b>	<b>24,956</b>	<b>8,267,298</b>	<b>18,159</b>	<b>1,558</b>	<b>2,681</b>	<b>-2,790</b>		<b>8,284,894</b>

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

## EVOLUTION OF PROVISIONS DURING 2019

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 01/01/2019 opening balance and 31/12/2019 closing balance).

		a	b
		Accumulated specific credit risk adjustment	Accumulated general credit risk adjustment
1	<b>Opening balance</b>	-18,554	-2,268
2	Increases due to amounts set aside for estimated loan losses during the period	-2,423	-749
3	Decreases due to amounts reversed for estimated credit risk adjustments	883	927
4	Decreases due to amounts taken against accumulated credit risk adjustments	0	0
5	Transfers between credit risk adjustments	0	0
6	impact of exchange rate differences	0	0
7	Business combinations, including acquisitions and disposals of subsidiaries	0	0
8	Other adjustments	1,935	531
9	<b>Closing balance</b>	-18,159	-1,558
10	Recoveries on credit risk adjustments recorded directly to the statement of profit or loss	0	0
11	Specific credit risk adjustments directly recorded to the 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 01/01/2019 opening balance and 31/12/2019 closing balance).

	Gross carrying value defaulted exposures
1 <b>Opening balance</b>	29,820
2 Loans and debt securities that have defaulted or impaired since the last reporting period	10,175
3 Returned to non-defaulted status	0
4 Amounts written off	-2,681
5 Other changes*	0
6 <b>Closing balance</b>	37,313

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



## NPL DISCLOSURE - CREDIT QUALITY OF PERFORMING AND NON-PERFORMING EXPOSURES BY PAST DUE DAYS

This new template provides an overview of credit quality of non-performing exposures, as per Commission Implementing Regulation (EU) No 680/2014.

The gross carrying amount of performing and non-performing exposures is presented according to the scope of regulatory consolidation in accordance with Chapter 2 of Title II of Part One of the CRR.

	a	b	c	d	e	f	g	h + i	j + k	l
Gross carrying amount/nominal amount										
	Performing exposures			Non-performing exposures						
	Not past due or past due <= 30 days	Past due > 30 days <= 90 days		Unlikely to pay that are not past due or are past due <= 90 days	Past due > 90 days <= 180 days	Past due > 180 days <= 1 year	Past due > 1 years <= 5 years	Past due > 5 years	of which defaulted	
1 <b>Loans and advances</b>	<b>4,455,519</b>	<b>4,432,363</b>	<b>23,156</b>	<b>37,313</b>	<b>12,357</b>	<b>3,310</b>	<b>2,592</b>	<b>7,014</b>	<b>12,040</b>	<b>37,313</b>
2 <i>Central banks</i>	1,835,626	1,835,626								
3 <i>General governments</i>	26	26								
4 <i>Credit institutions</i>	451,516	451,516								
5 <i>Other financial corporations</i>	459,703	439,062	20,642	8,763	0	2,274	35	4,426	2,028	8,763
6 <i>Non-financial corporations</i>	624,461	624,240	221	16,357	9,127		1,087	1,918	4,225	16,357
7 <i>of which SMEs</i>	562,733	562,733		15,106	9,127		988	790	4,201	15,106
8 <i>Households</i>	1,084,187	1,081,894	2,293	12,193	3,230	1,036	1,470	671	5,787	12,193
9 <b>Debt securities</b>	<b>3,103,563</b>	<b>3,103,563</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
10 <i>Central banks</i>										
11 <i>General governments</i>	1,050,806	1,050,806	0							
12 <i>Credit institutions</i>	1,621,291	1,621,291	0							
13 <i>Other financial corporations</i>	271,118	271,118	0							
14 <i>Non-financial corporations</i>	160,348	160,348	0							
15 <b>Off-balance-sheet exposures</b>	<b>450,158</b>			<b>0</b>						<b>0</b>
16 <i>Central banks</i>										
17 <i>General governments</i>										
18 <i>Credit institutions</i>	3,941									
19 <i>Other financial corporations</i>	153,768									
20 <i>Non-financial corporations</i>	145,503									
21 <i>Households</i>	146,946									
22 <b>Total</b>	<b>8,009,240</b>	<b>7,535,926</b>	<b>23,156</b>	<b>37,313</b>	<b>12,357</b>	<b>3,310</b>	<b>2,592</b>	<b>7,014</b>	<b>12,040</b>	<b>37,313</b>

## NPL DISCLOSURE - PERFORMING AND NON-PERFORMING EXPOSURES AND RELATED PROVISION

This new template provides an overview of the credit quality of non-performing exposures and related impairments, provisions and valuation adjustments by portfolio and exposure class.

The gross carrying amount is reported according to the scope of regulatory consolidation in accordance with Chapter 2 of Title II of Part One of the CRR.

The stages reported in this template refer to stages according IFRS9 methodology as described in the introduction of this chapter and in the Annual Report title 5.5.

	a		b		c		d		e		f		g					h		i		j		k		l		m		n		o	
	Gross carrying amount/nominal amount														Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions										Accumulated partial write-off		Collateral and financial guarantees received						
	Performing exposures				Non-performing exposures				Performing exposures - accumulated impairment and provisions				Non-performing exposures - accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						On performing exposures		On non-performing exposures												
	of which stage 1		of which stage 2		of which stage 2		of which stage 3		of which stage 1		of which stage 2		of which stage 2		of which stage 3																		
1 Loans and advances	4,455,519	4,393,333	62,186		37,313		0		37,313		-1,099		-1,074		-25		-18,159		0		-18,159				1,385,644		4,000						
2 Central banks	1,835,626	1,835,626	0		0		0		0		0		0		0		0		0		0				0		0						
3 General governments	26	26	0		0		0		0		0		0		0		0		0		0				0		0						
4 Credit institutions	451,516	451,516	0		0		0		0		0		0		0		0		0		0				14,601		0						
5 Other financial corporations	458,703	456,203	3,500		8,763		8,763		-551		-551		-5471		-5471		-5,471		-5,471		0		170,164		395,070		3,351						
6 Non-financial corporations	624,461	584,544	39,917		16,357		16,357		-356		-347		-9		-6,611		-6,611		-6,611		0		356,017		3,351		649						
7 of which SMEs	562,733	531,033	31,700		15,106		15,106		-345		-343		-2		0		0		0		0		356,017		3,351		649						
8 Households	1,084,187	1,065,418	18,769		12,193		12,193		-193		-176		-16		-6,078		-6,078		-6,078		0		805,810		649		0						
9 Debt securities	3,103,563	3,063,667	1,714						-480		-450		-30												293,088		0						
10 Central banks	0	0	0		0		0		0		0		0		0		0		0		0				0		0						
11 General governments	1,050,806	1,050,806	0		0		0		-86		-86		0		0		0		0		0				0		0						
12 Credit institutions	1,621,291	1,621,130	0		0		0		-147		-147		0		0		0		0		0				293,088		0						
13 Other financial corporations	271,118	231,383	1,714		0		0		-90		-60		-30		0		0		0		0				0		0						
14 Non-financial corporations	160,348	160,348	0		0		0		-157		-157		0		0		0		0		0				0		0						
15 Off-balance-sheet exposures	450,158	447,527	2,631						21		20		1												235,437		0						
16 Central banks	0	0	0		0		0		0		0		0		0		0		0		0				0		0						
17 General governments	0	0	0		0		0		0		0		0		0		0		0		0				0		0						
18 Credit institutions	3,941	3,941	0		0		0		0		0		0		0		0		0		0				0		0						
19 Other financial corporations	153,768	153,768	0		0		0		7		7		0		0		0		0		0				38,652		0						
20 Non-financial corporations	145,503	145,496	7		0		0		2		2		0		0		0		0		0				100,113		0						
21 Households	146,946	144,322	2,624		0		0		12		11		1		0		0		0		0				96,672		0						
22 Total	8,009,240	7,904,527	66,531		37,313		0		37,313		-1,558		-1,504		-54		-18,159		0		-18,159		0		1,914,169		4,000						

## NPL DISCLOSURE - COLLATERAL OBTAINED BY TAKING POSSESSION AND EXECUTION PROCESSES

In the Bank, we don't foresee in our acts or we have not encountered the "appropriation" (taking possession or acquisition of ownership) of the collateral. In consequence the group is not concerned by this template.

	a	b
	Collateral obtained by taking possession	
	Value at initial recognition	Accumulated negative changes
Property, plant and equipment (PP&E)		
Other than PPE		
Residential immovable property		
Commercial immovable property		
Movable property (auto, shipping, etc.)		
Equity and debt instruments		
Other		
<b>Total</b>	NA	NA

## 5.4. Forbearance

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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 incurring a loss.

This new template provides an overview of the quality of forborne exposures as per Commission Implementing Regulation (EU) No 680/2014 (as of 31/12/2019).

The gross carrying amount of forborne exposures and the related accumulated impairment, provisions, accumulated change in fair value due to credit risk, and collateral and financial guarantees received are presented according to the scope of regulatory consolidation in accordance with Chapter 2 of Title II of Part One of the CRR.

	a	b	c	d	e	f	g	h
	Gross carrying amount/nominal amount of exposures with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collateral received and financial guarantees received on forborne exposures	
	Performing forborne	Non-performing forborne			On performing forborne exposures	On non-performing forborne exposures		Of which collateral and financial guarantees received on non-performing exposures with forbearance measures
		of which defaulted	of which impaired					
<b>Loans and advances</b>	<b>4,835</b>	<b>9,155</b>	<b>9,155</b>	<b>9,155</b>	<b>-2</b>	<b>-3,408</b>	<b>10,579</b>	<b>5,747</b>
<i>Central banks</i>								
<i>General governments</i>								
<i>Credit institutions</i>								
<i>Other financial corporations</i>		6,700	6,700	6,700		-3,408	3,292	3,292
<i>Non-financial corporations</i>	4,835				-2		4,833	0
<i>Households</i>		2,455	2,455	2,455			2,455	2,455
<b>Debt securities</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Loan commitments given</b>	<b>0</b>	<b>292</b>						
<b>Total</b>	<b>4,835</b>	<b>9,447</b>	<b>9,155</b>	<b>9,155</b>	<b>-2</b>	<b>-3,408</b>	<b>10,579</b>	<b>5,747</b>

## 5.5. Counterparty Credit Risk

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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.

In allocating capital to counterparty credit risk, the Bank does not use an internal methodology. The counterparty credit risk is calculated according to the method “Mark-to-Market” defined in Article 274 of the CRR.

A Credit Valuation Adjustment is calculated to cover the volatility of expected losses due to counterparty credit risk exposure related to derivatives.

The use and impact of mitigation techniques is described in chapter 5.6.

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

	a	b	c	d	e	f	g
	Notional	Replacement	Potential	EEPE	Multiplier	EAD	RWAs
		cost/current	future credit			post CRM	
		market value	exposure				
Mark to market		35,191	95,393			118,896	71,145
Original exposure	15,261,307						
Standardised approach		130,584			0	118,896	71,145
IMM (for derivatives and SFTs)				0	0	0	0
Of which securities financing transactions				0	0	3,637	1,819
Of which derivatives and long settlement transactions				0	0	115,259	69,326
Of which contractual cross-product netting				0	0	0	0
Financial collateral comprehensive method (for SFTs)						0	0
Var for SFTs						0	0
<b>Total</b>						118,896	71,145

The **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 31/12/2019 (in millions of Eur)	Exposure value	RWA'S
All portfolios subject to the Standardised method	110.12	25.4
<b>Total subject to the CVA capital charge</b>	<b>110.12</b>	<b>25.4</b>

## 5.6. Use of credit risk mitigation techniques

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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 ECAs (“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 (we refer to Annual Report part 5.5 credit risk).

## 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.

	a	b
	EAD post CRM	RWAs
<b>Exposures to QCCPs (total)</b>		2,588
Exposures for trade at QCCPs (excluding initial margin and default fund contributions); of which		
(i) OTC derivatives	28,686	2,588
(ii) Exchange-traded derivatives	25,681	1,987
(iii) SFTs	3,004	601
(iv) Netting sets where cross-product netting has been approved	0	0
Segregated initial margin	0	0
Non-Segregated initial margin	0	0
Perfunded default fund contributions	0	0
Alternative calculation of own funds requirements for exposures		0
<b>Exposures to non-QCCPs (total)</b>		68,557
Exposures for trade at non-QCCPs (excluding initial margin and default fund contributions); of which		
(i) OTC derivatives	90,211	68,557
(ii) Exchange-traded derivatives	79,114	59,883
(iii) SFTs	7,459	6,855
(iv) Netting sets where cross-product netting has been approved	3,637	1,819
Segregated initial margin	0	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.

## DERIVATIVES TRANSACTIONS AND SECURITIES TRANSACTIONS POST CCF AND CRM (AS OF 31/12/2019)

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															Total	Of which unrated		
	0%	2%	4%	10%	20%	35%	50%	70%	75%	100%	150%	250%	370%	1250%	Other			Deducted	
Central governments or central banks																		0	
Regional governments or local authorities																		0	
Public sector entities																		0	
Multilateral Development Banks																		0	
International Organisations																		0	
Institutions			19,683		25,440		14,218											59,341	
Corporates										53,976								53,976	53,976
Retail									5,579									5,579	5,579
Secured by mortgages on immovable property																		0	
Exposures in default																		0	
Items associated with particular high risk																		0	
Covered bonds																		0	
Claims on institutions and corporates with a short-term credit assessment																		0	
Collective investments undertakings (CIU)																		0	
Equity exposures																		0	
Other exposures																		0	
<b>Total</b>		0	0	19,683	0	25,440	0	14,218	0	5,579	53,976	0	0	0	0	0	0	118,896	59,556

## 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).

	a	b	c	d	e
	Gross positive fair value or net carrying amount	Netting benefits	Netted current credit exposure	Collateral held	Net credit exposure
Derivatives	122,075	50,815	71,260	15,325	55,935
SFTs	3,444	0	3,444	193	3,251
Cross-product netting	0	0	0	0	0
<b>Total</b>	<b>125,519</b>	<b>0</b>	<b>74,704</b>	<b>15,519</b>	<b>59,185</b>

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).

	a	b		c		d		e		f	
	Collateral used in derivative transactions				Collateral used in SFTs						
	Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral				
	Segregated	Unsegregated	Segregated	Unsegregated	collateral received	posted collateral	collateral received	posted collateral			
DEBT SECURITIES	375	0	0	0	0	0	0	0			
EQUITIES	463	0	0	0	0	0	0	0			
FUNDS	187	0	0	0	0	0	0	0			
CASH	14,595	0	0	0	193	0	0	0			
<b>Total</b>	<b>15,621</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>193</b>	<b>0</b>	<b>0</b>			

## CREDIT RISK EXPOSURE AND CRM EFFECTS (AS OF 31/12/2019)

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.

	a	b	c	d	e	f
	Exposures before CCF and CRM		Exposures post CCF and CRM		RWA's and RWA density	
Exposure classes	On balance sheet amounts	Off balance sheet amounts	On balance sheet amounts	Off balance sheet amounts	RWA's	RWA density
Central governments or central banks	2,455,397	0	2,455,397	0	0	0.00%
Regional governments or local authorities	437,628	0	437,628	0	0	0.00%
Public sector entities	337,926	0	337,926	0	0	0.00%
Multilateral Development Banks	134,070	0	134,070	0	0	0.00%
International Organisations	17,479	0	17,479	0	0	0.00%
Institutions	304,727	3,941	290,126	3,941	49,530	2.98%
Corporates	1,894,759	402,970	884,996	110,338	989,105	59.58%
Retail	458,338	42,769	107,386	2,747	82,599	4.98%
Secured by mortgages on immovable property	108,793	455	98,465	455	36,133	2.18%
Exposures in default	19,299	0	15,299	0	18,553	1.12%
Items associated with particular high risk	20,382	0	20,382	0	30,572	1.84%
Covered bonds	1,128,718	0	1,128,718	0	112,872	6.80%
Claims on institutions and corporates with a short-term credit assessment	86,565	0	86,565	0	17,511	1.05%
Collective investments undertakings (CIU)	31,807	0	31,807	0	31,807	1.92%
Equity exposures	3,733	0	3,733	0	5,190	0.31%
Other exposures	395,138	0	395,138	0	286,388	17.25%
<b>Total</b>	<b>7,834,759</b>	<b>450,135</b>	<b>6,445,115</b>	<b>117,481</b>	<b>1,660,260</b>	
		<b>8,284,894</b>		<b>6,562,596</b>		

*Including amount subject to 250% risk weight*

## EXPOSURE BREAKDOWN POST CCF AND CRM (AS OF 31/12/2019) – RISK WEIGHT BY EXPOSURE CLASS

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 Weight																Total	Of which unrated
	0%	2%	4%	10%	20%	35%	50%	70%	75%	100%	150%	250%	370%	1250%	Other	Deducted		
Central governments or central banks	2,455,397														0	0	2,455,397	0
Regional governments or local authorities	437,628														0	0	437,628	0
Public sector entities	337,926														0	0	337,926	0
Multilateral Development Banks	134,070														0	0	134,070	0
International Organisations	17,479														0	0	17,479	0
Institutions			59,452		234,329					287					0	0	294,067	0
Corporates					2		18,352			971,085	5,896				0	0	995,334	856,989
Retail									110,132						0	0	110,132	110,132
Secured by mortgages on immovable property						90,035	8,529			356					0	0	98,920	98,920
Exposures in default										8,761	6,538				0	0	15,299	15,299
Items associated with particular high risk											20,382				0	0	20,382	20,382
Covered bonds				1,128,718											0	0	1,128,718	0
Claims on institutions and corporates with a short-term credit assessment					85,905		660								0	0	86,565	0
Collective investments undertakings (CIU)										31,807					0	0	31,807	31,807
Equity exposures										2,763		971			0	0	3,733	3,733
Other exposures	129,898									251,142		14,099			0	0	395,138	344,128
<b>Total standardised approach</b>	<b>3,512,398</b>	<b>0</b>	<b>59,452</b>	<b>1,128,718</b>	<b>320,235</b>	<b>90,035</b>	<b>27,540</b>	<b>0</b>	<b>110,132</b>	<b>1,266,200</b>	<b>32,816</b>	<b>15,069</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>6,562,596</b>	<b>1,481,390</b>

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.

## 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 (the loans exposures) that cannot be secured.

It gives an overview of the CRM techniques used for defaulted and non-defaulted exposure, irrespective of the regulatory approach used.

	a	b	c	d	e
	Exposures unsecured -	Exposures secured -	Exposures secured by	Exposures secured by	Exposures secured by
	Carrying amount	Carrying amount	collateral	financial guarantees	credit derivatives
<b>Total loans</b>	<b>3,083,929</b>	<b>1,389,644</b>	<b>1,389,644</b>	<b>0</b>	<b>0</b>
Central banks	1,836,992	0			0
General governments	26	0			0
Credit institutions	442,108	14,601	14,601	0	0
Other financial corporations	282,018	170,164	170,164	0	0
Non-financial corporations	239,223	398,421	398,421	0	0
Households	283,562	806,458	806,458	0	0
<b>Total debt securities</b>	<b>3,104,340</b>	<b>293,088</b>	<b>0</b>	<b>293,088</b>	<b>0</b>
Central banks	99,596	0	0	0	0
General governments	1,039,620	0	0	0	0
Credit institutions	1,507,624	293,088	0	293,088	0
Other financial corporations	297,355	0	0	0	0
Non-financial corporations	160,145	0	0	0	0
<b>Total exposures</b>	<b>6,188,269</b>	<b>1,682,732</b>	<b>1,389,644</b>	<b>293,088</b>	<b>0</b>
Of which defaulted	0	15,299	4,000	0	0
Loans and advances	0	15,299	4,000	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	3,292	0	0	0
Non-financial corporations	0	6,354	3,351	0	0
Households	0	5,653	649	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

	Guarantees and collateral	Maximum amount of the collateral or guarantee that can be considered			
		Loans collateralized by immovable property	Other collateralized loans		Financial guarantees received
		Residential/commercial	Cash [Debt instruments issued]	Securities	
		010	030	040	050
010	<b>Loans and advances</b>	<b>138,923</b>	<b>193,963</b>	<b>1,305,883</b>	<b>62,814</b>
020	of which: Other financial corporations	25,994	40,798	217,954	3,017
030	of which: Non-financial corporations	84,455	39,171	365,248	16,298
040	of which: Households	28,474	113,994	722,681	43,500
	<b>Eligible collateral percentage</b>	<b>77%</b>	<b>100%</b>	<b>86%</b>	<b>100%</b>

About market or credit risk concentrations within the collateral, more than 60% of the securities pledged as collateral consist of funds that are diversified by nature and debt instruments that are mainly issued in Belgium.

### 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	5,904		0	1,181
Securitisation	Investor	Residential mortgages	GB	1,714		30	5,894
Securitisation	Investor	Consumer loans	DE	21,544		2	3,144
Securitisation	Investor	Consumer loans	ES	2,933		0	586
Securitisation	Investor	Consumer loans	FR	22,053		2	2,748
Securitisation	Investor	Consumer loans	LU	42,851		4	6,927
Securitisation	Investor	Consumer loans	NL	5,979		1	1,196
				<b>102,976</b>	<b>0</b>	<b>40</b>	<b>21,676</b>

## 5.9. Settlement

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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 2019 (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 mobilized 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 and Internal Risk Committee).

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.

	a	b
	RWAs	Capital requirements
<b>Outright products</b>		
Interest rate risk (general and specific)	22,135	1,771
Equity risk (general and specific)	66,143	5,291
Foreign exchange risk	0	0
Commodity risk	0	0
<b>Options</b>		
Simplified approach	0	0
Delta-plus method	0	0
Scenario approach	0	0
<b>Securisation (specific risk)</b>	0	0
<b>Total</b>	<b>88,278</b>	<b>7,062</b>

## 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 Management Committee to the group's transformation activity. This includes all balance sheet items and, accordingly, also the treasury positions.

Furthermore, in accordance with Basel II, the sensitivity of the bank's economic value is stressed on the basis of scenarios involving parallel and non parallel increase in interest rates. The result of the most penalizing shock is 6.5%. As requested in the directive, this ratio takes account of the Bank's commitments to pension funds.

The loss in case of an increase in interest rates of 2% amounted to:

	2018	2019
On 31/12	14,234	35,089
Average for the period	19,792	37,293
Maximum for the period	24,567	45,724
Minimum for the period	14,234	31,808

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

	2018	2019
on 31/12	-199	-219
Average for the period	-216	-221
Maximum for the period	-255	-246
Minimum for the period	-199	-196

on 31/12	2018	2019
<b>Increase of the interest rates with 200 basis points</b>		
Increase (decrease) in net interest income over the next 12 months	57,852	35,766
Increase (decrease) in the present value of equity	-14,234	-35,089
<b>Decrease of the interest rates with 200 basis points</b>		
Increase (decrease) in net interest income over the next 12 months	-84,856	-19,426
Increase (decrease) in the present value of equity	12,799	7,116

Since June 2019, for scenarios simulating a fall in interest rates, a floor is applied to the yield curve, in line with EBA guidelines.

Since 1 January 2018, the Bank has decided to apply hedge accounting in accordance with the methodology described in the hedging policies and summarized 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 80% of the sensitivity is coming from the EUR currency.

	Global	EUR	USD	CHF	Other
Sensitivity	-244	- 203	- 29	- 8	4

## 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.

	2018		2019	
	Nominal	VAR 99%	Nominal	VAR 99%
on 31 december	2,212	9	2,100	31
Average for the period	2,124	20	2,250	28
Maximum for the period	1,443	7	1,025	7
Minimum for the period	3,774	90	19,965	451

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. In 2019, a new desk was set up called, "Equity Desk Derivatives". This activity consists of offering an option intermediation service where the market risk is managed via options traded on a listed market, options traded in OTC or the purchase/sale of the underlying.

		31/12/2019	Average	Minimum	Maximum
Equity Risk	Nominal	411	784	365	1,723
	VAR 99%	16	40	16	85
Option Risk	Delta equivalent	215	84	-339	423
	VAR 99%	51	48	79	29

## 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 four financial periods as a consequence of the sale of the majority of the share's portfolio.

The Legacy Portfolio is a portfolio of residual positions created at the creation of Degroof Equity. In 2019, the outstanding amount of this portfolio decreased with the sale of positions in Treetop funds.

In 2018, an Accompanying Portfolio was created containing positions of limited size held to support certain activities of the group. This portfolio contains DPAM funds.

The Bank also has a portfolio of private equity positions to support the sale of these products. These positions are shown in the table below in the illiquid support portfolio.

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

	Legacy Portfolio	Accompanying Portfolio Liquid	Accompanying Portfolio illiquid
31.12.2019	303	11,011	15,929
31.12.2018	24,504	13,818	18,604

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):

Relevant markets or indices[*]	Movement	Impact on own funds	
		31.12.2018	31.12.2019
Bel 20	10%	0	0
Other Belgian securities	10%	426	30
Other European securities	10%	0	1,317
The rest of th world	10%	3,406	1,377

*(\*) having a significant impact on the portfolio value.*

## 6.5 Commodities Risk

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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 2019, the Bank liquidity ratio stood for the LCR at 308% (liquidity buffer at EUR 4.4 mld and net outflows at EUR 1.4 mld) and for NSFR at 173%.

The table setting out the maturities of our assets and liabilities is available in our 2019 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 300 mln at end 2019 and represented 3.40% 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.

The tables below contain median values (i.e. quarterly medians over the previous 12 months), as set out under disclosure requirements for encumbered and unencumbered assets.

The first one gives the breakdown of encumbered vs unencumbered assets (template A).

	Carrying amount of encumbered assets	Fair value of encumbered assets	Carrying amount of unencumbered assets	Fair value of unencumbered assets
	010	040	060	090
<b>010 Assets of the reporting institution</b>	<b>299,587</b>		<b>8,407,668</b>	
030 Equity instruments	0		27,040	
040 Debt securities	171,023	172,580	2,586,007	2,526,504
050 <i>of which: covered bonds</i>	0	0	994,784	1,003,514
060 <i>of which: asset-backed securities</i>	0	0	94,202	93,542
070 <i>of which: issued by general governments</i>	170,995	172,552	757,359	745,594
080 <i>of which: issued by financial corporations</i>	28	28	1,620,473	1,560,671
090 <i>of which: issued by non-financial corporations</i>	0	0	160,881	176,941
120 Other assets	129,995		5,805,680	
121 <i>of which : mortgage loans</i>	0		190,345	

The second one gives the detail of the collateral received (template B).

	Fair value of encumbered collateral received or own debt securities issued	Unencumbered Fair value of collateral received or own debt securities issued available for encumbrance
	010	040
<b>130 Collateral received by the reporting institution</b>	<b>0</b>	<b>366,390</b>
140 Loans on demand	0	0
150 Equity instruments	0	33,677
160 Debt securities	0	137,650
170 <i>of which: covered bonds</i>	0	0
180 <i>of which: asset-backed securities</i>	0	0
190 <i>of which: issued by general governments</i>	0	63,761
200 <i>of which: issued by financial corporations</i>	0	54,140
210 <i>of which: issued by non-financial corporations</i>	0	0
220 Loans and advances other than loans on demand	0	0
230 Other collateral received	0	200,968
<b>240 Own debt securities issued other than own covered bonds or asset-backed securities</b>	<b>0</b>	<b>0</b>
<b>241 Own covered bonds and asset-backed securities issued and not yet pledged</b>		<b>0</b>
<b>250 TOTAL ASSETS, COLLATERAL RECEIVED AND OWN DEBT SECURITIES ISSUED</b>	<b>299,587</b>	

For 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 risk-taking 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 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, capital at risk ratio, products authorized 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 funds 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

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

The compliance risk is handled by the Compliance function.

### 9.2. Governance

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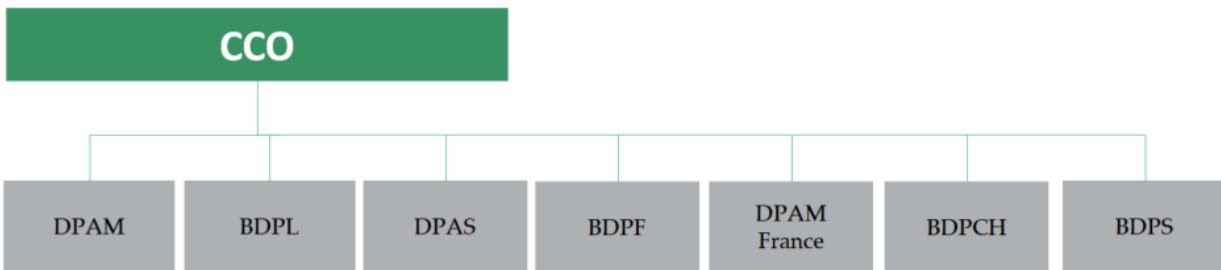
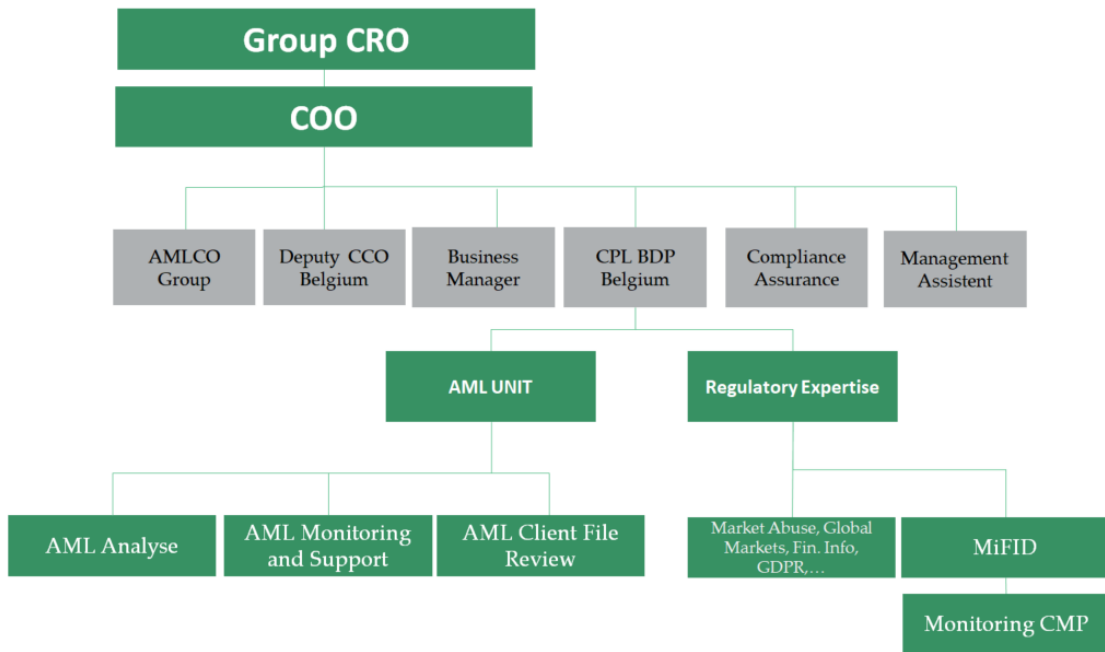
The Compliance function is an independent function that composes, with the Risk Management, the second line of defense.

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.

The AML team has been organized into 3 different sub-units. The first unit, composed of AML analysts, is responsible for handling day to day requests. The second unit is in charge of the monitoring and support functions of the team. The last unit is responsible for the client file review and the periodic client file review.

## 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.

The MiFID team has an extra responsibility where they take care of the coordination of the Compliance Monitoring Plan (CMP), where all monitorings for the Compliance team are centralized. According to the demands of the regulator, this CMP has been reviewed with respect to definition of controls, their documentation (instructions for executing controls) and the reports resulting from these controls. It should be noted that the CMP is to be constantly updated on the basis of legislative developments, the results of these controls, audit missions or the results of the RSCA.

## 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;
- Ensuring policies such as Chinese Walls and Market Sounding are respected.

## 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. This team is no longer a part of the Compliance department, but reports directly to the CRO.

## 9.4. Compliance Risks

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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 proper information he deserves in the context of its relationship with the Bank.
- The risk to publish non compliant marketing informations
- The risk to have conflict of interests nor mitigated nor managed

### MARKET ABUSE RISKS

- The risk of manipulating markets or not detecting a manipulation attempt;
- The risk of dissemination or use of inside information by a client or staff member;
- The risk to use a safe harbor without respecting the legal conditions
- The risk to have the conditions of a legitimate behavior not respected.

### DEONTOLOGICAL RISKS

The risk to have the staff members not respecting the rules contained in the internal code of conduct (personal transactions, gift and external mandates policies).

The Compliance Monitoring plan is in place to monitor the risks mentioned in the previous points (cf. AML, MiFID, Market abuse risks, Deontology) either based on 1 line of defense (LOD) results either based on own Compliance analysis. The results are gathered by their respective units and centralized by a Compliance Monitoring Plan Officer that reports to the Mifid team within Compliance department.

## 10. Operational risk

### 10.1 Definition

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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 organization, as well as from external sources such as legal requirements or natural disasters.

Beyond risks arising from the core back-office and day-to-day business 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

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The Operational Risk Management (ORM) function belongs to the second line of defense within the organization and ensures operational risks taken by the organization 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 Management Committee appoints the Operational Risk Committee as the official body to monitor the adequacy of the effective operational risk taken by the organization and to ensure that appropriate measures are undertaken to operate according to the approved operational risk appetite.

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 representatives mentioned above are invited to participate to the Operational Committees of the subsidiaries.

The ORM function also liaises with other control functions of the organization (e.g. compliance, data privacy office, portfolio management risk, etc.) in order to capture operational risk from those specific areas. Specific responsibilities of these functions are described in their own policies and/or frameworks.

## 10.3. Operational risk measurement

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The ORM function applies several techniques to capture operational risks faced by the organization and accomplish its tasks. The regulatory capital requirements are computed according to the Basic Indicator Approach.

### RISK APPETITE FRAMEWORK

The Risk Appetite for operational risk is set in line with the overall requirements as defined in the risk appetite framework and with the operational risk sub-categories. The ORM function also ensures the development and follow-up of Key Risk Indicators to ensure the monitoring of its operational risk on a continuous basis.

### INTERNAL CONTROL FRAMEWORK

The ORM function conducts recurrent independent controls on business activities or processes. The scope of these controls is set in line with the overall requirements as defined in the internal control framework. Risk assessment and effectiveness testing are conducted, on the level of risk associated with the activities and processes, as well as on the design and operating of the controls in place in the business lines.

### RISK AND CONTROL SELF ASSESSMENTS

The RCSA is a control exercise which assesses the organization 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:

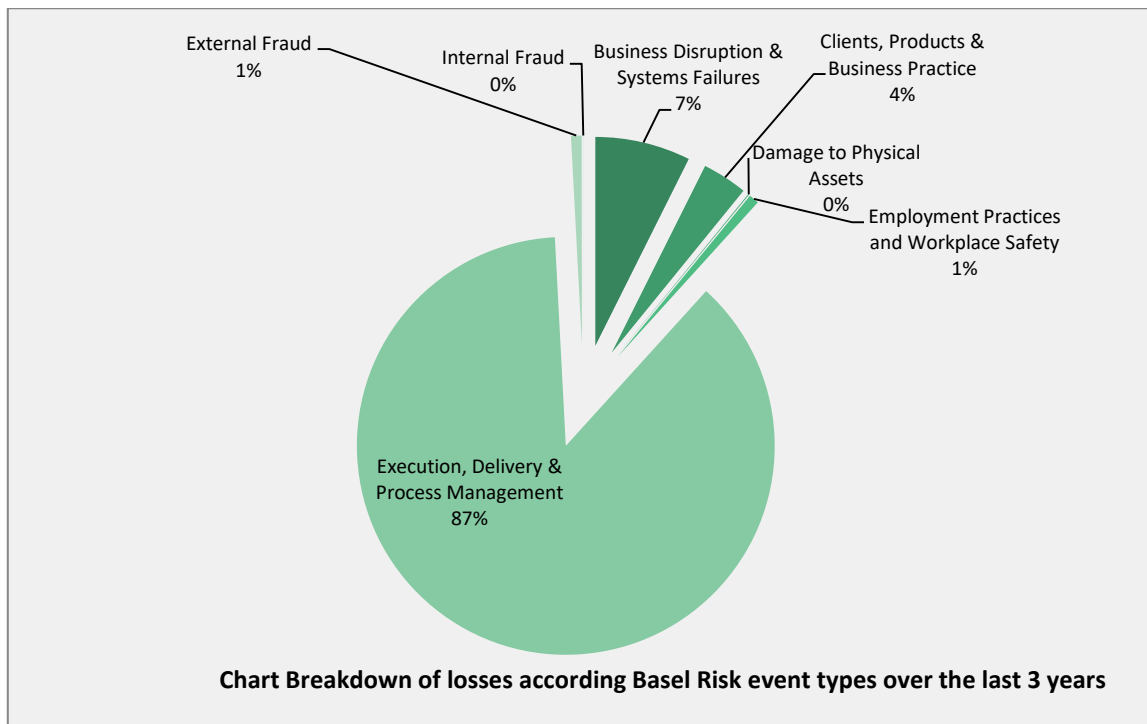
- Identify the risks encountered in the context of the activities carried out by Bank Degroof Petercam
- Assess the risks (from a quantitative as well as from a qualitative perspective) and the effectiveness of the controls in place;
- Determine the causes of the risks;
- Determine remediation plans.

### INCIDENT MANAGEMENT

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 organization or arising from external factors (i.e. root-cause analysis).

The bank has an escalation process enabling any incident/risk to be reported quickly and efficiently from the Business Unit/Subsidiaries to the Management 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 for instance statistics on incidents reported over last quarter (analysis by process, error types, etc.) and description of major incidents reported over last quarter.



## OUTSOURCING

The risks associated with outsourcing need to be managed adequately. The Outsourcing policy has been updated in accordance with the EBA Guidelines on Outsourcing Arrangements. The objectives of the policy are:

- To outline the principles and rules adopted by the Group Degroof Petercam for the assessment, approval, implementation, monitoring, review and termination of all Degroof Petercam outsourcing arrangements;
- To establish the organizational responsibilities for outsourcing management within the Group Degroof Petercam;
- To ensure compliance with laws and regulation applicable to outsourcing arrangements.

## PRODUCT APPROVAL PROCESS

The Product Approval Process is an indispensable element of risk management, it is both an awareness and decision-making tool for the management. It allows to be informed in due time of the envisaged launch within the group of new financial products, services or activities, and to ensure that they are designed, approved, marketed and managed in compliance with legal and regulatory requirements, and that they deliver appropriate customer outcomes.

## NEW INITIATIVE RISK PRODUCT APPROVAL PROCESS

The purpose of the New Initiative Risk Approval Process is to assess the criticality of any new change initiatives (outsourcing projects, new products, or any other projects, business or IT, with external and/or internal impacts) in order to guarantee that these initiatives are executed and delivered with an oversight proportionate to their assessed impact on the operational risk profile of the bank. Operational risks resulting from these new initiatives are monitored, with the definition, execution and follow-up of action plans to mitigate these risks along their lifecycle until they are launched into production.



## BUSINESS CONTINUITY MANAGEMENT

Degroof Petercam is committed to support the continuity of its services in case of disruption and therefore ensures that sufficient means are implemented within the Group to ensure the continuity of its activities and to protect its critical business processes from the effects of disasters or major failures of information systems. The objectives of the policy are:

- to state Degroof Petercam's commitment to business continuity;
- to establish the organizational responsibilities for contingency planning;
- to outline principles adopted by the Group in the context of business continuity management;
- to set out the approach to the implementation and maintenance of business continuity plans within the Group.

## INFORMATION RISK GOVERNANCE

The Management 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 Management 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 organizes 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.

## INSURANCE POLICIES

Potential financial impact of operational risks are also mitigated by taking out insurance policies, covering amongst other professional liability, fraud, and for cyber risk.

## 11. Remuneration

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

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

- Board of Directors ;
- Remuneration Committee;
- Management 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 Management 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 5 times in 2019.

#### **Management Committee**

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

The remuneration policy is an integral part of the governance memorandum prepared under the responsibility of the Management 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 Management 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

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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

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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.

The following **non-cash benefits** are granted to all staff according to the country specific customs and are not linked to performance criteria:

- cellular phone + data subscription
- hospitalization insurance
- pension plan
- death insurance
- disability insurance
- professional travel insurance
- business accident insurance
- extra legal holidays
- meal vouchers

Dependent upon the level of the role within the organization, some employees are also eligible to a mobility budget (to opt for a 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**

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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.

If 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 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 2019 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€

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 (l) 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**

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### **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.

The determination of the variable component is realized through the achievement of group and business unit related objectives as well as 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 Management Committee, for the year 2019, variable remuneration was significantly lower than for 2018, given the lower gross operating result of the group compared to last year.

### **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 2019 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 the individual performance score, the group and business unit result. The global budget available of the variable remuneration is determined by a percentage of the gross operating result.

## 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									2019
Number of members (Headcount)	0060	33	33							
Total number of staff in FTE	0100			129.8	373.9	209.4	603.5	83.4	-	
Total net profit (+) or loss (-) in year N (in EUR)	0200									
Total remuneration (in EUR)	0300	1,773,291	13,718,561	19,910,926	41,547,686	21,274,568	50,046,530	8,130,892	-	
Of which: Total variable remuneration (in EUR)	0310	10,000	2,197,902	4,209,040	5,531,545	3,656,849	4,235,453	863,998	-	

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									2019
Members (Headcount)	0060	28	31							
Number of identified staff in FTE	0100			9.0	12.9	2.0	10.8	18.3	-	
Number of identified staff in senior management positions	0200			4.0	9.9	2.0	7.0	3.6	-	
Total fixed remuneration (in EUR)	0400	1,703,291	11,239,227	2,074,225	2,455,398	324,273	1,949,332	2,113,292	-	
Of which: fixed in cash	0410	1,703,291	11,206,717	2,074,225	2,455,398	315,192	1,949,332	2,108,702	-	
Of which: fixed in shares and share-linked instruments	0420	-	-	-	-	-	-	-	-	
Of which: fixed in other types of instruments	0430	-	32,511	-	-	9,082	-	4,590	-	
Total variable remuneration (in EUR)	0500	10,000	1,896,902	496,901	434,737	38,703	337,275	306,641	-	
Of which: variable in cash	0510	10,000	1,501,527	444,020	434,737	38,703	337,275	306,641	-	
Of which: variable in shares and share-linked instruments	0520	-	185,875	-	-	-	-	-	-	
Of which: variable in other types of instruments	0530	-	209,500	52,882	-	-	-	-	-	
Total amount of variable remuneration awarded in Year N which has been deferred (in EUR) *	0600	-	663,713	42,305	-	-	-	-	-	
Of which: deferred variable in cash in Year N	0610	-	432,263	21,153	-	-	-	-	-	
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	-	231,450	21,153	-	-	-	-	-	
<b>Additional information regarding the amount of total variable remuneration</b>										
Article 450 h(iii) CRR: Total amount of outstanding deferred variable remuneration awarded in previous periods and not in year N (in Eur)	0680	-	3,828,434	243,571	184,365	-	248,474	27,922	-	
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	-	-	-	-	-	-	-	-	
Total amount of guaranteed variable remuneration (in EUR)	0900	-	-	-	-	-	-	-	-	
Number of beneficiaries of severance payments	1000	-	2	-	-	-	-	-	-	
Total amount of severance payments paid in year N (in EUR)	1100	-	1,368,676	-	-	-	-	-	-	
Article 450h(v): Highest severance payment to a single person in EUR	1150	-	-	-	-	-	-	-	-	
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 revoked 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		2019
<b>Total Remuneration; payment band (in EUR)</b>			
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-balance-sheet 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

$[\text{Tier-1 capital}] / [\text{total weighted risks}]$ . 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 Switzerland
BDPF	Banque Degroof Petercam France
BDPL	Banque Degroof Petercam Luxembourg
BDPS	Banque Degroof Petercam Spain
CCB	Countercyclical Capital Buffer
CCF	Credit Conversion Factor
CCO	Chief Compliance Officer
CCP	Central Counterparty
CCR	Counterparty Credit Risk
CEO	Chief Executive Officer
CET1	Core Equity Tier One
GISC	Group Information Security Committee
CISO	Chief Information Security Officer
CMP	Compliance Monitoring Plan
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 Adjustment
DPAM	Degroof Petercam Asset Management
DPAS	Degroof Petercam Asset Services
DVA	Debt Valuation Adjustment
EAD	Exposure at Default
EBA/ABE	European Banking Authority
ECB/BCE	European Central Bank
EEPE	Effective Expected Positive Exposure
EUR	Euro
CoDir	Management 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



LOD	Line of Defense
MAR	Market Abuse Reglementation
MiFID	Markets in Financial Instruments Directive
NBB/NBB	Banque Nationale de Belgique
NPE or NPL	Non-performing Exposure or Loans
NSFR	Net Stable Funding Ratio
ORM	Operational Risk Management
RAF	Risk Appetite Framework
RCSA	Risk and Control self Assessments
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 31/12/2019	CET1	Leverage Ratio	LCR	NSFR
Banque Degroof Petercam (Groupe Conso)	19.48%	6.39%	308%	173%
Banque Degroof Petercam Luxembourg	22.33%	6.63%	214%	169%
Banque Degroof Petercam France	16.59%	13.13%	214%	184%
Bank Degroof Petercam Spain	19.53%	13.88%	158%	NA

## 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 Report		
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	<p>Article 436 (a, b, d applicable)</p> <p>Template 1: EU LI1 – Differences between accounting and regulatory scopes of consolidation and the mapping of financial statement categories with regulatory risk categories</p> <p>Template 2: EU LI2 – Main sources of differences between regulatory exposure amounts and carrying values in financial statements</p> <p>Template 3: EU LI3 – Outline of the differences in the scopes of consolidation (entity by entity)</p> <p>Table 5: EU LIA – Explanations of differences between accounting and regulatory exposure amounts</p>
3	Risk management governance	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 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  Template NPE 3 : Credit quality of performing and non-performing exposures by past due days Template NPE 4 : Performing and non-performing exposures and related provisions Template NPE 9 : Collateral obtained by taking possession and execution processes
5.4. Forbearance		Template NPE 1 : quality of 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 techniques Template 27: EU CCR8 – Exposures to CCPs Template 28: EU CCR3 – Standardised approach – CCR exposures by regulatory portfolio and risk Template 31: EU CCR5-A – Impact of netting and collateral held on exposure values Template 32: EU CCR5-B – Composition of collateral for exposures to CCR Template 19: EU CR4 – Standardised approach – Credit risk exposure and CRM effects Template 20: EU CR5 – Standardised approach Template 18: EU CR3 – CRM techniques – Overview
5.7. Equity Exposures in the Banking Book		
5.8. Securitization Exposures in the Banking Book		
5.9. Settlement		
6 ALM & Market 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)
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		
6.4 Equity and option risk		
6.5 Commodities Risk		
7 Liquidity risk	Article 435(1)	
Encumbered assets	Article 443	Template A : encumbered and unencumbered assets in carrying amount and fair value by broad category of asset type, with the carrying amount of unencumbered assets broken down by asset quality Template B : collateral received by an institution, by broad category of product type
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	<p>Table 9: EU CRE – Qualitative disclosure requirements related to IRB models</p> <p>Table 10: EU MRB – Qualitative disclosure requirements for institutions using the IMA</p> <p>Template 5: EU CR10 – IRB (specialised lending and equities)</p> <p>Template 6: EU INS1 – Non-deducted participations in insurance undertakings</p> <p>Template 21: EU CR6 – IRB approach – Credit risk exposures by exposure class and PD range</p> <p>Template 22: EU CR7 – IRB approach – Effect on the RWAs of credit derivatives used as CRM techniques</p> <p>Template 23: EU CR8 – RWA flow statements of credit risk exposures under the IRB approach</p> <p>Template 24: EU CR9 – IRB approach – Backtesting of PD per exposure class</p> <p>Template 29: EU CCR4 – IRB approach – CCR exposures by portfolio and PD scale</p> <p>Template 30: EU CCR7 – RWA flow statements of CCR exposures under the IMM</p> <p>Template 35: EU MR2-A – Market risk under the IMA</p> <p>Template 36: EU MR2-B – RWA flow statements of market risk exposures under the IMA</p> <p>Template 37: EU MR3 – IMA values for trading portfolios</p> <p>Template 38: EU MR4 – Comparison of VaR estimates with gains/losses</p> <p>Templates NPE 2-5-6-7-8-10</p> <p>Template 1 to 3 Covid 19 (EBA/GL/2020/07)</p>
Template replaced with new NPL disclosure requirements		<p>Template 14: EU CR1-D – Ageing of past-due exposures</p> <p>Template 15: EU CR1-E – Non-performing and forborne exposures</p>



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